Independent Monitoring Team | Chicago Police Department Consent Decree

INDEPENDENT MONITORING REPORT 6

Reporting Period January 1, 2022, through June 30, 2022

Report Date: December 15, 2022

Monitor Maggie Hickey

By July 30, 2022—the end of the sixth reporting period—the City of Chicago (City), the Chicago Police Department (CPD), and other relevant City entities reached at least Preliminary compliance with about 78% of the monitorable paragraphs in the Consent Decree. Many of these reforms are significant and were achieved thanks to many hardworking and unsung public servants at the City, the CPD, and the City's other entities. If properly supported, the existing compliance levels will continue to pay dividends in the years to come and will be the foundations for the City to ultimately achieve full and effective compliance with the Consent Decree.

Preliminary compliance, however, is only the first step toward full and effective compliance, and the City and its entities still need to achieve Secondary and Full compliance with the majority of the monitorable paragraphs in the Consent Decree. And we continue to hear from community members, including officers, that reforms are lagging and that progress is urgently needed.

Chief Rodney Monroe, Ret.

Because many of the Consent Decree's requirements are interrelated, lagging compliance efforts prevent the CPD from implementing—much less demonstrating—reforms. And until significant progress is made to catch up, the City and the CPD will continue to fall behind.

For example, the CPD continues to struggle to find the staffing and resources available to fulfill its unity of command and span of control obligations. Such supervision requirements in the Consent Decree "are designed to ensure that CPD supervisors provide the effective supervision necessary for members to perform their duties lawfully, safely, and effectively and for members to improve and grow professionally. . . . This meaningful supervision will facilitate the establishment and re-enforcement of a culture of community policing, community and officer safety, and accountability throughout the Department." ¶342. While the CPD continues to work diligently on reaching the required supervision ratios, including running pilots in select districts, the CPD has a long way to go for citywide implementation and continues to be hindered by insufficient staffing.

To address these staffing limitations, the CPD must recruit and hire the right people. *See, e.g.*, ¶289 ("Having a department that recruits, hires, and promotes officers who are qualified to meet the increasingly complex needs of law enforcement and that reflects a broad cross section of the Chicago community in which it serves is critical to . . . running a professional police force; building community trust and confidence; increasing legitimacy and acceptance of CPD's supervision and accountability systems; and reducing perceptions of bias.")

To retain talent, the CPD must continue to improve support services for its personnel and encourage positive behavior. *See, e.g.*, ¶¶48 ("CPD will create opportunities to highlight,

reward, and encourage officer, supervisory, and district performance on furthering community partnerships, engaging in problem-solving techniques, effective use of de-escalation, exemplary and effective supervision, and implementing community-oriented crime prevention strategies."), 375, and 380 ("The City and CPD will implement the [Officer Wellness and Support] requirements in order to achieve a healthy, effective, and constitutionally compliant police force."). This includes making needed progress on the Consent Decree requirements that focus on supporting officer wellness and suicide prevention. *See e.g.*, ¶¶337 ("In fulfilling their duties, CPD members expose themselves to significant danger, high stress, and a wide spectrum of human tragedy. There is growing recognition that psychological and emotional wellness are critical to officers' health, relationships, job performance, and safety. The City and CPD have an obligation to help CPD members cope with the consequences that come from their service to the public.") and 388 ("As a component of the Officer Support Systems Plan, by *January 1, 2020*, CPD will develop and implement a comprehensive suicide prevention initiative ('Suicide Prevention Initiative'). . . . The Suicide Prevention Initiative will be overseen by a licensed mental health professional working in conjunction with a command staff member." (Emphasis added)).

To set appropriately high expectations, the CPD must provide sufficient, high-quality training to all of its officers. *See, e.g.*, ¶267. ("CPD training will convey CPD's expectations that officers perform their jobs diligently and safely, and have an understanding of, and commitment to, the constitutional rights of the individuals they encounter.").

And to ensure the CPD is measuring success—and identifying and responding to lessons learned—the CPD must continue to improve the accuracy, reliability, and efficiency of its data collection and analysis. *See, e.g.*, ¶566 ("Data can empower CPD to engage in the type of critical self-examination essential to instilling and maintaining constitutional policing."). Until then, the CPD will continue to struggle to demonstrate full and effective compliance for the Court overseeing the Consent Decree, within the CPD, and within Chicago's communities. This will, in turn, delay the City's ability to build "trust between officers and the communities they serve" and promote "community and officer safety." ¶2. *See also, e.g.*, ¶¶567 ("In addition to enhancing CPD's capacity for internal accountability, CPD can use data to promote accountability to the public by regularly publishing data it collects."), 572 ("CPD will regularly review citywide and district-level data regarding reportable uses of force to: a. assess the relative frequency and type of force used by CPD members against persons in specific demographic categories, including race or ethnicity, gender, age, or perceived or known disability status; and b. identify and address any trends that warrant changes to policy, training, tactics, equipment, or Department practice."), 17 ("The overall effectiveness of CPD's department-wide and district-level crime reduction strategies will be determined by a reduction in crime and not by the number of arrests, stops, or citations.").

Many similar challenges exist in any large organization, but in a police department, addressing these challenges are critical for the immediate and long-term safety and wellbeing of our community members, our officers, and our entire city. Because of the years of hard work from the Court and the dedicated people from the City, the CPD, the OAG, and Chicago's communities, Chicago is no longer at the starting line for reform, and we will continue to monitor and report on the City's and the CPD's efforts to reach the finish line.

Monitoring Under the Consent Decree

In August 2017, the Office of the Illinois Attorney General (OAG) sued the City of Chicago (City) in federal court regarding civil rights abuses by the Chicago Police Department (CPD). The lawsuit led to a Consent Decree, effective March 1, 2019.[1] The same day, the federal court appointed Maggie Hickey as the Independent Monitor. Ms. Hickey leads the Independent Monitoring Team, which monitors the City of Chicago's progress in meeting the Consent Decree's requirements.

Paragraph 2 of the Consent Decree sets out its overall purpose, which has guided and will continue to guide our monitoring efforts:

> ***2.*** *The State, the City, and the Chicago Police Department . . . are committed to constitutional and effective law enforcement. In furtherance of this commitment, the Parties enter into this Agreement to ensure that the City and CPD deliver services in a manner that fully complies with the Constitution and laws of the United States and the State of Illinois, respects the rights of the people of Chicago, builds trust between officers and the communities they serve, and promotes community and officer safety. In addition, this Agreement seeks to ensure that Chicago police officers are provided with the training, resources, and support they need to perform their jobs professionally and safely. This Agreement requires changes in the areas of community policing; impartial policing; crisis intervention; use of force; recruitment, hiring, and promotions; training; supervision; officer wellness and support; accountability and transparency; and data collection, analysis, and management.*[2]

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[1] For more information on the Consent Decree, see the Background section below. More information is also available on the Independent Monitoring Team's website (cpdmonitoringteam.com/) and on the Illinois Attorney General Office's Consent Decree website (chicagopoliceconsentdecree.org/about/).

[2] We cite the relevant paragraphs of the Consent Decree throughout this Independent Monitoring Report. The Consent Decree is available on the Independent Monitoring Team's website: cpdmonitoringteam.com/wp-content/uploads/2020/08/FINAL-CONSENT-DECREE-SIGNED-BY-JUDGE-DOW.pdf. *See also Resources*, CHICAGO POLICE CONSENT DECREE ("Consent Decree Approved by the Court on January 31, 2019"), chicagopoliceconsentdecree.org/resources/.

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Executive Summary

As the Independent Monitoring Team (IMT), we assess the City of Chicago's (City's) compliance with the requirements of the Consent Decree. Specifically, we assess how relevant City entities—including the Chicago Police Department (CPD); the Civilian Office of Police Accountability (COPA); the Chicago Police Board; the City Office of Inspector General, including the Deputy Inspector General for Public Safety (Deputy PSIG); and the Office of Emergency Management and Communications (OEMC)—are complying with the Consent Decree.[3]

This is Independent Monitoring Report 6.[4] Here, we update the Court and the public on compliance efforts during the sixth reporting period: from January 1, 2022, through June 30, 2022.[5] Among other things required by the Consent Decree, this report includes the following:

- an updated compliance or status assessment from the previous reporting period;
- a compliance or status assessment for each new paragraph we identified for this reporting period in our Monitoring Plan for Year Three, which as of this reporting period includes all monitorable paragraphs in the Consent Decree;
- a summary of the principal achievements and challenges facing the City's compliance with the Consent Decree; and

[3] As a party to the Consent Decree, the City is ultimately responsible for compliance. *See* ¶720. Unless otherwise specified, our references to the City typically include its relevant entities. *See* ¶736.

[4] We provided a draft of this report to the City and the OAG on January 30, 2022, as required by ¶¶661–65. Per ¶663, the OAG and the City provided written responses on August 17, 2022. On November 15, 2022, the IMT provided an updated draft to the Parties. The Parties provided their attached written responses on December 5, 2022. *See* Attachment A (OAG comments) and Attachment B (City comments).

[5] The Consent Decree generally prevents the IMT from making any public statements or issuing findings regarding any non-public information or materials outside of these reports (*see* ¶672). Because the Consent Decree will be in effect for a minimum of eight years, this is the sixth of at least 16 semiannual Independent Monitoring Reports. *See Stipulation Regarding Search Warrants, Consent Decree Timelines, and the Procedure for "Full and Effective Compliance," Illinois v. Chicago*, Case No. 17-cv-6260 (March 25, 2022), https://cpdmonitoringteam.com/wp-content/uploads/2022/03/2022.03.25-Stipulation-Regarding-Search-Warrants-Consent-Decree-Timelin.._.pdf. Each year, we file a Monitoring Plan that sets out what we will assess during the year, and we file two semiannual Independent Monitoring Reports. The Independent Monitoring Plans and Reports are available on the IMT's website. *See Reports and Resources*, https://cpdmonitoringteam.com/reports-and-resources/.

- an updated projection of upcoming work for the City, the Office of the Illinois Attorney General (OAG), and the IMT. *See* ¶661.[6]

The Consent Decree is a complex document that resulted from long and substantive negotiations between the City and the OAG. Throughout the reporting period, and in this report, we have aimed to address the nuances of the agreement fairly and accurately.

The monitoring process contains some tensions that we address in both our monitoring efforts and this report. For example, there has been—and likely will continue to be—a tension between the City's need to make compliance efforts quickly and the need to ensure that its efforts are effective and sustainable. Because the Consent Decree prioritizes both goals, we do too. If the City rushes to create a policy without, for example, the requisite community involvement, that may delay the date the City reaches compliance if the City must later re-engage the community, re-draft the policy, and potentially re-train personnel. We have attempted to address this tension in our analysis for each relevant paragraph in this report.

We know that many readers will be most interested in learning where the IMT has found the City, the CPD, and the other relevant entities to be in compliance or not in compliance with the requirements of the Consent Decree. But in reviewing this report, it is important to keep at least three things in mind regarding the scope and significance of our compliance assessments:

- First, this report represents a six-month assessment of the City's compliance efforts from January 1, 2022, through June 30, 2022. It does not reflect all the efforts of the City, the CPD, or the other relevant City entities to date. While we report on the compliance efforts within defined reporting periods (*see* ¶661), we stress that work is ongoing by the City, its relevant entities, the OAG, the IMT, and Chicago's communities. In many cases, relevant City entities have continued to develop policies and train personnel after June 30, 2022, and before the date we submit this report. In this report, we have not assessed efforts made after June 30, 2022. We will do so in the monitoring report for the seventh reporting period (July 1, 2022, through December 31, 2022).

- Second, we assess compliance at three levels: (1) Preliminary, (2) Secondary, and (3) Full. The Consent Decree requires the City and its entities to reach Full compliance and maintain that compliance for one to two years. *See* ¶¶714–15. These compliance levels allow us to share our assessments of the City's

[6] In October 2022, we filed the Monitoring Plan for Year Four, which outlined the projected monitoring efforts under the Consent Decree for Year Four (July 1, 2022, through June 30, 2023). The IMT's Monitoring Plan for Year Four is available on the IMT's website. *See Reports*, INDEPENDENT MONITORING TEAM (November 2, 2022), https://cpdmonitoringteam.com/wp-content/uploads/2022/11/2022.11.02-Monitoring-Plan-for-Year-Four-filed.pdf.

progress throughout the duration of the Consent Decree. Typically, these levels correspond with whether the City or its relevant entities have (1) created a compliant policy, (2) adequately trained personnel on that policy, and (3) successfully implemented the reform in practice. There are, however, many paragraphs that do not include policy or training elements. In those circumstances, the three levels may follow a different trajectory, such as (1) whether the City or its relevant entities have established the framework and resources to achieve the reform, (2) whether the City or its relevant entities have effectively communicated the reform to relevant personnel, and (3) whether the City or its relevant entities have appropriately implemented the reform.

- Third, because of the nuances of each Consent Decree requirement and each level of compliance, the City and its relevant entities must—in a timely manner—provide the IMT with evidence, including access to personnel, records, and data to establish that they have reached each level of compliance during the applicable reporting period.

Under the Consent Decree, the City, the CPD, or other relevant entities are not in compliance with any of the requirements of the Consent Decree until the IMT determines that the City provided sufficient proof that the City, the CPD, or other relevant entities are in compliance. *See* ¶720. Even if the City has made significant efforts toward complying with a requirement—which in some cases it has—the City still has the additional burden of providing sufficient proof of its efforts with sufficient time for the IMT and the OAG to review the information.

To reflect the City's and its relevant entities' progress through the Consent Decree process, we have added four subcategories for each of the three levels of compliance (Preliminary, Secondary, or Full):

- **In Compliance.** Based on the evidence that the City has produced, the City has met a level of compliance with a requirement of the Consent Decree.

- **Under Assessment.** Based on the evidence that the City has produced per ¶720, the IMT is still assessing whether the City has met a level of compliance with a requirement of the Consent Decree. This may occur, for example, when the City's efforts are not completed within a reporting period.

- **Not in Compliance.** Based on the evidence that the City has produced, the City has not met a level of compliance with a requirement of the Consent Decree.

- **Not Yet Assessed.** The IMT has not yet assessed whether the City has met this level of compliance with a requirement of the Consent Decree. This may occur, for example, when the IMT is still assessing a lower level of compliance or the City has not yet met a lower level of compliance.

Major Developments and Principal Achievements and Challenges Impacting Compliance

In the Consent Decree, the City committed "to ensuring that police services are delivered to all of the people of Chicago in a manner that fully complies with the Constitution and laws of the United States and the State of Illinois, respects the rights of all of the people of Chicago, builds trust between officers and the communities they serve, and promotes community and officer safety." The City also committed "to providing CPD members with the resources and support they need, including improved training, supervision, and wellness resources." ¶6.

As we have noted in previous reports and continue to emphasize here, to fulfill these commitments, it is paramount that the CPD increase ownership of reform across its operations. Specifically, compliance with the requirements of the Consent Decree relies heavily on increasing the communication and integration of efforts between the Office of Constitutional Policing and Reform and the CPD's Operations (*i.e.*, the Office of the First Deputy Superintendent, which includes the Bureau of Patrol and the Bureau of Counter-terrorism).

In the sixth reporting period, the City, the CPD, and Chicago faced ongoing challenges, including high levels of certain violent crimes and significant attrition of officers and non-sworn personnel leading to staffing difficulties. While the CPD has developed plans to approach Consent Decree reforms, these plans have yet to comprehensively integrate compliance efforts with community policing, impartial policing, community engagement, and crime-fighting strategies.[7] And we continue to have significant concerns regarding the CPD's commitment to have constitutional policing and reform efforts lead its crime-fighting strategies.

Still, in the sixth reporting period, many City entities and CPD divisions have demonstrated progress toward achieving some levels of compliance with Consent Decree requirements. The City and the City's entities have now reached at least Preliminary compliance (the first of three levels of compliance) with most monitorable paragraphs through the sixth reporting period. We note, however, that the City and its entities have reached Full compliance with comparatively few monitorable paragraphs. Compliance figures are detailed further below and throughout each section of this report. But in isolation, these figures only tell part of the story regarding the City's overall achievements and ongoing challenges to date.

[7] For example, during the last reporting period, the CPD's Office of Constitutional Policing and Reform presented the IMT and the OAG with a draft of a new "Roadmap Toward Operational Compliance" planning document. While we appreciate the strategic thinking and thoughtful effort that went into crafting the plan, we remain concerned about the lack of movement to implement the plan.

Executive Summary Figure 1, below, provides a sample of principal achievements and challenges across the 10 topic areas of the Consent Decree.

Executive Summary Figure 1. Sample of Principal Achievements & Challenges

Section	Sample of Principal Achievements	Sample of Principal Challenges
Community Policing	• The CPD implemented updated School Resource officer policies • The CPD delivered in-service community policing training to officers	• The CPD lacks coordination across its community policing initiatives and activities, such as reconciling CAPS and NPI • The CPD struggled to provide clarity for officers around the positive community interactions (PCI) initiative
Impartial Policing	• The CPD made significant strides for critical policies: *Human Rights* (G02-01), *Prohibition of Racial Profiling* (G02-04), and *Religious Interactions* (G02-01-05)	• The CPD continued to struggle with community engagement and community involvement in policy processes, per ¶52; at the end of the reporting period, much of this work was ongoing, including efforts to develop a plan for community engagement related to the *Search Warrants* policy
Crisis Intervention	• The CPD conducted training on updated *Crisis Intervention Refresher* curriculum • The City continued to efforts with its Crisis Assistance Response Engagement (CARE) program	• Understaffing in the CPD's Crisis Intervention Unit impeded its effectiveness • Nearly half (46.51%) of certified CIT officers were trained six or more years ago
Use of Force	• The CPD made significant strides toward finalizing its *Foot Pursuits* policy (G03-07) (which was since implemented in the seventh reporting period) • TRED continued critical efforts to observe, address, and publicly report on patterns and trends relating to uses of force, foot pursuits, and firearm pointing incidents	• The CPD's increased workload but decreased staffing in TRED, resulting in continued backlog of cases (*see* ¶580) • Recent revisions to critical Use of Force were still not implemented at the end of the reporting period, including policies related to Tasers, OC spray, and First Amendment rights
Recruitment, Hiring & Promotions	• The CPD maintained most levels of compliance achieved in previous reporting periods	• The CPD's officer recruitment functions have been reassigned to the BIA Chief, raising questions about capacity
Training	• The CPD maintained levels of compliance achieved in previous reporting periods	• The CPD has yet to find the right cadence for its required annual *Needs Assessment, Training Plan,* and training implementation

Section	Sample of Principal Achievements	Sample of Principal Challenges
Supervision	• The CPD continues to dedicate efforts toward and learn from its Unity of Command and Span of Control Pilot Program	• Staffing shortages continue to hinder pilot districts from consistently meeting the 10-to-1 officer-to-supervisor ratio required by ¶360
Officer Wellness	• The CPD maintained the levels of compliance achieved in previous reporting periods	• The CPD still had not implemented the required *Officer Suicide Prevention Plan* or the *Annual report to the Superintendent* • The CPD has experienced delays in the development of iCarol case-management system and continued to struggle to collect and analyze corresponding data • The CPD's Professional Counseling Division currently had 11 clinical staff vacancies
Accountability & Transparency	• The CPD's BIA continued to transition from Unit Directives (which are not public) to Special Orders and General Orders (which are public) to increase transparency • COPA, the Police Board, the OIG, and the Deputy PSIG continued to maintain many levels of compliance, including Full compliance for numerous paragraphs	• While the CPD's BIA continues to make progress, BIA continues to struggle to fully catch up with outstanding reforms, including regular reporting responsibilities • The CPD has not been able to staff and provide sufficient resources for Accountability Sergeants (*see* ¶494)
Data Collection, Analysis & Management	• The CPD developed a training and evaluation plan for its Officer Support System	• The CPD made no progress to analyze citywide and district-level data on officers' uses of force

In the following subsections, we provide additional details regarding several key developments and efforts:

- Personnel Changes and Staffing Challenges
- Officer Wellness and Safety
- Officer Training
- Data Collection, Management, and Analysis
- CPD's Community Engagement and Trust Building
- Use of Force and Accountability

Personnel Changes and Staffing Challenges

Many of the City's and CPD's efforts and achievements in the first five reporting periods continued into the sixth reporting period. The City Department of Law, the CPD's Office of Constitutional Policing and Reform, the Legal Affairs Division, and the Research and Development Division (¶¶677–78), continued to be fully engaged in the monitoring process. The City and the CPD also maintained channels of communication with the IMT and the OAG and continued dialogue, problem-solving, and brainstorming about requirements and challenges regarding the requirements of the Consent Decree.

The IMT remains quite concerned that the CPD has not yet produced its required comprehensive staffing study. *See, e.g.*, ¶¶343 and 356. As with many police departments across the country, the CPD has continued to struggle with recruiting and retaining personnel. Such vacancies may ultimately impact community and officer safety and will continue to prevent the CPD from implementing the systems necessary to ensure constitutional and effective policing. We have significant concerns about the lack of consistent staffing and retention levels within the City and the CPD in areas crucial to the efficient implementation of the requirements of the Consent Decree, including key training, supervision, and accountability responsibilities. The City and the CPD must continue to make efforts to maintain staffing at appropriate levels *at all times* in these key areas.

While some of the concerns referenced in this report relate directly to positions within the Office of Constitutional Policing and Reform, the CPD faces staffing issues across the entire department. During the first five reporting periods, the IMT remained concerned about the CPD's capacity to address the need for additional sworn supervisors. The shortage of supervisors hinders the CPD's ability to comply with the Consent Decree's requirements regarding the critical functional concepts of "unity of command" and "span of control" (*see* ¶¶357–68).[8]

We recognize that City and CPD resources are limited, but as ¶¶700 and 706 note, the City is responsible for "providing necessary support and resources to CPD to

[8] "Unity of command" means that "officers are supervised by a consistent and clearly identified immediate supervisor. Additionally, officers and their immediate supervisor will regularly have the same start time, the same day-off-group, and patrol the same geographic areas" (¶358e). Relatedly, "span of control" means the "number of officers assigned to each immediate supervisor for a tour of duty" (¶358d). Specifically, the Consent Decree requires "no more than ten officers to one Sergeant in the field units on each watch in each patrol district" (¶361). Due in part to the shortage of supervisors and an effort to diversify the ranks, in July 2021 Superintendent David Brown reinstated the controversial merit promotion system, a practice that was discontinued in 2019.

enable CPD to fulfill its obligations under this Agreement."[9] As referenced in previous reports, the City and the CPD have already added some resources to their compliance efforts.

In our previous reports, we recommended that the City and the CPD increase resources and staffing to various departments and divisions. In previous reporting periods, the CPD responded by increasing staffing in, among other divisions, the Research and Development Division, the Force Review Division, and the Legal Affairs Division. But maintaining consistent levels of sufficient staffing has been a challenge.[10]

As the Consent Decree process continues, the City and the CPD must ensure that such divisions are sufficiently staffed on a continuous basis. While we understand that ongoing challenges continue based on limited resources, we reiterate the need for increased resources and staffing and the Consent Decree's requirement for the City to "hire, retain, or reassign current City or CPD employees to form a unit with the knowledge, skills, and abilities necessary to facilitate compliance with this Agreement." ¶677. In the sixth reporting period, we continue to see the need for increased resources and staffing in the following areas (*see* ¶¶677–78):

- **Tactical Review and Evaluation Division (TRED).** The CPD has made TRED responsible for many key reform efforts, including reviewing use of force incidents and instances in which officers point firearms. TRED was already understaffed, and unfortunately, as a result of the increased responsibilities, its understaffing is even more problematic. Further, the CPD has repeatedly deployed members of TRED to meet patrol needs, further undermining its efforts and creating conflicts of interest in which TRED must review its own personnel.

- **The Research and Development Division.** The Research and Development Division reviews, revises, and develops policies for the CPD. This division has been critical for many of the CPD's compliance efforts and levels to date. Decreased staffing, however, could negatively impact the CPD's ability to sustain compliance and ensure that policies remain current. *See, e.g.*, ¶636 ("CPD will

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[9] The *2020 Litigation Report* is publicly available online: https://www.chicago.gov/content/dam/city/sites/public-safety-and-violenc-reduction/pdfs/City's%20Report%20on%202020%20Litigation%20(With%20Appendices).pdf at 4 ("The City settled 90 cases for a total of $20.7 million in settlement payouts in 2020. The City also paid $19.8 million after juries awarded damages to the plaintiffs in two Litigated Cases. In total, the City paid $40.5 million in financial settlements and to satisfy jury awards in 90 Settled and two Litigated Cases in 2020.").

[10] The Research and Development Division frequently works with the IMT to develop compliance documents and policies. Increases in staffing in this department can reduce bottlenecking with limited personnel. As discussed further in the Use of Force section below, the Force Review Division is critical to several Consent Decree requirements. The Legal Affairs Division must frequently work with the IMT to provide compliance documents, policies, and efforts. Specifically, the Legal Affairs Division reviews every document that the IMT receives.

periodically review each policy required to be revised or developed by this Agreement. CPD will conduct an initial review of each such policy no later than two years after the policy's implementation as provided for in this Agreement. CPD will conduct subsequent reviews every two years thereafter, although the Parties may modify the timeframe for the review of a specific policy. The purpose of the initial and subsequent reviews is to evaluate whether the policy provides effective guidance and direction to CPD members and is consistent with the requirements of this Agreement and current law.").

- **The Audit Division.** This division is crucial to the City's and the CPD's ability to sustain reforms and change culture over the long term. The Audit Division aims to provide quality, independent, and objective assessments of the operations, processes, and internal controls within the CPD. The division also aims to demonstrate compliance with the Consent Decree. Throughout the sixth reporting period, however, the Audit Division was chronically understaffed.

- **Education and Training Division (ETD).** The CPD's Education and Training Division is at the heart of numerous Consent Decree requirements. The CPD is one of the largest police departments in the country, and training personnel requires a massive effort. Our discussions with CPD personnel regarding training efforts, records, and plans underscore that the Training Division needs additional support. As the City and the CPD continue to move into Preliminary compliance with many requirements, the City and the CPD must increase training efforts and resources.

- **Strategic Initiatives Division.** The Strategic Initiatives Division is crucial to the City's and the CPD's successful reform endeavors, as it performs many of the CPD's data and analytics efforts. As the City and the CPD move into Secondary compliance for some paragraphs, and look toward eventual Full compliance, they will need to drastically increase their data collection, management, and analytical capabilities to document their operational successes. As is clearly stated in ¶720, the City bears the burden of demonstrating its compliance with the requirements of the Consent Decree and the most efficient way to achieve that is through valid, reliable, and best practice data collection, management, analysis, and reporting. See our assessment of ¶606 in Appendix 10 (Data Collection, Analysis, and Management) for a more detailed discussion of the IMT's concerns about the CPD's data deficiencies and challenges.

- **The Reform Management Group.** The project managers in the Reform Management Group—both sworn and nonsworn—are crucial to the successful implementation and documentation of Consent Decree requirements. However, throughout the entirety of the Consent Decree process, we have seen consistent turnover in these key project management positions, which hinder the

CPD's ability to provide consistent and accurate information. During this reporting period, it is our understanding that nearly half of the civilian staff members of the Reform Management Group left their positions.

More recently, in the seventh reporting period, many of the above concerns were exacerbated when the CPD terminated the employment of the Executive Director for the Office of Constitutional Policing and Reform, Robert Boik. While the Superintendent has the discretion and responsibility for these decisions, we must acknowledge that Mr. Boik's termination sent a demoralizing message to police officers, supervisors, and other CPD personnel, especially those sworn and non-sworn personnel within the Office of Constitutional Policing and Reform who have been painstakingly committed to enacting the required reforms.

Continuity in leadership positions is crucial to reform taking root throughout the CPD.[11] The new Executive Director, Tina Skahill, now leads the reform efforts, and we are committed to working with her to advance reform within the CPD.

Officer Wellness and Support

The Consent Decree requires the CPD to bolster its officer-support systems. As recognized by the Consent Decree, "[i]n fulfilling their duties, CPD members expose themselves to significant danger, high stress, and a wide spectrum of human tragedy[, and] psychological and emotional wellness are critical to officers' health, relationships, job performance, and safety." ¶377. The Consent Decree requirements aim to help the CPD "achieve a healthy, effective, and constitutionally compliant police force." ¶380. In fact, implementing reforms across the Consent Decree—including reforms related to Community Policing, Impartial Policing, Crisis Intervention, Use of Force, Training, Supervision, and Accountability and Transparency—require a healthy and effective police force. For officers to meet the high standards of the CPD, of the Consent Decree, and of Chicago's communities, officers must have sufficient support.

Chicago continues to experience heartbreaking losses of officers to suicides.[12] The IMT remains concerned about the safety, health, and wellness of CPD officers. Officers—and their families—require support to perform their high-stress jobs, and

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[11] Then-Executive Director Boik oversaw the CPD's reform efforts beginning in 2020, replacing Deputy Superintendent Barbara West, who retired that year.

[12] *See Investigation of the Chicago Police Department*, UNITED STATES DEPARTMENT OF JUSTICE CIVIL RIGHTS DIVISION AND UNITED STATES ATTORNEY'S OFFICE NORTHERN DISTRICT OF ILLINOIS at 123 (January 13, 2017) ("During our investigation we heard that officer suicide and suicide threats are a significant problem in CPD. In fact, when we met with officials from EAP in May 2016, they had just handled an officer suicide threat the night before. One CPD official told us that CPD's rate is 22.7 suicides per 100,000 Department members. The FOP shared figures showing that CPD's suicide rate between 2013 and 2015 was 29.4 per 100,000 based on available information. This would mean that CPD's officer suicide rate is more than 60% higher than the national

the Consent Decree requires the City and the CPD to provide increased levels of support (*see* ¶¶381–418).

We appreciate that, according to its job-position advertisement, the CPD is moving toward hiring a Director of Wellness, along with additional clinicians, to "enhance the Department's wellness services for members of the Chicago Police Department and their families." While the position was posted in March 2022, it remained unfilled at the end of the reporting period.

Officer Training

In the sixth reporting period, the City and the CPD continued making progress toward compliance with the Training section of the Consent Decree, but the IMT has real concerns about whether the CPD can fulfill their obligations to provide high quality, in-service training to all officers by the required deadline. Our concerns stem from, for example, the consistent deployment of Education and Training Division (ETD) personnel into the field, which hinders progress on training tasks and duties. As of this filing, the CPD has fallen behind in their in-service training provision for this year and we are uncertain about whether they can complete their requirements for this year.

Use of Force and Accountability

While the City and the CPD continue to make some progress toward the requirements of the Consent Decree that address use of force and accountability, the IMT remains concerned about the progress of these requirements and the culture change that the spirit of the Consent Decree is meant to engender.

First, the Consent Decree, in part, is meant to encourage the CPD to become a self-reflective learning organization, by analyzing its own data and making necessary corrections to its practices in a timely manner. One of the key aspects of this process is the CPD's required review of officers' use of force incidents (*see* ¶¶577-580). We have seen consistent understaffing in the CPD's TRED throughout this reporting period, hindering the required analysis and impeding CPD's ability to learn from its officers' field practices.

Second, a key close-to-the ground ingredient in accountability is the requisite staffing of Accountability Sergeants (*see* ¶¶493–95). During this reporting period, the IMT learned that these crucial roles were understaffed across the city.

Third, we continue to have concerns about the slow compliance progress of CPD's BIA, which has not made nearly the progress of its accountability counterparts

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average of 18.1 law enforcement suicides per 100,000."), http://chicagopoliceconsentdecree.org/resources/. *Cf.* ¶388.

COPA, the OIG, and the Police Board. The CPD has followed a less methodical path toward compliance with the Accountability and Transparency requirements, and because of this, has fallen behind in complying with Accountability and Transparency paragraphs. We hope to see continued efforts from BIA similar to its decision to move from Unit Directives to Special Orders and General Orders to increase public transparency of its work.

Data Collection, Management, and Analysis

As the City and the CPD move into Secondary compliance for some paragraphs and look toward eventual Full compliance, they will need to drastically increase their data collection, management, and analytical capabilities to document their operational successes. *See* Appendix 10 (Data Collection, Analysis, and Management).

The lack of a comprehensive assessment of the CPD's current information collection mechanisms and data management technology (*see* ¶606), has and will continue to delay the CPD's compliance efforts across the Consent Decree and ability to demonstrate constitutional and effective policing. Along with monitoring the CPD's internal data collection, management, and analysis challenges, we are also tracking the City's Public Safety Administration's role in overall compliance with the data requirements of the Consent Decree.

While the Consent Decree requires the City and the CPD to accurately report on, collect, manage, and analyze data regarding its police practices, the Consent Decree does not require officers to fill out duplicative and inefficient forms. In fact, the Consent Decree requires the CPD to "review and, as necessary, revise departmental forms relating to [for example] use of force" to "improve the accuracy, reliability, and efficiency of its data collection." ¶609.

On the other hand, solutions to the CPD's data issues requires allocating significant resources toward overhauling the CPD's data systems to integrate existing data and streamline accurate data collection. In the meantime, the CPD has yet to finish its initial comprehensive assessment of its data systems per ¶606. The CPD has indicated that it is in the process of expediting these efforts and hopes to incorporate a data system that is able to, among other things, link, and auto-populate forms for officers to increase data accuracy, efficiency, and utility. We greatly look forward to the City's and the CPD's continued efforts toward improving its data systems.

CPD's Community Engagement and Trust Building

As in the first five reporting periods, we continued to have concerns about the CPD's efforts and approaches to engaging Chicago's communities throughout the sixth reporting period. Since the first reporting period in 2019, we have raised con-

cerns about the CPD's insufficient community engagement during its policy development procedures, as well as its lack of comprehensive and layered community engagement and community policing strategies.

Despite the CPD's efforts to engage communities on specific policies, opportunities for community input continue to occur late in the policy development process for many policies under revision and only during public comment phases. When Chicago's community members are invited to provide input only at the later stages of the policy development process, they are prevented from contributing during the formative stages and, in some instances, are effectively prevented from meaningfully participating at all.[13]

We continue to be concerned about how the CPD understands and discerns the differences and nuances among community engagement, community partnerships, community relationships, community policing, and community service. It is still unclear—after over two years of asking for clarification on the issue—how the CPD proposes to merge its existing Chicago Alternative Policing Strategy (also known as CAPS) with its Neighborhood Policing Initiative (also known as NPI).[14] Moreover, it is also unclear how these programs align with or complement the CPD's other community-focused efforts such as the district-level Community Policing Strategic Plans, the activities of the Community Safety Team, or the CPD's goal of 1.5 million Positive Community Interactions in 2022.[15] Furthermore, the CPD has yet to clearly articulate how these programs support an overall philosophy of community policing. *See* ¶¶8–11.

Fortunately, in the sixth reporting period, CPD personnel worked on planning for long-term and consistent community engagement. In fact, the CPD recognized its need for continued improvement in this area and, during this reporting period, requested technical assistance. Their request states that the CPD seeks, "technical assistance revising its policy and its long-term community engagement plan with the hopes of identifying sustainable models for continued community engagement." And we have already seen some instances in which, the City and the CPD have also made meaningful changes to policies, trainings, and practices in response to community feedback. At the end of the reporting period, however, this work was ongoing, and unfortunately, there continues to be serious concerns regarding the CPD's ability to carry out the plans given the significant staffing issues, discussed above.

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[13] *Compare* ¶52 ("In developing or revising policies and training referenced in this section, CPD will seek input from members of the community and community-based organizations with relevant knowledge and experience through community engagement efforts.").

[14] *See How CAPS Works*, CHICAGO POLICE DEPARTMENT, home.chicagopolice.org/community-policing-group/how-caps-works/what-is-caps/.

[15] *See District Strategic Plan*, CHICAGO POLICE DEPARTMENT, home.chicagopolice.org/community-policing-group/consent-decree/strategic-plans/.

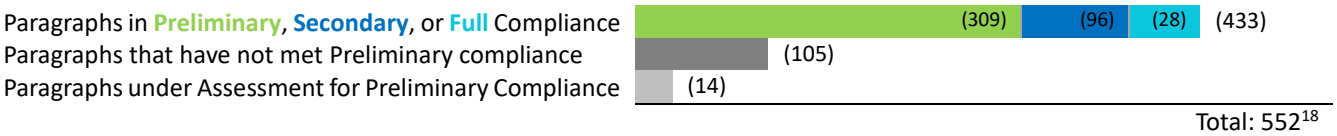
While we appreciate the CPD's continued online community engagement efforts such as seeking community input on draft policies, the CPD must establish and maintain "clear channels through which community members can provide input regarding CPD's use of force policies and propose revisions or additions to those policies" within the reporting period. ¶160.[16] We encourage the City to continue to pilot and implement innovative strategies to engage Chicago's diverse communities.

Compliance Assessments and Deadlines

At the end of the sixth reporting period, we assessed 554 paragraphs and provided status updates for 37 additional paragraphs (591 paragraphs total).[17]

At the end of the sixth reporting period, the City reached or maintained Preliminary compliance with 309 paragraphs, Secondary compliance for 96 paragraphs, and Full compliance for 28 paragraphs. The City did not reach any level of compliance for 105 paragraphs and remained under assessment for Preliminary compliance for an additional 14 paragraphs. As reflected in Executive Summary Figure 2 below, we found that the City achieved at least Preliminary compliance with 433 paragraphs.

Executive Summary Figure 2: Consent Decree Compliance by June 30, 2022



[16] In the sixth reporting period, while the City, the CPD, and the Coalition continue to struggle to work together, they met regularly regarding various policies in the sixth reporting period. *See* ¶669. (In March 2018, the Parties to the Consent Decree (the OAG and the City) entered into a Memorandum of Agreement with a "broad-based community coalition committed to monitoring, enforcing, and educating the community about the Consent Decree ('the Coalition')." The Coalition "includes the plaintiffs in the *Campbell* and *Communities United* lawsuits." *See Memorandum of Agreement Between the Office of the Illinois Attorney General and the City of Chicago and* Campbell v. City of Chicago *Plaintiffs and* Communities United v. City of Chicago *Plaintiffs* (March 20, 2018), http://chicagopoliceconsentdecree.org/wp-content/uploads/2019/05/Executed_MOA.pdf.)

[17] Two Impartial Policing paragraphs, ¶¶79–82, which did not contain requirements in the sixth reporting period. Specifically, while interrelated with the requirements of ¶¶79 and 80, ¶82 does not contain a substantive requirement for the City, and ¶81 contains conditional requirements that may never apply and did not apply in the fourth reporting period. For the purpose of this report, we have provided status updates for these paragraphs. We have provided status updates for ¶¶81 and 82.

[18] As referenced above, we have provided status updates for ¶¶81 and 82.

Of course, some requirements in the Consent Decree demand more effort to comply with than others. The number of requirements—and the amount of work necessary under each requirement—can vary substantially within each paragraph and topic area.

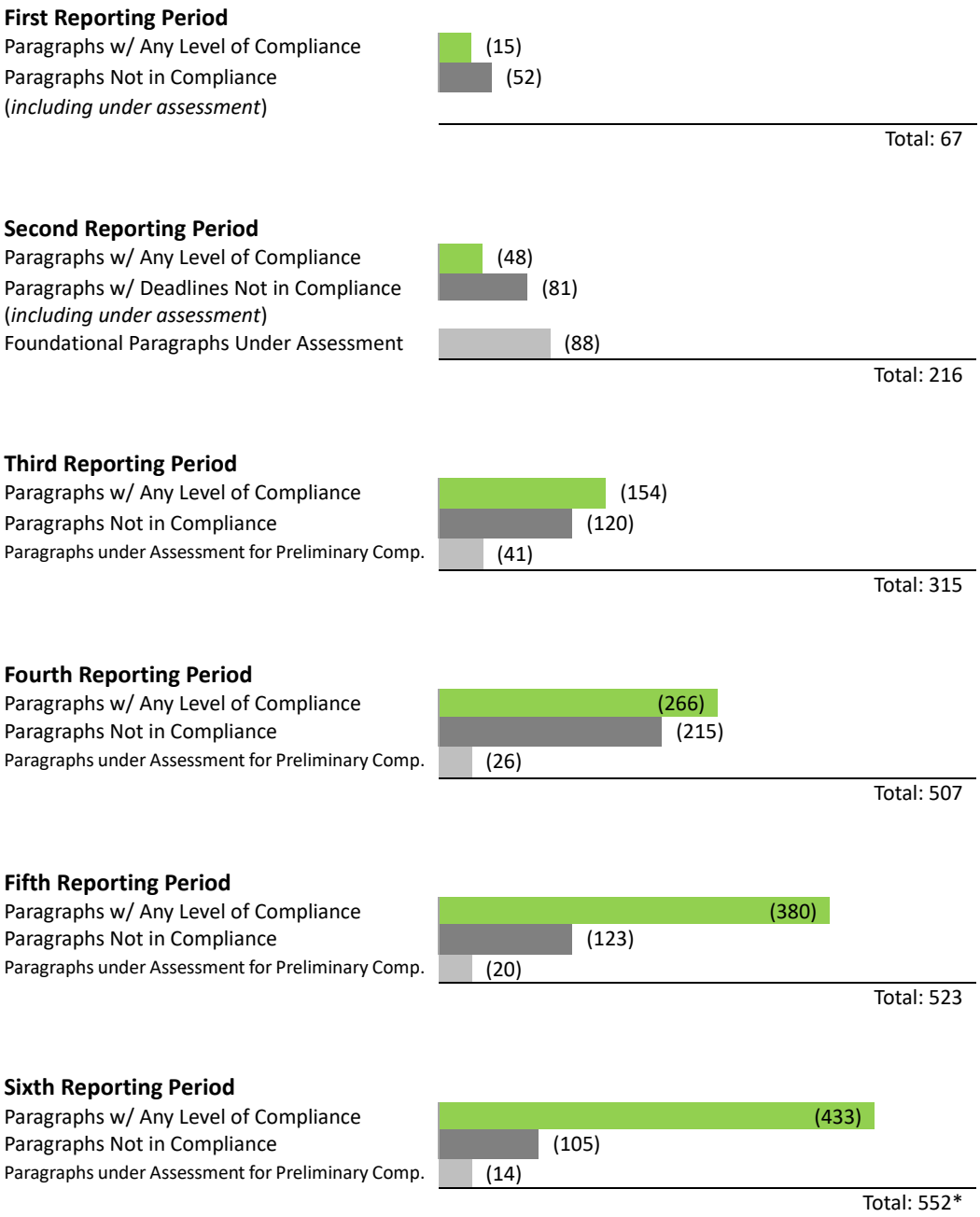
The City and the OAG agreed to specific deadlines to ensure that the City was making significant efforts to comply with the Consent Decree in a timely manner. As we are in Year Three of the Consent Decree, however, our focus will naturally shift from preliminary deadlines to measurements of effective and sustained practices. We are now at the end of Year Three of the Consent Decree (the end of the sixth reporting period), which means that this report includes the IMT's assessments on the City's efforts to comply with *all* requirements and monitorable paragraphs in the Consent Decree. The deadlines in this reporting period and moving forward comprise recurring timelines, such as regular policy review, training, and reporting requirements including annual reports.[19]

Executive Summary Figure 3 and Figure 4, respectively, show the City's compliance and deadline status through six reporting periods. As a result of our focus on underlying efforts, we must also track and report on areas where the City or the CPD have lost levels of compliance. *See* Executive Summary Figure 5.

[19] *See, e.g.*, ¶¶78, 546, and 550.

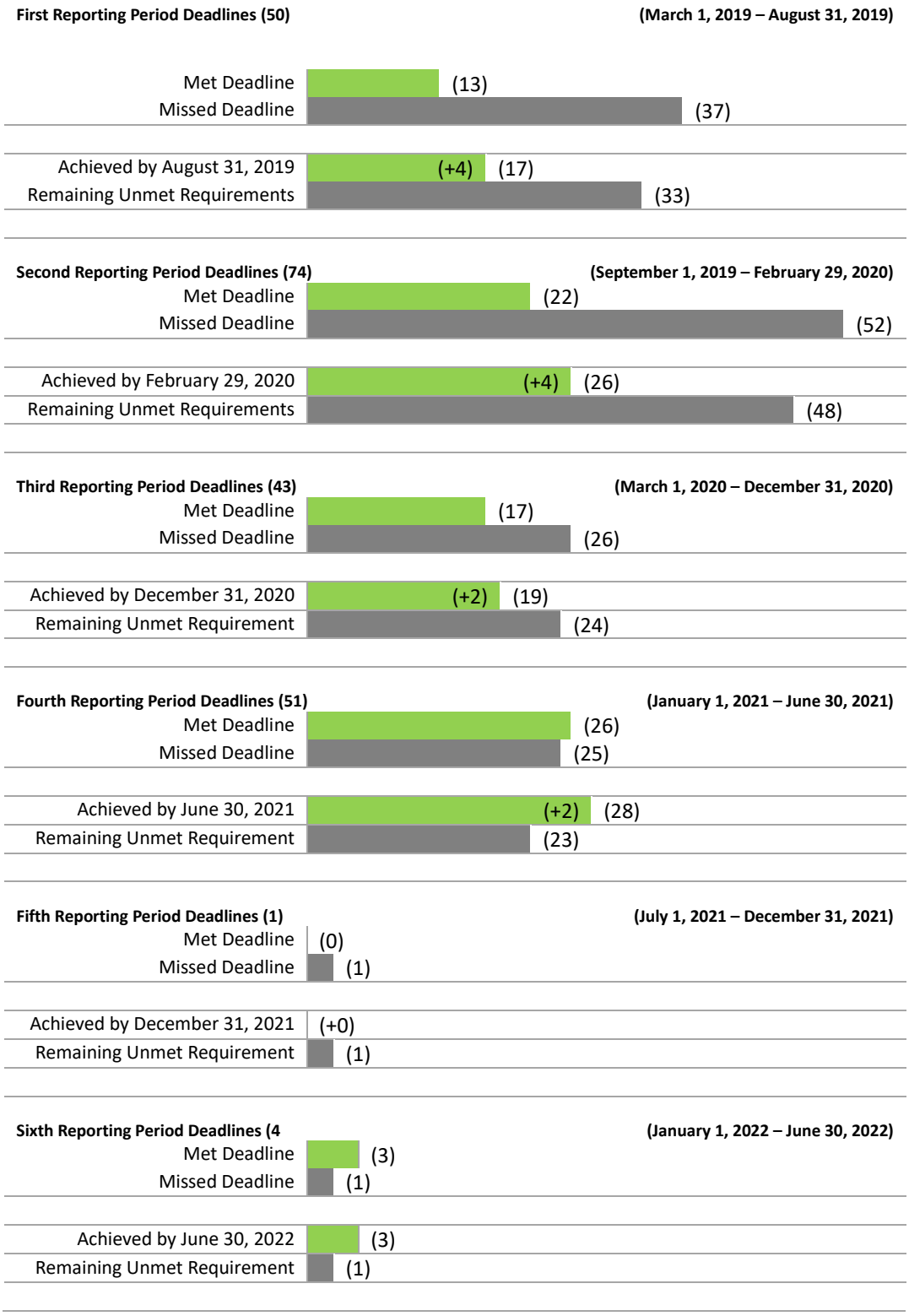
Consent Decree Compliance by June 30, 2022

Executive Summary Figure 3: Compliance Status through Six Reporting Periods Consent Decree Paragraphs

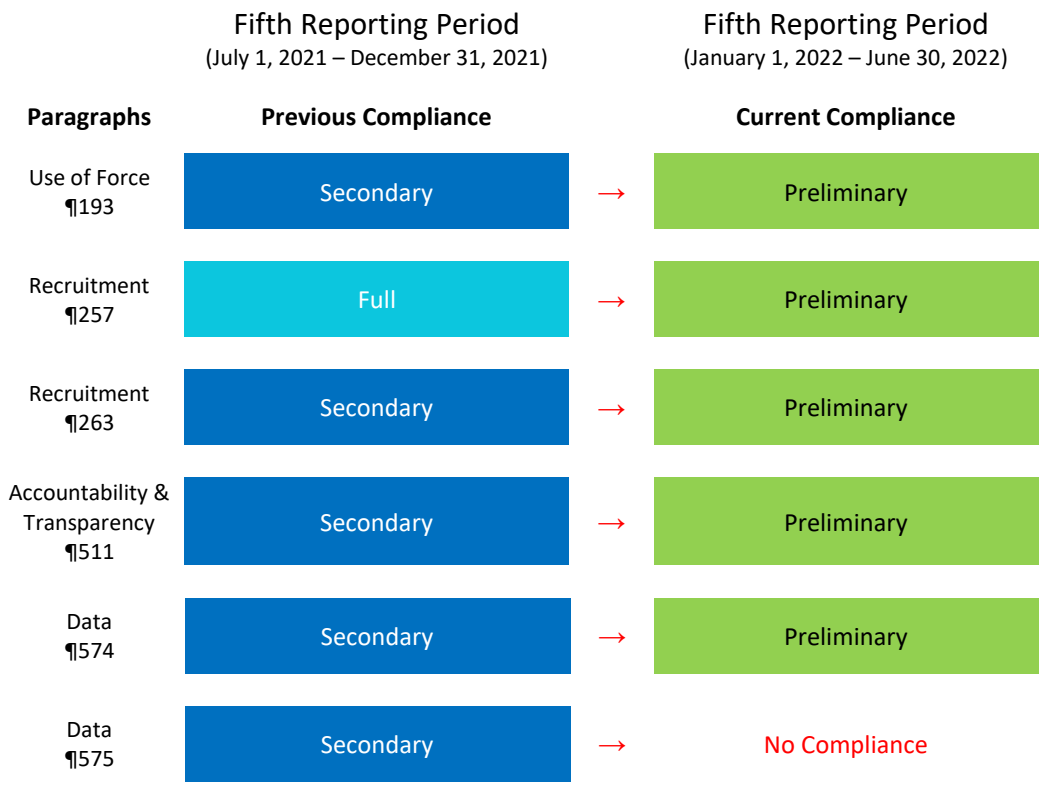


* As referenced above, two Impartial Policing paragraphs, ¶¶79–82, did not contain requirements this reporting period.

Executive Summary Figure 4: Consent Decree Deadlines before June 30, 2022



Executive Summary Figure 5:
Lost Levels of Compliance in the Sixth Reporting Period



Roadmap

We wrote this report to be as accessible and readable as possible. This report is long because the compliance efforts in the sixth reporting period required significant attention. As the IMT continues to move forward with its monitoring efforts and as we assess the City's requirements with appropriate detail, the monitoring reports may also continue to grow in length. For this reason, we have provided the following roadmap to help readers understand what they can expect from each section of this report.

We begin this report with a **Background** section that provides background about the Consent Decree and the IMT. This section will help those who have not read or would like to reacquaint themselves with the background information from our previous reports and Monitoring Plans.

The next section, **Compliance Activities and Assessments**, provides the following information regarding the sixth reporting period:

- An overview of the IMT's assessment process and priorities for the sixth reporting period, including deadlines and status updates;
- A summary of the IMT's activities;
- A summary of the City's achievements and challenges; and
- For each topic of the Consent Decree, a summary of relevant compliance efforts, a more specific analysis for each Consent Decree paragraph with a deadline before June 30, 2022, and if applicable, a summary of efforts regarding the corresponding paragraphs that do not have specific deadlines.
- Finally, we note that **Appendix A** details the IMT's compliance assessments for each and every monitorable paragraph, which were all under review in the sixth reporting period.

Finally, the last section, **Conclusion and Looking Ahead to Independent Monitoring Report 7**, provides concluding remarks and a projection of the upcoming work in the seventh reporting period.

Background

This is the IMT's sixth semiannual Independent Monitoring Report.[20] The report provides the IMT's monitoring activities and findings for the sixth reporting period—from January 1, 2022, through June 30, 2022.[21]

Specifically, consistent with the requirements of the Consent Decree, we address the following information throughout the sections of this report:

- The IMT's efforts during the reporting period;
- A description of each Consent Decree requirement that applied during the reporting period;
- The IMT's compliance findings for each corresponding requirement;
- A summary of the City's principal achievements and the challenges facing the City's ability to achieve complete compliance with the Consent Decree;
- The IMT's corresponding recommendations regarding the City's future efforts to achieve compliance; and
- A projection of the IMT's, the OAG's, and the City's upcoming work during the next reporting period (July 1, 2022, through December 31, 2022).

Per ¶661 of the Consent Decree, the IMT will continue to issue semiannual reports until the Consent Decree ends—which is after the City has reached full and effective compliance for each requirement for one to two years. *See* ¶¶693 and 714–15.

The Chicago Police Consent Decree

In December 2015, the U.S. Attorney General launched a broad civil rights investigation into the CPD's policing practices. The U.S. Department of Justice released the results of its investigation in January 2017, finding a longstanding, pervasive

[20] We provided a draft of this report to the City and the OAG on January 30, 2022, as required by ¶¶661–65. Per ¶663, the OAG and the City provided written responses on August 17, 2022. On November 15, 2022, the IMT provided an updated draft to the Parties. The Parties provided their attached written responses on December 5, 2022. *See* Attachment A (OAG comments) and Attachment B (City comments).

[21] The IMT's Monitoring Plan for Year Four is available on the IMT's website. *See Reports and Resources*, INDEPENDENT MONITORING TEAM (November 2, 2022), https://cpdmonitoringteam.com/wp-content/uploads/2022/11/2022.11.02-Monitoring-Plan-for-Year-Four-filed.pdf. The City filed its sixth status report (¶680) with the Court on October 3, 2022.

"pattern or practice" of civil rights abuses by the CPD.[22] Two separate class-action lawsuits followed: *Campbell v. City of Chicago* and *Communities United v. City of Chicago*.[23]

In August 2017, the OAG sued the City in federal court, seeking a Consent Decree that would address the US Department of Justice's (DOJ's) findings and recommendations. The case was assigned to federal Judge Robert M. Dow, Jr. The OAG then sought input from community members and Chicago police officers and negotiated the Consent Decree with the City.

In March 2018, the Parties to the Consent Decree (the OAG and the City) entered into a Memorandum of Agreement with a "broad-based community coalition committed to monitoring, enforcing, and educating the community about the Consent Decree ('the Coalition')." The Coalition "includes the plaintiffs in the *Campbell* and *Communities United* lawsuits."[24]

The OAG and the City then sought proposals for an Independent Monitoring Team (IMT) after posting a draft Consent Decree on the Chicago Police Consent Decree website.[25] Judge Dow approved and signed a modified version of the Consent Decree on January 31, 2019. The Consent Decree requires action by the CPD and many other City entities. On March 1, 2019, which was the effective date of the Consent Decree, and after a competitive selection process, Judge Dow appointed Maggie Hickey, a partner in the ArentFox Schiff law firm, as the Independent Monitor. On October 11, 2022, Chief US District Judge of the District Court for the Northern District of Illinois Rebecca R. Pallmeyer became the presiding judge over the Consent Decree. As the Independent Monitor, Ms. Hickey oversees the Independent Monitoring Team (IMT) and reports directly to Chief Judge Pallmeyer.[26]

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22 DOJ Civil Rights Division and United States Attorney's Office Northern District of Illinois, *Investigation of Chicago Police Department* (January 13, 2017) at 4, *available at* http://chicagopoliceconsentdecree.org/wp-content/uploads/2018/01/DOJ-INVESTIGATION-OF-CHICAGO-POLICE-DEPTREPORT.pdf.

23 *See Campbell v. Chicago*, N.D. Ill. Case No. 17-cv-4467 (June 14, 2017), and *Communities United v. Chicago*, N.D. Ill. Case No. 17-cv-7151 (October 4, 2017).

24 *See Memorandum of Agreement Between the Office of the Illinois Attorney General and the City of Chicago and* Campbell v. City of Chicago *Plaintiffs and* Communities United v. City of Chicago *Plaintiffs* (March 20, 2018), *available at* http://chicagopoliceconsentdecree.org/wp-content/uploads/2019/05/Executed_MOA.pdf.

25 More information about the IMT selection process is available on this website, which the OAG maintains. *See Independent Monitor*, CHICAGO POLICE CONSENT DECREE, http://chicagopoliceconsentdecree.org/independent-monitor/. Other resources, including Consent Decree documents, court filings, and reports, are also available on this website. *See Resources*, CHICAGO POLICE CONSENT DECREE, http://chicagopoliceconsentdecree.org/resources/.

26 Judge Dow also appointed Judge David H. Coar, Ret., as a special master. As special master, Judge Coar is not a member of the IMT, but he "help[s] facilitate dialogue and assist the [OAG], the City, and other stakeholders in resolving issues that could delay progress toward imple-

The Independent Monitoring Team

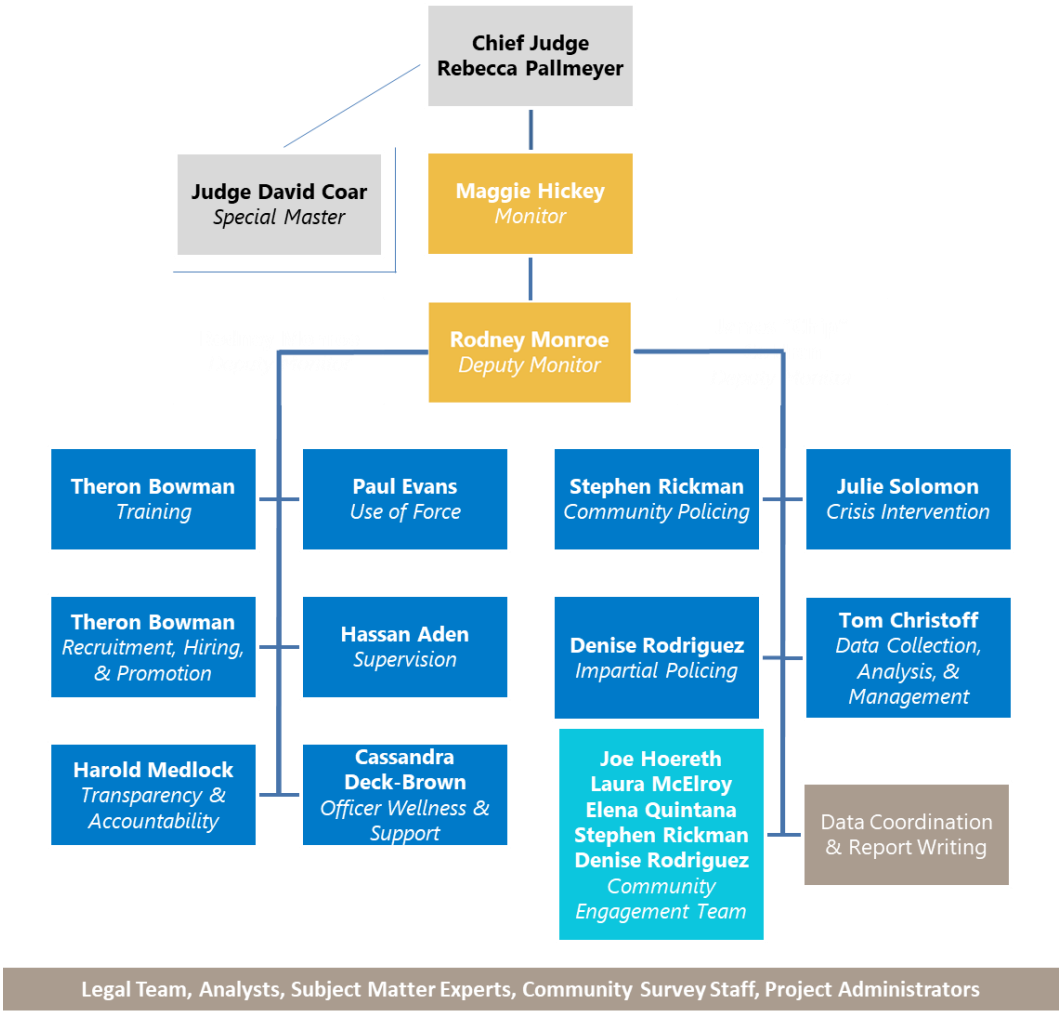
As the IMT, we (1) monitor the City's, the CPD's, and other relevant City entities' progress in meeting the Consent Decree's requirements and (2) offer assistance to the City, the CPD, and other relevant City entities to implement the changes that the Consent Decree requires. *See, e.g.*, ¶¶610 and 656.

Monitor Maggie Hickey and Deputy Monitor Chief Rodney Monroe, Ret., lead the IMT. The IMT's nine Associate Monitors, in turn, oversee the 10 topic areas of the Consent Decree. Our legal team, analysts, subject matter experts, Community Engagement Team, and community survey staff provide support in several ways: by reaching out to and engaging with Chicago communities; by providing general administrative support; and by collecting and analyzing policies, procedures, laws, and data, including conducting interviews and writing reports.

Our full organizational chart is in Background Figure 1 on the next page, and our team structure is in Background Figure 2 on the following page.

mentation of the consent decree." *About*, CHICAGO POLICE CONSENT DECREE, http://chicagopoliceconsentdecree.org/about/. On October 11, 2022, Chief US District Judge of the District Court for the Northern District of Illinois Rebecca R. Pallmeyer became the presiding judge over the Consent Decree. As the special master, Judge Coar also reports directly to Chief Judge Pallmeyer.

Background Figure 1. Independent Monitoring Team Organizational Chart



Background Figure 2. Independent Monitoring Team Members

Monitoring Team Leadership	Independent Monitor	Maggie Hickey
	Deputy Monitor	Rodney Monroe
Associate Monitors	Community Policing	Stephen Rickman
	Impartial Policing	Denise Rodriguez
	Crisis Intervention	Julie Solomon
	Use of Force	Paul Evans
	Training; Recruitment, Hiring Promotion	Theron Bowman
	Supervision	Hassan Aden
	Officer Wellness & Support	Cassandra Deck-Brown
	Accountability & Transparency	Harold Medlock
	Data Collection, Analysis & Management	Tom Christoff
Community Engagement Team	Member	Joe Hoereth
	Member	Laura McElroy
	Member	Elena Quintana
	Member (and Associate Monitor for Community Policing)	Stephen Rickman
	Member (and Associate Monitor for Impartial Policing)	Denise Rodriguez
	Community Surveys	Joe Hoereth & Other Experts
Subject Matter Experts and Legal Team	Project Director	Laura Kunard
	Lead Attorney	Anthony-Ray Sepulveda
	Attorney, Recruitment, Hiring, & Promotions; Training	Kyle Jacob
	Attorney	Derek Barella
	Attorney, Accountability & Transparency	Alex Becker
	Officer Wellness & Support	Brandi Burque
	Attorney, Use of Force; Data Collection, Analysis & Management	Meredith DeCarlo
	Use of Force; Data Collection, Analysis & Management	Terry Gainer
	Attorney, Community Policing; Impartial Policing	Kaila Clark
	Attorney, Crisis Intervention	Brian Hamilton
	Community Policing; Crisis Intervention	Bruce Johnson
	Training	Blake McClelland
	Attorney, Officer Wellness and Support; Supervision	Sarah Oligmueller
	Community Policing	Hildy Saizow
	Attorney, Accountability & Transparency	Kylie Wood
	Supervision; Recruitment, Hiring & Promotions	Tom Woodmansee
Monitoring Team Support	Analyst for Accountability & Transparency	Bridgette Bryson
	Analyst for Officer Wellness & Support	Jessica Dockstader
	Project Manager, Analyst for Use of Force	Vivian Elliot
	Analyst for Community Policing	Tammy Felix
	Analyst for Supervision	Monique Jenkins
	Analyst, Crisis Intervention	Heleana Melendez
	Deputy Project Manager, Analyst for Recruitment, Hiring & Promotions	Keri Richardson
	Analyst for Training	Valerie Schmitt
	Analyst for Data Collection, Analysis & Management	Gentry Schaffer
	Analyst for Impartial Policing	Christopher Sun

The IMT's Community Engagement Team Activities

The IMT's Community Engagement Team plays a critical role by monitoring levels of trust and sentiment among the stakeholders to the Consent Decree—the members of Chicago's communities. The IMT's Community Engagement Team includes experienced Chicago community members, experts in police-community relations, lawyers, and academic scholars. These team members work together to meaningfully engage Chicago's communities and ensure that community members participate throughout the monitoring process. The Community Engagement Team also works closely with the Monitor, Deputy Monitors, and Associate Monitors to assess the community components of compliance with the Consent Decree.

The IMT's Community Engagement Team's work is vital to measure compliance with specific policy, training, and procedural changes required by the Consent Decree. The City and the CPD do not function effectively when they lack trust from the communities they serve. In its 2017 report, the DOJ found that the impacts of the "CPD's pattern or practice of unreasonable force fall heaviest on predominantly black and Latino neighborhoods."[27] The DOJ also found that people in many neighborhoods in Chicago lack confidence that "their police force cares about them and has not abandoned them, regardless of where they live or the color of their skin."[28]

Effective policing requires both (1) procedural and cultural change and (2) improved relationships between the City and the CPD and the communities they serve. The Community Engagement Team encourages improved relationships based on respect, trust, and partnership and emphasizes how relationships may be strengthened by transparency and accountability.

The IMT's Community Engagement Team performs two key tasks regarding the Consent Decree monitoring process: (1) gathering input from Chicago residents about their concerns regarding CPD policies and practices, and (2) providing information to the Chicago community about the IMT's activities and findings.

We sought to hear sentiments from a broad range of Chicagoans during this reporting period. For example, we co-hosted a public status hearing with Judge Robert M. Dow on April 19, 2022, which was streamed live. At the hearing, Independent Monitor Hickey provided an overview of our most recent Independent Monitoring Report.

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[27] DOJ Civil Rights Division and United States Attorney's Office Northern District of Illinois, *Investigation of Chicago Police Department* (January 13, 2017) at 15, *available at* http://chicagopoliceconsentdecree.org/wp-content/uploads/2018/01/DOJ-INVESTIGATION-OF-CHICAGO-POLICE-DEPT-REPORT.pdf.

[28] *Id.* at 4.

We also held two Virtual Listening Sessions co-hosted by partner community organizations during this reporting period. On February 16, we co-hosted with the Hispanic Lawyers Association of Illinois, Pilsen Law Center, Business and Professional People for the Public Interest (BPI), Lawndale Christian Legal Center, and Illinois Latino Agenda. On May 19, we co-hosted with Alliance of Local Service Organizations, Kenwood Oakland Community Organization, and Precious Blood Ministry of Reconciliation. About 50 people attended each session and shared their thoughts and concerns with Independent Monitor Maggie Hickey, Deputy Monitor Rodney Monroe, and members of the IMT's Community Engagement Team.

Background Figure 3:
IMT Virtual Listening Session Flyers (February 16, 2022, and May 19, 2022)

We also issued periodic newsletters, emails, and press releases—in July, and October—to update community stakeholders on our monitoring activities.[29] *See* Background Figures 5 and 6, below.

[29] The IMT's newsletters are available online. *See, e.g.*, *Help Reform the Chicago Police Department - Community Newsletter*, INDEPENDENT MONITORING TEAM (April 2020), https://cpdmonitoringteam.com/wp-content/uploads/2020/05/April-2020_IMTCommunityNewsletter-7.pdf;

Background Figure 5: IMT Newsletter (February 11, 2022)

Independent Monitoring Team | Chicago Police Department Consent Decree

An Update from Monitor Maggie Hickey

want to make you aware of a new opportunity to voice your houghts about the Chicago Police Department and be part of he solution.

he Chicago Police Department is asking for public comment n its new draft of a Foot Pursuit Policy. The department pened a 15-day public comment period on February 10, 022. You have until February 25, 2022, to add your feedback.

Just click on the link below to comment on the draft policy.

Comment on the Foot Pursuit Policy

You can also read the Chicago Police Department's news release that explains how the CPD plans to use your critical input as it finalizes the policy.

CPD's News Release on the Foot Pursuit Policy

Your voice is a crucial part of the reform process. Stay tuned for future opportunities to get involved.

Sincerely,

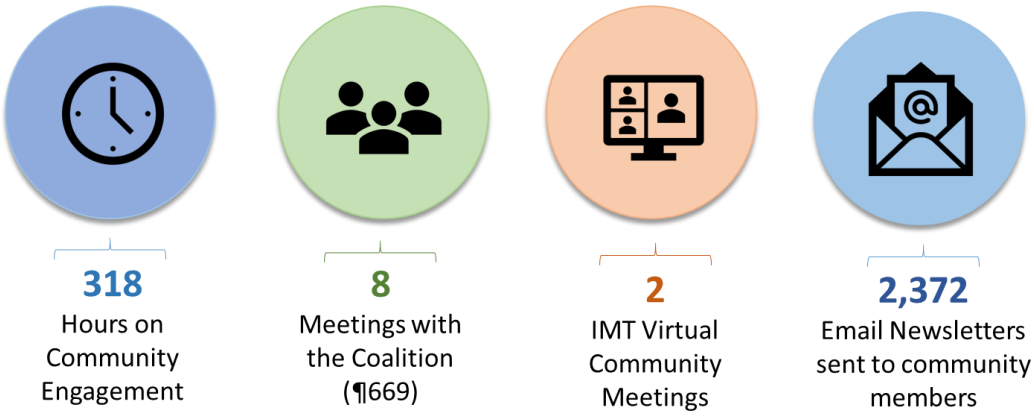
Maggie Hickey
Independent Monitor
www.cpdmonitoringteam.com

Federal Court Listening Sessions – Community Newsletter, INDEPENDENT MONITORING TEAM (August 2020), https://cpdmonitoringteam.com/wp-content/uploads/2020/12/IMT-Newsletter-Issue-3-August-2020.pdf; *Independent Monitoring Team Conducts Community Survey – Community Newsletter*, INDEPENDENT MONITORING TEAM (November 2020), https://cpdmonitoringteam.com/wp-content/uploads/2020/12/IMT-Newsletter-Issue-4-November-2020.pdf.

Background Figure 6: IMT Newsletter, April 12, 2022

Throughout this reporting period, the Community Engagement Team attended many community meetings across Chicago, including meetings with the Coalition (*see* ¶669) and community-based organizations. We summarize some of the Community Engagement Team's efforts in Background Figure 7 below.

Background Figure 7: IMT Community Engagement Efforts



Community Focus Group Report

Per ¶¶645–46, the IMT conducts a "reliable, representative, and comprehensive" surveys of a broad cross-section of members of the Chicago community regarding CPD" every other year. Accordingly, the IMT conducted a large-scale probability sample survey in Year One of the Consent Decree. The survey included the responses of over 1,000 Chicagoans, as well as an additional group of over 350 young Black men, age 18–25, which is the population subgroup with the most frequent

contact with the CPD. Results of this survey were summarized in *Special Report: Community Survey Report (November 2019 – February 2020)* (*2020 IMT Community Survey)*, filed in August 2020.[30] We have completed the data collection for Year Three's large-scale probability sample survey, and will present the results in a similar Community Survey Report later this year.[31]

Because the IMT believes that hearing community voices consistently throughout the monitoring process is crucial, we will undertake special studies of Chicago's communities during the years we are not conducting the ¶¶645–51 community surveys. Between December 2020 and June 2021, the IMT conducted focus groups with Black and Latino men between the ages of 15 and 35. Focus groups with Black and Latina women began in 2021 and are ongoing.

The IMT's first special study summarized the results of focus groups with Black and Latino men conducted December 2020 through June 2021.[32] The focus groups served as a qualitative complement to some of the key findings from our first citywide, representative survey. Specifically, the *2020 IMT Community Survey* reflected that young Black and Latino men in Chicago report having the highest frequency of contact with police and the most negative perception of police and lowest levels of trust in police. The specific feedback we received from the focus groups is not meant to be representative of the experiences, opinions, and perspectives of all young Black and Latino men in Chicago. But much of what was indicated by participants was consistent with what we learned from this population in the *2020 IMT Community Survey*.

The information from the focus groups goes beyond the *2020 IMT Community Survey* by providing additional context regarding why some members of these populations have more negative perceptions of police and lower levels of trust in police. As the City and the CPD continue their compliance efforts, it is our hope that the CPD considers the serious issues, concerns, and recommendations raised by the focus-group participants.

According to feedback from focus-group participants, the cumulative effect of repeated negative personal experiences with officers significantly hinders trust-building. Some participants described that communities need police, but distrust was among the strongest theme in terms of the forcefulness and frequency of responses from focus-group participants. Some participants recounted situations in

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30 *See Community Survey*, INDEPENDENT MONITORING TEAM (August 26, 2020), https://cpdmonitoringteam.com/wp-content/uploads/2020/08/2020_08_26-Community-Survey-Filed.pdf.

31 *See also Special Report: Focus Groups with Black and Latino Men, Ages 18–35 (Conducted December 2020 – June 2021)*, INDEPENDENT MONITORING TEAM (September 1, 2022), https://cpdmonitoringteam.com/overview/reports-and-resources/imt-special-report-focus-groups-with-black-and-latino-men-ages-18-35/.

32 We note that under ¶665 of the Consent Decree, which gives the IMT the authority to "prepare written reports on any issue or set of issues covered by the [Consent Decree]."

which they believed the police were ineffective, failed to take action, arrived too late to be helpful, or did not respond at all. Participants who described these situations often felt that the CPD was unresponsive to the community.

Still, many participants reported having repeated, frequent involuntary contact with police, and some participants indicated having up to 30 involuntary interactions with police in the past year. Many participants described incidents that involved a similar pattern: a traffic stop of a young adult man in a vehicle for a minor non-moving violation—such as a hanging air freshener or the degree of a window tint—followed by a perceived improper search of the vehicle, and after the search does not turn up anything, there is no citation for the initial infraction.

Moreover, consistent with the *2020 IMT Community Survey*, many participants reported that officers frequently take out and point guns at them during these interactions. Some participants said that they believe officers take out or point guns because officers feel afraid of a real or perceived threat or because officers want to force compliance, demonstrate authority, or instill fear. Much of the feedback focus-group participants provided involved a range of experiences, occurring across their lives, which demonstrates that interactions with police that community members perceive to be negative can have a lasting impact on trust and legitimacy.

During these focus groups, some participants provided recommendations on how the CPD could improve relationships in their neighborhoods, including the need for internal police reform, accountability, recruitment, improved training, and increased quality and quantity of non-enforcement-related social engagement with communities. The recommendations provided by focus-group participants also tracked closely with many requirements of the Consent Decree, including accountability (*see, e.g.,* Consent Decree ¶¶155–56, 217, 236, 342–43, 420, and 422), recruitment (*see, e.g.*, Consent Decree ¶¶249–51); disciplinary action (*see, e.g.*, Consent Decree ¶¶444, 449, and 501); training (*see, e.g.,* ¶¶272, 275, and 317); and treating all people equally and with respect (*see, e.g.*, Consent Decree ¶¶54–56, 85, 156, 161, and 346). The Consent Decree also highlights the need to consistently provide "CPD members with the resources and support they need" to meet these commitments, "including improved training, supervision, and wellness resources." Consent Decree ¶6.

The overarching implication of these focus group results is that the CPD continues to have serious work ahead to improve trust and confidence in the CPD. The IMT looks forward to completing our conversations with Black and Latina women focus group participants, analyzing the data, and producing our special report on what we learn.

Get Involved

The Community Engagement Team works to connect with neighborhoods, community groups, religious organizations, activists, advocates, and residents across the city. The Community Engagement Team encourages community members to participate in meetings and to promote these sessions through their social and other networks. We regularly update the Community Involvement section of the IMT website with details on upcoming community meetings and events. If your neighborhood or community group would like to invite a Community Engagement Team member to a meeting, please email us at contact@cpdmonitoringteam.com or fill out a feedback form on our website (https://cpdmonitoringteam.com/feedback-form/).

We encourage community members to provide input on CPD policies. When the CPD modifies or creates applicable policies, it will post them on its website so that community members can provide input: https://home.chicagopolice.org/reform/policy-review/.

Community members may also participate in the monitoring process in the following ways:

- Attend our public meetings listed on our website;
- Complete an input form on our website; and
- Reach out to the IMT or members of our Community Engagement Team (see below).

Contact the Independent Monitoring Team

Community members can reach out to the entire IMT via email:

- contact@cpdmonitoringteam.com

Community members can also contact individual members of our Community Engagement Team:

- Elena Quintana (Elena.Quintana@cpdmonitoringteam.com)
- Joe Hoereth (Joe.Hoereth@cpdmonitoringteam.com)
- Laura McElroy (Laura.McElroy@cpdmonitoringteam.com)
- Steve Rickman (Stephen.Rickman@cpdmonitoringteam.com)
- Denise Rodriguez (Denise.Rodriguez@cpdmonitoringteam.com)

Learn more at the Contact Us page on our website (https://cpdmonitoring-team.com/contact-us/).

Community members can also use the Feedback Form on our website to provide input (https://cpdmonitoringteam.com/feedback-form/).

Compliance Activities and Assessments

This section provides an overview of compliance efforts for the sixth reporting period. We begin by explaining our priorities for the sixth reporting period that we described in our Monitoring Plan for Year Three. We include an overview of the assessment process and the deadlines within the sixth reporting period. We then provide summaries for the period, including summaries of our activities and of the City's achievements and challenges. Finally, we summarize the relevant compliance efforts for each topic area of the Consent Decree; provide a more specific analysis for each Consent Decree paragraph with a deadline before June 30, 2022; and summarize status updates for other paragraphs.

The IMT's Methodologies during the Reporting Period

While most of this report addresses the City's efforts to meet the Consent Decree's requirements, the following subsection details the IMT's methodologies and activities in the sixth reporting period (January 1, 2022, through June 30, 2022).

In the sixth reporting period, we continued to meet regularly with representatives from the City, the City's relevant entities, the OAG, and members of Chicago's communities, including members of the Coalition (*see* ¶669). This included meetings with the CPD and the Superintendent (*see* ¶668), settlement conferences, and site visits.

At the beginning of the Consent Decree process, the City; the CPD; COPA; the Chicago Police Board; the City Office of Inspector General, including the Deputy Inspector General for Public Safety (Deputy PSIG); and the Office of Emergency Management and Communications (OEMC) worked to create open lines of communications.

Building on the efforts made in the previous reporting periods, these communications continued throughout the sixth reporting period. The communications included regularly scheduled meetings (*see, e.g.*, ¶¶668, 669), including regular meetings for each Consent Decree topic area. Specifically, we met consistently with, among others, members of the CPD, COPA, the City Office of Inspector General, the Police Board, and the OEMC, and reviewed thousands of City documents.[33]

A significant portion of our conversations involved discussing our methodologies for assessing the City's compliance with the Consent Decree. *See, e.g.*, ¶655. For the IMT, these discussions highlighted the importance of maintaining flexibility in

[33] The OAG has engaged in much of the same work and provided separate feedback to the City and the CPD.

our methodologies throughout the monitoring process. This flexibility ensures that our monitoring efforts continue to meet the letter and spirit of the Consent Decree, as the Parties and the IMT develop necessary information, learn from previous efforts, and identify unanticipated hurdles. *See, e.g.*, ¶717. Changed circumstances may require the IMT to consider fewer, more, or alternative sources of information. As a result, our methodologies may adjust based on ongoing consultation with the Parties, as we continue to identify and consider new information and data that is relevant to the Consent Decree. We endeavor to supplement our methodologies with additional specificity throughout this report. During this reporting period, like all prior reporting periods, the IMT discussed the methodologies with the Parties before implementation and prior to conducting its audits and reviews for this report, acknowledging their concerns, and making adjustments for clarity.

Finally, in addition to making these efforts, the IMT continued to adhere to several specific and ongoing requirements of the Consent Decree. Background Figure 7, below, summarizes our compliance with the Consent Decree's deadlines for the IMT in the sixth reporting period.

Background Figure 7: IMT Deadlines in the Sixth Reporting Period

¶s	Requirement	Deadline	Sixth Reporting Period Deadlines
627–37	Review of CPD Policies and Procedures	Various, Ongoing	Corresponds with policy deadlines
638–41	Review of Implementation Plans and Training Materials	Various, Ongoing	Corresponds with plan and training deadlines
642–44	Compliance Reviews and Audits	Various, Ongoing	Occur during each reporting period
652–55	Review Methodologies	45 Days prior (and every reporting period)	May 16, 2022
656	Technical Assistance and Recommendations	Ongoing	Ongoing
668	Maintain Regular Contact with the Parties	Ongoing	Monthly
669	Monitor will Participate in Meetings with the Coalition	Quarterly	Quarterly
670–71	Communication with the Parties, Collective Bargaining Representatives, and the Public	Ongoing	Ongoing

Sixth Reporting Period Priorities

We set out our priorities for the sixth reporting period in our Monitoring Plan for Year Three.[34] Throughout the sixth reporting period, we were monitoring compliance with those paragraphs to match the pace of the five-year goal described in the Consent Decree. As explained above, in the sixth reporting period, the Parties entered a stipulation, which extends the pace of the Consent Decree to eight years.[35]

Assessing Compliance

Overall, in accordance with ¶¶661–62 and 642, the IMT assesses how the City, the CPD, and other City entities comply with each paragraph of the Consent Decree in three successive levels: **(1) Preliminary compliance**, **(2) Secondary compliance**, and **(3) Full compliance**. The CPD and other City entities will not be "in compliance" with a requirement until they reach Full compliance for the requisite length of time required by the Consent Decree—either one or two years. *See* ¶714. We will assess the City's compliance on all appropriate levels for the paragraphs presented in this report.

- **Preliminary compliance** typically refers to the development of acceptable policies and procedures that conform to best practices (as defined in ¶730) and to the incorporation of requirements into policy (¶642). The IMT will assess the development of policies, procedures, rules, and regulations reasonably designed to achieve compliance. To attain Preliminary compliance, the City must have policies and procedures designed to guide officers, City employees, supervisors, and managers performing the tasks outlined in the Consent Decree. These policies and procedures must include appropriate enforcement and accountability mechanisms, reflect the Consent Decree's requirements, comply with best practices for effective policing policy, and demonstrate the City and its relevant entities' ability to build effective training and compliance.

- **Secondary compliance** typically refers to the development and implementation of acceptable and professional training strategies (¶642). Those strategies

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[34] The IMT's Monitoring Plan for Year Three is available on the IMT's website. *See Reports and Resources*, INDEPENDENT MONITORING TEAM (July 3, 2019), https://cpdmonitoringteam.com/wp-content/uploads/2020/07/2020_07_03-Monitoring-Plan-for-Year-Two-filed.pdf. Given the varying workloads of separate departments and personnel, the City and its relevant entities may make compliance efforts earlier than anticipated. When appropriate, we may also assess those efforts in our monitoring reports earlier than anticipated.

[35] *See Stipulation Regarding Search Warrants, Consent Decree Timelines, and the Procedure for "Full and Effective Compliance," Illinois v. Chicago*, Case No. 17-cv-6260 (March 25, 2022), https://cpdmonitoringteam.com/wp-content/uploads/2022/03/2022.03.25-Stipulation-Regarding-Search-Warrants-Consent-Decree-Timelin.._.pdf.

must convey the changes in policies and procedures that were established when we determined Preliminary compliance. Secondary compliance also refers to creating effective supervisory, managerial, and executive practices designed to implement policies and procedures as written (¶730). The IMT will review and assess the City's documentation—including reports, disciplinary records, remands for retraining, follow-up, and revisions to policies, as necessary—to ensure that the policies developed in the first stage of compliance are known to, are understood by, and are important to line, supervisory, and managerial levels of the City and the CPD. The IMT will be guided by the ADDIE model (Analysis, Design, Development, Implementation, and Evaluation) of curriculum development to assess training and will consider whether there are training, supervision, audit, and inspection procedures and protocols designed to achieve, maintain, and monitor the performances required by the Consent Decree.

- **Full compliance** refers to adherence to policies and training within day-to-day operations (¶642). Full compliance requires that personnel, including sergeants, lieutenants, captains, command staff, and relevant City personnel routinely hold each other accountable for compliance. In other words, the City must "own" and enforce its policies and training and hold officers accountable for misconduct through a disciplinary system that is fair, timely, and consistent. The IMT will assess whether the City's day-to-day operations follow directives, policies, and training requirements. When measuring Full compliance, we will note whether supervisors notice, correct, and supervise officer behavior and whether appropriate corrections occur in the routine course of business. In this phase, we will review whether compliance is reflected in routine business documents, demonstrating that reforms are being institutionalized. In addition, we will determine whether all levels of the chain of command ensure consistent and transparent compliance.

These levels typically correspond with whether the City or its relevant entities have (1) created a compliant policy, (2) adequately trained personnel on that policy, and (3) successfully implemented the policy reform in practice. Still, the three compliance levels often apply differently to various paragraphs. For some paragraphs, for example, Preliminary compliance may refer to efforts to establish the requisite training rather than to create a policy. Likewise, to reach and sustain Full compliance, the City may need to create a policy to ensure that it provides training consistently, as appropriate. In other circumstances, levels of compliance may include implementing effective pilot programs before rolling out reforms across the entire CPD.

Throughout this report, we provide our compliance assessments and descriptions of the status of current compliance based on efforts within the sixth reporting period. Under the Consent Decree, the City, the CPD, and other relevant City entities

are not in any level of compliance until we find that they comply. As a result, a finding that the City is not in compliance with a requirement does not mean that the City has not made efforts—even significant efforts—to achieve compliance toward that requirement.

In accordance with ¶¶661–62 and 642, we assess how the City, the Chicago Police Department (the CPD), and other City entities comply with each paragraph of the Consent Decree in three successive levels: (1) Preliminary compliance, (2) Secondary compliance, and (3) Full compliance. Typically, these levels correspond with whether the City or its relevant entities have (1) created a compliant policy, (2) adequately trained personnel on that policy, and (3) successfully implemented the policy reform in practice. The three compliance levels often apply differently to various paragraphs. For some paragraphs, for example, Preliminary compliance may refer to efforts to establish the requisite training rather than to create a policy. Still, to reach and sustain Full compliance, the City may need to create a policy to ensure that it provides training consistently, as appropriate.

Under the Consent Decree, the City, the CPD, and other relevant entities are not technically in compliance with any of the requirements of the Consent Decree until the City has provided sufficient proof to the IMT that the City, the CPD, or other relevant entities are complying. *See* ¶720. Even if the City has made significant efforts toward complying with a requirement, the City still has the additional burden of providing the IMT and the OAG with sufficient proof of its actions.

To reflect the City's and its relevant entities' progress through the Consent Decree process, for paragraphs under assessment in the sixth reporting period, we have added specific categories for each of the three levels of compliance, as appropriate:

- **In Compliance.** Based on the City's evidence, the City has met a level of compliance with a requirement of the Consent Decree.

- **Under Assessment.** Based on the City's evidence, the IMT is still assessing whether the City has met a level of compliance with a requirement of the Consent Decree. This may occur, for example, when the City's efforts do not cleanly overlap with a reporting period.

- **Not in Compliance.** Based on the City's evidence, the City has not met a level of compliance with a requirement of the Consent Decree.

- **Not Yet Assessed.** The IMT has not yet assessed whether the City has met this level of compliance with a requirement of the Consent Decree. This may occur, for example, when the IMT is still assessing a lower level of compliance, or the City has not met a lower level of compliance.

I. Community Policing

Guiding Principles

The IMT assessed whether the City complied with applicable Community Policing paragraphs in accordance with the Consent Decree's "Guiding Principles." These principles "are intended to provide the Court, the Monitor, and the public with the context for the subsequent substantive requirements" and "the overall goals" (¶757):

> ***8.*** *Strong community partnerships and frequent positive interactions between police and members of the public make policing safer and more effective, and increase public confidence in law enforcement. Moreover, these partnerships allow police to effectively engage with the public in problem-solving techniques, which include the proactive identification and analysis of issues in order to develop solutions and evaluate outcomes.*
>
> ***9.*** *To build and promote public trust and confidence in CPD and ensure constitutional and effective policing, officer and public safety, and sustainability of reforms, the City and CPD will integrate a community policing philosophy into CPD operations that promotes organizational strategies that support the systematic use of community partnerships and problem-solving techniques.*
>
> ***10.*** *CPD will ensure that its community policing philosophy is a core component of its provision of police services, crime reduction strategies and tactics, training, management, resource deployment, and accountability systems. All CPD members will be responsible for furthering this philosophy and employing the principles of community policing, which include trust and legitimacy; community engagement; community partnerships; problem-solving; and the collaboration of CPD, City agencies, and members of the community to promote public safety.*
>
> ***11.*** *The City and CPD are committed to exploring diversion programs, resources, and alternatives to arrest.*

Summary of Compliance Efforts and Assessments

Community Policing in the Sixth Reporting Period

In the sixth reporting period, the CPD struggled to make progress in addressing community policing Consent Decree requirements due to staffing challenges, balancing workloads, and managing competing priorities. In many instances, training requirements relating to policy development and enhancements were not completed as planned, and youth policy governing their interactions with the CPD continued to be delayed due to continued discussions and lack of consensus among local officials and stakeholders. However, despite these challenges, the CPD made some progress by further refining its District- and Bureau-wide strategy development processes including providing greater opportunities for community input. The CPD, in conjunction with the Chicago Public Schools (CPS), also firmly established the newly revised School Resource Officer (also known SRO) program by implementing policy changes in selection processes and providing robust initial and in-service training to School Resource Officer staff.

For this reporting period, the IMT reviewed, among other things, draft policy documents, training curricula and training records, and observed community meetings. The IMT also regularly met with the CPD's Office of Constitutional Policing and Reform staff covering a range of topics and issues regarding achieving compliance with the Community Policing section of the Consent Decree. Toward the end of the reporting period, the IMT conducted a field visit and met with school officials and School Resource Officers in the 25th District and held in person discussions with the CPD's District Coordination Officers (also known as DCOs), Chicago Alternative Policing Strategy (CAPS) liaison officers assigned to work with various affinity groups, and District Commanders in the 16th, 10th, and 6th Districts. During the field visit, the IMT also took part in a ride-along in the 6th District.

The CPD and the Chicago Public Schools (CPS) together completed delivery of their two-part in-service training for School Resource Officers. Recently enacted School Resource Officer policies were implemented with new selection criteria guiding School Resource Officer placements. The additional trainings and implementation of updated policies aligns the CPD School Resource Officer program with national best practices. A recent visit to a Chicago high school and discussions with school officials and School Resource Officers revealed great value and deep appreciation for the roles School Resource Officers play in promoting a safer and more positive school environment. Each officer articulated that recent training benefited their understanding of their roles and responsibilities. Local Districts will again have opportunities to request School Resource Officers be assigned to their schools or choose other school-safety options. The CPD also finalized revisions and delivered in-service community policing training to nearly all its members.

The CPD is making some efforts to clarify and coordinate the roles and responsibilities for their District Coordination Officers and Chicago Alternative Policing Strategy (CAPS) officers. In the districts visited during our site visit, the IMT found that CAPS officers now often serve as liaisons to affinity groups while the District Coordination Officers follow up on certain calls for service requiring follow-up responses and more community problem solving. In several of the districts the IMT visited, the IMT found that the CPD staff deeply engaged in problem-oriented policing and proactively connecting community members to services. The IMT also observed officers' commitment to identifying innovative ways to help resolve neighborhood and family issues, applying and integrating community policing principles in their everyday activity, and doing their best to mitigate the trauma of street violence. While the Neighborhood Policing Initiative (NPI) has yet to be implemented in many police Districts, these officers represent a hopeful future for broader implementation of community policing practices and a shift in the policing culture within the CPD. We continue to push the CPD to clearly articulate how CAPS and the Neighborhood Policing Initiative coordinate and collaborate, which they have not yet done.

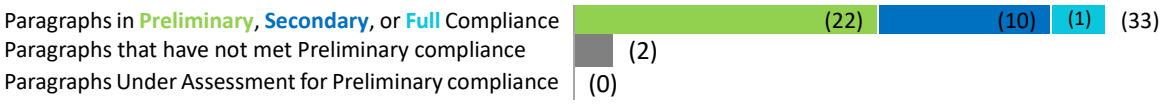
The CPD's training efforts fell short of expectations in several areas, most notably those related to juvenile arrest processing and for domestic violence. Staffing deficiencies also affected progress in expanding the Neighborhood Policing Initiative to other Districts and filling community ambassador positions in current Neighborhood Policing Initiative programming. Most concerning are the continued delays in finalizing the youth policy governing the CPD's interactions with youth and addressing the issues for diversion and deflection. This lack of formal policy is slowing efforts and delaying much needed reform in the CPD's interaction with youth. The workloads and staffing deficiencies in the CPD's Office of Constitutional Policing and Reform and the CPD's District community policing offices are undermining efforts to address requirements in the paragraphs comprising this section. The IMT hopes that the CPD will address these staffing imbalances and deficiencies soon to enhance compliance efforts in the community policing section of the Consent Decree.

While the CPD continues to make refinements and improvements in its community engagement processes concerning strategy development and policy and training development, community stakeholders still often report that their input is not seriously considered. The CPD also launched a major initiative during this reporting period to achieve 1.5 million "positive community interactions" (also known as PCIs). These efforts suffered from inadequate guidance and training, with a policy directive developed well after launching the initiative. The CPD's lack of a broader and more comprehensive engagement strategy that encapsulates the range of CPD engagement activities adversely affects efforts to build trust with community members and undermines other partnership building and collaborative policing efforts.

Updated Compliance Levels for the Sixth Reporting Period:

Overall, the IMT assessed the City's compliance with 35 Community Policing paragraphs in the sixth reporting period (¶¶13–20 and 22–48). The City and the CPD maintained Preliminary compliance for 20 paragraphs (¶¶18–20, 22–25, 27, 29, 31, 34–36, 38, 41–42, and 45–48), met Preliminary compliance with two paragraphs (¶¶16–17), maintained Secondary compliance for four paragraphs (¶¶26, 28, 30, and 43), met Secondary compliance for six paragraphs (¶¶13–15, 37, and 39–40), and maintained Full compliance with one paragraph (¶44). The City did not reach Preliminary compliance in the two other paragraphs (¶¶32–33). *See* Community Policing Figure 1 below.

Community Policing Figure 1: Compliance Progress for Community Policing Paragraphs at the End of the Sixth Reporting Period (June 30, 2022)



Community Policing Progress through Six Reporting Periods

Since the start of the Consent Decree, the City and the CPD have made progress toward compliance with various requirements of the Community Policing section of the Consent Decree. For some requirements, however, the City and the CPD's progress either slowed or stalled in the fifth and sixth reporting periods due to, among other things, limited resources and changing priorities. For example, through the sixth reporting period nine paragraphs—or nearly 25% of this section—the CPD and the City reported delays due to "balancing workload," often relating to the strategic redeployments to increase police presence in select areas.

While the CPD's workloads, staffing, and priorities remain a concern for the IMT, we acknowledge that the City and the CPD have invested considerable effort in retooling its engagement processes. During the fifth reporting period, for example, the City established a Community Safety Coordination Center to coordinate resources, staff, funding, and information to engage residents and organizations across Chicago's communities. In a public safety cabinet presentation, the City unveiled a public-health-inspired model to address root causes of violent crime and social disorder, that aims to leverage and coordinate public and private resources, embracing core principles of community policing. The City's efforts have included establishing by-laws, expanding membership for District Advisory Councils, and modifying processes for its strategy development and review. The City and the CPD also continued broadening the Neighborhood Policing Initiative, which enhances

community-policing outreach at the district-level. The partnership-driven approach is also demonstrated in the deployment of District Coordination Officers, the assignment of community liaisons to engage and work with marginalized communities, and the ongoing training of officers in community policing concepts and practices.

Perhaps most notably, the City, the CPD, and Chicago Public Schools established and implemented "Whole School Community Safety Plans" with intensive community collaboration and engagement directed, in part, by community-based organizations. During the sixth reporting period, Chicago Public Schools worked directly with community-based organizations to assist in outreach and were able to effectively engage community members to reach a consensus about School Resource Officer programming, setting an example for the City and the CPD. The Whole School Community Safety Plans provided guidance to reduce the number of onsite SROs in some schools and implement a more multi-disciplinary approach to school safety. Because of the finalized School Resource Officer selection and screening criteria—and expansive training for School Resource Officers—the CPD is now developing one of the most advanced School Resource Officer programs in the nation.

Over time, the City and the CPD have expanded the scope of district-wide crime-reduction and community-engagement strategies, using focus groups, working groups, and listening sessions to gauge community input on major policy formulations. Some community stakeholders and District Advisory Committee members have continued to raise concerns that their voices are often not heard and that the CPD does not seriously consider their feedback. The City and the CPD must continue to partner with community-based organizations to directly help with engagement efforts, in addition to improving effectiveness of working groups, focus groups and listening sessions.

The City and the CPD leadership will need to make critical decisions and investments to advance reform efforts regarding at-risk youth interactions with police and the justice system. Policies and programs must achieve multiple goals, including advancing community safety, further minimizing youth involvement in criminal justice system, building trust with this demographic, curtailing future criminal behavior—and consequently, meet the related Consent Decree requirements.

Through six reporting periods, the City and the CPD have committed several reforms from the Community Policing section into various policies and written guidance. Community Policing Figure 3, below, provides a sample of those policies.

Community Policing Figure 3: Sample of New or Revised Policies related to the Community Policing Section (between March 1, 2019, and June 30, 2022)[36]

	Policy #	Issue Date
❖ *Community Engagement in Policy Development* (NEW)	G01-03-01	05/28/2022
❖ *School Resource Officers and Investigations at Chicago Public Schools* (NEW)	S04-01-02	05/19/2022
❖ *Positive Community Interactions* (NEW)	S02-03-15	04/07/2022
❖ *District Strategic Plans* (NEW)	S02-03-02	03/31/2022
❖ *Community Policing Mission and Vision General Order*	G02-03	12/31/2021
❖ *Pre-Service Training Special Order*	S11-10-02	12/29/2021
❖ *In-Service Training Special Order*	S11-10-03	12/29/2021
❖ *School Resource Officers and Investigations at Chicago Public Schools Special Order*	S04-01-02	12/17/2021
❖ *Neighborhood Policing Initiative*	D21-04	6/30/2021
❖ *The Community Policing Office Special Order*	S02-03	6/30/2021
❖ *Crime Victim Assistance Special Order*	S02-01-03	6/10/2021
❖ *CPD's Community Policing Advisory Panel (CPAP) Quarterly Report Standard Operating Procedure*	n/a	1/1/2021
❖ *District Advisory Committee*	S02-03-14	12/31/2020
❖ *Bridging the Divide Special Order*	S02-03-12	12/31/2020
❖ *Officer Friendly Program Special Order*	S02-03-11	12/31/2020
❖ *Community Policing Business Public-Safety Initiative*	S02-03-13	12/31/2020
❖ *Social Media Outlet: Twitter Special Order*	S02-03-10	12/31/2020
❖ *Trespass Affidavit Special Order*	S02-03-09	12/31/2020
❖ *Gun Turn-In Special Order*	S02-03-08	12/31/2020
❖ *G.R.E.A.T. Program Special Order*	S02-03-07	12/31/2020
❖ *D.A.R.E. Program Special Order*	S02-03-06	12/31/2020
❖ *Ride Along Program Special order*	S02-03-04	12/31/2020
❖ *Community Concerns*	S02-03-03	12/31/2020
❖ *Beat Community Meetings*	S02-03-01	12/31/2020
❖ *Preliminary Investigations*	G04-01	12/30/2020

[36] Many of these policies are available online in the CPD's Department Directives System. *See Department Directives System*, CHICAGO POLICE DEPARTMENT, https://home.chicagopolice.org/inside-cpd/department-directives-system-dds/.

	Policy #	Issue Date
❖ *Processing of Juveniles and Minors Under Department Control*	S06-04	2/29/2020

Through six reporting periods, the City and the CPD have also developed or updated training materials to incorporate requirements from the Community Policing section. Community Policing Figure 4 provides a sample of training materials related to Community Policing that were developed or revised since the start of the Consent Decree.[37]

Community Policing Figure 4: Sample of New or Revised Trainings Materials related to the Community Policing Section (between March 1, 2019, and June 30, 2022)[38]

New or Revised Community Policing Related Training Materials (between March 1, 2019, and June 30, 2022)	Date
❖ *Community and Affinity Liaisons Training* (NEW)	2022
❖ *School Resource Officer Community Group Training* (NEW)	2022
❖ *Community Policing In-Service Training* (NEW)	2022
❖ *In-Service Two-day De-escalation, Response to Resistance Training*	2022
❖ *Use of Force Training* (NEW)	2022
❖ *School Resource Officer Refresher Training (2021–2022)*	2021
❖ *Strategies for Youth Training (Policing the Teen Brain)*	2021
❖ *Neighborhood Policing Initiative Training*	2021
❖ *School Resource Officer Initial Training (2019–2020)*	2019

Looking Ahead to the Seventh Reporting Period

In the sixth reporting period, the City and the CPD made progress toward compliance with various requirements of the Community Policing section of the Consent Decree. Moving forward, we are hopeful that the City and the CPD will provide sufficient resources toward reforms related to the Community Policing section, including developing and implementing related policies, training, supervision mechanisms, and evaluation processes.

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[37] As detailed in Appendix 1 (Community Policing), the City and the CPD may still need to demonstrate that they effectively provided all these trainings to the requisite personnel.

[38] Some of these trainings may not have been provided to 95% of personnel at the time of this report.

As referenced above, the City and the CPD have made progress in this section by developing new or revised policies and training materials. The Consent Decree requires, however, additional policy changes. For example, at the end of the sixth reporting period, the City and the CPD continued developing the following new or revised policies:

- *CompStat and Command Engagement* G01-08
- *Community Partnership* S02-03-16
- *Youth District Advisory Council* S02-03-15
- *Field Arrest Procedures General Order* G06-01-01
- *Interactions with Youth General Order* (NEW) G02-05
- *Prohibition of Sexual Misconduct* (NEW) G02-05

The Consent Decree also requires additional training development, and at the end of the sixth reporting period, the City and the CPD continued developing the following new or revised training materials:

- Integration Training Curriculum for DCO's and Community Policing Members, Parts 1–5
- Crime Victim Assistance eLearning Lesson Plan/Training Curriculum
- Recruit Curriculum on Victim Services
- Training Curriculum (Recruit, In-Service & Pre-Service) covering "Arrestee and In-Custody Communication"
- Processing Juveniles eLearning and Bulletin (in-service)
- Juvenile Processing Training (recruits)
- 2023 Youth Interactions In-Service Training
- Roll Call Training related to Diversion Program Roll-Out
- Pre-Service Training on Youth Diversion
- Recruit Training on Youth Diversion
- SRO Annual Refresher Training

We will continue reporting on the finalized policies and training materials, as well as evidence that the City and the CPD have implemented these reforms into practice.

***

Specific compliance assessments, by paragraph, for the Community Policing section are included in Appendix 1.

II. Impartial Policing

Guiding Principles

The IMT assessed compliance with applicable Impartial Policing paragraphs in accordance with the Consent Decree's "Guiding Principles." These principles "are intended to provide the Court, the Monitor, and the public with the context for the subsequent substantive requirements" and "the overall goals" (¶757):

> ***49.*** *The Parties agree that policing fairly, with courtesy and dignity, and without bias is central to promoting broad community engagement, fostering public confidence in CPD, and building partnerships between law enforcement and members of the Chicago community that support the effective delivery of police services.*
>
> ***50.*** *In conducting its activities, CPD will provide police services to all members of the public without bias and will treat all persons with the courtesy and dignity which is inherently due every person as a human being without reference to stereotype based on race, color, ethnicity, religion, homeless status, national origin, immigration status, gender identity or expression, sexual orientation, socio-economic class, age, disability, incarceration status, or criminal history.*
>
> ***51.*** *CPD will ensure its members have clear policy, training, and supervisory direction in order to provide police services in a manner that promotes community trust of its policing efforts and ensures equal protection of the law to all individuals.*

Summary of Compliance Efforts and Assessments

Impartial Policing in the Sixth Reporting Period

In the sixth reporting period, the City and the CPD revised several policies relevant to the Impartial Policing section of the Consent Decree. Policies such as *Human Rights* (G02-01), *Prohibition of Racial Profiling* (G02-04), *Gender-Based Violence In-Service Training* (S11-10-03), and *Religious Interactions* (G02-01-05), were finalized during the reporting period enabling the City and the CPD to achieve Preliminary compliance. While the City and the CPD also made improvements to their community engagement processes related to community input on policy review and development, additional work is needed to demonstrate comprehensive and meaningful community engagement, including informing the community about

how their input impacted policy revisions. This is particularly true for the City and the CPD to move compliance forward with the requirements of ¶52. Additionally, as the City and the CPD achieve Preliminary compliance and move toward Secondary in a number of paragraphs within the Impartial Policing section, it must continue this focus on community engagement as it develops and revises related training.

The IMT also received a request for technical assistance regarding the development of the CPD's long-term community-engagement plan and policy during this reporting period. Much of the initial feedback from the IMT on these documents centered around developing a broader organizational community engagement strategy, establishing performance measures for the plan, and including community input in the development of this plan. Follow-up meetings to discuss further technical assistance on these and other related materials have been occurring in the seventh reporting period. The IMT looks forward to reviewing and collaborating with the CPD on the pending materials in future reporting periods to assess further levels of compliance with ¶52.

In the sixth reporting period, we conducted monthly check-ins with members of the CPD responsible for the Impartial Policing section, including members of the Office of Community Policing. Throughout the reporting period, the IMT continued to review CPD policies and training plans regarding the requirements of this section, including materials on topics such as sexual misconduct, hate crimes, gender-based violence, and search warrants. In addition, the IMT met with members of the Office of Community Policing—including the Community Engagement Coordinators, Language Access Coordinator (or LAC), and the Americans with Disabilities Act Liaison—to discuss progress and corresponding compliance initiatives. During these site visits, the IMT learned more about current and future initiatives, updates on the Language Line pilot, and challenges in analyzing related data and producing annual reports and plans due to personnel shortages.

Further, in the sixth reporting period, the City, the CPD, and the OAG agreed to include the CPD's search-warrant practices under the Consent Decree.[39] As clarified by the Stipulation, the City and the CPD must demonstrate that the search-warrant practices (1) are not unlawfully discriminatory or retaliatory and (2) occur in an unbiased, fair, and respectful manner. Specifically, the CPD must implement sufficient policies, training, data collection, supervision, and accountability systems to ensure that the CPD's planning for, internal approval processes for, execution of, and after-action review of search warrants are carried out in a manner that

[39] *See Stipulation Regarding Search Warrants, Consent Decree Timelines, and the Procedure for "Full and Effective Compliance," Illinois v. Chicago*, Case No. 17-cv-6260 (March 25, 2022), https://cpdmonitoringteam.com/wp-content/uploads/2022/03/2022.03.25-Stipulation-Regarding-Search-Warrants-Consent-Decree-Timelin.._.pdf.

fully complies with the Constitution and laws of the United States and the State of Illinois and are in accordance with best practices."[40]

The Search Warrant policy (S04-19) was subsequently provided to the IMT for review and comment. The IMT submitted its comments to the City and the CPD and we look forward to reviewing future iterations of related policies, training materials, and data in future reports.

Overall, the City and the CPD made minimal progress in many areas of Impartial Policing during this reporting period. As reflected in the Community Policing section above and noted in previous reporting periods, we attribute much of this delay to staffing issues and changing priorities—often changing away from compliance with the requirements of these sections. We continue to stress the impact of limited personnel resources within the Office of Community Policing on its efforts to be responsive to the Consent Decree and requirements of the paragraphs within Impartial Policing. Staff shortages have presented continued delays in the production of, for example, revised policies, development of related training, reviews of plans, and documentation of annual reports. In light of these staffing shortages, the IMT stresses the importance for the Office of Community Policing to prioritize activities and develop a strategic plan to comply with this section of the Consent Decree. While the IMT acknowledges the CPD's concerns over the rise in crime as of late, it continues to note, as it has in previous reports, that the CPD's community policing efforts—consistent with impartial policing—are ultimately critical to the City's and the CPD's overall crime-reduction. *See, e.g.*, ¶¶8 and 17. Focusing on specific crime-control strategies at the expense of community and impartial policing undermines each effort and negatively impacts the community's perception of the CPD's commitment to reform. To fully address these issues, the City and the

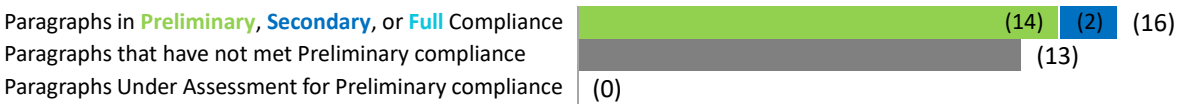
[40] The Parties further agree that the City and CPD must also continue to fulfill other Consent Decree requirements during the planning for, internal approval processes for, execution of, and after-action review of search warrants. The following is a non-exhaustive list of paragraphs that CPD must continue to comply with during the execution of warrants: ¶¶32 (regarding developmentally appropriate interactions with youth and children), 35 (regarding *Miranda* warnings for juveniles), 36 (regarding the use of handcuffs or other restraints on juveniles), 37 (regarding training on problem-solving tactics and effective communication/interpersonal skills), 156 (regarding use-of-force policies and training; supervision; and accountability systems), 157 (regarding the collection, analysis, and use of information on the use-of-force and de-escalation techniques by CPD members), 162 (regarding providing people with the opportunity to comply with lawful orders), 164 (regarding only using force that is objectively reasonable, necessary, and proportional), 189 (regarding pointing a firearm), 238 (regarding the need to record video and audio of law enforcement activities), 352 (regarding effective supervision requirements for all supervisors), 509 (regarding related Central Management System requirements), 546 (regarding annual report requirements), and 550 (regarding annual and quarterly report requirements).

CPD must incorporate comprehensive strategic planning that incorporates community and impartial policing principles.

Updated Compliance Levels for the Sixth Reporting Period

In this sixth reporting period, we assessed the City's compliance with all 31 of the Impartial Policing paragraphs (¶¶52–82)—with two of those paragraphs containing conditional requirements that did not apply to this reporting period (¶81–82).[41] The City maintained Preliminary compliance for nine paragraphs (¶¶52, 57, 61, 65–66, 70–71, 76, and 78), moved into Preliminary compliance for five paragraph (¶56, 59, 60, 74, 77), and maintained Secondary compliance for one paragraph (¶67) and moved into Secondary compliance for one paragraph (¶73). The City failed to reach Preliminary compliance for the remaining 13 paragraphs assessed (¶¶53–55, 58, 62–64, 68–69, 72, 75, and 79–80). *See* Impartial Policing Figure 1 below.

Impartial Policing Figure 1: Compliance Progress for Impartial Policing Paragraphs at the End of the Sixth Reporting Period (June 30, 2022)



Impartial Policing Progress through Six Reporting Periods

Through six reporting periods, the City and the CPD have committed some reforms from the Impartial Policing section into various policies and written guidance. Impartial Policing Figure 2, below, provides a sample of those policies.

[41] Specifically, because ¶¶79–82 are interrelated, we assessed their compliance together. Paragraph 82, however, does not contain a substantive requirement for the City. Likewise, ¶81 contains conditional requirements that may never apply and, at the time of this report, do not apply.

Impartial Policing Figure 2:
Sample of New or Revised Policies related to the Impartial Policing Section (between March 1, 2019, and June 30, 2022)[42]

	Policy #	Issue Date
❖ *Positive Community Interactions*	S02-03-15	6/7/2022
❖ *Interactions with Religious Communities*	G02-01-05	4/29/2022
❖ *Prohibition Regarding Racial Profiling and Other Bias Based Policing*	G02-04	11/15/2021
❖ *Protection of Human Rights*	G02-01	11/15/2021
❖ *Interactions with Transgender, Intersex, and Gender-Nonconforming Individuals (TGIN) Policy*	G02-01-03	6/30/2021
❖ *Positive Community Interactions*	S02-03-15	11/15/2021
❖ *Hate Crimes and Related Incidents Motivated by Bias or Hate*	G04-06	4/1/2021
❖ *Prohibition on Retaliation*	G08-05	12/30/2020

Through six reporting periods, the City and the CPD have also developed or updated training materials to incorporate requirements from the Impartial Policing section. Impartial Policing Figure 3 provides a sample of those training materials.[43]

Impartial Policing Figure 3:
Sample of New and Revised Trainings Materials related to the Impartial Policing Section (between March 1, 2019, and June 30, 2022)[44]

New or Revised Impartial Policing Related Training Materials (between March 1, 2019, and June 30, 2022)

- ❖ *Recruit Use of Force Training* (NEW)
- ❖ *Gender-Based Violence In-Service Training* (NEW)
- ❖ *Non-Bias Training*
- ❖ *Procedural Justice 3 Training Materials*
- ❖ *Sexual Assault Training and Knowledge Test*
- ❖ *2021 Two-Day De-Escalation, Response to Resistance, and Use of Force Training*

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42 Many of these policies are available online in the CPD's Department Directives System. *See Department Directives System*, CHICAGO POLICE DEPARTMENT, https://home.chicagopolice.org/inside-cpd/department-directives-system-dds/.

43 As detailed in Appendix 2 (Impartial Policing), the City and the CPD may still need to demonstrate that they effectively provided all these trainings to the requisite personnel.

44 Some of these trainings may not have been provided to 95% of personnel at the time of this report.

Looking Ahead to the Seventh Reporting Period

In the sixth reporting period, the City and the CPD continue to struggle to make significant progress with the Impartial Policing section of the Consent Decree. Moving forward, we are hopeful that the City and the CPD can provide sufficient resources toward reforms related to the Community Policing and the Impartial Policing sections.

The City and the CPD have, however, been developing new and revised policies and written guidance to make progress in this section. At the end of the sixth reporting period, the City and the CPD continued developing, for example, the following new or revised policies:

❖ Search Warrants (NEW)	S04-19
❖ Community Engagement in Policy Development (NEW)	G01-03-01
❖ Current G09-01-06, Use of Social Media Outlets	G09-01-06
❖ Limited English Proficiency Policy	S02-01-05
❖ Prohibition of Sexual Misconduct	G08-06 (Previously G08-05)
❖ Interactions with People with Disabilities	S02-01-01
❖ Body Worn Camera Policy	S03-14
❖ Initiation and Assignment of Investigations into Allegations of Misconduct (previously titled Specific Responsibilities Regarding Allegations of Misconduct) (NEW)	G08-01-02

The Consent Decree also requires additional training development, and at the end of the sixth reporting period, the City and the CPD continued developing, for example, the following new or revised training materials:

- First Amendment eLearning (NEW)
- Constitutional Policing Course (NEW)
- OEMC Language Access Training, TNG 19-004
- OEMC Diversity Awareness Training
  [Introduction to Implicit Bias and Inclusion: Building an Inclusive Organizational Culture]
- CPD Interactions with People with Disabilities Training
- CPD Deaf/Hard of Hearing Training Bulletin Task File
- CPD Hate Crimes eLearning, G04-06

We will continue reporting on the finalized policies and training materials, as well as evidence that the City and the CPD have implemented these reforms into practice.

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Specific compliance assessments, by paragraph, for the Impartial Policing section are included in Appendix 2.

III. Crisis Intervention

Guiding Principles

The IMT assessed compliance with applicable Crisis Intervention paragraphs in accordance with the Consent Decree's "Guiding Principles." These principles "are intended to provide the Court, the Monitor, and the public with the context for the subsequent substantive requirements" and "the overall goals" (¶757):

> ***83.*** *CPD officers often serve as first responders to individuals experiencing a behavioral or mental health crisis. These individuals may exhibit symptoms of known, suspected, or perceived behavioral or mental health conditions, including, but not limited to, mental illness, intellectual or developmental disabilities, or co-occurring conditions such as substance use disorders. The Parties acknowledge that having a mental illness, an intellectual or developmental disability, or co-occurring condition does not mean an individual necessarily is in crisis, or that having a behavioral or mental health condition would necessarily be the reason for any crisis that requires police involvement. However, it may need to be considered or warrant heightened sensitivity to ensure an appropriate response. Therefore, individuals in the groups listed above will be collectively referred to as "individuals in crisis" for the purposes of this Agreement.*
>
> ***84.*** *A person may be a suspected individual in crisis based on a number of factors, including, but not limited to, self-reporting; information provided by witnesses, family members, or individuals requesting service; CPD's previous knowledge of the individual; or an officer's direct observation.*
>
> ***85.*** *CPD officers will interact with individuals in crisis with dignity and respect. The use of trauma-informed crisis intervention techniques to respond appropriately to individuals in crisis will help CPD officers reduce the need to use force, improve safety in police interactions with individuals in crisis, promote the connection of individuals in crisis to the healthcare and available community-based service systems, and decrease unnecessary criminal justice involvement for individuals in crisis. CPD will allow officers sufficient time and resources to use appropriate crisis intervention techniques, including de-escalation techniques, to respond to and resolve incidents involving individuals in crisis. To*

achieve these outcomes, the City and CPD will implement the requirements set out below.

86. The City and CPD are committed to exploring diversion programs, resources, and alternatives to arrest for individuals in crisis.

Summary of Compliance Efforts and Assessments

Crisis Intervention in the Sixth Reporting Period

During the sixth reporting period, the CPD, the Office of Emergency Management and Communication (OEMC), and the Chicago Council on Mental Health Equity worked to address the requirements in the Crisis Intervention section of the Consent Decree related to policy, training, operational practices, and community engagement.

The IMT reviewed data and conducted site visits throughout the sixth reporting period to assess compliance with the requirements of the Consent Decree. For example, the IMT met with district commanders, Crisis Intervention Team patrol officers, Crisis Intervention Team sergeants, the Crisis Intervention Team District Operations and Community Support team (CIT DOCS), the Chicago Council on Mental Health Equity co-chairs, Coalition members, and the Office of Emergency Management and Communications (OEMC) policy and training directors. We also continued to participate in monthly calls with the City, the OEMC, and the CPD. Moreover, the City and the CPD were helpful in coordinating additional conference calls with the IMT to discuss significant compliance requirements. These additional discussions related to the CPD's S05-14, *Crisis Intervention Team (CIT) Program*, and the CPD's efforts to maintain a specialized, crisis-intervention response under S05-14, which remains an ongoing concern for the IMT. In light of the City and the CPD moving to a mandated CIT-training model, the CPD must commit itself to maintaining a specialized unit composed of volunteer officers with a demonstrated interest and skillset in responding to individuals in crisis. Evidence of the CPD's support for this type of CIT-training model will be an important factor in achieving future levels of compliance.

The IMT also observed the CPD's *De-escalation, Response to Resistance and Use of Force* training, which all officers receive. The CPD revised this training to emphasize skills regarding de-escalation, communication, and responding to individuals in mental or behavioral health crisis. The IMT also observed the eight-hour crisis-intervention training and the 16-hour *Crisis Intervention Refresher* training, both of which are required for all officers.

However, the IMT learned via site visits that the CPD continues to encounter staffing issues. The IMT's site-visit interviews reinforced that the Crisis Intervention Unit is severely understaffed. It will be difficult for the CPD to maintain or achieve future compliance if the unit initiatives that support the Crisis Intervention Section continue to have inadequate resources.

The CIT DOCS Unit is also understaffed and under-resourced, which has caused increased turnover. Unless the high turnover is addressed, it will be extremely difficult for the CPD to successfully implement the Crisis Intervention strategy. This anticipated difficulty will be exacerbated by the number of districts each CIT DOCS member is charged with overseeing.

While the IMT appreciates that the CPD is investing significant resources into both developing and updating training curricula with the goal of achieving further compliance with Consent Decree, there is still room for improvement concerning the manner in which the CPD invests these resources. For example, since moving to a mandated CIT-training model, the CPD has dramatically increased the cadence of its 40-hour basic CIT training, which the CPD is requiring for all officers. All officers must also receive the CPD's recently-launched two-day CIT Refresher training, and its annual *De-escalation, Response to Resistance and Use of Force training*. To maintain the quality of these training sessions, the CPD must increase the number of training officers employed to deliver them. In addition, it is imperative that the CPD refrain from either deploying its current training officers on other assignments or spreading those training officers too thin.

The IMT appreciates the CPD moving forward with its two-day *Crisis Intervention Team Refresher Training*, which is designed to refresh skills learned in *Basic Crisis Intervention Team* training. This refresher training is critical because a significant number of current "specialized" Crisis Intervention Team (CIT) officers have not received any refresher training since receiving their Basic Crisis Intervention Team training. For example, 20.36% of all current certified CIT officers were trained over 10 years ago with no refresher since (2004–2012). One-third of all certified CIT officers were trained seven or more years ago (2004–2015), and nearly half (46.51%) of certified CIT officers were trained six or more years ago with no refresher since (2004–2016). This fails to meet best-practice standards for a specialized model. Moreover, the CPD is counting these officers toward the CPD's specialized CIT-officer response ratios, which are required under the Consent Decree. This is concerning.

It is also problematic that the CPD is prioritizing its Refresher Training for those officers who have received the Basic CIT training in the last three years. Prioritizing training in such a way means that nearly half of the CIT officers who received Basic CIT training more than six years ago are not being prioritized for their Refresher, nor are they retaking their Basic CIT course. To better align with best practice, the

IMT continues to recommend that all Certified CIT Officers who have not received the Basic 40-hour class in the past three years be targeted to re-take the Basic 40 hour. Once they have retaken the 40-hour Basic training, those officers would then fall into the required refresher cadence of every three years. This practice would be a significant step towards meeting best practices.

Still, the City and the CPD have demonstrated continued progress toward achieving compliance for several paragraphs in the Crisis Intervention Section. They have finalized their *Crisis Intervention Team Program* policy (S05-14), the overarching policy for the Crisis Intervention Unit. Finalizing S05-14 enabled the CPD to achieve Preliminary compliance for several paragraphs in the sixth reporting period.

The City has also continued to launch portions of its Crisis Assistance Response Engagement (CARE) program. This is an alternative response pilot program designed to reduce the need for a criminal-justice response to individuals experiencing a mental-health crisis. The CARE program includes three types of responses:

(1) pre-response, which staffs mental-health professionals in the City's 911 Call Center to provide support to callers, call takers, dispatchers, and response teams;

(2) alternate response, where the 911 Call Center will dispatch mental-health professionals with first responders to respond to persons in crisis; and

(3) post-response, which links residents with appropriate community-based services and uses alternate drop-off sites for persons in behavioral health crisis.

This program aims to divert individuals in crisis away from the criminal justice system. *See, e.g.*, ¶86. These efforts are highly commendable, and we look forward to seeing continued progress, as well as data supporting these efforts. The City should dedicate additional attention to communicating with the public about these programs, specifically key advocacy and treatment communities and people with lived experience. The City deserves credit for these efforts.

However, the City's progress gained through these efforts can be lost without robust communication with interested community groups, organizations, and individual members of the community. As indicated in this and previous reports, the City and the CPD's data collection and related analysis continue to be inadequate. Near the end of the third reporting period, the CPD's CIT data analyst resigned. This was a significant loss because the data analyst was responsible for analyzing the data related to this section. While a new analyst has been hired and onboarded, the CPD's data reporting and analysis has stagnated.

Relatedly, the City and the CPD still have not yet completed a *Crisis Intervention Team Officer Implementation Plan* or a *Crisis Intervention Plan*. *See* ¶¶108 and

122. Although required annually, the last report was submitted in the third reporting period, which makes them overdue. While the IMT appreciates delaying these reports until they are supported by more robust strategies and reliable data, the City and the CPD's progress will continue to be delayed without these important reports.

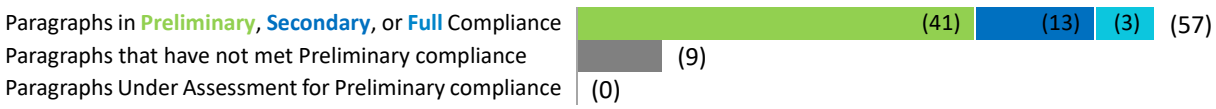
Further, the CPD and the OEMC must improve communication with the Chicago Council on Mental Health Equity and the public. By extension, the CPD and the OEMC must increase their efforts to both seek public feedback and respond to public feedback on policies, training, and operational practices. It is insufficient to merely invite the Chicago Council on Mental Health Equity to review a policy or to observe a training. The Chicago Council on Mental Health Equity is composed of talented, dedicated experts and people with lived experience that are eager to provide crucial feedback. The CPD and the OEMC must improve their efforts to respond to the feedback provided. Responding to this feedback requires the CPD and the OEMC to identify what feedback has been incorporated or not incorporated and why. *See* ¶131.

Similar to the CPD, the OEMC has had relatively high levels of turnover as well. This turnover has delayed policy development, limited the production of OEMC data supporting policy, and has hampered the OEMC's engagement with the Chicago Council on Mental Health Equity. With this regression, the OEMC risks losing compliance on several paragraphs if compliance efforts do not improve.

Updated Compliance Levels for the Fifth Reporting Period

During this reporting period, the IMT assessed the City's compliance with 66 Crisis Intervention paragraphs: ¶¶87–152. The City maintained Preliminary compliance for 28 paragraphs (¶¶98, 100, 102, 105–06, 113–14, 117–19, 121, 126–31, 133–36, 141, 146–51), moved into Preliminary compliance for 13 paragraphs (¶¶87–88, 91, 93–95, 101, 103–04, 115, 120, 124–25), maintained Secondary compliance for 13 paragraphs (¶¶89, 90, 92, 96–97, 99, 116, 132, 138–40, 144, and 152), and maintained Full compliance for three paragraphs (¶¶142–43 and 145). The City failed to reach Preliminary compliance in the remaining nine paragraphs assessed during the sixth reporting period (¶¶107–12, 122–23, and 137). *See* Crisis Intervention Figure 1.

Crisis Intervention Figure 1: Compliance Progress for Crisis Intervention Paragraphs at the End of the Sixth Reporting Period (June 30, 2022)



Crisis Intervention Progress through Six Reporting Periods

Through six reporting periods, the City and the CPD have made significant progress towards annually reviewing Crisis Intervention-related policies and seeking input from the Chicago Council on Mental Health Equity. The City and the CPD have committed reforms from the Crisis Intervention section into various policies and written guidance. Crisis Intervention Figure 2, below, provides a sample of those policies.

Crisis Intervention Figure 2: Sample of New or Revised Policies related to the Crisis Intervention Section (between March 1, 2019, and June 30, 2022)[45]

	Policy #	Issue Date
❖ *Recruit Training*	S11-10-01	11/17/2021
❖ *Pre-Service Training*	S11-10-02	11/17/2021
❖ *In-Service Training*	S11-10-03	11/17/2021
❖ *Annual Crisis Intervention Team Policy Review*	CIU S.O. 21-02	6/4/2021
❖ OEMC CAD Enhancement - *Crisis Intervention Team Check Box Training*	TNG 20-015	12/30/2020
❖ *Crisis Intervention Team Program*	S05-14	11/4/2020
❖ OEMC - *Crisis Intervention Team Program Policy*	TNG 21-004	10/7/2020
❖ OEMC - *Crisis Intervention Team Call Auditing Policy*		10/7/2020
❖ OEMC - *Audit and Employee Review of Crisis Intervention Team Calls*		10/7/2020
❖ OEMC - *Glossary for OEMC Quarterly Reports*		10/7/2020
❖ OEMC - *Mental Health Training Policy*	TNG 21-005	10/7/2020
❖ OEMC *Training Guidelines Policy*	TNG 20-016	9/24/2020
❖ OEMC - *Crisis Intervention Team Certified Officers Data Flowchart*		9/3/2020
❖ *Persons Subject to Involuntary or Voluntary Admission*	S04-20-02	2/2/2020
❖ *Persons on Unauthorized Absence from a State-Operated Mental Health Center*	S04-20-03	2/2/2020

[45] Many of these policies are available online in the CPD's Department Directives System. *See Department Directives System*, CHICAGO POLICE DEPARTMENT, https://home.chicagopolice.org/inside-cpd/department-directives-system-dds/.

	Policy #	Issue Date
❖ *Mental Health Transport and Related Duties Matrix*	S04-20-04	2/2/2020
❖ *Arrestees in Need of Mental Health Treatment*	S04-20-05	2/2/2020
❖ *Recognizing and Responding to Individuals in Crisis*	S04-20	2/2/2020

Crisis Intervention Figure 3:
Sample of New or Revised Trainings Materials related to the Crisis Intervention Section (between March 1, 2019, and June 30, 2022)[46]

	Date
❖ OEMC *Crisis Intervention Team Refresher Training*	2021
❖ *Crisis Intervention Team Basic Training*	2020
❖ *Crisis Intervention Team Refresher Training*	2020
❖ *Crisis Intervention Team Advanced Youth Training*	2020

Looking Ahead to the Seventh Reporting Period

Significant City and CPD compliance efforts are continuing into the seventh reporting period. At the end of the sixth reporting period, the City and the CPD continued developing, for example, the following new or revised policies:

❖ *Crisis Intervention Team Program Coordinator*	CIU S.O. 21-01
❖ *Mental Health - Crisis Intervention Report*	CPD-15.520
❖ *Mission, Organization, and Functions of the Crisis Intervention Unit*	CIU S.O. 20-01
❖ *Crisis Intervention Team Training Schedule, Attendance, Eligibility, and Recruitment*	CIU S.O. 20-02
❖ *CIU Crisis Intervention Plan*	CIU S.O. 20-03
❖ *CIU District-Level Strategy for Crisis Intervention Team*	CIU S.O. 20-04
❖ *CIU Crisis Intervention Team Officer Implementation Plan*	CIU S.O. 20-05
❖ *District-Level Strategy for Crisis Intervention Team*	CPD-15.605

[46] Some of these trainings may not have been provided to 95% of personnel at the time of this report.

It is our hope that many of these policies can be finalized in the seventh reporting period. We note, however, that at the end of the sixth reporting period, we continued to have material concerns regarding various drafts. For example, various paragraphs in the Crisis Intervention section relate to the CPD's ability to have Certified Crisis Intervention Team Officers who can provide a "timely response" to calls for services identified as involving individuals in crisis. *See, e.g.*, ¶¶108–09 and 120. The word "timely," however, remains undefined in relevant CPD policies, which will inhibit the CPD's ability to evaluate resources, performance, or success.

Still, at the end of the sixth reporting period, the City and the CPD also continued developing, for example, the following new or revised training materials:

- *Crisis Intervention Team Policy Updates* (eLearning)
- *OEMC Crisis Intervention Team Refresher Training*

As with other sections of the Consent Decree, the City and the CPD need comprehensive and reliable data to best inform policy, training, strategy, and operational success. Data has been and continues to be a significant challenge for the CPD and its efforts in the Crisis Intervention section, among others. The CPD operated without a data analyst for the Crisis Intervention-related efforts during the fourth and fifth reporting periods.[47] While the CPD onboarded a new data analyst in January 2022, the CPD has yet to produce evidence demonstrating the scope and nature of her analysis. Key requirements (*e.g.*, data captured by the new Crisis Intervention Team report or reliably tracking Crisis Intervention Team Officers' response ratios) cannot be accomplished without additional resources and a functional data platform.

In the next reporting period, we hope to report on increased levels of compliance related to policy, training, and plan development.

***

Specific compliance assessments, by paragraph, for the Crisis Intervention section are included in Appendix 3.

[47] The previous analyst resigned shortly after she started but was making good progress in setting up foundational systems to build reliable data reports.

IV. Use of Force

Objectives[48]

The IMT assessed compliance with applicable Use of Force paragraphs in accordance with the Consent Decree's corresponding objectives:

> ***153.*** *CPD's use of force policies, as well as its training, supervision, and accountability systems, must ensure that: CPD officers use force in accordance with federal law, state law, and the requirements of this Agreement; CPD officers apply de-escalation techniques to prevent or reduce the need for force whenever safe and feasible; when using force, CPD officers only use force that is objectively reasonable, necessary, and proportional under the totality of the circumstances; and any use of unreasonable or unnecessary force is promptly identified and responded to appropriately.*
>
> ***
>
> ***155.*** *CPD officers have the authority to use force, but that authority is limited by the law and Department policy. The provisions of this Agreement seek to facilitate compliance with the law and Department policy regarding the use of force to reduce the circumstances in which using force is necessary, and to ensure accountability when CPD officers use force that is not objectively reasonable, necessary, and proportional under the totality of the circumstances.*

Summary of Compliance Efforts and Assessments

Use of Force in the Sixth Reporting Period

In the sixth reporting period, the City and the CPD largely maintained the levels of compliance in the Use of Force section that they reached in previous reporting periods, achieving new levels of compliance with about one-fifth of the paragraphs under review but losing a level of compliance for one paragraph.

The City and the CPD continued their efforts to engage the community in revising the CPD's use-of-force policies. As in the previous reporting period, we attended

[48] The Use of Force section of the Consent Decree includes "objectives" rather than "guiding principles."

meetings with the City, the CPD, the OAG, and the Coalition regarding the CPD's policies on the First Amendment and the use of Oleoresin Capsicum (OC) Spray and Tasers. While we appreciate the continued progress made by the City and the CPD to incorporate feedback into those policies, we also look forward to the implementation of long-contemplated changes.

This reporting period, the IMT reviewed several new or revised policies and trainings intended to address the Consent Decree's requirements regarding the Use of Force section. For example, we provided a no-objection notice to the CPD's permanent *Foot Pursuits* policy, G03-07, which went into effect after the end of the sixth reporting period on August 29, 2022. We also reviewed and commented on a *Foot Pursuits eLearning training* that the CPD ultimately delivered in advance of the new policy's effective date.

We met monthly with the City, the CPD, and the OAG to address the Use of Force requirements in the Consent Decree, including ongoing record productions from the City and the CPD, in a departure from prior reporting periods in which we met every two weeks. We also continued to review reports published by the Tactical Review and Evaluation Division (TRED, and formerly known as the Force Review Division or FRD).

The CPD demonstrated its *Tactical Response Report Supervisory Dashboard* for the IMT during the sixth reporting period. According to TRED's *2021 Year-End Report*, "The information included in this dashboard should allow for Department supervisors to correct the action of individual members and also recommend specific training for their districts/units based on documented need."[49] To that end, it is hoped that the dashboard will be expanded in the future to include firearm pointing incidents. TRED's 2021 Year-End Report contains extensive firearm pointing incident data—about beat and unit, weapons recovered, the nature of the initial incident, foot pursuits, and FPIs reported in error, for example—that could be useful to supervisors in real time.

We remain impressed by TRED's professionalism and its efforts to observe, address, and publicly report on patterns and trends relating to uses of force, foot pursuits, and firearm pointing incidents—even with inadequate resources. Unfortunately, however, TRED's lack of adequate resources continues to negatively impact its operations. TRED fell behind on its reviews during the fifth reporting period because of insufficient staffing, and the backlog grew in the sixth reporting period. In the meantime, the CPD continues to give TRED new and important responsibilities regarding the observation and analysis of patterns and trends in the CPD's practices.

[49] TRED's *2021 Year-End Report*, CHICAGO POLICE DEPARTMENT (APRIL 29, 2022), https://home.chica-gopolice.org/wp-content/uploads/2021-YEAR-END-REPORT.pdf, p. 85.

During the sixth reporting period, we learned that the CPD has been deploying its limited TRED personnel into the field. This practice is troubling and runs contrary to the lessons learned and recommendations from our *Special Report: the City's and the CPD's Responses to Protests and Unrest under the Consent Decree*. In addition to undermining the City and the CPD's efforts to demonstrate reform, identify trends, improve practices, and increase transparency and accountability, deploying TRED personnel creates significant concerns regarding supervision and force review. As we noted during the fifth reporting period, it is imperative that the City and the CPD address its staffing issues to allow its existing and developing processes to best serve the CPD, its officers, and Chicago's communities.

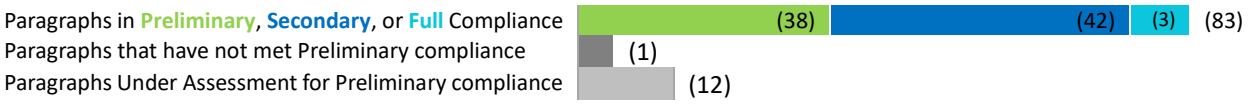
At the end of the sixth reporting period, therefore, more work was necessary. The City and the CPD's data issues have continued to hamper the CPD's ability to evaluate its use-of-force policies, training, and operations in general and its recent focus on foot pursuits in particular. See ¶¶572–73 and 606. Until the City and the CPD adequately prioritize their data issues their progress in the Use of Force section (among others) will stall. This will require the City and the CPD to, among other things, consistently devote sufficient resources to address its data and supervision efforts, including adequately staffing TRED.

Updated Compliance Levels for the Sixth Reporting Period

During this reporting period, the IMT assessed the City's compliance with 96 Use of Force paragraphs. At the end of the sixth reporting period, the City maintained Preliminary compliance for 34 paragraphs (¶¶153, 157–59, 162, 167, 174, 191, 193, 200, 206–07, 209–10, 213–15, 222–26, 228–35, 243–44, and 247–48) and achieved Preliminary compliance for four paragraphs (¶¶166, 171–72, and 217). The City maintained Secondary compliance for 27 paragraphs (¶¶154, 164–65, 169, 173, 175–76, 181–87, 189–90, 192, 194, 196–97, 202–03, 218–20, 227, and 246) and achieved Secondary compliance for 15 paragraphs (¶¶161, 177–80, 198–99, 201, 204–05, 211–12, 216, 221, and 245). The city maintained Full compliance for one paragraph (¶170) and achieved Full compliance for two paragraphs (¶¶188 and 195). The City's Preliminary compliance for 12 paragraphs remained under assessment at the end of the sixth reporting period (¶¶155–56, 160, 163, 168, 208, 236–41), and the City failed to reach any level of compliance with the remaining paragraph (¶242). *See* Use of Force Figure 1 below.

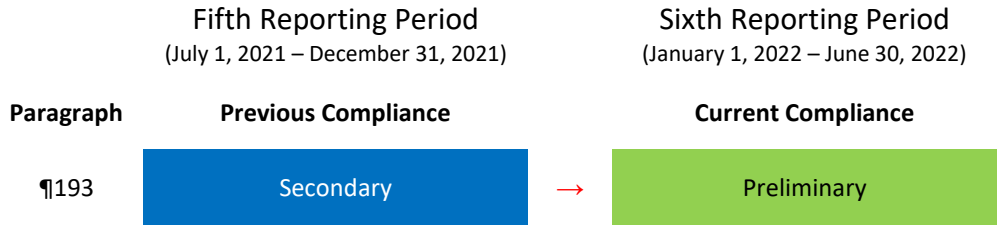
This includes the fact that the City also lost at least one level of compliance with one paragraph (¶193). *See* Use of Force Figure 2 below.

Use of Force Figure 1: Compliance Progress for Use of Force Paragraphs at the End of the Fifth Reporting Period (June 30, 2022)



This includes the fact that the City also lost at least one level of compliance with one paragraph (¶201). *See* Use of Force Figure 2 below.

Use of Force Figure 2:
Lost Levels of Compliance in the Use of Force Section



Use of Force Progress through Six Reporting Periods

The CPD has made significant progress with its use-of-force policies, training, and analysis of data since the start of the Consent Decree.

Through six reporting periods, for example, the City and the CPD have committed reforms from the Use of Force section into various policies and written guidance. Use of Force Figure 3, below, provides a sample of those policies.

While we have had and continue to have concerns with the CPD's corresponding community engagement efforts and strategies, the CPD has and continues to make meaningful efforts toward improving its corresponding community engagement and efforts to receive input. *See* ¶160.

Use of Force Figure 3: Sample of New or Revised Policies related to the Use of Force Section (between March 1, 2019, and June 30, 2022)[50]

	Policy #	Issue Date
❖ *Annual Prescribed Weapon Qualification Program and Taser Recertification* (NEW) This Directive updates to clarify that sworn officers must qualify with their prescribed duty weapons prior to the end of the seventh police period.	S11-03-01	5/5/2022
❖ *Emergency Use of Department Vehicles* This revision updates titles and unit names regarding training per CALEA procedure requirements.	G03-03	3/11/2022
❖ *First Aid Kit Order, Law Enforcement Medical and Rescue Training (LEMART) Policy* Updated the policy changing the LEMART requirement from "optional" to "mandatory," consistent with CPD practice.	U06-02-23	7/22/2021
❖ *Department Approved Weapons and Ammunition* Adds additional requirements (*e.g.*, officers must be "currently certified" and must comply with applicable laws related to the storage of firearms).	U04-02	5/07/2021
❖ *Department Review of Use of Force* Aligned terminology with the Consent Decree terminology, and other Use of Force directives. Further detailed the responsibilities of the Force Review Division and Force Review Board.	G03-02-08	1/27/2021
❖ *Use of Force* Updates terminology in alignment with other Use of Force directives, following revisions based on input from the Use of Force Working Group and other community input (e.g., further defining standards, responsibilities, and prohibitions for use of force).	G03-02	12/31/2020
❖ *Force Options* Updates terminology in alignment with other Use of Force directives and clarifies the purpose of the directive and standards for levels of resistance.	G03-02-01	12/31/2020
❖ *Incidents Requiring the Completion of a Tactical Response Report* Updates terminology in alignment with other Use of Force directives and further defines and clarifies the purpose and use of Tactical Response Reports (TRRs), supervisory responsibilities for reviewing use-of-force incidents, and the incident review process.	G03-02-02	12/31/2020
❖ *Firearms Discharge Incidents Involving Department Members* Updates terminology in alignment with other Use of Force directives, clarifies administrative duty assignments, and adds trauma-informed techniques and implicit bias to post-shooting training.	G03-02-03	12/31/2020
❖ *Taser Use Incidents* Updates terminology in alignment with other Use of Force directives and further defines the standard for when Taser use is authorized and when it is prohibited.	G03-02-04	12/31/2020

[50] Many of these policies are available online in the CPD's Department Directives System. *See Department Directives System*, CHICAGO POLICE DEPARTMENT, https://home.chicagopolice.org/inside-cpd/department-directives-system-dds/.

	Policy #	Issue Date
❖ *Oleoresin Capsicum (OC) Devices and Other Chemical Agent Use Incidents* Updates terminology in alignment with other Use of Force directives.	G03-02-05	12/31/2020
❖ *Canine Use Incidents* Updates terminology in alignment with other Use of Force directives and establishes a prohibition on canine response to protests.	G03-02-06	12/31/2020
❖ *Firearm Discharge and Officer-Involved Death Incident Response and Investigations* Establishes a prohibition on retaliation in reporting use-of-force incidents, clarifies medical attention standards, and clarifies the responsibilities on using restraints/handcuffs.	G03-06	12/31/2020
❖ *Baton Use Incidents* Updates terminology in alignment with other Use of Force directives.	G03-02-07	12/31/2020
❖ *Prohibition on Retaliation* Adds language related to supervision, reporting, forms of retaliation, and retaliation specific to First Amendment activity.	G08-05	12/30/2020
❖ *Reporting the Response to Crowds, Protests, and Civil Disturbances* (NEW) Requires documentation by supervisors of information concerning crowds and the nature of the police response and use of force during protests.	D20-08	11/02/2020
❖ *Control Devices and Instruments* Clarifies language regarding training, CPD-issued Taser devices and personal OC devices.	U04-02-02	2/28/2020
❖ *Department Vehicles* Clarifies standards for motor vehicle operations safety, accountability related to motor vehicle license suspension or revocation, and corresponding training requirements.	U02-01	2/28/2020
❖ *Firearm Pointing Incidents* (NEW) Clarifies requirements for engaging in, reporting, documenting, and reviewing firearm-pointing incidents, including that officers are to point a firearm at a person only when objectively reasonable under the totality of the circumstances.	D19-01	10/01/2019

Through six reporting periods, the City and the CPD have developed or updated training materials to incorporate requirements across the Use of Force section. For example, because of the Consent Decree, the CPD now develops and delivers use-of-force in-service training *every year*, which includes training on de-escalation and force mitigation. Use of Force Figure 4, below, provides a larger sample of those training materials.[51]

[51] As detailed in Appendix 4 (Use of Force), the City and the CPD may still need to demonstrate that they effectively provided all these trainings to the requisite personnel.

Use of Force Figure 4:
Sample of New or Revised Trainings Materials related to the Use of Force Section (between March 1, 2019, and June 30, 2022)[52]

	Date
❖ *First Amendment eLearning* (NEW)	2022
❖ *Foot Pursuit eLearning* (NEW)	2022
❖ *2022 CIT In-Service Training* (NEW)	2022
❖ *Active Bystandership for Law Enforcement Training* (NEW)	2022
❖ *Impact Weapon Test* (NEW)	2022
❖ *Recruit Use of Force Training* (NEW)	2022
❖ *Constitutional Policing Course* (NEW)	2022
❖ *Emergency Vehicle Operations Course In-Service 4-Hour Training*	2022
❖ *Annual Carbine Training*	2021
❖ *Foot Pursuit Training Bulletin* (NEW)	2020
❖ *In-Service Use of Force 2020* (NEW)	2020
❖ *Custodial Escort and Custody Training* (NEW)	2020
❖ *Positional Asphyxia Training Bulletin*, ETB 20-01 (NEW)	2020
❖ *Foot Pursuits Review training* (NEW)	2020
❖ *Force Review Unit Firearm Pointing Incident Review training* (NEW)	2020
❖ *Weapons Discipline Training Bulletin (Firearms Pointing Incidents Training Bulletin)* (NEW)	2019

The CPD has also increased the workload carried by the Tactical Review and Evaluation Division (also known as TRED, and formerly known as the Force Review Division or FRD) in the time since the Consent Decree became effective. TRED now reviews use-of-force incidents, firearm-pointing incidents, and foot pursuits to identify and allow the CPD to address patterns and trends. It is also our understanding that TRED's responsibilities will soon be expanded to include search warrant reviews.[53]

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[52] Some of these trainings may not have been provided to 95% of personnel at the time of this report.

[53] "It should be noted that the annual and quarterly reports were previously produced by the Force Review Unit (FRU). Moving forward these reports will be generated by the Tactical Review and Evaluation Division (TRED). The new name change more accurately reflects TRED's focus on new and future responsibilities which include search warrant, foot chase and investigative stop reviews." *TRED 2022 Q1 Report*, CPD TRED (August 16, 2022), https://home.chicagopolice.org/wp-content/uploads/Q1-2022-16Aug22-FINAL.pdf.

Finally, while significant challenges remain, the CPD has made progress in its public reporting of use-of-force data. For example, the CPD makes relevant data available to the public via its Use of Force Dashboard.[54] TRED also publishes quarterly reports that contain analysis of and conclusions about the CPD's use-of-force data, including data collected via Tactical Response Reports (TRRs). TRED also analyzes and reports on firearm-pointing incidents and foot pursuits.

Looking Ahead to the Seventh Reporting Period

In the sixth reporting period, the City and the CPD continued making progress toward compliance with the Use of Force section of the Consent Decree, particularly related to policy and training requirements. Community engagement, data, and staffing challenges continue to present significant hurdles to further levels of compliance.

Nonetheless, at the end of the sixth reporting period, the City and the CPD were also continuing to develop new and revised policies and written guidance to make progress in this section. At the end of the sixth reporting period, the City and the CPD continued developing, for example, the following new or revised policies:

- *Foot Pursuits* G03-07
- *Use of Force Policy Suite* (various)
- *First Amendment Rights Policy* G02-02
- *Body Worn Cameras*[55] S03-14
- *Community Engagement in Policy Development* (new) G01-03-01

At the end of the sixth reporting period, the City and the CPD also continued developing, for example, the following new or revised training materials:

[54] *See Use of Force Dashboard*, CHICAGO POLICE DEPARTMENT (2015 to present), https://home.chicagopolice.org/statistics-data/data-dashboards/use-of-force-dashboard/.

[55] We note, however, that body-worn-camera failures continue to be one of largest de-briefing points, and we recommend expediting reforms to this policy to better address these issues.

- *In-Service Supervisors Training* (new)
- *2022 In-Service Use of Force Training* (new)
- *Foot Pursuit Training* (new)
- *Recruit Use of Force Training* (Force Options Suite)
- *Law Enforcement Medical and Rescue Training*

By the end of the sixth reporting period, the CPD was preparing to train on and implement its new, permanent *Foot Pursuits* policy, which went into effect on August 29, 2022. While the CPD's related policy, *Department Review of Foot Pursuits*, G03-07-01 will not take effect until January 1, 2023, in the eighth reporting period, we look forward to monitoring the CPD's progress regarding foot pursuits in the seventh reporting period.

Likewise, the CPD demonstrated its *Tactical Response Report Supervisory Dashboard* for the IMT during the sixth reporting period, which we hope will enhance front-line supervision and promote accountability for Department supervisors over those they supervise and their training needs. The CPD must also provide written guidance and training for supervisors on (1) how to effectively use the district-level dashboards to identify patterns and trends at the district and officer level, and (2) the strategies to address them, including how to provide constructive feedback from use-of-force incidents. *See, e.g.*, ¶253.

In the seventh reporting period, we look forward to reviewing a draft of a new incident debriefing report (IDR) that TRED is developing. The incident debriefing report will streamline TRED's review and identification of de-briefing points for incidents involving multiple reportable events (uses of force, firearm pointing, and foot pursuits).

There are other policy and training requirements related to the Use of Force section, however, where progress has stalled. For example, the CPD must implement its revised *First Amendment* policy and Use of Force policy suite. The City and the CPD must also continue to address many of the unresolved reporting, planning, data, and training issues identified in our *Special Report: the City's and the CPD's Responses to Protests and Unrest under the Consent Decree*.[56]

In the sixth reporting period, the City and the CPD dedicated—and continues to dedicate—significant efforts to identifying and addressing data issues, particularly

[56] *See Special Report: the City's and the CPD's Responses to Protests and Unrest under the Consent Decree*, INDEPENDENT MONITORING TEAM (July 20, 2021), https://cpdmonitoringteam.com/wp-content/uploads/2021/07/2021_07_20-Independent-Monitoring-Team-Special-Report-filed.pdf.

regarding foot pursuits. As we noted in previous reporting periods, until the CPD can appropriately collect, manage, and analyze data related to the Use of Force section, among others, the City and the CPD cannot sufficiently demonstrate whether the CPD's practices have improved. This will, in turn, prevent the City and the CPD from becoming a true learning agency, capable of reviewing and revising policies and training in a way that is data driven and specific to the needs of Chicago's communities and CPD officers. To be effective, such efforts must continue past the seventh reporting period, but we hope to be able to provide positive updates in our next monitoring report.

***

Specific compliance assessments, by paragraph, for the Use of Force section are included in Appendix 4.

V. Recruitment, Hiring & Promotions

Guiding Principles

The IMT will assess compliance with the Recruitment, Hiring, and Promotions paragraphs in accordance with the Consent Decree's "Guiding Principles." These principles "are intended to provide the Court, the Monitor, and the public with the context for the subsequent substantive requirements" and "the overall goals" (¶757):

> ***249.*** *Having a department that recruits, hires, and promotes officers who are qualified to meet the increasingly complex needs of law enforcement and that reflects a broad cross section of the Chicago community in which it serves is critical to accomplishing the following goals: running a professional police force; building community trust and confidence; increasing legitimacy and acceptance of CPD's supervision and accountability systems; and reducing perceptions of bias.*
>
> ***250.*** *The provisions of this Agreement are designed to ensure that CPD attracts, hires, retains, and promotes individuals who are equipped to perform their jobs safely, effectively, and in accordance with the law, CPD policy, and the terms of this Agreement. Further, this Agreement is designed to ensure that CPD promotes individuals who are capable of: providing effective supervision; guiding officers under their command on lawful, safe, and effective policing; and holding officers accountable for misconduct.*
>
> ***251.*** *The City and CPD's recruitment, hiring, and promotions policies and practices will show a commitment to attracting, hiring, and promoting qualified candidates at all ranks that reflect a broad cross section of the Chicago community the Department serves.*
>
> ***252.*** *The Parties acknowledge that the City and CPD are currently subject to the City of Chicago Police Department Hiring Plan for Sworn Titles ("Hiring Plan"), dated May 14, 2014, which may be subject to change in the future.*

Summary of Compliance Efforts and Assessments

Recruitment, Hiring, and Promotions in the Sixth Reporting Period

In the sixth reporting period, the City and CPD did not significantly progress toward additional compliance with the requirements of the Consent Decree. The City and CPD either maintained or lost compliance levels this reporting period.

The CPD did not demonstrate a strong commitment to improving compliance toward requirements in the Recruitment, Hiring, and Promotions section. This delay is likely due to ongoing staffing issues that have perpetuated a lack of meaningful progress and appear to have shifted attention away from this important area. In many instances, applicable policies were produced without data demonstrating implemented practices that align with policy requirements.

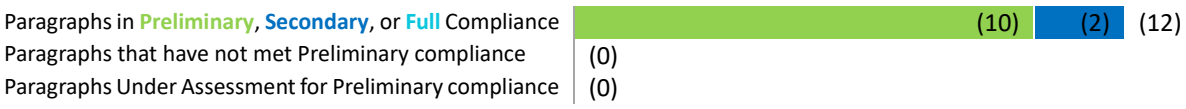
The recruitment function has also been reassigned to the BIA Chief, which raises concerns regarding whether both critical and distinct functions can receive sufficient attention by one position. Acute personnel shortages across CPD would typically indicate a need for additional investments in the recruitment and hiring functions, which are critical to addressing these very same staffing shortages. However, production delays, compliance setbacks, and unanticipated organization structural changes do not indicate that compliance with this section is a top priority for the CPD or the City. Until appropriate resources and attention are dedicated to recruitment, hiring, and promotion, the staffing shortages that have impeded meaningful progress in this and other areas under the Consent Decree are unlikely to be resolved.

Updated Compliance Levels for the Sixth Reporting Period

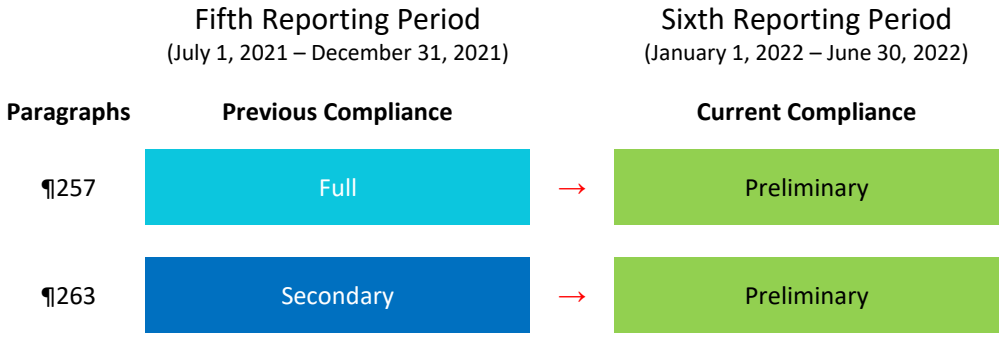
Independent Monitoring Report 6 provides compliance assessments of the same 12 paragraphs the IMT addressed in Independent Monitoring Reports 4 and 5, and the City and the CPD maintained at least Preliminary compliance with each of these paragraphs during this reporting period.

Specifically, the City and the CPD maintained Preliminary compliance for each paragraph (¶¶253–60 and 262–64) and maintained Secondary compliance for two paragraphs (¶ 255 and 261). *See* Recruitment Figure 1 below. However, the City and the CPD lost Secondary compliance for two paragraphs (¶¶257 and 263) and lost Full compliance for one paragraph (¶ 257). *See* Recruitment Figure 2 below.

Recruitment Figure 1: Compliance Progress for Recruitment, Hiring & Promotions Paragraphs at the End of the Sixth Reporting Period (June 30, 2022)



Recruitment Figure 2:
Lost Levels of Compliance in the Recruitment, Hiring, and Promotions Section



Recruitment, Hiring, and Promotions Progress through Six Reporting Periods

Through six reporting periods, the City recently incorporated requirements of this section into policies and written guidance. Recruitment Figure 3, below, provides a sample of those policies.

Recruitment Figure 3:
Sample of New or Revised Policies
related to the Recruitment, Hiring, and Promotions Section
(between March 1, 2019, and June 30, 2022)[57]

New or Revised Recruitment, Hiring, and Promotions Related Policies (between March 1, 2019, and June 30, 2022)	Policy #	Issue Date
❖ *City Interagency Policy, CPD Sworn Member Recruitment and Hiring*	IAP 07-01	6/30/22
❖ *City Interagency Policy, CPD Sworn Member Promotions*	IAP 07-02	6/30/22
❖ *Department Recruitment Selection and Hiring Plan*	E05-34	3/2/22

[57] Many of these policies are available online in the CPD's Department Directives System. *See Department Directives System*, CHICAGO POLICE DEPARTMENT, https://home.chicagopolice.org/inside-cpd/department-directives-system-dds/.

New or Revised Recruitment, Hiring, and Promotions Related Policies (between March 1, 2019, and June 30, 2022)	Policy #	Issue Date
❖ *Revision, Assessment, and Publication of Class Specifications for CPD Sworn & Civilian Class Titles* (NEW)	HR CPCD INCS01	12/31/21
❖ *Police Promotions Committee* (NEW)	HR CPCD INPC01	12/31/21
❖ *Sergeant and Lieutenant Expert Assessment Standard Operating Procedure* (NEW)	SOP 03-02	12/31/21

Looking Ahead to the Seventh Reporting Period

In the sixth reporting period, the City and the CPD failed to make significant progress towards compliance with the Recruitment, Hiring, and Promotions section of the Consent Decree, and in fact lost compliance due to a failure to demonstrate that policies put in place to meet Preliminary compliance were effectively incorporated into CPD practices. It appears clear that staffing shortages and unanticipated organizational changes in the leadership of this section has stalled progress in an area that is critical to addressing those same staffing shortages.

Looking forward to the seventh reporting period, the IMT hopes to see the City and the CPD allocate appropriate attention and resources to the Recruitment, Hiring, and Promotions section of the Consent Decree to make meaningful progress towards further levels of compliance, which should aid in addressing the CPD's ongoing staffing shortage and the corresponding challenges that staffing shortage has caused. Indeed, while this is the smallest section of the Consent Decree, the City's and the CPD's efforts directed at recruitment, hiring, and promotions are critical to every section of the Consent Decree and the short and long-term success of Chicago's policing efforts overall.

***

Specific compliance assessments, by paragraph, for the Recruitment, Hiring, and Promotions section are included in Appendix 5.

VI. Training

Guiding Principles

The IMT assessed compliance with the Training paragraphs in accordance with the Consent Decree's "Guiding Principles." These principles "are intended to provide the Court, the Monitor, and the public with the context for the subsequent substantive requirements" and "the overall goals" (¶757):

> ***265.*** *CPD will enhance its recruit training, field training, in-service training, and preservice promotional training so that they are sufficient in duration and scope to prepare officers to comply with CPD directives consistently, effectively, and in accordance with the law, CPD policy, best practices, and this Agreement.*
>
> ***266.*** *CPD training will reflect its commitment to procedural justice, de-escalation, impartial policing, and community policing.*
>
> ***267.*** *CPD training will convey CPD's expectations that officers perform their jobs diligently and safely, and have an understanding of, and commitment to, the constitutional rights of the individuals they encounter.*
>
> ***268.*** *The training required under this Agreement is set out in this section and, for specific topic areas, in the Community Policing, Impartial Policing, Crisis Intervention, Use of Force, Officer Wellness and Support, and Accountability and Transparency sections.*

Summary of Compliance Efforts and Assessments

Training in the Sixth Reporting Period

In the sixth reporting period, the City and the CPD worked to spread out and timely submit document productions and to more actively and assertively communicate regarding plans and policy progress. This improvement in the timeliness of productions and communications surrounding them assisted in evaluating compliance this reporting cycle.

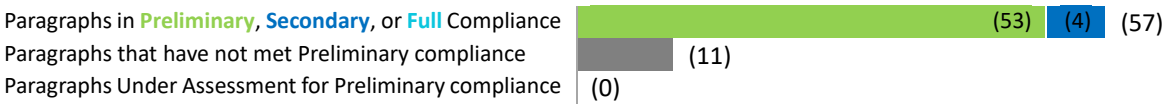
The IMT also notes continued improvement in multiple Training areas compared to prior reporting periods, including in particular with the Field Training and Evaluation Program (also known as FTEP) and related policies and by incorporating outside experts, community interest groups, and guest speakers in training development. The IMT observed multiple training classes this reporting period, which were generally well prepared and presented, although the subject matter was somewhat siloed and the IMT observed opportunities for cross-training between subject areas. For example, while the IMT's observation of the LEMART training was overall very positive in terms of the first-aid training that is the primary subject matter of the course, we noted that other tactics were not consistently practiced and reinforced during the scenario-based portions of that training, such as using proper approach and entry tactics when officers enter a room or properly securing the room upon entry. Officer safety and proper tactics should always be practiced and reinforced during any scenario-based training.

Additionally, the sequencing of the required annual *Needs Assessment*, *Training Plan*, and implementation of training continues to be problematic, whereby the *2022 Training Plan* was still under review by the IMT and the OAG well into the 2022 Training Year after a significant amount of training had already occurred. The IMT also noted that meeting minutes from Training Oversight Committee (TOC) meetings did not consistently demonstrate the depth and breadth of TOC oversight over training development that is expected under the Consent Decree to ensure that trainings fully integrate the key concepts of procedural justice, de-escalation, impartial policing, and community policing. Also, more planning and work is needed to systematically integrate evaluative components into all courses and instruction provided, including pre- and post-tests and substantive course and instructor evaluations, as well as a process for the CPD to review and make use of the course and instructor evaluations provided.

Updated Compliance Levels for the Sixth Reporting Period

Independent Monitoring Report 6 provides compliance assessments of the same 68 paragraphs. During this reporting period, the City and the CPD were able to achieve or maintain at least Preliminary compliance with 53 of these paragraphs. Specifically, in the sixth reporting period, the City and the CPD maintained Preliminary compliance for 45 paragraphs (¶¶272–80, 282, 284–85, 289, 292, 295–97, 299–300, 303–10, 317, 319–24, 326–29, 331–35, 337–38, 340), achieved Preliminary compliance for 8 paragraphs (¶¶281, 291, 298, 311–14, 316), maintained Secondary compliance with three paragraphs (¶¶270–71, 322), and achieved Secondary compliance for one paragraph (¶283). The City failed to reach Preliminary compliance for 11 paragraphs (¶¶ 286–88, 290, 294, 301–02, 315, 318, 336, 339). *See* Training Figure 1 below.

Training Figure 1: Compliance Progress for Training Paragraphs at the End of the Sixth Reporting Period (June 30, 2022)



Training Progress through Six Reporting Periods

Through six reporting periods, the City and the CPD have incorporated requirements of the Training section into policies and written guidance. Training Figure 2, below, provides a sample of those policies.

Training Figure 2:
Sample of New or Revised Policies
related to the Training Section
(between March 1, 2019, and June 30, 2022)[58]

New or Revised Training Related Policies (between March 1, 2019, and June 30, 2022)	Policy #	Issue Date
❖ *Field Training and Evaluation Program*	S11-02	06/14/22
❖ *Field Training and Evaluation Review Board*	S11-02-01	06/14/22
❖ *Promotional Process for Captain*	E05-04	01/25/22
❖ *Promotional Process for Commander*	E05-05	01/21/22
❖ *Training Oversight Committee*	S11-11	12/10/21
❖ *Training Oversight Committee*	S11-11	12/10/21
❖ *Recruit Training*	S11-10-01	12/29/21
❖ *Pre-Service Training*	S11-10-02	12/29/21
❖ *In-Service Training*	S11-10-03	12/29/21
❖ *Department Training*	S11-10	12/29/21
❖ *Returning Service Officer*	E04-05	12/30/21

Through six reporting periods, the City and the CPD have developed or updated many training materials to incorporate requirements across the Consent Decree

[58] Many of these policies are available online in the CPD's Department Directives System. *See Department Directives System*, CHICAGO POLICE DEPARTMENT, https://home.chicagopolice.org/inside-cpd/department-directives-system-dds/.

sections. Many of these trainings are reflected in the corresponding sections of this report.

Looking Ahead to the Seventh Reporting Period

In the sixth reporting period, the City and the CPD continued making progress toward compliance with the Training section of the Consent Decree. The FTEP policies that were in development during the end of the last reporting period were finalized and produced this reporting period and received no objection notices from the IMT and the OAG. The content of the *2022 Training Plan* was generally improved over the prior version, though the sequencing of the production of the annual *Needs Assessment, Training Plan*, and training implementation continues to be problematic. The City and the CPD also developed a Training Deviations tracking system that is an improvement from prior reporting periods but has some aspects that require further work as the IMT relayed in its comments to that production.

Looking forward to the next reporting period, the IMT anticipates enhanced and more substantive compliance reviews in several areas based on the progress the City and the CPD have made in meeting preliminary or maintaining preliminary compliance in most, but not all, sections. Such enhanced compliance reviews include recruit academy and field training, TOC oversight and training evaluations, training staffing, in-service training, and eLearning. Further progress is also expected on training and instructor evaluations and attendance documentation to demonstrate that the required training is being received.

The IMT also expects that the sequencing of the annual *Needs Assessment, Training Plan*, and training implementation will be addressed in the next reporting period to allow the IMT and the OAG to review and comment on the *2023 Needs Assessment* and *2023 Training Plan* before the 2023 Training Year begins.

***

Specific compliance assessments, by paragraph, for the Training section are included in Appendix 6.

VII. Supervision

Guiding Principles

The IMT will assess compliance with the Supervision paragraphs in accordance with the Consent Decree's "Guiding Principles." These principles "are intended to provide the Court, the Monitor, and the public with the context for the subsequent substantive requirements" and "the overall goals" (¶757):

> ***341.*** *Effective supervisors, who lead by example and actively engage with the subordinates under their direct command, play a critical role in ensuring lawful, safe, effective, and community-centered policing. To achieve this outcome, the Parties agree to the requirements set out below.*
>
> ***342.*** *The provisions of this Agreement are designed to ensure that CPD supervisors provide the effective supervision necessary for members to perform their duties lawfully, safely, and effectively and for members to improve and grow professionally. Further, the provisions of this Agreement are designed to allow supervisors to spend time monitoring and training members under their direct command so as to provide adequate opportunities to prevent, promptly identify, and promptly correct adverse officer behavior. This meaningful supervision will facilitate the establishment and re-enforcement of a culture of community policing, community and officer safety, and accountability throughout the Department.*
>
> ***343.*** *CPD should have the staffing necessary to promote lawful, safe, effective, and community-centered policing; provide effective supervision; ensure officer safety and accountability; and implement the terms of this Agreement.*
>
> ***344.*** *Immediate supervisors of all ranks are responsible for supervising, managing, and overseeing, as appropriate, the day-to-day work activities of members under their direct command.*
>
> ***345.*** *Supervisors of all ranks are accountable for the performance of subordinate members directly observed or under their direct command.*
>
> ***346.*** *Effective supervisors will: a. engage in activities and conduct that support the mission and goals of the Department, including those set forth in this Agreement; b. model appropriate*

conduct, including abiding by high standards of integrity and adhering to the United States Constitution and other laws, CPD policy, and the terms of this Agreement; and c. consistently demonstrate professionalism, courtesy, and respect towards all people with whom they interact.

Summary of Compliance Efforts and Assessments

Supervision in the Sixth Reporting Period

Many of the City's and the CPD's efforts in the Supervision section of the Consent Decree rely on the concepts of unity of command and span of control. Unity of command requires that the same sergeant supervise the same group of police officers. *See* ¶358. Span of control limits the number of officers any one sergeant can supervise daily. *See* ¶358. The goal of span of control is to create a consistent ratio of 10 officers to 1 sergeant to encourage effective supervision. This is a fundamental change from the current model of shift (watch) scheduling and a requirement of the Consent Decree.

The Unity of Command and Span of Control Pilot Program was launched to implement these concepts to enable more effective and efficient supervision, mentoring, officer support, and policing. Through the pilot program, the City and the CPD implemented a new pod supervision structure (primary, secondary, and tertiary role for supervisors). The Unity of Command and Span of Control Pilot Program began in the 6th District during the second reporting period. In the fourth reporting period, the CPD expanded the pilot into the 4th and 7th districts.

Despite the CPD's continued efforts to implement the Unity of Command and Span of Control Pilot Program, the CPD has faced various challenges with the implementation, as explained in previous IMT reports. The CPD continues to face staffing shortages that prevented the pilot districts from consistently meeting the 10-to-1 officer-to-supervisor ratio required by ¶360. We learned that officers were not being consistently overseen by the same supervisors, as envisioned by the pilot program. We also heard frustrations from officers regarding the staffing shortages, which not only hampered compliance with the program, but also created situations in which understaffing could have reduced officer safety. In the sixth reporting period, these challenges remain, and will need to be meaningfully addressed to effectively implement this program.

During the sixth reporting period, we had in-depth discussions with the CPD about the strengths and shortcomings of the pilot program. The CPD decided that implementing the Unity of Command and Span of Control Pilot programs in three districts was not feasible, so they chose to focus efforts on refining the program

within the 6th District. During the IMT's conversations with command staff, officers, and supervisors, we were informed that the pod supervision structure did not consistently result in unity of command as envisioned. Therefore, in April, the City and the CPD requested technical assistance from the IMT regarding the Unity of Command and Span of Control Pilot Program. In late June, during the first technical assistance meeting, the City and CPD shared their plans to develop a new staffing model to address a number of the shortcomings of the pod model. This new model will focus on three tenets: (1) geographic familiarity, (2) high-quality supervision, and (3) resource flexibility. The IMT believes that, despite the various challenges, the City and CPD are working toward compliance in earnest.

The CPD has chosen to also begin implementing the pilots for the Performance Evaluation System and Officer Support System Pilot Programs in the same districts as the Unity of Command and Span of Control Pilot Program. We believe that it makes sense to think of these pilots and efforts together, because they all rely on effective supervision. As a result, however, the difficulties in fulfilling the requirements with the Unity of Command and Span of Control Pilot Program will also cause difficulties in achieving the goals of these other pilot programs.

Finally, the CPD has also convened a Unity of Command and Span of Control Pilot Program Evaluation Committee, which is to meet at least quarterly to discuss implementation progress and share feedback from CPD personnel. The IMT observed one of the quarterly evaluation committee meetings during this reporting period. This committee will play an important role in the programs' effective implementation. The CPD has also recently added similar tasks to this committee for the Performance Evaluation System and Officer Support System Pilot Programs. The IMT hopes that the committee will work to anticipate and address some of the possible challenges to ensure a smoother implementation process.

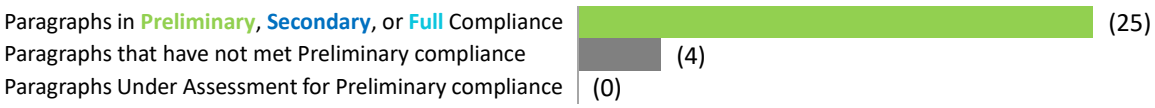
The IMT believes that programs required by the Supervision section of the Consent Decree are being thoughtfully developed and implemented by the City and the CPD as a pilot. To test and develop strategies to implement Unity of Command and Span of Control, the Performance Evaluation System, and the Officer Support System Pilot Programs in all CPD districts, the 6th District became the central location and focus of the IMT and the Parties as the pilot district. We recognize the aforementioned progress that has been made and the pilot in the 6th District was used to assess and grant Preliminary compliance as policies and processes have been developed and are at various stages of implementation. However, the Consent Decree requires that all of the paragraphs within the Supervision area be implemented and measured for compliance in all CPD police districts. As such, while preliminary compliance was granted in the 6th District, further levels of compliance cannot be granted until the pilot moves beyond the 6th District and is able to be replicated and implemented in other districts. The IMT may be able to consider these levels of compliance once evidence of successful implementation is

observable and measurable beyond the 6th District. The IMT stands ready to continue to work with the City and the CPD toward the goal of broadening the impact of implementing an effective supervision structure in all CPD districts.

Updated Compliance Levels for the Sixth Reporting Period

Overall, we assessed the City's compliance with 29 Supervision paragraphs during the sixth reporting period (¶¶347-57 and 359-76). In the sixth reporting period, the City and the CPD maintained Preliminary compliance for 19 paragraphs (¶¶348, 350, 352–55, 360–64, 368, and 370–76) and achieved Preliminary compliance for six paragraphs (¶¶347, 349, 351, 359, 367, and 369). The City and the CPD did not reach any level of compliance with four paragraphs (¶¶356–57 and 365–66).

Supervision Figure 1: Compliance Status for Supervision Paragraphs at the End of the Sixth Reporting Period (June 30, 2022)



Supervision Progress through Six Reporting Periods

Through six reporting periods, and as referenced above, the City and the CPD have committed several reforms from the Supervision section into various policies and written guidance. Supervision Figure 2, below, provides a sample of those policies.

Supervision Figure 2:
Sample of New or Revised Policies
related to the Supervision Section
(between March 1, 2019, and June 30, 2022)[59]

	Policy #	Issue Date
❖ *Officer Support System (OSS) – Pilot Program*	D20-04	12/30/2021
❖ *Performance Evaluation System – Pilot Program*	D21-09[60]	12/10/2021

[59] Many of these policies are available online in the CPD's Department Directives System. *See Department Directives System*, CHICAGO POLICE DEPARTMENT, https://home.chicagopolice.org/inside-cpd/department-directives-system-dds/.

[60] Early versions of the *Performance Evaluation System – Pilot Program* Directive were numbered D21-03 and D02-09. The finalized version of the policy, which was submitted this reporting

	Policy #	Issue Date
❖ *Unity of Command and Span of Control Schedule – Pilot Program*	D20-02	12/10/2021
❖ *Supervisory Responsibilities*	G01-09[61]	5/10/2021

Through six reporting periods, the City and the CPD have also developed or updated training materials to incorporate requirements from the Supervision section. Supervision Figure 3 provides a sample of training materials related to Supervision that were developed or revised since the start of the Consent Decree.[62]

Supervision Figure 3:
Sample of New or Revised Trainings Materials
related to the Supervision Section
(between March 1, 2019, and June 30, 2022)[63]

❖ *Emotional Intelligence for Supervisors Pre-Service Training*	2021
❖ *Performance Evaluation System Pilot Training*	2022
❖ *Performance Evaluation System eLearning*	2021
❖ *Pre-Service Promotional Training*	2021
❖ *In-Service Supervisors Training*	2021
❖ *Officer Support System Training for Supervisors*	2021

Looking Ahead to the Seventh Reporting Period

In the seventh reporting period, the IMT will continue to meet regularly with the City and the CPD to provide technical assistance concerning an appropriate staffing model to accomplish unity of command and span of control. We look forward to reviewing data relevant to the program such as the contents of the staffing dashboard, assignment sheets, transfer orders, and other relevant records. Additionally, we hope to conduct further interviews and focus groups with members of the pilot district. We look forward to reviewing how additional assigned supervisors to 6th District have impacted the pilot programs. The IMT also anticipates observing

period, is D21-09. For consistency, we refer to the *Performance Evaluation System – Pilot Program* Directive as D21-09 throughout this report.

61 Early versions of the *Supervisory Responsibilities* General Order were numbered G01-07 and G01-08. The finalized version of the policy, which was submitted in the fourth reporting period, is G01-09. For consistency, we refer to the *Supervisory Responsibilities* General Order as G01-09 throughout this report.

62 As detailed in Appendix 7 (Supervision), the City and the CPD may still need to demonstrate that they effectively provided all these trainings to the requisite personnel.

63 Some of these trainings may not have been provided to 95% of personnel at the time of this report.

training related to the Unity of Command and Span of Control Pilot Programs along with evaluations of that training. Further, we plan to observe further evaluation committee meetings and hope to see a shift from a briefing model to more collaborative and conversational structure.

***

Specific compliance assessments, by paragraph, for the Supervision section are included in Appendix 7.

VIII. Officer Wellness and Support

Guiding Principles

The IMT assessed compliance with applicable Officer Wellness and Support paragraphs in accordance with the Consent Decree's "Guiding Principles." These guidelines "are intended to provide the Court, the Monitor, and the public with the context for the subsequent substantive requirements" and "the overall goals" (¶757):

> ***377.*** *In fulfilling their duties, CPD members expose themselves to significant danger, high stress, and a wide spectrum of human tragedy. There is growing recognition that psychological and emotional wellness are critical to officers' health, relationships, job performance, and safety. The City and CPD have an obligation to help CPD members cope with the consequences that come from their service to the public.*
>
> ***378.*** *The City and CPD's obligation to CPD members includes providing adequate support systems to treat members experiencing mental health, substance abuse, and other emotional challenges.*
>
> ***379.*** *The City and CPD's obligation to CPD members also includes equipping them in a manner that enables them to do their jobs as safely as reasonably possible. CPD will ensure that the safety of its members is not jeopardized by equipment and technology that is outdated, broken, or in need of repair or replacement.*
>
> ***380.*** *The City and CPD will implement the following requirements in order to achieve a healthy, effective, and constitutionally compliant police force.*

Summary of Compliance Efforts and Assessments

Officer Wellness and Support in the Sixth Reporting Period

Officer Wellness and Support is always of immense importance, but the IMT would be remiss if we did not highlight the timeliness of this issue and acknowledge the officers who died by suicide in 2022. We offer our sincerest condolences to the CPD and their families as they navigate this difficult time. The work the City and the CPD began before and have continued during the Consent Decree process related to officer wellness and support is critical to the health of the CPD, its officers, their families and friends, and Chicago's communities.

As stated in the guiding principles for this section (*see* ¶377–80), CPD officers expose themselves to significant danger, high stress, and a wide spectrum of human tragedy. The City and the CPD have an obligation to help CPD officers cope with the consequences that come from their service to the public. The City and the CPD's obligation to CPD officers includes providing adequate support systems to treat CPD personnel experiencing mental health, substance-use disorder, and emotional challenges.

In the sixth reporting period, the City and the CPD stalled their progress towards compliance with many of the paragraphs in the Officer Wellness and Support section due to the lack of data and absence of a technology solution to inform and evaluate whether their efforts are efficient, timely, and effective. While the City and the CPD have been intentional in the sixth reporting period about implementing training focused on officer wellness, crisis intervention, use of force, and traumatic incident stress management, their inability to analyze their initiatives' impact on their CPD officers and personnel continues to pose significant barriers. For example, the CPD is unable to currently analyze whether the Professional Counseling Division services are readily accessible, the frequency with which they receive and provide internal and external referrals, the period for client follow up, or specific data related to clinician caseload. While the Professional Counseling Division has opened a counseling office in a CPD District, it will be important to capture how effective and accessible the Professional Counseling Division is to those personnel seeking services at this new office. Monitoring this new facility and accessibility to Professional Counseling Division services should provide greater ease for similar analysis when the other building comes online.

During the sixth reporting period, the IMT met with Professional Counseling Division personnel. Specifically, we met with the Professional Counseling Division director, clinicians, chaplains, peer-support officers, and the drug and alcohol counselors. During the virtual site visits, some of the staff raised issues including clinician caseloads, case management, and auditing. The IMT learned that, although it varies, a clinician's caseload averages between 25 and 30 clients per week, about five to eight personnel per day, which seemed high from their perspective. However, without case-management tools, auditing practices, and procedures in place—along with a formal case review—it is difficult to determine how to adequately measure what a workable caseload should look like.

The technological solution to mitigate some of these issues, iCarol, was scheduled to be deployed in June 2022, but has been delayed six months. The CPD has informed the IMT about several delays regarding the roll out and pilot testing of the iCarol system. The iCarol system is a single component for collecting data as it

pertains to the Professional Counseling Division services. However, during this period, the IMT has seen little to no data that is required in several of the Officer Wellness and Support paragraphs of the Consent Decree. Related data includes, but is not limited to, traumatic incident stress management program (TISMP) referrals; attendance numbers for classroom instruction and eLearning; and survey results for activities such as the couples retreat held in February 2022.

Along with the IMT's Data Collection, Analysis, and Management monitors, we also met with individuals from the Public Safety Administration's (PSA) Data Committee to discuss the equipment and technology and corresponding audit required by the Consent Decree. The IMT also observed a peer support eight-hour refresher training and reviewed several policies and trainings regarding officer wellness and support. These materials included the *Chaplains Unit SOP* (20-01), the *Suicide Prevention Initiative*, the *2022 Communications Strategy*, the *2021 Officer Wellness In-Service Training*, the *2022 In-Service Crisis Intervention Team (CIT) Training*, the *2021 De-Escalation, Response to Resistance, and Use of Force In-Service Training*, the *EAP Recruit Training*, the *Traumatic Incident Stress Management Program (TISMP) eLearning*, and the *Active Bystandership for Law Enforcement Training*.

At the end of the sixth reporting period, the Professional Counseling Division had posted 11 vacancies for clinical staff and extended conditional offers to two applicants. The process for hiring 11 additional clinicians requires a strategic approach coordinated between the City's Human Resources Department, the CPD, and the Professional Counseling Division to ensure that Notifications of Job Opportunities (NOJOs) are capturing the necessary skill sets required for such an important role. Collectively, the CPD should evaluate the workload of its counselors, peers support members, clinicians, and chaplains to ensure that burn out does not occur within the Professional Counseling Division unit, whose role is to assist the members of the CPD in wellness, resilience, and support.

Updated Compliance Levels for the Sixth Reporting Period

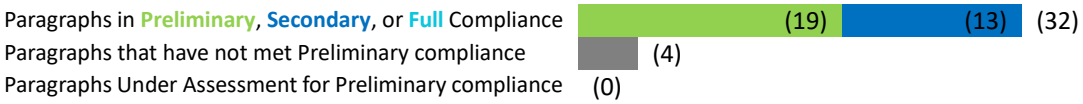
Overall, the IMT assessed the City's compliance with 36 Officer Wellness and Support paragraphs in the sixth reporting period (¶¶381–402, 404, and 406–18). We assessed all of these in previous reporting periods.

In the sixth reporting period, the City and the CPD maintained Preliminary compliance with 19 paragraphs (¶¶388, 394–400, 402, 404, 407–14, and 418), maintained Secondary compliance with 13 paragraphs (¶¶381–87, 390–93, 401, and 406), and failed to reach Preliminary compliance with four paragraphs (¶¶389 and 415–17).

Where Secondary compliance may be reached, it is imperative that the City and the CPD show that routine data collection, follow through, and continuity of programs is measured and reported on a regular basis.

Additionally, the City and the CPD may be in jeopardy of losing Preliminary compliance levels for some paragraphs if specific requirements, such as the annual report to the Superintendent (see ¶411) are not met during the seventh reporting period. The timeliness of officer wellness necessitates a more expeditious and strategic path toward compliance with those paragraphs related to officer wellness. *See* Officer Wellness Figure 1 below.

Officer Wellness Figure 1: Compliance Progress for Officer Wellness Paragraphs at the End of the Sixth Reporting Period (June 30, 2022)



Officer Wellness and Support Progress through Six Reporting Periods

Since the inception of the Consent Decree on March 1, 2019, the City and the CPD have developed and implemented several policies and trainings related to Officer Wellness and Support. The following Officer Wellness and Support policies have been implemented under the Consent Decree (between March 1, 2019, and June 30, 2022).

Officer Wellness Figure 2:
Sample of New or Revised Policies related to the Officer Wellness Section (between March 1, 2019, and June 30, 2022)[64]

	Policy #	Issue Date
❖ *Chaplains Unit Standard Operating Procedure*	20-01	10/1/2021
❖ *Traumatic Incident Stress Management Program (TISMP) Directives* (NEW)	E06-03	3/17/2021
❖ *Professional Counseling Division (PCD) Policy* (NEW)	E06-01	5/17/2020
❖ *Professional Counseling Division (PCD) Standard Operating Procedure*	19-01	5/17/2020
❖ *Officer Support Plan* (NEW)	New	2/10/2020
❖ *Firearms Owner's Identification Card (FOID) Standard Operating Procedure*	19-01; E01-17	12/20/2019

Additionally, since the inception of the Consent Decree, the City and the CPD have worked to implement new and revised trainings related to Officer Wellness and Support. The following Officer Wellness and Support trainings have been developed under the Consent Decree (between March 1, 2019, and June 30, 2022).[65]

Officer Wellness Figure 3:
Sample of New or Revised Trainings Materials related to the Officer Wellness Section (between March 1, 2019, and June 30, 2022)[66]

New or Revised Officer Wellness Related Training Materials (between March 1, 2019, and June 30, 2022)	**Date**
❖ *Firearms Owner's Identification Card (FOID) Training*	2/14/2020
❖ *EAP Pre-Service Promotional Training*	12/2/2021
❖ *Chaplains Unit Training Deck: Overview of SOP 20-01* (NEW)	11/1/2020
❖ *Peer Support Program Training (40 Hours)*	8/19/2020
❖ *2021 In-Service Wellness Training*	6/14/2021

[64] Many of these policies are available online in the CPD's Department Directives System. *See Department Directives System*, CHICAGO POLICE DEPARTMENT, https://home.chicagopolice.org/inside-cpd/department-directives-system-dds/.

[65] As detailed in Appendix 8 (Officer Wellness and Support), the City and the CPD may still need to demonstrate that they effectively provided all these trainings to the requisite personnel.

[66] Some of these trainings may not have been provided to 95% of personnel at the time of this report.

New or Revised Officer Wellness Related Training Materials (between March 1, 2019, and June 30, 2022)	Date
❖ *Peer Support 8 Hour Refresher* (NEW)	12/2/2021
❖ *EAP Recruit Training*	2/3/2021
❖ *Peer Support for Public Safety Summary of Training Subjects*	8/19/2020
❖ *Peer Support Training and Consultation Program Synopsis*	8/19/2020
❖ *Training Experts Materials (NEW)*	8/26/2020
❖ *Stress Management & Resilience Course (NEW)*	9/24/2020
❖ *EAP Training*	5/6/2020

Looking Ahead to the Seventh Reporting Period

Since the inception of the Consent Decree, the City and the CPD have made considerable progress under the Officer Wellness and Support sections. To date, the CPD has made efforts to review and revise officer-wellness policies, lesson plans, strategies, and trainings to ensure that quality trainings are presented to the CPD membership in the most timely and efficient manner.

At the end of the sixth reporting period, the City and the CPD's efforts had plateaued. While the CPD conducted training during the sixth reporting period on the topics of officer wellness and produced new or revised policies, they remain unable to evaluate the efficacy, efficiency, and timeliness of their services without a robust data collection mechanism or technological solution. The deployment of iCarol, the intended technological solution, has been delayed and is expected to be deployed at the end of the seventh reporting period. Additionally, the Annual Report to the Superintendent was not submitted during the sixth reporting period, and thus, prior to the deployment of the iCarol platform, the IMT expects to see the data collected for the last year from the manual tracking forms, which should be included in the report to the Superintendent.

In line with ¶415, during the seventh reporting period, the IMT also expects to receive a clear and full picture of the following:

1) the equipment and technology in the CPD's possession,
2) the state of that equipment and technology, and
3) any recommendations for addressing any identified concerns or problems with the listed/non-listed equipment or technology to include proper disposal and surplus of same.

Thus far, the IMT has appreciated the CPD's efforts related to the Officer Wellness and Support section, but continued progress is critical. We hope to see positive updates in the next reporting period regarding technological solutions, staffing levels, and the use of data from PCD services, referrals, and caseloads to influence decision making.

***

Specific compliance assessments, by paragraph, for the Officer Wellness and Support section are included in Appendix 8.

IX. Accountability and Transparency

Guiding Principles

The IMT assessed compliance with applicable Accountability and Transparency paragraphs in accordance with the Consent Decree's "Guiding Principles." These principles "are intended to provide the Court, the Monitor, and the public with the context for the subsequent substantive requirements" and "the overall goals" (¶757):

> ***419.*** *Holding public servants accountable when they violate law or policy is essential to ensuring legitimacy and community confidence.*
>
> ***420.*** *A robust and well-functioning accountability system in which CPD members are held to the highest standards of integrity is critical to CPD's legitimacy and is a priority of CPD. A culture of accountability also promotes employee safety and morale, and improves the effectiveness of CPD operations. Organizational justice also plays an important role in ensuring that CPD members have confidence in the legitimacy of the system that holds them accountable.*
>
> ***421.*** *In order to foster public trust and receive critically important community feedback, and promote confidence in CPD, the City and CPD will ensure the process for submitting and pursuing complaints that allege violations of CPD policy or the law by CPD members is open and accessible for all individuals who wish to file complaints.*
>
> ***422.*** *Meaningful community involvement is imperative to CPD accountability and transparency. Nothing in this Agreement should be construed as limiting or impeding community participation in CPD's accountability system, including the creation and participation of a community safety oversight board. OAG and the City acknowledge the significant work many of Chicago's community organizations have undertaken and are continuing to undertake, including work alongside CPD, in the area of police reform and accountability, and OAG and the City know this critical work will continue.*
>
> ***423.*** *The City, CPD, and COPA will ensure that all complaints of misconduct, whether from internal or external sources, are thoroughly, fairly, timely, and efficiently investigated in accordance*

with this Agreement; that all investigative findings are supported by the appropriate standard of proof and documented in writing; and that all CPD members who commit misconduct are held accountable pursuant to a disciplinary system that is fair, timely and consistent, and provides due process.

Summary of Compliance Efforts and Assessments

Accountability and Transparency in the Sixth Reporting Period

The Accountability and Transparency section of the Consent Decree requires reform efforts from many City entities. The reach of the section is vast—involving several City entities—and is motivated by the guiding principles at the outset of the Section, as noted above (¶¶419–23).

The Accountability and Transparency section of the Consent Decree explicitly sets obligations for the following City entities: the Chicago Police Department (CPD) and the CPD's Bureau of Internal Affairs (BIA), the Office of the Inspector General's (OIG) Deputy Inspector General for Public Safety (Deputy PSIG), the Civilian Office of Police Accountability (COPA), and the Police Board. In addition, some of the requirements of the Accountability and Transparency section call for action by the City at large.

While the CPD, COPA, the Deputy PSIG, and the Police Board are working toward the common goal of increased accountability and transparency, these entities work toward this goal in different manners as appropriate for each entity and as required by the Consent Decree. These entities have each found some success in complying with the requirements set out in the Accountability and Transparency section at different paces and with varying degrees of success. The Deputy PSIG, for example, reached Full compliance with all requirements pertaining to the Deputy PSIG in the fourth reporting period and maintained that Full compliance during the fifth and sixth reporting periods. COPA and the Police Board have developed and followed plans that have allowed them to consistently gain compliance with various requirements of this section in the past few reporting periods. The CPD has followed a less methodical path toward compliance with the Accountability and Transparency requirements, and because of this, has fallen behind in complying with Accountability and Transparency paragraphs.

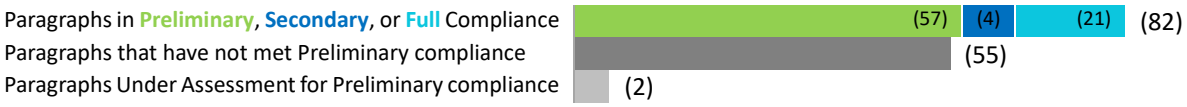
Updated Compliance Levels for the Sixth Reporting Period

Overall, the IMT assessed the City's compliance with 139 Accountability and Transparency paragraphs. With the combined efforts of all the City entities noted in this section, the City moved into Preliminary compliance with one paragraph in the

sixth reporting period (¶433). The City moved into Secondary compliance with two paragraphs (¶¶543 and 560) and reached Full compliance with four paragraphs (¶¶430, 441, 442, and 485). The City maintained Preliminary compliance with 56 paragraphs (¶¶424–29, 431–32, 436–37, 439, 446–49, 452, 454–57, 462, 467, 470–77, 482–83, 493, 496–97, 499, 500, 502, 504, 506–07, 511, 515, 518, 522–25, 532, 540–42, 548–49, 551, and 553) and Secondary compliance with two paragraphs (¶¶498 and 550).[67] The City maintained Full compliance with 17 paragraphs (¶¶533–39, 554–59, 561–63, and 565). The City did not reach any level of compliance with 55 paragraphs (¶¶434–35, 438, 440, 443–45, 450–51, 453, 459, 460–61, 463–66, 468–69, 479, 480–81, 484, 486–89, 490–92, 494–95, 501, 503, 505, 508–09, 512–14, 516–17, 519, 521, 526–29, 530, 544–47, 552, and 564). The City remained under assessment for Preliminary compliance with two paragraphs (¶¶478 and 531) and under assessment for Full compliance for one paragraph (¶543).

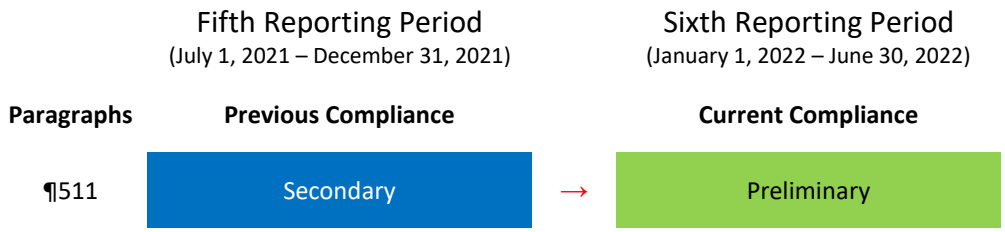
See Accountability Figure 1 below.

Accountability Figure 1: Compliance Progress for Accountability & Transparency Paragraphs at the End of the Fourth Reporting Period (June 30, 2022)



This includes the fact that the City also lost at least one level of compliance with one paragraph (¶511). *See* Accountability and Transparency Figure 2 below.

Accountability Figure 2:
Lost Levels of Compliance in the Accountability and Transparency Section



[67] For one of these paragraphs, ¶511, the City fell out of Secondary compliance. It had previously achieved Secondary compliance with this paragraph in the fourth reporting period.

Accountability and Transparency Progress through Six Reporting Periods and Looking Ahead to the Seventh Reporting Period

Given the variable nature of the Accountability and Transparency Section requirements for each City entity, we provide a summary of each entity's efforts in turn, below.

The Chicago Police Department (CPD)

We monitored the CPD's progress in a variety of ways, including but not limited to attending frequent meetings with BIA and the CPD's Research and Development Division to obtain updates on efforts and ask questions, reviewing draft policies and training materials, observing training sessions, and conducting site visits to gain insight from Accountability Sergeants and BIA investigators.

During the sixth reporting period, the CPD decided to reduce the number of regularly scheduled meetings with the IMT by half, which had negative results for the CPD and required a number of "emergency" meetings toward the end of the reporting period.

Since the start of the Consent Decree, the CPD implemented several policies related to the Accountability and Transparency section, which include the below list of new or revised policies.

Accountability and Transparency: CPD Policies Implemented

	Policy Number	Issue Date
❖ *Conflict of Interest General Order*	G08-01-03	12/31/21
❖ *Non-Disciplinary Intervention Special Order*	S08-01-08	05/04/18
❖ *Cannabis Enforcement Special Order*	S04-32	7/9/2020
❖ *Live Lineups, Photo Lineups, and Showups Special Order*	S06-02	10/16/20
❖ *Extended-Hours Vehicle Use*	U02-01-07	3/18/22
❖ *Nameplates and Unit Designators*	U06-01-24	7/22/20
❖ *Uniform - Bicycle Patrol*	U06-03-04	7/27/20
❖ *Complaint and Disciplinary System General Order*	G08-01	12/31/21
❖ *Department Directives System General Order*	G01-03	5/5/20
❖ *Protection of Human Rights General Order*	G02-01	6/30/22

	Policy Number	Issue Date
❖ *First Amendment Rights General Order*	G02-02	4/13/21
❖ *Complaint Initiation and Log Number Investigation Assignment*	G08-01-02	12/31/21
❖ *Prohibition of Retaliation General Order*	G08-05	12/30/20
❖ *Complaint and Disciplinary Investigators and Investigations Special Order*	S08-01	12/31/21

In the sixth reporting period, the CPD informed the IMT that it would be eliminating the Unit Directives that the BIA had developed during the previous five reporting periods. These include the following Unit Directives:

❖ *Accountability Sergeants BIA Unit Directive*	2020-U001
❖ *Administrative Misconduct Investigations Unit Directive*	N/A
❖ *Administrative Summary Reports Unit Directive*	2021-U001
❖ *Assignment of Administrative Log Number Investigations Unit Directive*	N/A
❖ *BIA Confidentiality Policy Unit Directive*	N/A
❖ *CPD Member Communication Procedures and Timelines Unit Directive*	N/A
❖ *BIA Investigation Timelines and Benchmarks Unit Directive*	N/A
❖ *BIA Investigators Unit Directive*	N/A
❖ *BIA Log Number Unique Tracking Number Unit Directive*	N/A
❖ *BIA Requirements of a Complete Investigative File Unit Directive*	N/A
❖ *BIA Standard Operating Procedure Unit Directive*	N/A
❖ *BIA Supervisory Responsibilities over Misconduct Investigations Unit Directive*	N/A
❖ *BIA Training Unit Directive*	N/A
❖ *Case Management System Unit Directive*	N/A
❖ *Advocate Section Command Channel Review Procedures Unit Directive*	N/A
❖ *Conflict of Interest in CCR Review Unit Directive*	N/A
❖ *Command Channel Review Unit Directive*	N/A
❖ *Complaint Communications and Timelines Unit Directive*	N/A
❖ *Conflict of Interest Unit Directive*	N/A
❖ *Initial Responsibilities in Assigned Log Number Investigations Unit Directive*	N/A
❖ *Initiation, Intake, and Assignment of Log Investigation Unit Directive*	2019-U005
❖ *Intake Initiation of Log Number Unit Directive*	N/A
❖ *Initiation of Log Numbers in the Case Management System Unit Directive*	N/A
❖ *Incidents Occurring Five Years Prior to Complaint Unit Directive*	N/A

- *Photo Room Operations Unit Directive* N/A
- *Conduct of the Investigation; Sworn Affidavits and Sworn Affidavit Overrides Unit Directive* N/A
- *Mediation Protocol Unit Directive* N/A
- *City Policy Regarding Procedures for COPA, BIA, and Accountability Sergeant's Review and Consideration of Evidence from Civil and Criminal Litigation Unit Directive* N/A
- *BIA Training Directive* N/A

Many of these Unit Directives had received no-objection notices from the IMT and the OAG in previous reporting periods. The CPD assured the IMT and the OAG that the Unit Directives that had previously received no-objection notices would simply be renamed with a Special Order designation with no changes to the content of the directives, allowing for an easy transition for the CPD and ensuring quick no-objection notices for the policies. The CPD agreed to provide the IMT with a chart that would detail each Unit Directive section that would be moved to a Special Order, but this did not occur.

The IMT views the CPD's decision to move from Unit Directives to Special and General Orders as a positive development that increases transparency because the CPD did not previously publish Unit Directives for public comment or otherwise make them available for the public to review. The Special and General Orders, in comparison, are available to the public and posted for public comment. The CPD has informed the IMT that the transition from Unit Directives to Special and General Orders will be an ongoing, department-wide effort. We expect to receive regular updates from the CPD regarding its progress.

During this reporting period, the CPD continued to draft and revise policies to comply with the requirements of the Consent Decree. These efforts included drafting and revising a suite of policies aimed at codifying numerous Accountability and Transparency Section requirements in Department-wide General Orders and Special Orders. This suite of policies includes the following:

Accountability and Transparency: CPD Policies under Development

	Policy Number
❖ *Mediation Pilot Policy*	IAP 11-01
❖ *Officer Support System Pilot Program*	D20-04
❖ *Force Review Board Standard Operating Procedures*	2020-002
❖ *Prohibitions of Sexual Misconduct General Order*[68]	G08-06
❖ *Firearm Discharge and Officer-Involved Death Incident Response and Investigation*	G03-06
❖ *Response to Crowds and Civil Disturbances Special Order*	S03-22
❖ *Coordinated Multiple Arrest Incident Procedures Special Order*	S06-06
❖ *Search Warrants Special Order*	S04-19
❖ *Log Number Case Management System* (NEW)	S08-01-01
❖ *Investigation Timelines and Benchmarks* (NEW)	S08-01-02
❖ *Requirements of a Complete Log Number Investigative File* (NEW)	S08-01-09
❖ *Complaint and Disciplinary Definitions* (NEW)	G08-01-01
❖ *Department Member Bill of Rights* (NEW)	G08-01-05
❖ *Initial Investigatory Responsibilities in Log Number Investigations* (NEW)	S08-01-04
❖ *Conducting Log Number Investigations* (NEW)	S08-01-05
❖ *Command Channel Review* (NEW)	S08-01-07
❖ *Communication Procedures and Timelines* (NEW)	S08-01-03
❖ *Supervisor Responsibilities in Log Number Investigations* (NEW)	S08-01-06
❖ *Post-Investigation Log Number Procedures* (NEW)	S08-01-08[69]

The CPD also submitted G08-01-01, *Compliant and Disciplinary Procedures*, and G08-01-05, *Department Member Bill of Rights*, for review in the sixth reporting period.

The CPD made progress in drafting and revising the suite of policies listed above in the sixth reporting period. However, the CPD did not submit these policies to the IMT for review until the last two months of the reporting period, despite the fact that several of the policies were close to completion at the end of the fifth reporting period. As a result, the policies remained in the collaborative revision and review process.[70] When these policies are finalized, we anticipate the CPD reaching

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[68] CPD previously submitted this General Order as General Order G08-05, however as of May 5, 2021, CPD changed the numbering to General Order G08-06.

[69] This policy was previously titled Special Order S08-01-04, *Post-Investigation Log Number Procedures*, and was finalized in the fifth reporting period. In the sixth reporting period, this finalized policy was renumbered and retitled as Special Order S08-01-08, *Post-Investigation Log Number Procedures*.

[70] The Consent Decree requires that the CPD and BIA submit draft policies and training materials and engage in a collaborative review and revision process until the IMT and OAG have no objection to the drafts. *See* ¶627–28 and ¶641. Thereafter the CPD and BIA finalize and implement these materials. Policies and procedures required by the Consent Decree must also be

Preliminary compliance with a number of Accountability and Transparency Section paragraphs. We strongly urge the CPD to diligently revise and finalize these policies early in the seventh reporting period, moving with the same urgency the CPD implemented in the final two months of the sixth reporting period. The CPD will not reach Preliminary compliance with several paragraphs until these policies are revised and finalized per the Consent Decree process.

The late-in-the-reporting-period push to finalize policy demonstrated by the CPD in the sixth reporting period is part of a cycle the IMT identified and made the CPD aware of in previous reporting periods. (In Independent Monitoring Report 5 we explained that we would "not continue to allow the CPD's procrastination to force expedited reviews that, if occurring too often, can reduce the quality of revisions and suggestions for improvement on policies or training materials."[71]) The CPD is typically slow to produce materials for review early in the reporting period (for example the CPD produced only six documents in the first four months of the sixth reporting period). But the end of the reporting period is marked with more rushed productions and CPD requests for the IMT and the OAG to expedite reviews. We understand the motivation to complete certain projects before the close of a reporting period, but the CPD would likely find more success under the Consent Decree and in reform efforts more generally if they implement a more consistent and organized approach, taking steps to produce materials for review earlier in the reporting period.

While this has been an ongoing pattern for the CPD, we see the current suite of policies that remains in the review and revision process as an opportunity to break from this cycle. At the end of the sixth reporting period, the CPD turned around revised drafts within less than a week (and in some instances, less than a day) of receiving feedback from the IMT and the OAG, despite telling the IMT over the past five reporting periods that the time required to turn around drafts for IMT review was two to four weeks. The IMT is pleased to know that the CPD has the ability to turn around drafts for review in less than two to four weeks. If the CPD continues this intentional and focused revision of these policies, this suite could be finalized in the seventh reporting period.

Since the start of the Consent Decree, the CPD also delivered the *Command Channel Review Exempt Training/Command Staff* training, and many relevant CPD trainings remain in development. This training, for example, includes the following:

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posted for public comment for a period of at least 15 days. *See* ¶633. In addition, the Accountability and Transparency section requires that "To the extent permissible by law, within 60 days of its implementation, each CPD policy and directive, including those created pursuant to this Agreement, will be posted online and otherwise made publicly available. Any exception will be limited to documents that must remain confidential to protect public safety, and as approved by the Superintendent." ¶545.

71 *See Independent Monitoring Report 5*, at 103.

Accountability and Transparency: CPD Trainings under Development

New or Revised Accountability and Transparency Related Training Materials (between March 1, 2019, and June 30, 2022)

- *Automated Log Investigation*
- *Command Staff Training*
- *COPA Familiarization Training*
- *Complaint Log Number Investigation*
- *Civilian Ethics/Do the Right Thing*
- *Ethics Recruit Training*
- *BIA Investigator Log Number Investigator Training*
- *Complaint Log Investigation Clear*
- *Log Number Investigation/Call Out Procedures*
- *BIA Lieutenant Training*
- *BIA Field Training Officer Training*
- *BIA Sergeant Training*
- *BIA Recruit Training*
- *Rules/Regulations for Crossing Guards*
- *Firearm Discharge*
- *Police Impersonator Detective*
- *Log Number Investigation*
- *Rules and Regs Detention Aids*
- *Records/Summary Punishment Action Request (SPAR) Training*
- *Log Number Process*
- *BIA Investigators Formal Statement Standards*
- *BIA In-Service Training Plan*
- *BIA Investigator and Accountability Sergeant Basic Training Schedule*
- *BIA/Accountability Sergeant Training Plan*
- *BIA Investigator Accountability Onboarding Training Schedule*
- *BIA Rules and Regulations*
- *SPAR*
- *BIA Ethics Training*
- *BIA Policies and Techniques On Boarding Annual Training*
- *Case Management System Case Investigative Console Conducting Investigations*

New or Revised Accountability and Transparency Related Training Materials (between March 1, 2019, and June 30, 2022)

- *Complaint Initiation Process In-Service*
- *Advocate Section Overview*
- *Findings Recommendations & Effective Log Closings*
- *Intake & Case Assignment In Service/On Boarding*
- *Interviews, Questions & Answer Techniques*
- *Investigative Practices Annual Training*
- *Legal Update/Due Process*
- *Conducting Log Investigations On-Boarding*
- *Policies and Procedures*
- *Procedural Justice & Log Number Investigations*
- *Training Scenarios*
- *CCR Exempt Staff for Training Manual/2020*
- *BIA Training COPA Municipal Code 2020*
- *BIA Training Strategy, Implementation and Execution Plan*
- *CMS Updates & Enhancements Training In-service*
- *CMS Log Number Intake Training In-Service Lesson Plan/PowerPoint*
- *CPD BIA eLearning* (NEW)

We also note that the CPD and BIA must begin finalizing and publishing their quarterly and annual reports in a timelier manner. Paragraph 550 of the Consent Decree requires the CPD to electronically publish quarterly and annual reports that contain a variety of data points. In Independent Monitoring Report 5, we noted that the CPD and BIA made significant progress in producing consistent and thorough quarterly and annual reports, which allowed the CPD to achieve Secondary compliance with ¶550 in the fifth reporting period. By the end of the sixth reporting period, however, the CPD had only produced quarterly reports for the first two quarters of 2021 and had not yet produced its *2021 Annual Report*. We appreciate the CPD's and BIA's efforts and understand that the demands of ¶550 are significant; but the CPD and BIA will not reach Full compliance with this paragraph until they begin finalizing and publishing their reports in a timelier manner. To accomplish this task, we strongly suggest that the CPD develop a CPD policy that directs the regular and timely publication of quarterly and annual reports.

During site visits in June 2022, the IMT met with a number of Accountability Sergeants and BIA Investigators. These meetings were very helpful for the IMT to learn

more about the day-to-day responsibilities and experiences of Accountability Sergeants and BIA Investigators. At the same time, some of the information the IMT learned about the day-to-day responsibilities and experiences of Accountability Sergeants and BIA Investigators during the course of these meetings are cause for great concern.

For example, the IMT learned that not every district has two Accountability Sergeants as required by the Consent Decree (*see* ¶494). Moreover, Accountability Sergeants are often required to fill in for patrol sergeants who are on days off, on leave, or when the district is short staffed. As a result, Accountability Sergeants are often not able to complete their investigations in a timely manner because they cannot conduct interviews and compile evidence when responding to calls for service as a patrol sergeant. We learned that Accountability Sergeants often have many other district responsibilities that take their focus away from administrative investigations, and therefore perform their duties as Accountability Sergeants on a part-time basis. Even with these challenges, Accountability Sergeants cannot easily lighten their caseloads, as other sergeants designated as backup Accountability Sergeants only take cases when an Accountability Sergeant listed in the roster is away from duty for an extended period of time. Due to these additional demands on their time, Accountability Sergeants often must request multiple time extensions in order to complete their investigations.

Additionally, we learned that Accountability Sergeants do not have designated areas in the district where they can conduct interviews, review videos confidentially, and complete their investigations. Some Accountability Sergeants indicated that they have access to a private office only because they serve in some other role, such as an Administrative Sergeant, and most others must attempt to locate private space subject to availability, such as a Commander's office or a conference room that may or may not be in use. We also learned that Accountability Sergeants are not properly equipped to efficiently conduct investigations or utilize the Case Management System and are often using old technology with outdated and slow processing systems that cannot keep up with the Case Management System. When the IMT suggested that Accountability Sergeants could be equipped with laptop computers to use for completing investigations, many were hopeful that this would occur due to the need for improved technology to adequately perform their duties. At the same time, others shared concerns that, with laptops, the CPD would then require them to complete the investigations at home on their personal time, since they do not have time to complete the investigations during the work day as a result of their conflicting responsibilities. Many BIA investigators shared the same thoughts and concerns, and described how BIA computer workstations with old technology and outdated processers that cannot keep up with the Case Management System sometimes cause them to wait hours for a case file to upload into the Case Management System.

The CPD drafted Special Order S08-01-05, *Conducting Log Number Investigations*, during the sixth reporting period to provide direction to Accountability Sergeants. This policy requires Accountability Sergeants to audio-record interviews and upload the interviews into the Case Management System. Based on the information we learned in conversations during site visits with Accountability Sergeants, we are very concerned that Accountability Sergeants are not properly equipped to comply with this policy and would be in violation of the policy once it is implemented for reasons outside their control. The IMT provided comments to the CPD in the sixth reporting period noting that, for this policy to be followed once it becomes effective, Accountability Sergeants must be properly equipped. This includes, at a minimum, having recording devices; quiet, private spaces in which to conduct interviews; and the ability to upload recordings into the Case Management System.

Finally, the IMT continues to be concerned about the lack of reform of the Accountability and Disciplinary process. For example, many Accountability Sergeants still refer to themselves and their positions as "CR Sergeants," which reflects their previous titles, and are not familiar with the overall processes that the CPD has developed to better investigate administrative complaints. The IMT expects that the CPD will integrate the Accountability Sergeants and BIA Investigators into the new procedures and hopes that the CPD will begin to involve Accountability Sergeants and BIA investigators in the policy development that directs their work.

Moving forward, we will look for the CPD to further revise and finalize policies in a focused and expeditious manner, and to begin developing and revising trainings related to the policies it has developed and implemented under the Consent Decree thus far.

Civilian Office of Police Accountability (COPA)

In the sixth reporting period, COPA continued making progress toward compliance with Accountability and Transparency requirements. As stated in the previous reporting period, COPA continues to work from a detailed plan to ensure that their policies and procedures are revised and comply with the requirements of the Consent Decree. COPA previously moved into Secondary compliance for many Consent Decree paragraphs due to their training plan that was very detailed and attainable. In the sixth reporting period, COPA maintained compliance with numerous paragraphs and reached new levels of compliance with several. The IMT continued to meet with COPA monthly and each meeting was deliberate and demonstrated COPA's commitment to fulfilling the requirements of the Consent Decree.

Accountability and Transparency: COPA Written Guidance and Policies Implemented

	Policy Number	Issue Date
❖ *Investigative File Maintenance*	3.1.9	2/8/2022
❖ *Major Incident Responses – Officer-Involved Shooting or Officer-Involved Death*	3.1.10	6/15/2022
❖ *Timeliness Benchmarks and Appendix*	3.3.2	6/24/2021
❖ *CLEAR and Column CMS Systems*	3.1.6	7/30/2021
❖ *COPA Interviews – Chicago Police Department Members*	3.1.2.b	11/01/2021
❖ *Final Summary Report*	3.1.3	7/30/2021
❖ *Conflict of Interest and Recusal*	1.1.3	12/28/2021
❖ *Quality Assurance*	3.3.1	6/24/2021
❖ *Transparency Initiatives - Release of Video and Related Materials*	2.1.2	12/28/2021
❖ *Intake Policy*	3.1.1	6/24/2021
❖ *Fact Gathering & Investigative Process*	3.1.2	11/01/2021
❖ *COPA Equipment and Apparel*	3.1.8	6/24/2021
❖ *Disciplinary and Remedial Recommendations*	3.2.1	6/24/2021
❖ *Candidates for COPA Employment – Current or Former Chicago Police Department Members*	N/A	12/28/2021
❖ *Recommendation Regarding Department Members Duties, Powers*	3.2.2	6/24/2021
❖ *Sexual Misconduct Investigations*	N/A	12/28/2021
❖ *Compelled Statements*	3.4.4	11/1/21
❖ *COPA Sexual Assault MOU w/BIA*	N/A	N/A

During the sixth reporting period, COPA continued to revise policies to be compliant with the Consent Decree. Further demonstrating COPA's efforts toward accountability and transparency, COPA continued working with the COPA Community Policy Review Working group.[72] This working group consists of volunteers from across the Chicago community who are dedicated to working with COPA to produce exemplary and community-experience informed policies. The group reviews COPA policies and documents related to efforts under the Consent Decree. COPA ensures that the group is involved throughout the development of the policy and not just at the end of the revision process. By regularly engaging this group, COPA

[72] The OAG, the City, and the IMT have agreed to a stipulation that mandates that COPA will solicit feedback on the draft policies relevant to the Consent Decree from a working group that consists of community stakeholders and thereby approved by the IMT. See *Stipulation Regarding the Policy and Training Review Process for the Civilian Office of Police Accountability (COPA)*, Illinois v. Chicago, Case No. 17-cv-6260 (January 30, 2020), https://cpdmonitoringteam.com/wp-content/uploads/2020/06/2020_01-Stipulation-Regarding-the-Policy-and-Training-Review-Process-for.._.pdf. The IMT has approved the members from COPA's Community Policy Review Working Group.

has produced policies and procedures that provide detailed direction to its personnel and important information about COPA's practices to the community.

Accountability and Transparency: COPA Policies under Development

	Policy Number
❖ *COPA Rules and Regulations Manual*	N/A
❖ *COPA Guidelines and References*	N/A
❖ *COPA Investigator Manual*	N/A
❖ *Affidavits, Affidavit Overrides, Exceptions to Affidavit Requirement*	3.1.4
❖ *Pattern or Practice Investigations*	3.1.5
❖ *Superintendent Non-Concurrence*	3.4.1
❖ *Medical Records & HIPAA Compliance*	3.4.2
❖ *PCRIA Compliance*	3.4.3
❖ *Request for Modification of Department Member Duties or Police Powers/Appendix*	3.2.2.b
❖ *Revised Employee Handbook*	N/A
❖ *Request for Extension of Investigation*	N/A
❖ *Civil and Criminal Complaint Review*	1.3.8
❖ *Reopening a Case*	1.3.9
❖ *Consideration of Officer Training and Disciplinary Records*	3.1.2(a)
❖ *COPA Employment Background Checks*	N/A

Additionally, this reporting period COPA improved its data tracking and sharing abilities. COPA's website is robust and now includes new data dashboards for the public to view. These dashboards are interactive and no longer are in the form of a static chart that the public could not interact with, as in prior reporting periods. The IMT applauds COPA for taking these steps to ensure that the website is user-friendly and provides the community with the appropriate information.

Due to COPA's continued efforts toward compliance with Consent Decree requirements, we are encouraged that COPA will continue to move into additional compliance levels with numerous paragraphs in the next reporting period. We also anticipate that COPA will soon move into Full compliance with several paragraphs.

Accountability and Transparency: COPA Trainings Delivered

- ❖ *COPA Intake*
- ❖ *COPA Training on CPD Directives*
- ❖ *Implicit Bias*
- ❖ *Procedural Justice*
- ❖ *CMS Overview of Policy and Procedures*
- ❖ *CMS Case Management System*

- *Collective Bargaining Agreement*
- *Consent Decree Overview*
- *Consent Decree Policies*
- *CPD Lockup Procedures*
- *CPD Rules and Directives*
- *Domestic Violence*
- *Evidence Collection*
- *Fourth Amendment*
- *Intro to OIS/OID Investigation*
- *Jurisdiction*
- *Lead Homicide Investigations*
- *Sexual Assault*
- *Use of Force*
- *Witness Reliability in Police Use of Force Investigations*
- *Legal Concepts Overview*
- *Complainant and Civilian Witness Interview*
- *Science of Justice Understanding the Role of Bias in Investigations*
- *Transparency and Confidentiality*
- *Quality Management*
- *Case and Time Management*
- *Civilian Oversight of Policing*
- *COPA Ordinance Mission Rules*
- *Disciplinary Process*
- *Bureau of Support Services*
- *Photo Array Procedures*
- *Parallel Civil and Criminal Litigation*
- *Personnel Rules and COPA Policies*
- *Approaching, Managing, Securing and Preserving the Scene*
- *Leading v. Non-leading Questions*
- *The Role of Evidence Specialist*
- *Core Values*
- *Chicago Police Board*
- *Ill. Notary Public Act*
- *OEMC Reports and Resources*
- *COPA Authority, Procedures, Rules, and Jurisdiction*
- *Understanding Cultural Differences*
- *Value Clarification Exercise*
- *Witness Reliability in Police Misconduct Cases*
- *Canvassing*
- *Civil, Criminal and Administrative Discovery*
- *FETI*
- *Welcome to COPA Academy Systems Training*
- *Digital Forensic Analyst*
- *Investigative Process Interview*
- *OEMC Records Portal*
- *Procedural Justice and Police Legitimacy*

- *Unnamed Graphs*
- *Professionalism in Service*
- *Intro to Training Academy*
- *Miranda and the Right to Counsel*
- *Forensic Podiatry*
- *Child Interviews*
- *Trauma Informed Care*
- *Intro to Use of Force*
- *CPD BIA*
- *COPA Policies Part III Professionalism*
- *Flex Fleet Training*
- *CPD Reports*
- *Fourth Amendment in Police Misconduct Cases*
- *Major Case Investigation Protocols*
- *CCSAO USAO Presentation*
- *CLEAR Training*
- *Lock Up Procedures*
- *Recorder*
- *Community Engagement*
- *Public Engagement*
- *COPA Academy CCSAO Presentation*
- *Investigative Process*
- *COPA Policies Part 1*
- *Public Policy in Police Accountability*
- *COPA Academy Cook County State's Attorney's Office, US Attorney's Office CCSAO Garrity*
- *2022 Disciplinary and Remedial Recommendations In-Service Training* (NEW)
- *Officer Interviews Training* (NEW)
- *Final Summary Reports* (NEW)

Accountability and Transparency: COPA Trainings under Development

New or Revised Accountability and Transparency Related Training Materials (between March 1, 2019, and June 30, 2022)

- *Introduction to the City of Chicago*
- *COPA Training Plan*
- *Affidavit Override*
- *COPA Lesson Plan Template*

The Chicago Police Board

In the sixth reporting period the Police Board continued making progress toward fulfilling Accountability and Transparency section requirements. Throughout the sixth reporting period, we continued to meet with the Police Board on a monthly basis. These meetings are invaluable as the Police Board ensures that the Police

Board leadership attends to share information with the IMT and OAG regarding their efforts. Beyond taking the steps necessary to achieve compliance levels, the Police Board has continued to show a dedication to the spirit of the Consent Decree, taking reform, accountability, and transparency seriously.

In past reporting periods, the Police Board reached Full compliance with 11 paragraphs—the Police Board maintained Full compliance with each of these paragraphs in the sixth reporting period. A few paragraphs relevant to the Police Board were assessed for the first time in the sixth reporting period. Among these, ¶531 sets out the overall goal for the Police Board to play "important dual roles of protecting CPD members' due process rights and providing a platform for regular community feedback." The Police Board reached Full compliance with this paragraph. The Police Board has demonstrated an honest assessment of its needs and resources to determine what it needs to fulfill this role. Additionally, the Police Board has certain processes and rules in place to protect officers' due process rights, such as ensuring that a hearing officer presides over disciplinary hearings and providing access to records to the CPD officer implicated by the process. The Police Board also has created a forum for regular community feedback through its regular meetings that are open to the public, where community members are able to raise concerns and provide public comments. The Police Board collects, documents, and acts on community members' comments and concerns by ensuring that the CPD, COPA, and the Police Board itself document and follow-up with the concerns and feedback as appropriate.

Accountability and Transparency: Police Board Policies Implemented

	Policy Number	Issue Date
❖ *Policy Regarding Training of Police Board Members and Hearing Officers*	N/A	N/A
❖ *Police Board Hearing Officer Selection Criteria*	2.1.1	12/12/19
❖ *Police Board Policy Regarding Community Input Received at Police Board Public Meetings*	N/A	6/20/19

The Police Board has not yet reached Full compliance with all relevant Consent Decree paragraphs, but it continues to make thoughtful and methodical efforts toward compliance with these paragraphs. For example, the Police Board has continued to work toward meeting training requirements. (*See* ¶¶540–42). The Police

Board has sought the help of outside entities on a *pro bono* basis to provide relevant and thorough trainings on topics required by the Consent Decree, and the trainings provided to date have been appropriate and helpful.[73]

Moving into the seventh reporting period, we anticipate that the Police Board will continue to work toward Full compliance with the Consent Decree requirements relevant to it. We commend the Police Board for its strong efforts and progress to date.

Deputy Inspector General of Public Safety (Deputy PSIG)

The Deputy PSIG reached Full compliance with all Consent Decree requirements in the fourth reporting period. The Deputy PSIG has made consistent efforts to maintain Full compliance in the fifth and sixth reporting periods. As we noted in the fifth reporting period, the Deputy PSIG developed a plan to maintain Full compliance. It has followed that plan through the end of the sixth reporting period.

We met with the Deputy PSIG regularly during the sixth reporting period to discuss developments related to continued compliance and to discuss what additional evidence, if any, was needed to assess continued compliance. The Deputy PSIG remains transparent and responsive in its Consent Decree compliance. The methodical and forthcoming approach adopted by the Deputy PSIG early in the Consent Decree has continued through the sixth reporting period and, with this, the Deputy PSIG maintained Full compliance with all relevant paragraphs.

Other City Entities

As noted above, the City of Chicago often works toward and accomplishes compliance through the efforts of COPA, the Deputy PSIG, the CPD, and the Police Board. However, other City entities occasionally undertake efforts relevant to compliance with Accountability and Transparency section paragraphs.

As noted in the fifth reporting period, at the end of the reporting period, the City submitted an Interagency Policy, IAP 11-01, *Community-Policy Mediation Pilot Program Policy*, and supporting materials. Although it was labeled as an "Interagency Policy," this document was better understood as a description of a potential program. Upon submitting this document, the City indicated that all relevant agencies had agreed to the Policy and that the City intended to launch the Mediation Pilot in the sixth reporting period. As mentioned in our assessment of ¶511, early in the sixth reporting period, the City met with the IMT to describe its intentions to roll

[73] The Police Board has also implemented training related to this section (*i.e.*, *Mental Health & Policing Training*) and continues to develop training curricula (*e.g.*, *Policing First Amendment Activity Training*).

out the Mediation Pilot Program. At that time, we voiced concerns that the program appeared to be designed for evaluation only after the sixth-month pilot period was completed. The City did not complete this evaluation. We asked for regular updates on the progress of the program throughout the pilot, which the City agreed to provide. We also urged that the City continue to consider the real-time feedback it received regarding the Mediation Pilot Program. However, we did not receive any updates regarding the Mediation Pilot Program in the sixth reporting period.

In the seventh reporting period, we have begun to receive updates on the new Mediation Pilot Program, and we look forward to reporting on any updates regarding the successes and challenges of this pilot program. Further, we urge the City to assess and evaluate the pilot program in real time to avoid the delayed progress that can often plague pilot programs.

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Specific assessments, by paragraph, for the Accountability and Transparency section are included in Appendix 9.

X. Data Collection, Analysis & Management

Guiding Principles

The IMT assessed compliance with applicable Data Collection, Analysis, and Management paragraphs in accordance with the Consent Decree's "Guiding Principles." These principles "are intended to provide the Court, the Monitor, and the public with the context for the subsequent substantive requirements" and "the overall goals" (¶757):

> ***566.*** *Data can empower CPD to engage in the type of critical self-examination essential to instilling and maintaining constitutional policing. CPD can leverage data to ensure constitutional policing by: systematically collecting enough data to have a broad-based understanding of officers' interactions with the public; auditing the data to ensure it accurately reflects those interactions; analyzing the data to identify trends or areas of concern; developing tailored support and interventions to address behavior that is or may become problematic; and assessing the effectiveness of attempts to modify officers' behavior.*
>
> ***567.*** *In addition to enhancing CPD's capacity for internal accountability, CPD can use data to promote accountability to the public by regularly publishing data it collects.*

Summary of Compliance Efforts and Assessments

Data Collection, Analysis, and Management in the Sixth Reporting Period

In the sixth reporting period, the City and the CPD experienced a mix of accomplishes and setbacks for the reforms required by the Data Collection, Analysis, and Management section. For example, during this monitoring period, the CPD provided the IMT with a training and evaluation plan for the Officer Support System (also known as the OSS). The CPD will use the Officer Support System to proactively identify officers with a heightened risk for future adverse events and provide interventions to minimize such risks. The evaluation plan and training are necessary preliminary steps before the Officer Support System can be operationalized, and although we believe the evaluation plan requires additional revisions before finalization, we see real progress towards implementation.

Similarly, the CPD provided us with an updated prototype for completing the comprehensive analysis of CPD data and data-systems (¶606). The assessment is designed to review all points of data required for successful implementation of the Consent Decree and ensure the CPD and the City validly and reliably capture the data. As we have noted in prior reports, data integrity is a core component for demonstrating overall compliance and we have therefore made this review a priority in this Section. While we were only provided with a prototype and the City and the CPD will still need to apply it to each section of the Consent Decree, we believe the current approach is consistent with the type of rigorous analysis we have long-awaited.

Finally, we found increased levels of compliance for the publicly-available use of force data dashboard (¶¶581–82). The dashboard allows community members to review and download use-of-force data, both at the aggregate-level and incident-level and provides a transparent mechanism for any person to conduct independent analysis of CPD force data. During this monitoring period, the CPD updated the dashboard to provide a mechanism for community feedback on the dashboard. Relatedly, the CPD also assigned the Tactical Review and Evaluation Division (TRED) to review community comments and provide appropriate response.

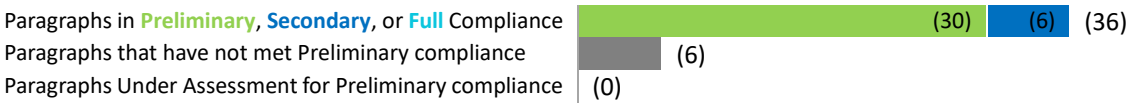
In other areas, however, we found limited progress and, in some cases, reduced levels of compliance. For instance, the CPD failed to maintain compliance with two paragraphs involving TRED (¶¶574-575), resulting in loss of compliance due to resource and personnel concerns. For instance, in May of 2022, the CPD informed us that TRED had only 36 officers despite being budgeted for 48 officers. Additionally, TRED had six sergeants, despite being budgeted for eight. Also, in the sixth reporting period, TRED was operating without a commander and only a single lieutenant. As a result, near the end of the monitoring period, TRED had over twice as many use of force instances that were pending review than actually being reviewed. We are concerned about this backlog of cases, as the CPD's overall success in reforming its accountability structures depends in part upon timely review of data.

We also continue to see no progress related to conducting a citywide and district-level data analysis of use of force (¶¶572–73). The CPD has continued to fail to provide us with a methodology or take any meaningful steps toward conducting the necessary analyses. The analysis is designed to allow the CPD to assess parity (or disparity) among demographic categories in the CPD's use of force, a primary component of the investigation and findings that led to the Consent Decree. Particularly since the CPD already has the necessary data to conduct such an analysis, the lack of affirmative steps to conduct the analysis is both puzzling and disappointing.

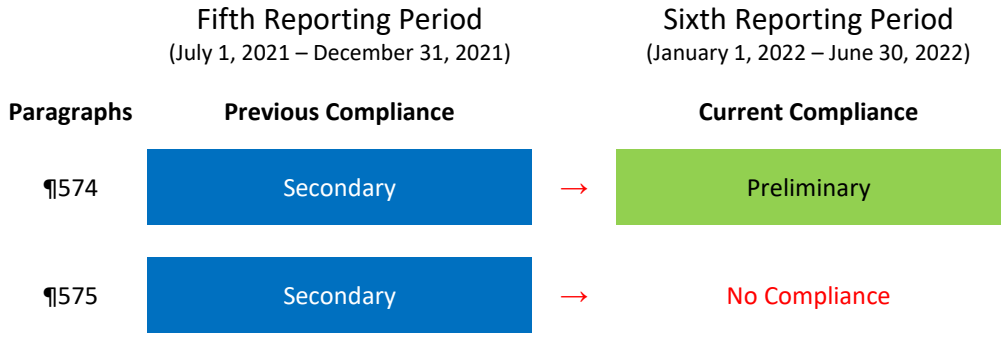
Updated Compliance Levels for the Sixth Reporting Period

Overall, the IMT assessed the City's compliance with 42 Data Collection, Analysis, and Management paragraphs. At the end of the sixth reporting period, the City maintained Preliminary compliance for 25 paragraphs (¶¶569, 574, 577–80, 583–96, 598, and 601–04), achieved Preliminary compliance for five paragraphs (568, 597, 599–600, 606), maintained Secondary compliance with two paragraphs (¶¶608–09), achieved Secondary compliance for four paragraphs (¶¶570–71, 581–82) and failed to reach any level of compliance with six paragraphs (¶¶572–73, 575–76, and 605–607). Additionally, the City lost Secondary compliance with one paragraph (¶574) and lost both Secondary and Preliminary compliance with one paragraph (¶575). *See* Data Figure 1 below.

Data Figure 1: Compliance Progress for Data Collection, Analysis & Management Paragraphs at the End of the Fifth Reporting Period (June 30, 2022)



Data Figure 2:
Lost Levels of Compliance in the Data Collection, Analysis, and Management Section



Data Collection, Analysis, and Management Progress through Six Reporting Periods

Since the effective date of the Consent Decree, the CPD and the City have made steady, if at times slow, progress with the Data Collection, Analysis, and Management Section. Particularly as it relates to addressing foundational data issues that affect all sections of the Consent Decree (¶606), the CPD is making an appreciable effort to ensure that it is relying on strong data. This is also reflected in the CPD's efforts to create an evaluation plan for the Officer Support System program which

should lead to a strong pilot program initiative, ultimately culminating in a department-wide early intervention approach.

However, it is not enough to merely collect the data. The CPD could benefit from an expanded perspective of the importance of data utilization. This is apparent in the lack of progress with respect to ¶¶572–73 which requires an evaluation of the relative use of force against persons in specific demographic categories. This is also apparent via the reduced personnel and resources afforded to TRED, the importance of whose work cannot be understated. Whereas through policy and training, the CPD has moved past many requirements to collect data, they will now need to fully utilize it.

Finally, little attention to-date has been paid to verifying the reliability of the data. In part, this is due to the fact that the CPD has only begun (or will soon begin) to regularly collect the data required by the Consent Decree and therefore has not had the opportunity to validate it. However, in other instances, the lack of validation has been the result of the CPD simply not performing the necessary tasks. In part, we see significant movement towards validity through the ¶606 assessment, though as noted in this report, that assessment must expand to each corner of the Consent Decree. This is no small task; though one for which the CPD appears prepared to do. We will also need to see expanded capabilities for the Audit Division to conduct validation analyses though we have not seen consistent production from that Division.

But the CPD has not yet completed the comprehensive data assessment required by ¶606, which is critical for a full understanding of its data deficiencies and addressing them in a Data Systems Plan, the implementation of which is a key responsibility of the Information Systems Development Group.

Still, through six reporting periods, the City and the CPD have developed or revised policies related to the requirements of the Data Collection, Analysis, and Management section. Data Collection, Analysis, and Management Figure 2, below, provides a sample of those policies.

Data Figure 3:
Sample of New or Revised Policies
related to the Data Collection, Analysis, and Management Section
(between March 1, 2019, and June 30, 2022)[74]

	Policy #	Issue Date
❖ *Department Approved Weapons and Ammunition*	U04-02	05/07/2021
❖ *Control Devices and Instruments*	U04-02-02	02/28/2020
❖ *Use of Force*	G03-02	12/31/2020
❖ *Force Options*	G03-02-01	12/31/2020
❖ *Incidents Requiring the Completion of a Tactical Response Report*	G03-02-02	12/31/2020
❖ *Firearms Discharge Incidents Involving Department Members*	G03-02-03	12/31/2020
❖ *Taser Use Incidents*	G03-02-04	12/31/2020
❖ *Oleoresin Capsicum (OC) Devices and Other Chemical Agent Use Incidents*	G03-02-05	12/31/2020
❖ *Canine Use Incidents*	G03-02-06	12/31/2020
❖ *Baton Use Incidents*	G03-02-07	12/31/2020
❖ *Department Review of Use of Force*	G03-02-08	1/27/2021
❖ *Prohibition on Retaliation*	G08-05	12/30/2020
❖ *Foot Pursuit Reviews Standard Operating Procedure*	2020-001	
❖ *Performance Recognition System*		
❖ *Audit Division Standard Operating Procedures*		
❖ *Force Review Board (FRB), Standard Operating Procedure*	2020-002	
❖ *Information Systems Development Group Policy*	S09-01-01	

Looking Ahead to the Sixth Reporting Period

In preparing for the seventh monitoring period and beyond, the CPD will need to identify and prioritize areas of progress that will have the greatest organizational utility. In some of these areas, we anticipate the CPD could achieve such progress before the end of the year. For instance, the CPD needs to initiate efforts to conduct the analysis of use of force by demographic characteristics, though before conducting the analysis, a comprehensive methodology will need to be provided for IMT review. The CPD also needs to begin the Officer Support System pilot program once a full evaluation plan has been completed. As Officer Support System

[74] Many of these policies are available online in the CPD's Department Directives System. *See Department Directives System*, CHICAGO POLICE DEPARTMENT, https://home.chicagopolice.org/inside-cpd/department-directives-system-dds/.

training already exists, the evaluation plan is all that needs to be accomplished for the moment. Finally, the CPD will need to complete the assessment of its data systems and the data necessary to comply with the Consent Decree. While this has begun in some respects with the prototype provided, the seventh monitoring period offers an opportunity to fully complete it.

Other progress will likely require a longer timeline. For instance, the CPD must also adequately staff and provide sufficient resources to TRED to ensure comprehensive management of use of force as well as guide future policy and training. However, at present, it does not appear that this issue will be resolved in the near future and is tied into larger operational decisions, including deploying TRED personnel to patrol functions. Relatedly, the need for the CPD to validate the broader use of force data (including targeted and systematic reviews from CPD's Audit Division) will necessarily require a longer timeline, as will the CPD's ability to conduct random reviews of Body-Worn Cameras and In-Car Cameras. Although we anticipate a longer timeline being needed to fully implement these things, we expect initial steps to occur on a shorter timeframe.

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Specific assessments, by paragraph, for the Data Collection, Analysis & Management section are included in Appendix 10.

XI. Implementation, Enforcement & Monitoring

This is the last section of the Independent Monitoring Team's (IMT's) sixth semiannual Independent Monitoring Report. It includes our status updates for the City of Chicago's (City's) and its relevant entities' efforts from January 1, 2022, through June 30, 2022, regarding the implementation, enforcement, and monitoring obligations of the Consent Decree.

As we identified in our Monitoring Plan for Year Three, the City has certain obligations that fall outside the 10 topic areas. While these paragraphs do not fall within the specific topic areas discussed above, these obligations are critical to the success of the reform efforts across all 10 topic areas of the Consent Decree. For this reason, the IMT is providing updates on the City's efforts under the following paragraphs: ¶¶626–27, 629–43, 677–80, 682–87, 699–701, 704–06, 711, 714, and 720–21.

Specific compliance status updates, by paragraph, for the Implementation, Enforcement, and Monitoring section are included in Appendix 11.

Conclusion and Looking Ahead to Independent Monitoring Report 6

We have concluded our monitoring efforts for the sixth reporting period (January 1, 2022, through June 30, 2022). We appreciate the reform efforts made by many hard-working City personnel, including the significant compliance progress made by the City, the CPD, COPA; the Chicago Police Board; the OIG, including the Deputy PSIG; and the OEMC.

The IMT's next semiannual report, Independent Monitoring Report 7, will cover the reporting period from June 1, 2022, through December 31, 2022. As with previous reports, we will continue to work with the City and the OAG to address the requirements of all the Consent Decree's requirements. We will also continue to engage with Chicagoans to determine whether these reforms are being felt in their communities.

Appendix 1
Community Policing
Compliance Assessments, by Paragraph

Appendix 1
Community Policing
Compliance Assessments, by Paragraph

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Community Policing: ¶13

13. *In 2017, the Superintendent accepted CPAP's recommendations, and CPD began to implement some of the recommendations, namely, the creation of the Office of Community Policing, which reports directly to the Superintendent and is responsible for overseeing the implementation of CPD's community policing efforts. CPD will, within 90 days of the Effective Date, develop a plan, including a timeline, for implementing CPAP's recommendations, consistent with the requirements set forth in this Agreement.*

Compliance Progress

(Reporting Period: January 1, 2022, through June 30, 2022)

Preliminary:	***In Compliance*** **(FIRST REPORTING PERIOD)**
Secondary:	***In Compliance*** **(NEW)**
Full:	***Not in Compliance***

In the sixth reporting period, the City and the CPD maintained Preliminary compliance, and regained Secondary compliance by completing Community Policing Advisory Panel (CPAP) Quarterly Reports for remainder of 2021 and the first quarter of 2022.

To assess preliminary compliance, the IMT compared the elements of the CPD plan to the CPAP recommendations and sub-recommendations. To assess Secondary compliance, the IMT reviewed the CPD's efforts to (1) convey accurate status updates and implementation challenges to the CPAP recommendations and (2) reporting progress in implementing the remaining CPAP recommendations. For Full compliance, we will monitor the CPD's efforts to evaluate the effectiveness of its implementation efforts.

Progress before the Sixth Reporting Period

As we have outlined in our previous reports covering earlier reporting period, the CPD's plan to implement CPAP recommendations covers the following:

(1) community partnerships;
(2) restorative justice;
(3) youth outreach;
(4) community policing strategies;
(5) annual strategy review and feedback;
(6) quarterly reports;
(7) community policing staffing and training;
(8) selection of Chicago Alternative Policing Strategy (CAPS) officers;
(9) coordination of City services;

(10) victims' resources; and
(11) community policing evaluations.

In the first reporting period, the City and the CPD missed the ¶13 deadline but ultimately met Preliminary compliance because it developed a plan, including a timeline, for implementing the CPAP's recommendations. The City and CPD achieved secondary compliance in the second reporting period because a review of the CPD's CPAP plan implementation efforts and the draft CPAP Meetings SOP demonstrated effective oversight of progress in implementing the CPAP recommendations. The City and CPD maintained preliminary and secondary compliance during the third and fourth reporting periods.

In the last reporting period, the City and the CPD maintained Preliminary compliance, but did not maintain Secondary compliance with the requirements of ¶13 because the CPD did not provide sufficient evidence to assess the CPD's efforts to comply with this paragraph. Despite the CPD's progress in previous reporting periods, the CPD failed to publish any CPAP Quarterly Reports during the fifth reporting period.

Likewise, in previous reporting periods, the CPD produced its published CPAP Quarterly Reports as evidence of their efforts to convey accurate status reports and challenges to implementation of the recommendations. The Reports track and describe the implementation status of the 14 projects developed to implement the CPAP recommendations. Unfortunately, in the fifth reporting period, the CPD failed to provide the IMT with any evidence of its implementation efforts.

Progress in the Sixth Reporting Period

The IMT reviewed the CPAP Quarterly Reports for the last three quarters of 2021, and the first quarter of 2022, which provide evidence of CPD efforts to convey accurate status reports and challenges to implementation of the CPAP recommendations. These reports track and describe the implementation status of the 14 projects developed to implement the CPAP recommendations.

Highlights covered in the 2021 year-end Quarterly Report included the following:

- Youth District Councils met with the CPD 176 times with a total of 1,695 youth engaged;
- The CPD finalized G02-03, *Community Policing Mission and Vision*;
- The CPD completed Operation Clean, in which the CPD coordinates with other City agencies to problem solve quality of life issues that can lead to crime and disorder;

- The CPD conducted "Parks Rolling Rec on the Block," which provided activities and services in three different neighborhood blocks across Chicago every Friday during Q2, Q3, and Q4;
- The CPD completed 2022 District and Bureau Strategic Plans.

The reports also acknowledge ongoing challenges in achieving implementation timelines, citing workforce shortages and COVID-19 related impediments.

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By completing the Quarterly Reports for the remainder of 2021, and the first Quarterly report for 2022, the CPD regained Secondary compliance. The CPD must produce future CPAP Quarterly Reports in a timely manner. For Full compliance, the IMT will assess the CPD's efforts to develop an appropriate process to assess effectiveness of implementation of tasks relating to CPAP recommendations.

Moreover, as we have discussed in previous reports, the CPD must demonstrate that it is developing a process to effectively and sustainably evaluate the effectiveness of its implementation of the CPAP recommendations. Such evaluation will likely be tied to the CPD's efforts to comply with ¶47. That paragraph requires the CPD to annually evaluate its efforts to build community partnerships and use problem-solving techniques to reduce crime and improve quality of life. Many of these efforts to build community partnerships and use problem-solving techniques to reduce crime align with the CPAP recommendations.

Paragraph 13 Compliance Progress History

FIRST REPORTING PERIOD SEPTEMBER 1, 2019 – AUGUST 31, 2019 COMPLIANCE PROGRESS: Preliminary	SECOND REPORTING PERIOD SEPTEMBER 1, 2019 – FEBRUARY 29, 2020 COMPLIANCE PROGRESS: Secondary	THIRD REPORTING PERIOD MARCH 1, 2020 – DECEMBER 31, 2020 COMPLIANCE PROGRESS: Secondary
FOURTH REPORTING PERIOD JANUARY 1, 2021 – JUNE 30, 2021 COMPLIANCE PROGRESS: Secondary	FIFTH REPORTING PERIOD JULY 1, 2021 – DECEMBER 31, 2021 COMPLIANCE PROGRESS: Preliminary	SIXTH REPORTING PERIOD JANUARY 1, 2022 – JUNE 30, 2022 COMPLIANCE PROGRESS: Secondary

Community Policing: ¶14

14. *Within 180 days of the Effective Date, CPD will review and, to the extent necessary, revise all relevant policies to clearly delineate the duties and responsibilities of the Office of Community Policing and any other offices or entities that report to the Office of Community Policing.*

Compliance Progress

(Reporting Period: January 1, 2022, through June 30, 2022)

Preliminary:	***In Compliance*** **(FIRST REPORTING PERIOD)**
Secondary:	***In Compliance*** **(NEW)**
Full:	***Not Yet Assessed***

In the sixth reporting period, the City and the CPD maintained Preliminary compliance and regained Secondary compliance with at least 95% of members completing required in-service community policing training.

To assess compliance, the IMT monitored the CPD's completion and documentation of relevant trainings and its efforts to supervise compliance with the Office of Community Policing policies to ensure the policy changes are implemented in CPD practices. We monitored the CPD's efforts to supervise the implementation of these policies, assessing, for example, whether the CPD's evaluation process, as outlined in the Community Policing Biennial Policy Review procedure, is effective at ensuring the policies are implemented.

This paragraph was first assessed in the second reporting period, but it failed to meet preliminary compliance because, although the IMT reviewed policies regarding the Office of Community Policing, the IMT found that the draft policies and SOPs required further revision. The City and the CPD achieved preliminary compliance in the third reporting period by reviewing and revising all relevant policies that delineate the duties and responsibilities of the Office of Community Policing and its programs and entities. In the fourth reporting period, the City and the CPD maintained Preliminary compliance and achieved Secondary compliance with ¶14 because the CPD trained members of the Office of Community Policing on the various policy changes made as part of this paragraph's requisite review. In the last reporting period, the City and the CPD maintained Preliminary compliance but remained under assessment for Secondary compliance.

In previous reporting periods, the CPD reviewed and revised aspects of its community policing policy framework, however progress stalled in the sixth reporting period. Specifically, the CPD did not sufficiently demonstrate its ability to review the implementation of the policies to ensure the changes are reflected in member conduct and program engagement. In conversation with the Office of Community Policing (also known as OCP), we learned that the CPD is developing additional

standard operating procedures for some of the community policing programs covered in the Office of Community Policing policies. However, other than an updated version of the CPD's General Order G02-03, *Community Policing Mission and Vision policy*, we did not receive any records reflecting the CPD's efforts to supervise the implementation of the updated Office of Community Policing policies.

During this reporting period, the CPD reported that at least 95% of members completed required in-service community policing training. The CPD also developed and issued two directives covering community partnerships and Youth District Advisory Committees.

The CPD also reports additional directives will be developed as required to strengthen supervisory oversight. These new directives will also provide additional guidance on engaging community members in the development of CPD policy The CPD also reports that during the next reporting period, a thorough review of Office of Community Policing programming—such as the Dare Program and Officer Friendly—to determine efficacy and help inform programming changes.

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The IMT finds that the City and the CPD maintained Secondary compliance by completing required training and providing some additional guidance through issuance of directives to strengthen supervisory oversight. For Full compliance, the IMT expects the CPD to finalize additional directives, specifying community roles in policy and strategy development. The IMT assess the effectiveness of the CPD's efforts to evaluate whether these programs and processes as outlined in the Community Policing Biennial Policy Review procedure and other directives, are effective in ensuring Office of Community Policing policy implementation and achieving intended outcomes. That assessment will likely overlap with our assessment of the CPD's effort to comply with ¶47.

Paragraph 14 Compliance Progress History

FIRST REPORTING PERIOD	SECOND REPORTING PERIOD	THIRD REPORTING PERIOD
SEPTEMBER 1, 2019 – AUGUST 31, 2019	SEPTEMBER 1, 2019 – FEBRUARY 29, 2020	MARCH 1, 2020 – DECEMBER 31, 2020
COMPLIANCE PROGRESS:	COMPLIANCE PROGRESS:	COMPLIANCE PROGRESS:
Not Applicable	None	Preliminary
FOURTH REPORTING PERIOD	**FIFTH REPORTING PERIOD**	**SIXTH REPORTING PERIOD**
JANUARY 1, 2021 – JUNE 30, 2021	JULY 1, 2021 – DECEMBER 31, 2021	JANUARY 1, 2022 – JUNE 30, 2022
COMPLIANCE PROGRESS:	COMPLIANCE PROGRESS:	COMPLIANCE PROGRESS:
Secondary	Preliminary	Secondary

Community Policing: ¶15

15. *With the assistance of the Office of the Community Policing, CPD will ensure its command staff develops crime reduction and problem-solving strategies that are consistent with the principles of community policing. To achieve this outcome, CPD will: a. within 180 days of the Effective Date, provide CPD's command staff methods and guidance, in writing, for ensuring that department-wide and district-level crime reduction strategies are consistent with the principles of community policing; b. require CPD's command staff to review department-wide and district-level crime reduction strategies implemented under their command, as appropriate, in order to ensure they incorporate problem-solving techniques and are consistent with the principles of community policing; and c. designate the Deputy Chief of the Office of Community Policing to review and provide written feedback on implemented department-wide and district level crime reduction strategies, excluding operational strategies that are determined on a day-to-day or short term basis, to ensure they are community oriented and consistent with the principles of community policing.*

Compliance Progress

(Reporting Period: January 1, 2022, through June 30, 2022)

Preliminary:	***In Compliance*** **(SECOND REPORTING PERIOD)**
Secondary:	***In Compliance*** **(NEW)**
Full:	***Not in Compliance***

In the sixth reporting period, the City and the CPD maintained Preliminary compliance and regained Secondary compliance by completing its district-wide and bureau-wide strategy development process and posting strategies for public awareness. The IMT notes improvements, including more detailed strategies that better reflect community input, more documentation of the review process, and continued efforts to broaden participation in the review process.

In this reporting period, we monitored the CPD's efforts to engage in ¶15 review when developing crime-reduction strategies and problem-solving techniques. We also monitored the CPD's efforts to evaluate and refine its processes to ensure that they result in strategies consistent with community policing.

Progress before the Sixth Reporting Period

In the previous reporting period, the CPD failed to complete and document the review of the districtwide and bureau-wide strategies. The IMT urged the CPD to

initiate the planning process, including the community conversations and the command-level reviews in a timely manner and meet their internal deadlines.

Progress in the Sixth Reporting Period

On March 15, 2021, the CPD provided compliance records regarding District Strategic Plans. The CPD also posted these finalized plans on their website early in the sixth reporting period. The 19-page template that each District completes covers crime reduction strategies and community engagement priorities. Since its inception, the template has expanded from 4 pages to 19 pages, which better provides the CPD opportunity to articulate detailed crime reduction and community engagement strategies.

Each District also engaged in "community conversations," which comprised a series of community meetings to identify, discuss, and establish crime reduction and engagement priorities. Feedback from these sessions, coupled with internal discussions informed by data, led to the priorities identified in each of the 22 District Plans. In addition, issues identified during Beat meeting discussions were often cited as sources of community concerns considered in the planning process.

The most mentioned priority concerns included the following:

- Vehicular hijacking
- Violent crime
- Quality of life issues

The community engagement section of these strategies focuses on youth, older adults, business community, survivors of domestic violence, and affinity groups. For youth engagement, many Districts plan to conduct outreach activities with schools, initiation, and/or expansion of Police Explorer programs, and expansion of Youth Advisory Committees. For older adults, well-being check-ins, and presentations covering safety tips were often-used strategies. Business engagement strategies primarily included security assessments and information sharing, while for survivors of domestic violence using liaisons to better connect victims to services. The affinity group outreach efforts often focus on the unsheltered and stepped-up efforts to connect to other marginalized groups.

The crime reduction and engagement strategies, however, lacked performance baselines and measurable goals. There is little guidance provided to explain how to assess performance levels and make judgements about strategy implementation and impact. The IMT suggests the CPD consider modifying the template to assign and capture measurable goals.

Still, improvements in the extent of engagement and considerations of those engagement outcomes from previous planning cycles were evident.[1] Despite these improvements, the CPD will need to find ways to expand their outreach and strategy development participation among young men of color. Reaching and involving this demographic will provide important insights and contribute to building trust among this group.

***

The City and the CPD maintained Secondary compliance by competing its districtwide and bureau-wide strategy development process and posting strategies for public awareness. Improvements include more detailed strategies that better reflect community input, more documentation of the review process, and continued efforts to broaden participation in the review process. The IMT expects the CPD to continue refinements and improvements in broadening participation and making additional efforts to include more young adults of color and include measurable goals in their strategies.

To achieve Full compliance, the CPD must demonstrate its written guidance and supervisory practices for its development, review, and implementation, of districtwide and bureau-wide strategies, and provide evidence of broadening their input on strategy development to better reflect a cross-section of community members. The CPD will need to develop measures to assess effectiveness of the engagement processes and impact of the districtwide and bureau-wide strategies in achieving community safety goals.

Paragraph 15 Compliance Progress History

FIRST REPORTING PERIOD	SECOND REPORTING PERIOD	THIRD REPORTING PERIOD
SEPTEMBER 1, 2019 – AUGUST 31, 2019	SEPTEMBER 1, 2019 – FEBRUARY 29, 2020	MARCH 1, 2020 – DECEMBER 31, 2020
COMPLIANCE PROGRESS:	COMPLIANCE PROGRESS:	COMPLIANCE PROGRESS:
Not Applicable	Preliminary	Preliminary
FOURTH REPORTING PERIOD	**FIFTH REPORTING PERIOD**	**SIXTH REPORTING PERIOD**
JANUARY 1, 2021 – JUNE 30, 2021	JULY 1, 2021 – DECEMBER 31, 2021	JANUARY 1, 2022 – JUNE 30, 2022
COMPLIANCE PROGRESS:	COMPLIANCE PROGRESS:	COMPLIANCE PROGRESS:
Secondary	Preliminary	Secondary

[1] *See Special Report: Focus Groups with Black and Latino Men, Ages 18–35 (Conducted December 2020 – June 2021*), INDEPENDENT MONITORING TEAM (September 1, 2022), https://cpdmonitoringteam.com/overview/reports-and-resources/imt-special-report-focus-groups-with-black-and-latino-men-ages-18-35/.

Community Policing: ¶16

16. *CPD Bureau of Patrol Area Deputy Chiefs and District Commanders will regularly review district efforts and strategies for building community partnerships and using problem-solving techniques.*

Compliance Progress

(Reporting Period: January 1, 2022, through June 30, 2022)

Recurring Schedule: Regularly ☐ **Met** ☑ **Missed**

Preliminary: ***In Compliance*** **(NEW)**
Secondary: ***Not Yet Assessed***
Full: ***Not Yet Assessed***

During the sixth reporting period, the City and the CPD reported that District Commanders regularly reviewed their strategies and conducted quarterly reviews led by District Commanders. The City and the CPD also met Preliminary compliance through its *District Strategic Plans* policy, S02-03-02, with the CPD receiving no-objection notices from both the IMT and the Office of the Illinois Attorney General. On the other hand, the CPD has not yet implemented a recurring reviewing schedule to be met.

The IMT monitored the CPD's efforts to finalize a policy that incorporates this paragraph's requirements, including guidance regarding what data the Deputy Chief and District Commander should be reviewing, how regularly they should be reviewing, and how to document the review.

Progress before the Sixth Reporting Period

The City and the CPD's efforts to comply with ¶16 was first assessed in the fourth reporting period where the CPD did not achieve preliminary compliance because it had not fully codified the requisite reviews into policy. Specifically, the CPD's Special Order S02-03-02, *District Strategic Plans*, was still under review. In the previous reporting period, the CPD continued to review and revise the policy that provides guidance for the command-level review of district efforts and strategies for building community partnerships and using problem-solving techniques. While the CPD planned to provide the IMT with a revised version of the *District Strategic Plans* policy, S02-03-02, to address ¶16, including additional guidance for how command staff should conduct these reviews, the CPD did not provide it by the end of the fifth reporting period.

Progress in the Sixth Reporting Period

The IMT received a revised version of S02-03-02 during this reporting period. The CPD acknowledged a need to develop a more specific directive for providing more guidance for developing, documenting, and tracking community partnerships, but this policy has not been completed. The CPD also received no-objection notices from both the IMT and the Office of the Illinois Attorney General, and at the end of the reporting period, were in the process to receive and consider community input.

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In sum, the CPD and City met Preliminary compliance because the requirements of this paragraph have been codified into policy. Moving forward, to maintain Preliminary compliance, the CPD must complete and finalize a new directive concerning partnership development and implementation and more documentation of the quarterly review processes. For Secondary compliance, CPD must demonstrate that supervisors understand their oversight role to ensure that strengthening community partnerships remains a priority in their district or area. To achieve further compliance, the IMT will require that the CPD demonstrate it has a sustainable review process to determine the effectiveness of District strategies toward community partnerships.

Paragraph 16 Compliance Progress History

FIRST REPORTING PERIOD	SECOND REPORTING PERIOD	THIRD REPORTING PERIOD
SEPTEMBER 1, 2019 – AUGUST 31, 2019	SEPTEMBER 1, 2019 – FEBRUARY 29, 2020	MARCH 1, 2020 – DECEMBER 31, 2020
COMPLIANCE PROGRESS:	COMPLIANCE PROGRESS:	COMPLIANCE PROGRESS:
Not Applicable	Not Applicable	Not Applicable
FOURTH REPORTING PERIOD	**FIFTH REPORTING PERIOD**	**SIXTH REPORTING PERIOD**
JANUARY 1, 2021 – JUNE 30, 2021	JULY 1, 2021 – DECEMBER 31, 2021	JANUARY 1, 2022 – JUNE 30, 2022
COMPLIANCE PROGRESS:	COMPLIANCE PROGRESS:	COMPLIANCE PROGRESS:
None	None	Preliminary

Community Policing: ¶17

17. *The overall effectiveness of CPD's department-wide and district-level crime reduction strategies will be determined by a reduction in crime and not by the number of arrests, stops, or citations.*

Compliance Progress

(Reporting Period: January 1, 2022, through June 30, 2022)

Preliminary:	***In Compliance*** **(NEW)**
Secondary:	***Not Yet Assessed***
Full:	***Not Yet Assessed***

In the sixth reporting period, the City and the CPD achieved Preliminary compliance with this paragraph by adding specific language in a revised and approved S02-03-02, *District Strategic Plans*, covering procedures for developing District- and Bureau-wide crime-reduction and community-engagement strategies. The revised policy states that the "CPD will assess the effectiveness of policing strategies that focuses on crime reduction and not the numbers of arrests as the measure of effectiveness."

To assess compliance, we monitored the CPD's efforts to incorporate this paragraph's requirement into policy, including guidance regarding the process by which the CPD would assess the effectiveness of the strategies. We also monitored the CPD's efforts to conduct such assessments based on appropriate data.

Progress before the Sixth Reporting Period

In previous reporting periods, the City and the CPD did not provide any evidence that the CPD revised or developed a new directive that establishes the process by which the CPD will assess the effectiveness of policing strategies that focuses on crime reduction and not the number of arrests as the measure of effectiveness.

Progress in the Sixth Reporting Period

During this reporting period, the CPD added specific language in a revised and approved S02-03-02 policy covering procedures for developing District- and Bureau-wide crime reduction and community engagement strategies that states, "CPD will assess the effectiveness of policing strategies that focuses on crime reduction and not the numbers of arrests as the measure of effectiveness."

***

The IMT finds that the CPD and City achieved Preliminary compliance. To achieve additional levels of compliance, the CPD must demonstrate through its ongoing

assessments and reporting of crime reduction efforts, that officers adhere to this policy.

Paragraph 17 Compliance Progress History

FIRST REPORTING PERIOD SEPTEMBER 1, 2019 – AUGUST 31, 2019	SECOND REPORTING PERIOD SEPTEMBER 1, 2019 – FEBRUARY 29, 2020	THIRD REPORTING PERIOD MARCH 1, 2020 – DECEMBER 31, 2020
COMPLIANCE PROGRESS: Not Applicable	COMPLIANCE PROGRESS: Not Applicable	COMPLIANCE PROGRESS: Not Applicable
FOURTH REPORTING PERIOD JANUARY 1, 2021 – JUNE 30, 2021	**FIFTH REPORTING PERIOD** JULY 1, 2021 – DECEMBER 31, 2021	**SIXTH REPORTING PERIOD** JANUARY 1, 2022 – JUNE 30, 2022
COMPLIANCE PROGRESS: None	COMPLIANCE PROGRESS: None	COMPLIANCE PROGRESS: Preliminary

Community Policing: ¶18

18. *The City will establish and coordinate regular meetings, at minimum quarterly, with representatives from City departments, sister agencies, and CPD to collaborate on developing strategies for leveraging City resources to effectively and comprehensively address issues that impact the community's sense of safety, security and well-being. The City departments and agencies will include, but not be limited to, the Department of Streets and Sanitation, the Department of Buildings, the Chicago Fire Department, the Department of Business Affairs and Consumer Protection, the Department of Planning and Development, the Office of Emergency Management and Communication People with Disabilities, the Department of Public Health, the Department of Family and Support Services, the Chicago Public Schools, the Chicago Housing Authority, and the Chicago Park District. If after two years the City concludes that less frequent meetings would be more effective, it may propose an alternative schedule subject to Monitor approval.*

Compliance Progress

(Reporting Period: January 1, 2022, through June 30, 2022)

Recurring Schedule: Quarterly ☐ **Met** ☑ **Missed**

Preliminary: ***In Compliance*** **(FIRST REPORTING PERIOD)**
Secondary: ***Not in Compliance***
Full: ***Not in Compliance***

The IMT finds that the CPD and City maintained Preliminary compliance but failed to achieve Secondary compliance by not providing sufficient records for the two required Quarterly meetings for this reporting period.

To assess this paragraph, we observe, review, and track outcomes from the Quarterly meetings chaired by the Mayor that coordinate City entities in leveraging resources to promote community safety.

The City met Preliminary compliance in the first reporting period by holding quarterly meetings and providing the IMT with a summary of its activities regarding regular meetings with representatives from City departments. The City maintained Preliminary compliance during the subsequent reporting periods by holding two "cabinet meetings." The City has not achieved secondary compliance because they have not produced records to show that these meetings involve quality collaboration on developing strategies for leveraging City resources, including a review of actions assigned, actions taken, and progress made.

On July 1, 2022, the City held a Mayor's Public Safety Cabinet meeting, one day after the end of the reporting period. The meeting was scheduled for earlier but an emergency led to the re-scheduling. The meeting attendees included many agency heads or their designees. The agenda included updates on progress made in reducing violence in previously targeted areas and impact on city-wide crime numbers. The data revealed significant progress thus far in 2022 in reducing homicides and nonfatal shootings. The City also reported significant improvements in homicide clearance rates and attributed that progress to improved technology and increased cooperation from residents due to improved community relations. There was considerable discussion about roles that other City entities can play in providing safe places, such as improving street lighting, targeted clean-ups of vacant lots, and block parties. There was also discussion regarding finding ways to bring the various youth advisory boards together to promote more collaboration.

The IMT finds that these meetings address the requirements of this paragraph by coordinating and leveraging resources to contribute to community safety efforts. However, we only received documentation for one meeting—rescheduled to after the reporting period—when the requirement is for two meetings for each reporting period. The IMT is concerned that either (1) the additional meeting is not taking place or (2) the IMT was not notified of the event nor provided documentation of the proceedings.

***

The IMT finds that the City and the CPD maintain Preliminary compliance but failed to achieve Secondary compliance by not providing documentation for two Quarterly Public Safety meetings required form this reporting period. For the City and the CPD to maintain Preliminary compliance, they must hold and provide the documentation for two Quarterly meetings each reporting period and continue to track and report out on the progress and impact of the coordinated interventions.

Paragraph 18 Compliance Progress History

FIRST REPORTING PERIOD	SECOND REPORTING PERIOD	THIRD REPORTING PERIOD
SEPTEMBER 1, 2019 – AUGUST 31, 2019	SEPTEMBER 1, 2019 – FEBRUARY 29, 2020	MARCH 1, 2020 – DECEMBER 31, 2020
COMPLIANCE PROGRESS:	COMPLIANCE PROGRESS:	COMPLIANCE PROGRESS:
Preliminary	Preliminary	Preliminary
FOURTH REPORTING PERIOD	**FIFTH REPORTING PERIOD**	**SIXTH REPORTING PERIOD**
JANUARY 1, 2021 – JUNE 30, 2021	JULY 1, 2021 – DECEMBER 31, 2021	JANUARY 1, 2022 – JUNE 30, 2022
COMPLIANCE PROGRESS:	COMPLIANCE PROGRESS:	COMPLIANCE PROGRESS:
Preliminary	Preliminary	Preliminary

Community Policing: ¶19

19. *CPD will ensure that officers are provided with information regarding the communities they serve, including their assets and challenges, community groups and leaders, and business, residential, and demographic profiles.*

Compliance Progress

(Reporting Period: January 1, 2022, through June 30, 2022)

Preliminary:	***In Compliance*** **(FOURTH REPORTING PERIOD)**
Secondary:	***Not in Compliance***
Full:	***Not Yet Assessed***

In this reporting period, the City and the CPD maintained Preliminary compliance but did not achieve Secondary compliance because they did not complete digitized updates of resource guides or obtain the community's input.

To assess compliance, we monitored whether the CPD sought input from community stakeholders in developing and revising the district resource guides and whether district members received and access the guides. We also continued to monitor the CPD's progress to develop a plan to track, assess, and update the use district guides, determine which resources officers most often refer community members to, and which are not as active.

Progress before the Sixth Reporting Period

During the previous reporting periods, we monitored the CPD's efforts to incorporate this paragraph's requirement into policy. We reviewed the CPD's Special Order S02-03, *The Community Policing Office*, and Department Notice D21-03, *Neighborhood Policing Initiative Pilot Program*, and determined that these directives effectively codified ¶19's requirements. We also reviewed the CPD's standard operating procedure regarding the Community Policing District Resource Guide, which provides more guidance regarding how the Office of Community Policing will collect community information. Because the CPD finalized S02-03 and D21-03 and developed a process by which the Office of Community Policing can collect and distribute community information, the City and the CPD met Preliminary compliance.

During the last reporting period, the CPD continued to distribute district resource guides and made progress on efforts to provide officers with helpful neighborhood information but did not provide records to support those efforts.

Progress in the Sixth Reporting Period

During this reporting period, the CPD reported still working on processes to produce, update, and disseminate resource guides and other pertinent District-related information using a digital process. The CPD hopes to complete a database including procedures for regular review and updates of resource guides in the next reporting period.

***

The CPD and City maintained Preliminary compliance but did not achieve Secondary compliance. To achieve Secondary compliance, the IMT expects the CPD to complete its digital database and update and make available these digitized resource guides to CPD members.

Paragraph 19 Compliance Progress History

FIRST REPORTING PERIOD	SECOND REPORTING PERIOD	THIRD REPORTING PERIOD
SEPTEMBER 1, 2019 – AUGUST 31, 2019	SEPTEMBER 1, 2019 – FEBRUARY 29, 2020	MARCH 1, 2020 – DECEMBER 31, 2020
COMPLIANCE PROGRESS:	COMPLIANCE PROGRESS:	COMPLIANCE PROGRESS:
Not Applicable	Not Applicable	Not Applicable
FOURTH REPORTING PERIOD	**FIFTH REPORTING PERIOD**	**SIXTH REPORTING PERIOD**
JANUARY 1, 2021 – JUNE 30, 2021	JULY 1, 2021 – DECEMBER 31, 2021	JANUARY 1, 2022 – JUNE 30, 2022
COMPLIANCE PROGRESS:	COMPLIANCE PROGRESS:	COMPLIANCE PROGRESS:
Preliminary	Preliminary	Preliminary

Community Policing: ¶20

20. *Within 180 days of the Effective Date, CPD will develop and institute a policy prohibiting the transport of individuals with the intent to display or leave them in locations where known rivals or enemies live or congregate.*

Compliance Progress (Reporting Period: January 1, 2022, through June 30, 2022)

Preliminary:	***In Compliance*** **(THIRD REPORTING PERIOD)**
Secondary:	***Not in Compliance***
Full:	***Not Yet Assessed***

During this reporting period, the City and the CPD maintained Preliminary compliance by updating the 2021 *In-Service Use of Force* training and completing delivery in early 2022. However, the CPD did not achieve Secondary compliance because they did not provide a process to track transports which is necessary to determine compliance with this paragraph.

To assess compliance, the IMT monitored the CPD's efforts to train officers on this requirement. Specifically, we reviewed records indicating that members received the *2021 In-Service Use of Force* training. We were also looking for the CPD to submit guidance on supervisory practices and data-collection efforts related to transports to evaluate how the CPD tracks transports to ensure officers comply with this requirement.

Progress before the Sixth Reporting Period

In the previous reporting period, the IMT determined that the City and the CPD maintained Preliminary compliance and took meaningful steps to achieve Secondary compliance. The City and the CPD did not provide any other records demonstrating that officers attended the training courses, nor did we receive any evidence that the CPD has developed supervisory practices to ensure policy implementation.

Progress in the Sixth Reporting Period

The IMT reviewed the CPD's General Order G04-01, *Transport Policies*; the CPD's 2021 Two-Day *De-Escalation, Response to Resistance, and Use of Force* training; and the revised *2021 In-Service Use of Force* training. The training includes guidance regarding this paragraph's requirements. The CPD did not provide any other records demonstrating developed supervisory practices including a process to track transports to ensure policy implementation. To assess Secondary compliance, the CPD must demonstrate that supervisors have tools by which to understand policy implementation.

***

The CPD and City maintained Preliminary compliance but did not achieve Secondary compliance, which requires a demonstration of supervisory mechanisms to implement the policy. Moving forward, the CPD and City must demonstrate a process to track transports to achieve Secondary compliance with this paragraph. For further compliance, the CPD must demonstrate that its supervisory practices are effective to sustain compliance, and the IMT's review may include relevant community complaints

Paragraph 20 Compliance Progress History

FIRST REPORTING PERIOD	SECOND REPORTING PERIOD	THIRD REPORTING PERIOD
SEPTEMBER 1, 2019 – AUGUST 31, 2019	SEPTEMBER 1, 2019 – FEBRUARY 29, 2020	MARCH 1, 2020 – DECEMBER 31, 2020
COMPLIANCE PROGRESS:	COMPLIANCE PROGRESS:	COMPLIANCE PROGRESS:
Not Applicable	None	Preliminary
FOURTH REPORTING PERIOD	**FIFTH REPORTING PERIOD**	**SIXTH REPORTING PERIOD**
JANUARY 1, 2021 – JUNE 30, 2021	JULY 1, 2021 – DECEMBER 31, 2021	JANUARY 1, 2022 – JUNE 30, 2022
COMPLIANCE PROGRESS:	COMPLIANCE PROGRESS:	COMPLIANCE PROGRESS:
Preliminary	Preliminary	Preliminary

Community Policing: ¶22

22. *CPD will encourage and create opportunities for CPD members to participate in community activities and have positive interactions with the community, including those that extend beyond the context of law enforcement duties.*

Compliance Progress

(Reporting Period: January 1, 2022, through June 30, 2022)

Preliminary:	***In Compliance*** **(FOURTH REPORTING PERIOD)**
Secondary:	***Not in Compliance***
Full:	***Not Yet Assessed***

In this reporting period, the City and the CPD maintained Preliminary compliance with this paragraph because of its continued progress in implementing the Chicago Neighborhood Policing Initiative program (also known as Neighborhood Policing Initiative), including the further deployment of district coordination officers and assignment of liaison officers to work with affinity groups. However, the CPD did not make progress toward Secondary compliance during this period because they did not expand implementation of the Neighborhood Policing Initiative or hire additional District Coordination Officers.

To assess compliance, the IMT monitored the CPD's efforts to expand its Neighborhood Policing Initiative to the remaining CPD districts and to address concerns raised in Northwestern University's preliminary evaluation report. The report provided suggested improvements to the Neighborhood Policing Initiative:

- shift resources to increase staffing levels of officers in the program;
- increase consistency by keeping officers with the program and not pulling officers to resume other calls;
- increase resources and compensate community ambassadors; and
- define the "community ambassador" roles more clearly.

We also assessed the CPD's efforts to train Neighborhood Policing Initiative personnel and develop other supervisory practices to ensure the relevant written guidance is implemented as written.

Progress before the Sixth Reporting Period

In the previous reporting period, the City and the CPD maintained Preliminary compliance by continued progress in implementing the Neighborhood Policing In-

itiative program, including the hiring and deployment of district coordination officers and assignment of liaison officers to work with affinity groups. However, the CPD did not make progress toward Secondary compliance during that period. The CPD noted its lack of progress citing overall efforts to balance workloads and address competing priorities.

Progress in the Sixth Reporting Period

During the sixth reporting period, the CPD launched a department-wide initiative to achieve 1.5 million positive community interactions (PCIs) in 2022. The IMT and the OAG provided feedback on the initial implementation plan of the initiative. As a result of this feedback the CPD developed the draft *Positive Community Interactions* policy (S02-XX-XXX) that addressed many of the concerns raised by the IMT and the OAG by better defining activities, data collection, and supervision and accountability measures. Field interviews with CPD officers revealed some confusion in defining and reporting on PCIs.

The CPD's participation in community activities most often involve Community Policing Office staff in each District which includes both District Coordination Officers and Chicago Alternative Policing Strategy (CAPS) officers. Field interviews revealed that District Coordination Officers engage primarily in helping with following up on service calls that require more time and problem solving while CAPS officers often serve as liaisons for the various affinity groups attending many community meetings.

During this reporting period, the CPD is piloting the integration of Neighborhood Policing Initiative and Chicago Alternative Policing Strategy (CAPS) functions and still working to fine tune and expand programming to other Districts. Many District Coordination Officers have received training. The community ambassadors, an important part of the Neighborhood Policing Initiative strategy, are also not fully staffed in those District's with District Coordination Officers.

The CPD also acknowledges that they are still addressing issues raised in the Northwestern University's evaluation of the Neighborhood Policing Initiative program including not pulling officers off for other duties, shifting resources to increase officer participation, and more clearly defining the community ambassador role. The CPD has now established the Neighborhood Policing Initiative program in 10 of its 22 districts.

The Neighborhood Policing Initiative program including the integration of District Coordination Officer and Chicago Alternative Policing Strategy functions is a center piece to the CPD's efforts to expand non-enforcement contacts and positive interactions with community members. Full implementation of Neighborhood Policing Initiative and integration of District Coordination Officer and Chicago Alternative

Policing Strategy functions are important to addressing the requirements of this paragraph.

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In sum, while there has been progress with integrating and delineating the roles of District Coordination Officers and Chicago Alternative Policing Strategy officers, the CPD needs to complete its city-wide implementation including requisite training, and fully staff Neighborhood Policing Initiative to achieve Secondary compliance.

Paragraph 22 Compliance Progress History

FIRST REPORTING PERIOD SEPTEMBER 1, 2019 – AUGUST 31, 2019 COMPLIANCE PROGRESS: Not Applicable	SECOND REPORTING PERIOD SEPTEMBER 1, 2019 – FEBRUARY 29, 2020 COMPLIANCE PROGRESS: Not Applicable	THIRD REPORTING PERIOD MARCH 1, 2020 – DECEMBER 31, 2020 COMPLIANCE PROGRESS: Not Applicable
FOURTH REPORTING PERIOD JANUARY 1, 2021 – JUNE 30, 2021 COMPLIANCE PROGRESS: Preliminary	FIFTH REPORTING PERIOD JULY 1, 2021 – DECEMBER 31, 2021 COMPLIANCE PROGRESS: Preliminary	SIXTH REPORTING PERIOD JANUARY 1, 2022 – JUNE 30, 2022 COMPLIANCE PROGRESS: Preliminary

Community Policing: ¶23

23. *CPD has established and will continue and build upon a variety of community partnerships and engagement strategies designed to encourage positive community interactions, such as Bridging the Divide, Officer Friendly, and youth mentorship and engagement programs.*

Compliance Progress

(Reporting Period: January 1, 2022, through June 30, 2022)

Preliminary:	***In Compliance*** **(FOURTH REPORTING PERIOD)**
Secondary:	***Not in Compliance***
Full:	***Not Yet Assessed***

In this reporting period, the IMT finds that the City and the CPD maintained Preliminary compliance but did not achieve Secondary compliance because they did not finalize a process to document and track the expansion of community partnerships.

To assess compliance, the IMT monitored the CPD's efforts to document its coordinated efforts to build relationships with community partners, including ongoing outreach efforts. We also assessed the CPD's efforts to ensure personnel central to the implementation of these requirements received adequate training and to collect and document data regarding its collaborative work and partnerships with community organizations, groups, and community members.

Progress before the Sixth Reporting Period

In the previous reporting period, the CPD worked on drafting a special order to define community partnerships and provide guidance on how to develop, implement, track, and assess community partnerships. The CPD also reported that after finalizing the draft directives, they would begin to train relevant community policing staff members, but they did not provide sufficient evidence to support these efforts.

In earlier reporting periods, the City and the CPD met Preliminary compliance by codifying this paragraph into CPD Special Order S02-03, *Community Policing Office*; General Order G02-03, *Vision, Mission Statement, and Core Values*; and Department Notice D21-03, *Neighborhood Policing Initiative*. In an early reporting period, the CPD updated 14 policies relating to community partnerships and programming, including programs like "Officer Friendly," "D.A.R.E," and "Bridging the Divide." The CPD's goal for these programs and others is, in part, to provide opportunities for CPD members to have positive interactions with community members.

Progress in the Sixth Reporting Period

In this reporting period, the CPD issued Special-Order S02-03-16 *Community Partnership* to define roles and responsibilities. The CPD reports that it continues to work on processes to document, and track expansion of partnerships using the Community Engagement Management System (also known as CEMS). The CPD hopes to complete these processes in the next reporting period. As previously noted, the CPD launched a major initiative encouraging officers to engage in and report unplanned positive community interactions. After considerable feedback from the IMT and the OAG, the CPD made some program changes and finalized a policy providing additional implementation guidance.

During this reporting period, the CPD also reported expansion of the Police Athletic and Arts League (PAAL), primarily in the South and West sides, including basketball, baseball, and launching a new boxing program.

***

To achieve Secondary compliance, the IMT expects the CPD and the City to use the Community Engagement Management System to document expansion of partnerships and to provide evidence of supervisory oversight and any required training. The IMT also expects the CPD to report any outcome data concerning the city-wide Positive Community Interactions initiative.

Paragraph 23 Compliance Progress History

FIRST REPORTING PERIOD SEPTEMBER 1, 2019 – AUGUST 31, 2019 COMPLIANCE PROGRESS: Not Applicable	SECOND REPORTING PERIOD SEPTEMBER 1, 2019 – FEBRUARY 29, 2020 COMPLIANCE PROGRESS: Not Applicable	THIRD REPORTING PERIOD MARCH 1, 2020 – DECEMBER 31, 2020 COMPLIANCE PROGRESS: Not Applicable
FOURTH REPORTING PERIOD JANUARY 1, 2021 – JUNE 30, 2021 COMPLIANCE PROGRESS: Preliminary	FIFTH REPORTING PERIOD JULY 1, 2021 – DECEMBER 31, 2021 COMPLIANCE PROGRESS: Preliminary	SIXTH REPORTING PERIOD JANUARY 1, 2022 – JUNE 30, 2022 COMPLIANCE PROGRESS: Preliminary

Community Policing: ¶24

24. *Each district will identify and maintain collaborative partnerships with community stakeholders to serve the specific needs of the community. District representatives will meet, as appropriate, with residential, business, religious, civic, educational, youth, and other community-based groups to proactively maintain these relationships and identify and address community problems and needs.*

Compliance Progress

(Reporting Period: January 1, 2022, through June 30, 2022)

Preliminary:	***In Compliance*** **(FOURTH REPORTING PERIOD)**
Secondary:	***Not in Compliance***
Full:	***Not Yet Assessed***

In the sixth reporting period, the City and the CPD maintained Preliminary compliance but did not achieve Secondary compliance because they did not complete written processes for documenting, tracking, and expanding partnerships.

To assess compliance, the IMT monitored the CPD's efforts to develop written processes for documenting, tracking, and expanding partnerships. IMT monitored District Coordination Officers and Community Ambassadors efforts to conduct outreach to a range of community stakeholder groups, as well as develop and implement partnerships.

Progress before the Sixth Reporting Period

In the previous reporting period, the City and the CPD maintained Preliminary compliance but did not achieve Secondary compliance because of a lack of documentation of partnership efforts and training of staff to track, maintain, and expand those partnerships. Prior to the fifth reporting period, the City and the CPD incorporated guidance specific to this paragraph into Community Policing Office policy (S02-03), *the Neighborhood Policing Initiative* (NPI) department notice (D21-03), and the *Vision, Mission Statement, and Core Values* policy (G02-03) that requires collaborative partnerships to serve specific needs of the community. These directives include roles for both District Coordination Officers and Community Ambassadors. The Community Ambassadors are CPD selected volunteers who are "local residents and leaders representing a wide spectrum of neighborhood groups, organizations, and interests." The Ambassadors will work with officers to increase officers' understanding of community issues, stakeholders, and other community dynamics. Most importantly, they will facilitate the partnership building and dialogue between the CPD and these community groups.

Progress in the Sixth Reporting Period

In this reporting period, the CPD expanded its use of District Coordination Officers and Liaison officers to work with community partners and city agencies for problem solving and relationship building. Chicago Alternative Policing Strategy (CAPS) officers often served as community liaisons while District Coordination Officers engaged in more problem-solving activities. The CPD reports that there are now Liaison officers assigned in all 22 districts. The CPD also completed as previously noted issued a special-order governing community partnership, and piloted efforts to integrate the Chicago Alternative Policing Strategy and District Coordination Officer functions. Staffing issues and pulling officers away to perform other duties adversely impacted program effectiveness and expansion of District Coordination Officers to other districts has slowed.

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The IMT finds that the City and the CPD maintained Preliminary compliance but did not achieve Secondary compliance. Moving forward, to achieve further compliance, the IMT expects the CPD will articulate its plans to use the Community Engagement Management System to document and track community partnership expansion efforts, provide any required additional training, and produce progress reports.

Paragraph 24 Compliance Progress History

FIRST REPORTING PERIOD	SECOND REPORTING PERIOD	THIRD REPORTING PERIOD
SEPTEMBER 1, 2019 – AUGUST 31, 2019	SEPTEMBER 1, 2019 – FEBRUARY 29, 2020	MARCH 1, 2020 – DECEMBER 31, 2020
COMPLIANCE PROGRESS:	COMPLIANCE PROGRESS:	COMPLIANCE PROGRESS:
Not Applicable	Not Applicable	Not Applicable
FOURTH REPORTING PERIOD	**FIFTH REPORTING PERIOD**	**SIXTH REPORTING PERIOD**
JANUARY 1, 2021 – JUNE 30, 2021	JULY 1, 2021 – DECEMBER 31, 2021	JANUARY 1, 2022 – JUNE 30, 2022
COMPLIANCE PROGRESS:	COMPLIANCE PROGRESS:	COMPLIANCE PROGRESS:
Preliminary	Preliminary	Preliminary

Community Policing: ¶25

25. *CPD will meet with members of the community from each beat and District Advisory Committee members at least once every two months. These community meetings will be scheduled in consultation with the community, be used to identify problems and other areas of concern in the community, and provide an opportunity to discuss responses and solutions through problem-solving tactics and techniques.*

Compliance Progress

(Reporting Period: January 1, 2022, through June 30, 2022)

Recurring Schedule: Every Two Months ☐ **Met** ☑ **Missed**

Preliminary: ***In Compliance*** **(THIRD REPORTING PERIOD)**
Secondary: ***Not in Compliance***
Full: ***Not Yet Assessed***

In this reporting period, the IMT finds that the City and the CPD maintained Preliminary compliance but failed to achieve Secondary compliance due to inadequate functionality of the District Advisory Committees (also known as DACs) and a lack of complete records on these proceedings.

To assess compliance, the IMT reviewed documents provided by the CPD pertaining to agendas and minutes for the district Beat and District Advisory Committee meetings. Sample documents provided to the IMT showed information gaps regarding participation, and capturing detailed notes on district-specific problems, action items, and tracking mechanisms.

Progress before the Sixth Reporting Period

In the fifth reporting period, the CPD spent considerable time revitalizing the District Advisory Committees. The CPD specifically identified Chairs for all its District Advisory Committees and stepped up the recruitment of new members. The CPD is also worked to understand how the District Advisory Committees will function in the future considering passage of a new police oversight ordinance that requires District Advisory Committee members to be elected. The CPD indicated that they are working on a transition plan that will minimize interruption of District Advisory Committee activity, and keep current interested members involved in some capacity. The IMT was provided some documentation on District Advisory Committee and Beat meeting activities, but the CPD was clearly still working to expand and develop a more representative membership.

Progress in the Sixth Reporting Period

During the sixth reporting period, the CPD reported Beat and District Advisory Committee meetings occurred once every two months. The CPD provided a small sampling of agendas and minutes from these meetings. The CPD reported that many Beat and District Advisory Committee meetings were now returning to in-person. The CPD indicated that it is trying to implement a hybrid model allowing for both in-person and virtual access to meetings. The CPD also reported their continued efforts to work through the issues raised in the 2020 audit of Beat and District Advisory Committee meetings including further codification of policies and procedures and how documents are to be maintained and stored.

The CPD reported that it is working with the audit division to plan a 2022 audit of District Advisory Committees and Beat meetings. They are also working on how to adapt the functioning of the current District Advisory Committees to align with new city ordinance establishing District Councils comprised of elected members that will be seated in May 2023. The CPD also noted that many District Advisory Committee members have resigned to run for District Council because these are paid positions.

The IMT understands the challenges posed by adapting District Advisory Committee operations to align with the ordinance requirements. The IMT still expects that this new body will execute the requirements of the CD relevant to District Advisory Committee operations and demonstrate a more diverse and representative membership. The IMT is concerned about the dissemination of information about Beat and District Advisory Committee meetings. Locating the times and locations of these meetings on the CPD websites is onerous, especially virtual meeting addresses which require a Twitter account to access.

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The IMT finds that the City and the CPD maintained Preliminary compliance but failed to achieve Secondary compliance resulting from inadequate District Advisory Committee functionality, a lack of complete records on these proceedings and easy access to meeting information. Sample documents provided included information gaps regarding participation and follow-up on action items. Moving forward, the CPD will continue to enhance outreach efforts for Beat meeting participation, align District Advisory Committee operations with the new District Council city ordinance, and continue to address document maintenance and storage issues.

Paragraph 25 Compliance Progress History

FIRST REPORTING PERIOD
SEPTEMBER 1, 2019 – AUGUST 31, 2019
COMPLIANCE PROGRESS:
Not Applicable

SECOND REPORTING PERIOD
SEPTEMBER 1, 2019 – FEBRUARY 29, 2020
COMPLIANCE PROGRESS:
Not Applicable

THIRD REPORTING PERIOD
MARCH 1, 2020 – DECEMBER 31, 2020
COMPLIANCE PROGRESS:
Preliminary

FOURTH REPORTING PERIOD
JANUARY 1, 2021 – JUNE 30, 2021
COMPLIANCE PROGRESS:
Preliminary

FIFTH REPORTING PERIOD
JULY 1, 2021 – DECEMBER 31, 2021
COMPLIANCE PROGRESS:
Preliminary

SIXTH REPORTING PERIOD
JANUARY 1, 2022 – JUNE 30, 2022
COMPLIANCE PROGRESS:
Preliminary

Community Policing: ¶26

26. *CPD's Office of Community Policing will designate CPD members, as needed, to serve as points of contact for organizations to assist with access to police services, including those serving communities that have experienced previous challenges with access to police services, such as LGBTQI individuals, religious minorities, immigrants, individuals with disabilities, homeless individuals, and survivors of sexual assault and domestic violence. The designated CPD members will provide feedback to the Deputy Chief of the Office of Community Policing about the issues or potential policy recommendations raised by community-based organizations or the community to improve access to police services.*

Compliance Progress

(Reporting Period: January 1, 2022, through June 30, 2022)

Preliminary:	***In Compliance*** **(FOURTH REPORTING PERIOD)**
Secondary:	***In Compliance*** **(FIFTH REPORTING PERIOD)**
Full:	***Not Yet Assessed***

In this reporting period, the City and the CPD maintained Secondary compliance by continuing to assign officers to liaisons roles.

The City and the CPD's efforts to comply with ¶26 were first assessed in the fourth reporting period where they achieved preliminary compliance by codifying ¶26's requirements into Special Order S02-03, *Community Policing Office*. In the fifth reporting period, the City and the CPD achieved secondary compliance by hiring citywide "liaisons" and providing initial training.

During this reporting period, we assessed the CPD's efforts to staff citywide liaison positions, train the selected members on their responsibilities, and develop supervisory practices that ensure the policy is implemented as written. The CPD hired one new Domestic Violence Advocate, reported the assignment of liaison officers in all 22 districts, and piloting efforts in the 6th District to integrate Chicago Alternative Policing Strategy (CAPS) and District Coordination Officer functions with CAPS officers often serving as liaisons at the District-level.

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The CPD continues to address staffing issues and submitted sufficient evidence to maintain Secondary compliance. To achieve Full compliance, the CPD needs to establish assessment processes to determine to determine effectiveness and impact.

Paragraph 26 Compliance Progress History

FIRST REPORTING PERIOD
SEPTEMBER 1, 2019 – AUGUST 31, 2019
COMPLIANCE PROGRESS:
Not Applicable

SECOND REPORTING PERIOD
SEPTEMBER 1, 2019 – FEBRUARY 29, 2020
COMPLIANCE PROGRESS:
Not Applicable

THIRD REPORTING PERIOD
MARCH 1, 2020 – DECEMBER 31, 2020
COMPLIANCE PROGRESS:
Not Applicable

FOURTH REPORTING PERIOD
JANUARY 1, 2021 – JUNE 30, 2021
COMPLIANCE PROGRESS:
Preliminary

FIFTH REPORTING PERIOD
JULY 1, 2021 – DECEMBER 31, 2021
COMPLIANCE PROGRESS:
Secondary

SIXTH REPORTING PERIOD
JANUARY 1, 2022 – JUNE 30, 2022
COMPLIANCE PROGRESS:
Secondary

Community Policing: ¶27

27. *CPD will facilitate relationships with youth by establishing regular meetings to serve as opportunities to provide input to CPD about the issues affecting their lives and their communities. CPD will partner with community-based organizations to identify strategies to include participants that represent a racially, geographically, and socio-economically diverse cross-section of Chicago youth, including, but not limited to, at-risk youth and youth who have been arrested, incarcerated, or otherwise involved in the criminal or juvenile legal systems.*

Compliance Progress

(Reporting Period: January 1, 2022, through June 30, 2022)

Preliminary:	***In Compliance*** **(FOURTH REPORTING PERIOD)**
Secondary:	***Not in Compliance***
Full:	***Not Yet Assessed***

In the sixth reporting period, the City and the CPD maintained Preliminary compliance but did not achieve Secondary compliance by not working effectively with community partners to facilitate meetings.

To assess compliance, the IMT monitored the CPD's efforts to develop supervisory practices to ensure the General Order G02-03, *Vision, Mission Statement, and Core Values* is implemented as written. We also assessed the CPD's efforts to evaluate the effectiveness of its efforts to partner with community-based organizations and facilitate relationships with Chicago youth.

Progress before the Sixth Reporting Period

In the previous reporting period, the CPD worked with Youth Advisory Councils to expand their relationship with Youth, but also acknowledged minimal progress in developing partnerships with community-based organizations to engage youth from diverse backgrounds in discussions about how best to address the community safety and quality of life issues. While this outreach and engagement with youth previously codified into policy (G02-03) is required, the CPD provided no evidence of implementation.

Progress in the Sixth Reporting Period

During this reporting period, the CPD invested time in strengthening its Youth District Advisory Committees (also known as YDACs). The CPD issued a directive covering interactions with these committees. The CPD reports about 18 functioning Youth District Advisory Committees. The CPD also reports putting in place a new

civilian youth team with a priority to this summer to restart and relaunch the District Advisory Committees. The requirements of this paragraph directly address the need for the CPD to partner with community organizations to identify a cross-section of youth to participate in these discussions. The IMT was neither provided with evidence that the CPD worked with community-based organizations to facilitate youth discussions, nor provided evidence of community input in determining Youth District Advisory Committee membership.

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Moving forward, to achieve Secondary compliance, the IMT expects the CPD to document the selection processes and provide records documenting their efforts to gather input from the Youth District Advisory Committee and other meetings with youth about the issues affecting their lives and their communities. The IMT will also be expecting evidence of the CPD's efforts to reach-out to other community-based organizations to ensure input from a cross-section of City youth regarding the issues affecting them.

Paragraph 27 Compliance Progress History

FIRST REPORTING PERIOD	SECOND REPORTING PERIOD	THIRD REPORTING PERIOD
SEPTEMBER 1, 2019 – AUGUST 31, 2019	SEPTEMBER 1, 2019 – FEBRUARY 29, 2020	MARCH 1, 2020 – DECEMBER 31, 2020
COMPLIANCE PROGRESS:	COMPLIANCE PROGRESS:	COMPLIANCE PROGRESS:
Not Applicable	Not Applicable	Not Applicable
FOURTH REPORTING PERIOD	**FIFTH REPORTING PERIOD**	**SIXTH REPORTING PERIOD**
JANUARY 1, 2021 – JUNE 30, 2021	JULY 1, 2021 – DECEMBER 31, 2021	JANUARY 1, 2022 – JUNE 30, 2022
COMPLIANCE PROGRESS:	COMPLIANCE PROGRESS:	COMPLIANCE PROGRESS:
Preliminary	Preliminary	Preliminary

Community Policing: ¶28

28. *CPD will, with the assistance of the Office of Community Policing, institute a public awareness campaign to inform the public, at least once a year, about: (a) CPD policies most relevant to police interactions with the public, including, but not limited to: use of force, body-worn cameras, and Tasers; (b) steps for filing a complaint against CPD or a CPD member; and (c) the public's rights when stopped, arrested, or interrogated by police. CPD's public awareness campaign may include presentations, trainings, written guides, or web-accessible videos.*

Compliance Progress

(Reporting Period: January 1, 2022, through June 30, 2022)

Recurring Schedule: At Least Once a Year ☑ **Met** ☐ **Missed**

Preliminary: ***In Compliance*** **(THIRD REPORTING PERIOD)**
Secondary: ***In Compliance*** **(FIFTH REPORTING PERIOD)**
Full: ***Not Yet Assessed***

During the sixth reporting period, the City and the CPD maintained Secondary compliance by completing the second year of their public awareness campaign.

To assess compliance, the IMT monitored the CPD's efforts to expand the modalities of the campaign to ensure a larger audience sees the content. We also monitored the CPD's ability to supervise members to ensure this requirement continues annually, and its efforts to assess its public awareness campaign metrics to determine effectiveness.

Progress before the Sixth Reporting Period

In the previous reporting period, the CPD followed the IMT's recommendation to codify the Public Awareness Campaign into a policy to ensure the campaign continues on an annual basis. The CPD incorporated ¶28 into Directive G02-03, *Community Policing Mission and Vision*, which was submitted during the fifth reporting period for review. The CPD also finalized an SOP requiring public awareness campaigns on an annual basis.

For the 2021 campaign, CPD partnered with DePaul University's, marketing and advertising program, to engage current students in development of the campaign. Ads were developed and will be shown on various social media platforms and will also be posted on the CPD website. The ad campaign this year focuses on knowing your rights. We also reviewed the second public awareness campaign that ran from December 13, 2021, through the end of the fifth reporting period, December 31, 2021. The ads included a Quick Response (QR) code that linked readers to the

CPD website, where they could read a question-and-answer format about the topics required by ¶28; CPD policies on use of force and body-worn cameras; steps for filing a complaint; and rights when stopped, arrested, or interrogated by police. The DePaul University students intended for the campaign to utilize a wider range of communication channels to reach a broader audience, but CPD only shared the campaign digitally via social media, its website, and through the local media. The ads will also be translated into Spanish. The CPD paid to promote the ads on Facebook and Twitter and targeted zip codes on the South and West Sides, along with the CPD's 19th District.

Progress in the Sixth Reporting Period

The CPD launched its most recent public awareness program at the end of the last reporting period in December 2021. The CPD acknowledged some challenges which resulted in a small roll out. The ads were largely targeted to Instagram, and Twitter, the south and west side of Chicago, and LGBTQ and minority communities on the north side. Information was posted on Facebook, Instagram, and Twitter. The information guided the audience back to the CPD website. The CPD reported reaching about 200,000 people, with a smaller number clicking on and viewing the ad. The CPD reported improvements needed in the process, including the need to appoint a point person for the campaign, using similar messages and approaches from the previously supported DePaul University campaign, creating additional ads, having bilingual options, using more social media, and using a range of other advertising tools. The CPD pledged to work with a former professor from DePaul University Marketing/communication Department and contract with him to provide more specific assistance. The CPD reported that it will seek community input from some of the groups engaged with in developing the human rights policies.

***

The IMT finds that the City and the CPD maintained Secondary compliance by completing the second year of the public awareness campaign. Moving forward to maintain Secondary compliance, the IMT expects the CPD to complete and provide a final report including program metrics, and address improvements highlighted in a program review. To achieve Full compliance, the IMT expects a long-term plan, and metrics that demonstrate effectiveness of campaign.

Paragraph 28 Compliance Progress History

FIRST REPORTING PERIOD	SECOND REPORTING PERIOD	THIRD REPORTING PERIOD
SEPTEMBER 1, 2019 – AUGUST 31, 2019	SEPTEMBER 1, 2019 – FEBRUARY 29, 2020	MARCH 1, 2020 – DECEMBER 31, 2020
COMPLIANCE PROGRESS:	COMPLIANCE PROGRESS:	COMPLIANCE PROGRESS:
Not Applicable	Not Applicable	Not Applicable
FOURTH REPORTING PERIOD	**FIFTH REPORTING PERIOD**	**SIXTH REPORTING PERIOD**
JANUARY 1, 2021 – JUNE 30, 2021	JULY 1, 2021 – DECEMBER 31, 2021	JANUARY 1, 2022 – JUNE 30, 2022
COMPLIANCE PROGRESS:	COMPLIANCE PROGRESS:	COMPLIANCE PROGRESS:
Preliminary	Preliminary	Secondary

Community Policing: ¶29

29. *Fair, unbiased, and respectful interactions between CPD members and victims of crime provide an opportunity to strengthen community trust and foster public confidence in CPD. CPD will continue to require that CPD members interact with victims of crime with courtesy, dignity, and respect. CPD will continue to require that CPD members inform victims of crime of the availability of victim assistance and resources, including providing written notices of victim's rights, when applicable. CPD will also have such victim assistance information readily available on its public website and at all district stations.*

Compliance Progress

(Reporting Period: January 1, 2022, through June 30, 2022)

Preliminary:	***In Compliance*** **(THIRD REPORTING PERIOD)**
Secondary:	***Not in Compliance***
Full:	***Not Yet Assessed***

In this reporting period, the IMT finds that the City and the CPD maintained Preliminary compliance but did not achieve Secondary compliance because they did not develop or deliver the required training to achieve citywide implementation.

In this reporting period the IMT monitored the CPD's efforts to ensure each district has the resources needed to inform crime victims of available resources, completed training curriculum, and their efforts to initiate staff training.

Progress before the Sixth Reporting Period

In the previous reporting period, the CPD's continued to make progress toward implementing requirements of this paragraph and hired victim advocates who focus on domestic violence cases citywide. The CPD also initiated a pilot for a violent crime victim services program. The CPD also continued to engage the Crime Victim Advisory Council comprised of community partners, fully approved the *Victim Assistance* policy (S02-01-03) and indicated that they will develop an eLearning module.

Progress in the Sixth Reporting Period

During this reporting period, the CPD experienced challenges in addressing paragraph requirements. The CPD continues to roll out pilots but are limited to three victim advocates who now serve 9 Districts. The CPD also reported that the victim services grant used to help fund the program expires at the end of the year

and have requested additional funding to sustain the program. The CPD also reported that the planned eLearning curriculum was not completed or delivered to CPD members.

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To achieve Secondary compliance, the IMT expects the CPD to expand their crime victim assistance program citywide and complete the development and delivery of eLearning in support of program implementation.

Paragraph 29 Compliance Progress History

FIRST REPORTING PERIOD	SECOND REPORTING PERIOD	THIRD REPORTING PERIOD
SEPTEMBER 1, 2019 – AUGUST 31, 2019	SEPTEMBER 1, 2019 – FEBRUARY 29, 2020	MARCH 1, 2020 – DECEMBER 31, 2020
COMPLIANCE PROGRESS:	COMPLIANCE PROGRESS:	COMPLIANCE PROGRESS:
Not Applicable	Not Applicable	Preliminary
FOURTH REPORTING PERIOD	**FIFTH REPORTING PERIOD**	**SIXTH REPORTING PERIOD**
JANUARY 1, 2021 – JUNE 30, 2021	JULY 1, 2021 – DECEMBER 31, 2021	JANUARY 1, 2022 – JUNE 30, 2022
COMPLIANCE PROGRESS:	COMPLIANCE PROGRESS:	COMPLIANCE PROGRESS:
Preliminary	Preliminary	Preliminary

Community Policing: ¶30

30. *CPD will prominently display signs both in rooms of police stations or other CPD locations that hold arrestees or suspects and near telephones which arrestees or suspects have access to. These signs will state: a. that arrestees and suspects have the right to an attorney; b. that if an arrestee cannot afford an attorney, one may be appointed by the court for free; and c. the telephone numbers for the Cook County Public Defender, and any other organization appointed by the Cook County Circuit Court to represent arrestees.*

Compliance Progress

(Reporting Period: January 1, 2022, through June 30, 2022)

Preliminary:	***In Compliance*** **(THIRD REPORTING PERIOD)**
Secondary:	***In Compliance*** **(FOURTH REPORTING PERIOD)**
Full:	***Not in Compliance***

In the sixth reporting period, the City and the CPD maintained Secondary compliance but failed to achieve Full compliance by not putting in place a system to verify signage.

To assess compliance the IMT monitored the CPD's effort to develop supervisory practices that will ensure G06-01 is implemented as written, ensuring prominence and accuracy of signage. We also provided (in previous reporting periods) guidance on how the CPD could demonstrate Full compliance with ¶30 by, for example, requiring District Commanders to annually review signage in their station and certify in writing compliance with this paragraph or surveying a sampling of arrestees to confirm awareness of signage.

Progress before the Sixth Reporting Period

The City and the CPD met Preliminary compliance in the third reporting period, because CPD's General Order G06-01, *Processing Persons Under Department Control*, incorporated this paragraph's requirements.

In the fourth reporting period, the City and the CPD maintained Preliminary compliance and met Secondary compliance, as the IMT observed signage in locations that hold arrestees or suspects in eight Districts (1, 4, 6, 16, 17, 18, 19, and 20). The signs clearly stated the information outlined in this paragraph and appeared in multiple languages, including Spanish, English, Polish, and Mandarin. These signs provide arrestees and suspects with information, and also provide officers with a regular reminder of arrestee rights. Officer awareness of arrestee rights aligns with one of our Special Report recommendations that the CPD aims to provide officers with refresher training on arrestee rights and related topics.

In the previous reporting period, the CPD showed little progress in attaining Full compliance and provided no evidence of certifying compliance with the signage requirements in this paragraph. The IMT suggested options including certification by district commanders of compliance or surveying a sample of arrestees for signage awareness.

Progress in the Sixth Reporting Period

During this reporting period, the CPD reported having discussions about putting in place a process whereby a team would visit district stations to verify signage requirements and include in this process district commander certification. The CPD reports that these procedures will be implemented in the next reporting period.

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Moving forward and to achieve Full compliance, the IMT expects the CPD to develop and implement verification and/or certification procedures for addressing the signage requirements of this paragraph.

Paragraph 30 Compliance Progress History

FIRST REPORTING PERIOD	SECOND REPORTING PERIOD	THIRD REPORTING PERIOD
SEPTEMBER 1, 2019 – AUGUST 31, 2019	SEPTEMBER 1, 2019 – FEBRUARY 29, 2020	MARCH 1, 2020 – DECEMBER 31, 2020
COMPLIANCE PROGRESS:	COMPLIANCE PROGRESS:	COMPLIANCE PROGRESS:
Not Applicable	Not Applicable	Preliminary
FOURTH REPORTING PERIOD	**FIFTH REPORTING PERIOD**	**SIXTH REPORTING PERIOD**
JANUARY 1, 2021 – JUNE 30, 2021	JULY 1, 2021 – DECEMBER 31, 2021	JANUARY 1, 2022 – JUNE 30, 2022
COMPLIANCE PROGRESS:	COMPLIANCE PROGRESS:	COMPLIANCE PROGRESS:
Preliminary	Secondary	Secondary

Community Policing: ¶31

31. *CPD will provide arrestees access to a phone and the ability to make a phone call as soon as practicable upon being taken into custody.*

Compliance Progress

(Reporting Period: January 1, 2022, through June 30, 2022)

Preliminary:	***In Compliance*** **(THIRD REPORTING PERIOD)**
Secondary:	***Not in Compliance***
Full:	***Not Yet Assessed***

In this reporting period, the IMT finds that the City and the CPD maintained Preliminary compliance but did not achieve Secondary compliance because they did not complete policy revisions or establish supervisory tracking mechanisms.

To assess compliance, the IMT monitored the CPD's efforts to implement supervisory practices to ensure the policy is up-to-date and implemented as written. However, the City and the CPD did not provide the IMT with evidence that they put together supervisory practices to ensure consistent implementation of G06-01-04, *Arrestee and In-Custody Communications*. Specifically, the CPD has not implemented procedures to track the time between when an arrestee is taken into custody and when the arrestee is provided access to a telephone.

Progress before the Sixth Reporting Period

In the fifth reporting period, the CPD provided no evidence of progress in developing and instituting timeframes and processes for arrestee access to telephones.

Before the fifth reporting period, the IMT noted our concerns with the lack of attention given to ensuring proper implementation of General Order G06-01-04, *Arrestee and In-Custody Communications*, which requires timely telephone access for arrestees. Illinois amended state law to guarantee an arrestee the right to a telephone call within three hours after arrival at the first place of custody.[2] This issue continues to be a subject of community concern, debated by City officials and community stakeholders.

Progress in the Sixth Reporting Period

The CPD reported working on policy revisions that will provide guidance on arrestee access to telephones and how to track the time. The CPD reported that portions of the policy is involved in litigation, but the CPD is currently doing some time

[2] *See* the SAFE-T Act (Safety, Accountability, Fairness and Equity – Today), codified as Public Act 101-0652.

tracking. The CPD hopes to have the policy and tracking processes in place by the end of the next reporting period.

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Moving forward, the IMT expects the CPD to demonstrate supervisory oversight by implementing procedures that track the time between when an arrestee is taken into custody and provided access to a telephone.

Paragraph 31 Compliance Progress History

FIRST REPORTING PERIOD	SECOND REPORTING PERIOD	THIRD REPORTING PERIOD
SEPTEMBER 1, 2019 – AUGUST 31, 2019	SEPTEMBER 1, 2019 – FEBRUARY 29, 2020	MARCH 1, 2020 – DECEMBER 31, 2020
COMPLIANCE PROGRESS:	COMPLIANCE PROGRESS:	COMPLIANCE PROGRESS:
Not Applicable	Not Applicable	Preliminary
FOURTH REPORTING PERIOD	**FIFTH REPORTING PERIOD**	**SIXTH REPORTING PERIOD**
JANUARY 1, 2021 – JUNE 30, 2021	JULY 1, 2021 – DECEMBER 31, 2021	JANUARY 1, 2022 – JUNE 30, 2022
COMPLIANCE PROGRESS:	COMPLIANCE PROGRESS:	COMPLIANCE PROGRESS:
Preliminary	Preliminary	Preliminary

Community Policing: ¶32

32. *Within 180 days of the Effective Date, CPD will review and revise its current policies relating to youth and children and, within 365 days, will revise its training, as necessary, to ensure that CPD provides officers with guidance on developmentally appropriate responses to, and interactions with, youth and children, consistent with the provisions of this Agreement and as permitted by law.*

Compliance Progress

(Reporting Period: January 1, 2022, through June 30, 2022)

Preliminary:	***Not in Compliance***
Secondary:	***Not Yet Assessed***
Full:	***Not Yet Assessed***

In the sixth reporting period, the City and the CPD once again failed to achieve Preliminary compliance for this paragraph because they did not finalize the *Children and Youth* policy (G02-05).

To assess compliance, the IMT continued to assess the CPD's efforts to review and revise its youth-related directives and trainings. During the last reporting period, we reviewed initial drafts of the *Interactions with Youth Policy* (G02-05) and the Mayor's Office briefing regarding Chicago's youth deflection, diversion, and reform efforts. The IMT did not receive any updated materials concerning the policy during the sixth reporting period.

The City and the CPD were first assessed for compliance with ¶32 in the second reporting period but failed to meet preliminary compliance because: (1) it had not completed its review and revision of each policy regarding youth and children; and (2) it did not provide any evidence showing its efforts to revise the requisite trainings. The City and CPD likewise failed to reach preliminary compliance in the third reporting period because the CPD had not completed nor provided a plan for the review and revision process of its youth- and children-related policies. Although the CPD developed, updated, and finalized up to 18 general orders, special orders, and directives relating to youth interaction, the CPD did not complete its work on the core policy covering CPD *Interactions with Youth* (G02-05) and thus did not meet Preliminary compliance.

During this reporting period, the CPD indicated that it continues to collaborate with the Mayor's Office and the Department of Family Support Services to arrive at a consensus on the *Interactions with Youth* policy. More specifically, the CPD indicated that these ongoing discussions are focused on how to best address youth diversion and deflection.

The IMT remains concerned about the lack of progress in resolving these and other outstanding issues and the finalization of this policy. Requirements concerning revised training to ensure that CPD members are provided with guidance on developmentally appropriate responses are also not being addressed for most members. The City and the CPD anticipate finalizing the *Interactions with Youth Policy* (G02-05) in the next reporting period.

***

In sum, by not finalizing the *Interactions in Youth Policy* (G02-05), the City and the CPD failed to achieve Preliminary compliance for this paragraph. The IMT remains concerned about delays in finalizing the policy and developing and delivering the requisite training. The IMT expects the CPD and the City to come to a resolution and finalize this policy in the next reporting period to achieve Preliminary compliance.

Paragraph 32 Compliance Progress History

FIRST REPORTING PERIOD	SECOND REPORTING PERIOD	THIRD REPORTING PERIOD
SEPTEMBER 1, 2019 – AUGUST 31, 2019	SEPTEMBER 1, 2019 – FEBRUARY 29, 2020	MARCH 1, 2020 – DECEMBER 31, 2020
COMPLIANCE PROGRESS:	COMPLIANCE PROGRESS:	COMPLIANCE PROGRESS:
Not Applicable	None	None
FOURTH REPORTING PERIOD	**FIFTH REPORTING PERIOD**	**SIXTH REPORTING PERIOD**
JANUARY 1, 2021 – JUNE 30, 2021	JULY 1, 2021 – DECEMBER 31, 2021	JANUARY 1, 2022 – JUNE 30, 2022
COMPLIANCE PROGRESS:	COMPLIANCE PROGRESS:	COMPLIANCE PROGRESS:
None	None	None

Community Policing: ¶33

33. *When interacting with youth and children, CPD will, as appropriate and permitted by law, encourage officers to exercise discretion to use alternatives to arrest and alternatives to referral to juvenile court, including, but not limited to: issuing warnings and providing guidance; referral to community services and resources such as mental health, drug treatment, mentoring, and counseling organizations, educational services, and other agencies; station adjustments; and civil citations.*

Compliance Progress

(Reporting Period: January 1, 2022, through June 30, 2022)

Preliminary:	***Not in Compliance***
Secondary:	***Not Yet Assessed***
Full:	***Not Yet Assessed***

In the sixth reporting period, the City and the CPD failed to achieve Preliminary compliance with ¶33 because they did not finalize the *Interactions with Youth Policy* (G02-05).

To assess compliance, the IMT continued to assess the CPD's efforts to review and revised its youth-related directives and trainings. During this reporting period, the IMT received an update that the City and the CPD are continuing to develop the *Interactions with Youth Policy* (G02-05).

The City and the CPD were first assessed on their compliance with the requirements of ¶33 during the fourth reporting period, and again in the fifth reporting period, but failed to achieve preliminary compliance because they did not finalize the *Interactions with Youth Policy* (G02-05).

As previously noted, during this reporting period, the City and the CPD continue develop the *Interactions with Youth Policy* (G02-05). While the IMT acknowledges the challenges in addressing administrative and legal barriers, the City and the CPD must prioritize resolving outstanding issues and finalizing this policy in the next reporting period. Once the policy is finalized the CPD will need to immediately develop and deliver the requisite training to implement the policy.

***

The IMT finds that the CPD failed to achieve Preliminary compliance because the City and the CPD have not finalized the *Interactions with Youth Policy* (G02-05). Moving forward, to achieve Preliminary compliance, the City and the CPD will have to finalize G02-05 in a manner that meets both ¶¶32 and 33 requirements.

Paragraph 33 Compliance Progress History

FIRST REPORTING PERIOD
SEPTEMBER 1, 2019 – AUGUST 31, 2019
COMPLIANCE PROGRESS:
Not Applicable

SECOND REPORTING PERIOD
SEPTEMBER 1, 2019 – FEBRUARY 29, 2020
COMPLIANCE PROGRESS:
Not Applicable

THIRD REPORTING PERIOD
MARCH 1, 2020 – DECEMBER 31, 2020
COMPLIANCE PROGRESS:
Status Update

FOURTH REPORTING PERIOD
JANUARY 1, 2021 – JUNE 30, 2021
COMPLIANCE PROGRESS:
None

FIFTH REPORTING PERIOD
JULY 1, 2021 – DECEMBER 31, 2021
COMPLIANCE PROGRESS:
None

SIXTH REPORTING PERIOD
JANUARY 1, 2022 – JUNE 30, 2022
COMPLIANCE PROGRESS:
None

Community Policing: ¶34

34. *CPD will clarify in policy that juveniles in CPD custody have the right to an attorney visitation, regardless of parent or legal guardian permission, even if the juvenile is not going to be interviewed.*

Compliance Progress (Reporting Period: January 1, 2022, through June 30, 2022)

Preliminary:	***In Compliance*** **(THIRD REPORTING PERIOD)**
Secondary:	***Not in Compliance***
Full:	***Not Yet Assessed***

During the sixth reporting period, the City and the CPD maintained Preliminary compliance with the requirements of ¶34 but did not achieve Secondary compliance because they did not complete and deliver eLearning modules covering the requirements of ¶34.

To assess Secondary compliance, the IMT monitored the CPD's efforts to train members on this specific directive and to create supervisory practices designed to ensure members are implementing the policy as written. During this reporting period, the IMT reviewed revised S06-04, *Processing of Juveniles and Minors under Department Control*, and signage notifying juveniles of their right to an attorney regardless of parental consent. The CPD did not complete development of the eLearning modules covering the requirements of this paragraph.

In the third reporting period, the CPD met Preliminary compliance because the CPD had finalized its Special Order S06-04, *Processing of Juveniles and Minors under Department Control*, which clarifies juveniles' right to an attorney visitation. The CPD submitted the requisite training materials to the S06-04 policy but did so at the end of the fourth reporting period. In the previous reporting period, the CPD began revising an eLearning module for ¶¶34–36, which would provide specific guidance on implementation of those paragraphs, but "paused" revisions pending changes in juvenile policies and processes. During this reporting period, the CPD demonstrated little progress in implementing training requirements of this paragraph.

***

The IMT finds that the CPD maintained Preliminary compliance but did not achieve Secondary compliance during this reporting period because the eLearning materials were not revised and delivered. The CPD reports that the eLearning curriculum will be finalized and delivered in the next reporting period to achieve Secondary compliance. We look forward to reviewing the revised eLearning curriculum in the next reporting period.

Paragraph 34 Compliance Progress History

FIRST REPORTING PERIOD	SECOND REPORTING PERIOD	THIRD REPORTING PERIOD
SEPTEMBER 1, 2019 – AUGUST 31, 2019	SEPTEMBER 1, 2019 – FEBRUARY 29, 2020	MARCH 1, 2020 – DECEMBER 31, 2020
COMPLIANCE PROGRESS:	COMPLIANCE PROGRESS:	COMPLIANCE PROGRESS:
Not Applicable	Not Applicable	Preliminary
FOURTH REPORTING PERIOD	**FIFTH REPORTING PERIOD**	**SIXTH REPORTING PERIOD**
JANUARY 1, 2021 – JUNE 30, 2021	JULY 1, 2021 – DECEMBER 31, 2021	JANUARY 1, 2022 – JUNE 30, 2022
COMPLIANCE PROGRESS:	COMPLIANCE PROGRESS:	COMPLIANCE PROGRESS:
Preliminary	Preliminary	Preliminary

Community Policing: ¶35

35. *If a juvenile has been arrested CPD will notify the juvenile's parent or guardian as soon as possible. The notification may either be in person or by telephone and will be documented in any relevant reports, along with the identity of the parent or guardian who was notified. Officers will document in the arrest or incident report attempts to notify a parent or guardian. If a juvenile is subsequently interrogated, CPD policy will comply with state law and require, at a minimum, that: a. Juvenile Miranda Warning will be given to juveniles before any custodial interrogation; b. the public defender's office may represent and have access to a juvenile during a custodial interrogation, regardless of parent or legal guardian permission; c. CPD officers will make reasonable efforts to ensure a parent or legal guardian is present for a custodial interrogation of a juvenile arrestee under 15 years of age in custody for any felony offense; and d. juveniles in custody for felony offenses and misdemeanor sex offenses under Article 11 of the Illinois Criminal Code will have their custodial interrogation electronically recorded.*

Compliance Progress

(Reporting Period: January 1, 2022, through June 30, 2022)

Preliminary:	***In Compliance*** **(THIRD REPORTING PERIOD)**
Secondary:	***Not in Compliance***
Full:	***Not Yet Assessed***

In the sixth reporting period, the City and the CPD maintained Preliminary compliance, but did not achieve Secondary compliance because they did not move forward with developing the requisite training materials (i.e., draft training bulletin and eLearning modules) that incorporate the requirements of this paragraph.

In the third reporting period, the CPD achieved Preliminary compliance by finalizing its Special Order S06-04, *Processing of Juveniles and Minors under Department Control*, which codifies this paragraph's requirements. In the fourth reporting period, the IMT assessed the CPD's efforts to finalize and deliver training to CPD members. The CPD did not provide the IMT with any additional documentation regarding this paragraph. Thus, there was insufficient evidence that CPD has finalized and delivered training. In the previous reporting period, the IMT monitored the CPD's efforts to finalize training materials and deliver training to CPD members.

During this reporting period, the IMT monitored the CPD's efforts to finalize training materials and deliver training to CPD members. The IMT suggests that the CPD also develop assessment tools to determine ongoing compliance with this policy

directive. The City and the CPD did not provide the IMT with any additional documentation for the IMT to assess compliance with the requirements of this paragraph. The City and CPD reported that the requisite eLearning training materials and training bulletins will be completed in the next reporting period.

***

In sum, the CPD and City did not achieve Secondary compliance during this reporting period and demonstrated minimal progress in in addressing the training requirements of this paragraph, including training bulletins and eLearning that provide the guidance for implementing the requirements of this paragraph. Moving forward, to achieve Secondary compliance, the IMT expects the CPD to finalize changes to its juvenile processing procedures and deliver the required training to implement the requirements of this paragraph in the next reporting period.

Paragraph 35 Compliance Progress History

FIRST REPORTING PERIOD	SECOND REPORTING PERIOD	THIRD REPORTING PERIOD
SEPTEMBER 1, 2019 – AUGUST 31, 2019	SEPTEMBER 1, 2019 – FEBRUARY 29, 2020	MARCH 1, 2020 – DECEMBER 31, 2020
COMPLIANCE PROGRESS:	COMPLIANCE PROGRESS:	COMPLIANCE PROGRESS:
Not Applicable	Not Applicable	Preliminary
FOURTH REPORTING PERIOD	**FIFTH REPORTING PERIOD**	**SIXTH REPORTING PERIOD**
JANUARY 1, 2021 – JUNE 30, 2021	JULY 1, 2021 – DECEMBER 31, 2021	JANUARY 1, 2022 – JUNE 30, 2022
COMPLIANCE PROGRESS:	COMPLIANCE PROGRESS:	COMPLIANCE PROGRESS:
Preliminary	Preliminary	Preliminary

Community Policing: ¶36

36. *When determining whether or not to apply handcuffs or other physical restraints on a juvenile, CPD officers will consider the totality of the circumstances, including, but not limited to, the nature of the incident and the juvenile's age, physical size, actions, and conduct, when known or objectively apparent to a reasonable officer, and whether such restraints are necessary to provide for the safety of the juvenile, the officer, or others.*

Compliance Progress

(Reporting Period: January 1, 2022, through June 30, 2022)

Preliminary:	***In Compliance*** **(THIRD REPORTING PERIOD)**
Secondary:	***Not in Compliance***
Full:	***Not Yet Assessed***

During the sixth reporting period, the City and the CPD maintained Preliminary compliance, but did not achieve Secondary compliance because they did not finalize and deliver the required training.

In this reporting period, the IMT assessed the CPD's efforts to finalize and train members on Special-Order S06-04, *Processing of Juveniles and Minors Under Department Control Policy*, and to create supervisory practices designed to ensure members are implementing the policy as written.

In the third reporting period, the City and the CPD met Preliminary compliance with ¶36 by implementing an updated the *Processing of Juveniles and Minors Under Department Control Policy* (S06-04), which codifies this paragraph's requirements. In the fourth reporting period, the CPD did not provide the IMT with any records regarding this paragraph or complete the training materials or deliver training to CPD members. In the fifth reporting period, the CPD reported that it did not move forward with the required training to implement the paragraph requirements due to pending changes in juvenile processing procedures.

During this reporting period, the CPD did not provide the IMT with any additional documentation to show that they finalized and delivered the training consistent with the requirements of this paragraph. The CPD reports that it is still working on the curriculum and scheduling of the eLearning training to guide implementation of paragraph requirements.

***

The IMT finds that the CPD and the City maintained Preliminary compliance but did not achieve Secondary compliance. Moving forward, the IMT expects that the

CPD will finalize and deliver the requisite training for this paragraph in the next reporting period to achieve Secondary compliance.

Paragraph 36 Compliance Progress History

FIRST REPORTING PERIOD	SECOND REPORTING PERIOD	THIRD REPORTING PERIOD
SEPTEMBER 1, 2019 – AUGUST 31, 2019	SEPTEMBER 1, 2019 – FEBRUARY 29, 2020	MARCH 1, 2020 – DECEMBER 31, 2020
COMPLIANCE PROGRESS:	COMPLIANCE PROGRESS:	COMPLIANCE PROGRESS:
Not Applicable	Not Applicable	Preliminary
FOURTH REPORTING PERIOD	**FIFTH REPORTING PERIOD**	**SIXTH REPORTING PERIOD**
JANUARY 1, 2021 – JUNE 30, 2021	JULY 1, 2021 – DECEMBER 31, 2021	JANUARY 1, 2022 – JUNE 30, 2022
COMPLIANCE PROGRESS:	COMPLIANCE PROGRESS:	COMPLIANCE PROGRESS:
Preliminary	Preliminary	Preliminary

Community Policing: ¶37

37. *Consistent with the requirements set forth in the Training section of this Agreement, CPD will incorporate the philosophy of community policing into its annual in service training for all officers, including supervisors and command staff, by providing training on the following topics: a. an overview of the philosophy and principles of community policing, consistent with this Agreement; b. methods and strategies for establishing and strengthening community partnerships that enable officers to work with communities to set public safety and crime prevention priorities and to create opportunities for positive interactions with all members of the community, including, but not limited to, youth, people of color, women, LGBTQI individuals, religious minorities, immigrants, individuals with limited English proficiency, homeless individuals, and individuals with disabilities; c. problem-solving tactics and techniques; d. information about adolescent development and techniques for positive interactions with youth; and e. effective communication and interpersonal skills.*

Compliance Progress

(Reporting Period: January 1, 2022, through June 30, 2022)

Preliminary:	***In Compliance*** **(FOURTH REPORTING PERIOD)**
Secondary:	***In Compliance*** **(NEW)**
Full:	***Not Yet Assessed***

In the sixth reporting period, the City and the CPD achieved Secondary compliance by providing evidence that at least 95% of members received the required in-service community policing training during this reporting period.

In this reporting period, the IMT assessed the CPD's efforts to finalize the in-service training, conduct a rigorous evaluation of its training, implement improvements based on those assessments, and provide significant oversight to ensure officer behavior is reflective of this training.

In the previous reporting periods, the IMT reviewed the in-service training curriculum and reviewed the court-approved suite of community policing training from the Seattle, New Orleans, and Albuquerque police departments. The City and the CPD met preliminary compliance in the fourth reporting period, which they maintained in the fifth reporting period when they remained under assessment for Secondary compliance resulting from a court granted COVID pandemic related extension to March 2, 2022 to complete the delivery of the in-service community policing training and provide evidence for completion of that training.

During this reporting period, the CPD continued to revise its community policing in-service training. The City and the CPD requested and received feedback from the IMT before finalizing the curriculum. Further, the IMT was provided with records to indicate that the training was delivered to at least 95% of members during the reporting period.

***

The CPD achieved Secondary compliance by administering the revised 2022 community policing in-service training to CPD members during the reporting period. The CPD reports that in the next reporting period all in-service officers will be required to complete Active Bystandership for Law Enforcement, which promotes peer intervention to reduce harm for community members and officers. To achieve Full compliance, the CPD must demonstrate both effectiveness of training in reinforcing community policing concepts and further application of these concepts in CPD member practices.

Paragraph 37 Compliance Progress History

FIRST REPORTING PERIOD	SECOND REPORTING PERIOD	THIRD REPORTING PERIOD
SEPTEMBER 1, 2019 – AUGUST 31, 2019	SEPTEMBER 1, 2019 – FEBRUARY 29, 2020	MARCH 1, 2020 – DECEMBER 31, 2020
COMPLIANCE PROGRESS:	COMPLIANCE PROGRESS:	COMPLIANCE PROGRESS:
Not Applicable	Not Applicable	Status Update
FOURTH REPORTING PERIOD	**FIFTH REPORTING PERIOD**	**SIXTH REPORTING PERIOD**
JANUARY 1, 2021 – JUNE 30, 2021	JULY 1, 2021 – DECEMBER 31, 2021	JANUARY 1, 2022 – JUNE 30, 2022
COMPLIANCE PROGRESS:	COMPLIANCE PROGRESS:	COMPLIANCE PROGRESS:
Preliminary	Preliminary	Secondary

Community Policing: ¶38

38. *Through inter-governmental agreements between CPD and Chicago Public Schools ("CPS"), CPD has assigned officers to work in CPS schools. In the event that CPD and CPS decide to continue this practice, officers assigned to work in CPS schools will be appropriately vetted, trained, and guided by clear policy in order to cultivate relationships of mutual respect and understanding, and foster a safe, supportive, and positive learning environment for students.*

Compliance Progress

(Reporting Period: January 1, 2022, through June 30, 2022)

Preliminary:	***In Compliance*** **(FOURTH REPORTING PERIOD)**
Secondary:	***Not in Compliance***
Full:	***Not Yet Assessed***

In the sixth reporting period, the City and the CPD maintained Preliminary compliance but did not achieve Secondary compliance by not delivering the School Resource Officer (SRO) in-service and supplemental training in a timely manner. The SRO annualized training needs to be delivered close to the beginning of the school year, and improvements required in documenting the SRO vetting and selection process.

In this reporting period, the IMT assessed the CPD's efforts to provide the annualized in-service training for SROs closer to the beginning of the school year and provide additional documentation regarding the vetting and selection process. The IMT interviewed SROs and school leadership.

In the fourth reporting period, the IMT reviewed Intergovernmental Agreements and Memoranda of Understanding documents for the past two years and the CPD's and the Chicago Public School's *Whole School Safety Plan*. The City and CPD achieved preliminary compliance during the fourth reporting period. In previous reporting periods, the CPD, in conjunction with CPS, reengineered the selections and vetting process for SROs. In the fifth reporting period, the City and the CPD maintained Preliminary compliance but did not achieve Secondary compliance because in-service training was not completed in a timely manner and sufficient documentation for the vetting and selection process was not provided.

In this reporting period, the City and the CPD provided an *SRO Training To-From Report* and *SRO School Assignment Roster*. The IMT also reviewed supplemental SRO in-service training curriculum and conducted interviews with SRO and school leadership.

***

In sum, the City and the CPD did not achieve Secondary compliance because the SRO supplemental training was not delivered in a timely manner during the 2021/2022 school year. The IMT expects the CPD and CPS to deliver in-service and supplemental training prior to or soon after the onset of the 2022/2023 school year, and improved documentation of the selection and vetting process.

Paragraph 38 Compliance Progress History

FIRST REPORTING PERIOD	SECOND REPORTING PERIOD	THIRD REPORTING PERIOD
SEPTEMBER 1, 2019 – AUGUST 31, 2019	SEPTEMBER 1, 2019 – FEBRUARY 29, 2020	MARCH 1, 2020 – DECEMBER 31, 2020
COMPLIANCE PROGRESS:	COMPLIANCE PROGRESS:	COMPLIANCE PROGRESS:
Not Applicable	Not Applicable	Status Update

FOURTH REPORTING PERIOD	FIFTH REPORTING PERIOD	SIXTH REPORTING PERIOD
JANUARY 1, 2021 – JUNE 30, 2021	JULY 1, 2021 – DECEMBER 31, 2021	JANUARY 1, 2022 – JUNE 30, 2022
COMPLIANCE PROGRESS:	COMPLIANCE PROGRESS:	COMPLIANCE PROGRESS:
Preliminary	Preliminary	Preliminary

Community Policing: ¶¶39–40

39. *Before the 2019-2020 school year begins, in consultation with CPS and considering input from CPD members, including officers assigned to work in CPS schools, school personnel, families, students, and community stakeholders, CPD will develop and implement screening criteria to ensure that all officers assigned to work in CPS schools have the qualifications, skills, and abilities necessary to work safely and effectively with students, parents and guardians, and school personnel. Only CPD officers who satisfy the screening criteria will be assigned to work in CPS schools.*

40. *Before the 2019-2020 school year begins, in consultation with CPS and considering input from CPD members, including officers assigned to work in CPS schools, school personnel, families, students, and community stakeholders, CPD will develop a policy that clearly defines the role of officers assigned to work in CPS schools. This policy will be reviewed by the Monitor by the end of 2019. Any suggested revisions by the Monitor that are adopted by CPD will be implemented by CPD before the 2020-2021 school year. The policy will reflect best practices and will include, but not be limited to: a. the duties, responsibilities, and appropriate actions of officers assigned to work in CPS schools and school personnel, including an express prohibition on the administration of school discipline by CPD officers; b. selection criteria for officers assigned to work in CPS schools; c. the requirement that officers assigned to work in CPS school receive initial and refresher training; and d. the collection, analysis, and use of data regarding CPD activities in CPS schools.*

Compliance Progress

(Reporting Period: January 1, 2022, through June 30, 2022)

Preliminary:	***In Compliance*** **(THIRD REPORTING PERIOD)**
Secondary:	***In Compliance*** **(NEW)**
Full:	***Not Yet Assessed***

In the sixth reporting period, the City and the CPD achieved Secondary compliance by updating and demonstrating implementation of the School Resource Officer (SRO) policy and completion of the annual two-part refresher course now required for SROs to be delivered before or at onset of the 2022/2023 schoolyear.

During this reporting period, the IMT assessed the CPD's efforts to complete the development of updated in-service annualized trainings for returning and newly appointed SROs, and requirements for SROs to receive training prior to or at the onset of the 2022/2023 school year. The IMT also reviewed the revised SRO policy

and the CPD's continued progress in delineating the SRO selection process in policy. *See* ¶42.

This paragraph has been under assessment from the outset of the monitoring plan. In the first and second reporting periods, the City and the CPD had not met preliminary compliance with these paragraphs because CPD continued to refine its School Resource Officer policy regarding selection criteria and roles and responsibilities for *School Resource Officers* (S04-01-02). In the third reporting period, the CPD codified its SRO selection criteria and defined the roles of SROs in CPD's Special Order S04-01-02, *School Resource Officers (SROs) and Investigations at Chicago Public Schools (CPS)*. In the fourth and fifth reporting period, the City and the CPD maintained its Preliminary compliance but had not yet achieved Secondary compliance because they were unable to schedule all the required in-service training before or shortly after the onset of the current school year.

During the sixth reporting period, the CPD submitted a revised version of S04-01-02, *School Resource Officer and Investigations of Chicago Public Schools*, with further refinements. The CPD also completed development of the second part of a two-part annual refresher training for SROs. The supplemental training developed included extensive input and participation by community organizations with plans for community members to deliver much of the instruction. The CPD reports that the refresher training for the 2022/2023 schoolyear will be delivered prior to or at the onset of next schoolyear to avoid the delays that transpired in delivery the training in the previous schoolyear. The processes put in place through the implementation of S04-01-02 appear to be generally adhered to with opportunities for more deliberation in the selection and assignment of SROs.

***

In sum, the IMT finds that the City and the CPD achieved Secondary compliance by updating and demonstrating implementation of SRO policy involving officer selection and delineation of responsibilities, and completion of the annual two-part refresher course with the requirement that SROs receive this training prior to or at onset of the 2022/2023 schoolyear. To maintain Secondary compliance, the CPD and the City must follow through with delivery of training prior to (or at the onset) of schoolyear and produce additional data regarding SRO activities in schools in the next reporting period. For Full compliance, the CPD and the City must demonstrate a use of data to continue to make improvements in the SRO program, and to provide evidence of the program's efficacy.

Paragraphs 39 Compliance Progress History

FIRST REPORTING PERIOD
SEPTEMBER 1, 2019 – AUGUST 31, 2019
COMPLIANCE PROGRESS:
Under Assessment

SECOND REPORTING PERIOD
SEPTEMBER 1, 2019 – FEBRUARY 29, 2020
COMPLIANCE PROGRESS:
None

THIRD REPORTING PERIOD
MARCH 1, 2020 – DECEMBER 31, 2020
COMPLIANCE PROGRESS:
Preliminary

FOURTH REPORTING PERIOD
JANUARY 1, 2021 – JUNE 30, 2021
COMPLIANCE PROGRESS:
Preliminary

FIFTH REPORTING PERIOD
JULY 1, 2021 – DECEMBER 31, 2021
COMPLIANCE PROGRESS:
Preliminary

SIXTH REPORTING PERIOD
JANUARY 1, 2022 – JUNE 30, 2022
COMPLIANCE PROGRESS:
Secondary

Paragraphs 40 Compliance Progress History

FIRST REPORTING PERIOD
SEPTEMBER 1, 2019 – AUGUST 31, 2019
COMPLIANCE PROGRESS:
Not Applicable

SECOND REPORTING PERIOD
SEPTEMBER 1, 2019 – FEBRUARY 29, 2020
COMPLIANCE PROGRESS:
None

THIRD REPORTING PERIOD
MARCH 1, 2020 – DECEMBER 31, 2020
COMPLIANCE PROGRESS:
Preliminary

FOURTH REPORTING PERIOD
JANUARY 1, 2021 – JUNE 30, 2021
COMPLIANCE PROGRESS:
Preliminary

FIFTH REPORTING PERIOD
JULY 1, 2021 – DECEMBER 31, 2021
COMPLIANCE PROGRESS:
Preliminary

SIXTH REPORTING PERIOD
JANUARY 1, 2022 – JUNE 30, 2022
COMPLIANCE PROGRESS:
Secondary

Community Policing: ¶41

41. *CPD will, within 60 days of the completion of the 2019-2020 school year, and on an annual basis thereafter, review and, to the extent necessary, revise its policies and practices regarding officers assigned to work in CPS schools to ensure they are responsive to the needs of the Department, CPS, and its students. This evaluation will include input from CPD members, including officers assigned to work in CPS schools, school personnel, families, students, and community stakeholders. Any revisions to CPD's policies and procedures regarding officers assigned to schools will be submitted to the Monitor and OAG in accordance with the requirements of Part C of the Implementation, Enforcement, and Monitoring section of this Agreement.*

Compliance Progress

(Reporting Period: January 1, 2022, through June 30, 2022)

Recurring Schedule: Annual ☑ **Met** ☐ **Missed**

Preliminary: ***In Compliance*** **(THIRD REPORTING PERIOD)**
Secondary: ***Under Assessment***
Full: ***Not Yet Assessed***

In the sixth reporting period, the City and the CPD maintained Preliminary compliance and are currently being assessed as to whether they have achieved Secondary compliance pending completion of the annual report for the 2021/2022 school year.

In this reporting period, the IMT assessed the CPD's efforts to finalize the latest iteration of the Special Order S04-01-02, *School Resource Officers (SROs) and Investigations at Chicago Public Schools (CPS)* and to implement trainings that align with any additional policy changes. *See* ¶42. The IMT also monitored the CPD's efforts to work closely with the CPS to anticipate potential changes to the policy as schools consider the different and more customized school safety options. We also interviewed SROs and school leadership on their perspectives of the program.

During the third reporting period, the City and the CPD achieved preliminary compliance by revising Special Order S04-01-02, *School Resource Officers (SROs) and Investigations at Chicago Public Schools (CPS)*. The IMT also assessed the CPD's efforts to incorporate ¶41's review requirement into a policy. In the fifth reporting period, the City and the CPD maintained Preliminary compliance by finalizing revisions to the most current iteration of the SRO policy but did not achieve Secondary compliance.

During this reporting period, Chicago Public Schools and the CPD continued with the implementation of the "*Whole School Safety Program*." Local School Districts will again decide whether they want SROs posted in their schools. Currently, CPS reports that 19 of its 91 high schools maintain two SROs while 19 have one assigned SRO. The SRO budget has declined from $33 million in 2020 to $11 million this year with some funding shifting to "Whole School Safety programs" to support mental health and restorative programming.

The IMT visited one SRO program and found an example where school personnel and SRO staff worked effectively together in implementing program policy and goals. SROs were well integrated into the school environment and worked in a highly complementary manner with school personnel. CPS and the CPD finalized the curriculum and completed portions of in-service training for the SROs. The IMT understands that, given the recent end of the schoolyear, CPS and the CPD will need time to gather data, conduct interviews and engage in other fact-finding activities prior to completing the formal evaluation. The IMT does expect the CPD and CPS to complete the evaluation in the next reporting period.

***

In sum, the IMT finds that the City and CPD maintained Preliminary compliance and are under assessment for Secondary compliance pending completion of the annual evaluation of the SRO program in the next reporting period.

Paragraph 41 Compliance Progress History

FIRST REPORTING PERIOD	SECOND REPORTING PERIOD	THIRD REPORTING PERIOD
SEPTEMBER 1, 2019 – AUGUST 31, 2019	SEPTEMBER 1, 2019 – FEBRUARY 29, 2020	MARCH 1, 2020 – DECEMBER 31, 2020
COMPLIANCE PROGRESS:	COMPLIANCE PROGRESS:	COMPLIANCE PROGRESS:
Not Applicable	Not Applicable	Preliminary
FOURTH REPORTING PERIOD	**FIFTH REPORTING PERIOD**	**SIXTH REPORTING PERIOD**
JANUARY 1, 2021 – JUNE 30, 2021	JULY 1, 2021 – DECEMBER 31, 2021	JANUARY 1, 2022 – JUNE 30, 2022
COMPLIANCE PROGRESS:	COMPLIANCE PROGRESS:	COMPLIANCE PROGRESS:
Preliminary	Preliminary	Preliminary

Community Policing: ¶42

42. *CPD officers assigned to work in CPS schools will receive specialized initial and annual refresher training that is adequate in quality, quantity, scope, and type, and that addresses subjects including, but not limited to: a. school-based legal topics; b. cultural competency; c. problem-solving; d. the use of de-escalation techniques, use of restorative approaches, and available community resources and alternative response options; e. youth development; f. crisis intervention; g. disability and special education issues; and h. methods and strategies that create positive interactions with specific student groups such as those with limited English proficiency, who are LGBTQI, or are experiencing homelessness.*

The training will be developed and delivered in accordance with the requirements of the Training section of this Agreement.

Compliance Progress

(Reporting Period: January 1, 2022, through June 30, 2022)

Recurring Schedule: Annual ☑ **Met** ☐ **Missed**

Preliminary: ***In Compliance*** **(FIFTH REPORTING PERIOD)**
Secondary: ***Not in Compliance***
Full: ***Not Yet Assessed***

In the sixth reporting period, the City and the CPD maintained Preliminary compliance for this paragraph but failed to achieve Secondary compliance by not delivering the required in-service School Resource Officer training for the 2021/2022 calendar year in a timely manner.

During this reporting period, the IMT assessed the CPD's effort to finalize the SRO refresher training and to deliver that training to SRO officers, in part, before and during the current schoolyear. The IMT also monitored the CPD's efforts to establish a process to ensure annualized updates of this training based on evaluative materials and ongoing community stakeholder input. Further, the IMT also reviewed training records of SRO in-service members.

The IMT first assessed compliance with this paragraph in the second reporting period, and found that the City and CPD had not met preliminary compliance. At that time, although the NASRO-provided training and the materials submitted by CPD addressed most of the consent decree requirements, the IMT raised concerns about large training class sizes and the processes in place to evaluate the training's effectiveness. Compliance was once again assessed in the fourth reporting period, with the IMT reviewing drafts of SRO in-service training curricula, community input

on SRO training, the 40-hour National Association of School Resource Officers (NASRO) training, the CPS supplemental training curricula, and the draft SRO policy (S04-01-02). The City and CPD did not reach preliminary compliance at that time because the policy was not yet finalized. In the fifth reporting period, the City and the CPD achieved preliminary compliance for this paragraph by finalizing the SRO in-service training curriculum.

In this reporting period, the CPD did not complete delivery of its in-service SRO training for the 2021-2022 schoolyear in a timely manner with much of the training occurring late into the school year. The CPD and Chicago Public Schools completed development of a revised Part two of their supplemental training for SROs involving considerable community participation.

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In sum, the City and the CPD maintained Preliminary compliance by completing the development of the updated SRO in-service training, but did not achieve Secondary compliance. To achieve Secondary compliance, the CPD must deliver the refresher training for the 2022/2023 schoolyear in a timely manner either before, or soon after, the onset of the schoolyear.

Paragraph 42 Compliance Progress History

FIRST REPORTING PERIOD	SECOND REPORTING PERIOD	THIRD REPORTING PERIOD
SEPTEMBER 1, 2019 – AUGUST 31, 2019	SEPTEMBER 1, 2019 – FEBRUARY 29, 2020	MARCH 1, 2020 – DECEMBER 31, 2020
COMPLIANCE PROGRESS:	COMPLIANCE PROGRESS:	COMPLIANCE PROGRESS:
Not Applicable	None	Status Update

FOURTH REPORTING PERIOD	FIFTH REPORTING PERIOD	SIXTH REPORTING PERIOD
JANUARY 1, 2021 – JUNE 30, 2021	JULY 1, 2021 – DECEMBER 31, 2021	JANUARY 1, 2022 – JUNE 30, 2022
COMPLIANCE PROGRESS:	COMPLIANCE PROGRESS:	COMPLIANCE PROGRESS:
None	Preliminary	Preliminary

Community Policing: ¶43

43. *The curricula, lesson plans, and course material used in initial training provided before the 2019-2020 school year will be reviewed by the Monitor by the end of 2019. Any suggested revisions by the Monitor that are adopted by CPD will be implemented by CPD before the 2020-2021 school year.*

Compliance Progress

(Reporting Period: January 1, 2022, through June 30, 2022)

Preliminary: ***In Compliance*** **(SECOND REPORTING PERIOD)**
Secondary: ***In Compliance*** **(FIFTH REPORTING PERIOD)**
Full: ***Not Yet Assessed***

In the sixth reporting period, the City and the CPD maintained Secondary compliance completing revisions to SRO training curriculum. The IMT will continue to assess the CPD's efforts to deliver training to incoming School Resource Officers (SROs) in a timely manner and to establish an annualized review process for the training curriculum.

The City and the CPD achieved Preliminary compliance for ¶43 in the second reporting period by providing the initial training materials for review prior to the end of the 2019/2020 school year. The City and the CPD maintained Preliminary compliance for the third and fourth reporting periods because they did not finalize the SRO refresher training curriculum. The IMT suggested that the CPD establish an annualized process for the review and update of the curriculum. In the fifth reporting period, the City and the CPD achieved Secondary compliance by reviewing and finalizing the SRO training curriculum and delivering a portion of the training to incoming SRO members.

During this reporting period, the IMT assessed the CPD's efforts to review and provide subsequent revisions to the SRO training program. The CPD completed an update of the SRO annual in-service training curricula of the current SRO with a required subsequent review by the IMT. The update included significant community input and addressed paragraph requirements. The IMT also reviewed the revised part two of the SRO in-service annual curriculum to be delivered prior to at onset of the 2022/2023 school year.

***

The IMT finds that the City and CPD maintained Secondary compliance by continuing to make curriculum changes based on the IMT, the OAG, and community stakeholder feedback. In next reporting period, the IMT expects the initial training for new SRO officers to occur prior to or at the onset of the school year. The IMT also expects the CPS and CPD to conduct an annual program review including an

assessment of training of training curriculum and delivery and to make any revisions based on that review. To achieve Full compliance, the CPD must implement a process for annual review, including updates of the curriculum. The City and the CPD will also have to assess the efficacy of training for improving SRO performance.

Paragraph 43 Compliance Progress History

FIRST REPORTING PERIOD	SECOND REPORTING PERIOD	THIRD REPORTING PERIOD
SEPTEMBER 1, 2019 – AUGUST 31, 2019	SEPTEMBER 1, 2019 – FEBRUARY 29, 2020	MARCH 1, 2020 – DECEMBER 31, 2020
COMPLIANCE PROGRESS:	COMPLIANCE PROGRESS:	COMPLIANCE PROGRESS:
Not Applicable	Preliminary	Preliminary
FOURTH REPORTING PERIOD	**FIFTH REPORTING PERIOD**	**SIXTH REPORTING PERIOD**
JANUARY 1, 2021 – JUNE 30, 2021	JULY 1, 2021 – DECEMBER 31, 2021	JANUARY 1, 2022 – JUNE 30, 2022
COMPLIANCE PROGRESS:	COMPLIANCE PROGRESS:	COMPLIANCE PROGRESS:
Preliminary	Secondary	Secondary

Community Policing: ¶44

44. *Before the 2019-2020 school year begins, CPD will undertake best efforts to enter a memorandum of understanding with CPS, to clearly delineate authority and specify procedures for CPD officer interactions with students while on school grounds, consistent with the law, best practices, and this Agreement.*

Compliance Progress

(Reporting Period: January 1, 2022, through June 30, 2022)

Preliminary:	***In Compliance*** **(FIRST REPORTING PERIOD)**
Secondary:	***In Compliance*** **(THIRD REPORTING PERIOD)**
Full:	***In Compliance*** **(FIFTH REPORTING PERIOD)**
Sustainment Period Ends	***December 31, 2023***

During the sixth reporting period, the City and the CPD maintained Full compliance through their execution of an IGA/MOU for the 2021-2022 schoolyear.

To determine Full compliance, the IMT assessed whether the CPD and the CPS demonstrated a consistent and annualized effort to update the IGA/MOU to reflect changing community sentiments, feedback on SRO program performance, and other considerations.

Compliance with the consent decree requirements of this paragraph was assessed in the first reporting period. Although the IMT found some inconsistencies between the MOU and the CPD's SRO policy, the IMT nevertheless found that the City and CPD achieved preliminary compliance, and were advised to review both the SRO policy and the MOU with CPS to address the inconsistencies. In the third reporting period, because the IMT found that the MOU could benefit from more precise and specific procedures regarding CPD officers' interactions with students, specifically the consultation processes and the complaint process, the IMT determined that the CPD had not met Secondary compliance. The City and the CPD achieved Secondary compliance in the third reporting period by working with CPS to ensure that the 2020/2021 MOU aligned with the SRO policy. The City and the CPD maintained Preliminary and Secondary compliance with ¶44 during the fourth reporting period. During the fifth reporting period, the City and the CPD maintained Preliminary and Secondary compliance and achieved Full compliance with ¶44 by finalizing and executing an IGA/MOU for the 2021-2022 school year.

In the sixth reporting period, the CPS and the CPD successfully implemented the MOU requirements developed for the 2021/2022 schoolyear. The IMT expects the CPD and the CPS to continue with its annual update of the MOU which is consistent with law and best practices and reflecting extensive community.

***

The IMT finds that the CPD and the CPS remain in Full compliance with this paragraph. For six reporting periods, the CPD and the CPS have had in place MOUs governing the operations of the SRO program. The continued practice of the CPD and the CPS working together and annually entering a MOU consistent with law, and best practices and reflecting extensive community input results in a Full compliance assessment.

Paragraph 44 Compliance Progress History

FIRST REPORTING PERIOD	SECOND REPORTING PERIOD	THIRD REPORTING PERIOD
SEPTEMBER 1, 2019 – AUGUST 31, 2019	SEPTEMBER 1, 2019 – FEBRUARY 29, 2020	MARCH 1, 2020 – DECEMBER 31, 2020
COMPLIANCE PROGRESS:	COMPLIANCE PROGRESS:	COMPLIANCE PROGRESS:
Preliminary	Preliminary	Secondary
FOURTH REPORTING PERIOD	**FIFTH REPORTING PERIOD**	**SIXTH REPORTING PERIOD**
JANUARY 1, 2021 – JUNE 30, 2021	JULY 1, 2021 – DECEMBER 31, 2021	JANUARY 1, 2022 – JUNE 30, 2022
COMPLIANCE PROGRESS:	COMPLIANCE PROGRESS:	COMPLIANCE PROGRESS:
Secondary	Full	Full

Community Policing: ¶45

45. *By January 1, 2020, and annually thereafter, District Commanders will review their district's policing strategies, with input from the District Advisory Committees and the Office of Community Policing, to ensure the strategies are consistent with the principles of community policing. This review will include, but not be limited to: a. reviewing available district resources and personnel assignments; b. identifying methods to support their district's ability to effectively problem-solve, including collaborating with City departments, services, and sister agencies; and c. identifying district-level CPD members, as needed, to assist members of the community with access to police and City services, including community members who have experienced previous challenges, such as LGBTQI individuals, religious minorities, immigrants, individuals with disabilities, individuals in crisis, homeless individuals, and survivors of sexual assault and domestic violence.*

Compliance Progress

(Reporting Period: January 1, 2022, through June 30, 2022)

Recurring Schedule: Annual ☑ **Not Yet Applicable**

Preliminary: ***In Compliance*** **(FOURTH REPORTING PERIOD)**
Secondary: ***Not in Compliance***
Full: ***Not Yet Assessed***

The City and the CPD maintained Preliminary compliance but did not achieve Secondary compliance. The CPD will have to demonstrate proposed improvements for the 2022 strategy development and review processes, including more thorough documentation of deliberations and reviews by District Advisory Committees and enhanced outreach and participation by marginalized groups in the strategy development process.

To assess Secondary compliance, the IMT examined the CPD's efforts to garner community input from populations experiencing the most police contact. The IMT also reviewed a sampling of the CPD's efforts to implement supervisory practices to ensure the policy is up-to-date and implemented as written.

In the second reporting period, the IMT assessed and determined that the City and the CPD did not met Preliminary compliance with ¶45 because the IMT could not conclude from the CPD's records whether the District Commanders' review of their district community policing strategic plans included a review of their district's available resources and personnel assignments. Similarly, the IMT was unable to determine from the records whether the District Commanders identified district-

level members who could assist members of marginalized communities in gaining access to CPD and City services, as needed. In the third reporting period, the City and the CPD implemented Special Order, S02-03-02, District Strategic Plans, and developed a new directive addressing the District Strategic Plans review process, Office of Community Policing (OCP) District Strategic Plans Standard Operating Procedure. The directives were, however, too limited in scope to meet Preliminary compliance with ¶45 because they only covered District Strategic Plans. The City and the CPD met Preliminary compliance with ¶45 in the fourth reporting period, which they maintained in the fifth reporting period.

During the sixth reporting period, the CPD reports that the Commanders reviewed the crime reduction and strategies with input from the District Advisory Committees. The process calls for Commanders to meet with the District Advisory Committees after both community conversations and acquire documentation from the District Advisory Committee chair. The CPD acknowledged struggling with follow through and is still working to resolve issues but felt that progress will be made in deliberations and reviews for the next set of strategies. The CPD also noted that, in 2021, it required all Districts to hold a third meeting with organizations representing marginalized groups (with one District going to homeless encampments to garner input on how officers can better serve them). The CPD acknowledged continued challenges and indicated that future efforts will focus on youth outreach and leveraging of partnerships to gain access and input from youth in the strategy development process.

***

The City and the CPD maintain Preliminary compliance but have not achieved Secondary compliance. The CPD's failure to complete development within CPD guidelines and to engage community partners remained an issue during this reporting period. Moving forward, to achieve Secondary compliance, the IMT expects the CPD to complete the strategy development process within its own established guidelines, continue improving the representativeness and functionality of District Advisory Committees, and provide more and better documentation for the review processes. This includes enhanced outreach and participation by marginalized groups in the strategy development process.

Paragraph 45 Compliance Progress History

FIRST REPORTING PERIOD	SECOND REPORTING PERIOD	THIRD REPORTING PERIOD
SEPTEMBER 1, 2019 – AUGUST 31, 2019	SEPTEMBER 1, 2019 – FEBRUARY 29, 2020	MARCH 1, 2020 – DECEMBER 31, 2020
COMPLIANCE PROGRESS:	COMPLIANCE PROGRESS:	COMPLIANCE PROGRESS:
Not Applicable	None	None
FOURTH REPORTING PERIOD	**FIFTH REPORTING PERIOD**	**SIXTH REPORTING PERIOD**
JANUARY 1, 2021 – JUNE 30, 2021	JULY 1, 2021 – DECEMBER 31, 2021	JANUARY 1, 2022 – JUNE 30, 2022
COMPLIANCE PROGRESS:	COMPLIANCE PROGRESS:	COMPLIANCE PROGRESS:
Preliminary	Preliminary	Preliminary

Community Policing: ¶46

46. *Within 180 days of the Effective Date, and as appropriate thereafter, CPD will solicit, consider, and respond to input, feedback, and recommendations from the community in each district about its policing efforts and strategies. Such practices may include, but are not limited to, direct surveys, community meetings, beat community meetings, and engagement through social media. CPD will identify strategies for soliciting input from individuals that reflect a broad cross-section of the community each district serves.*

Compliance Progress

(Reporting Period: January 1, 2022, through June 30, 2022)

Preliminary:	***In Compliance*** **(SECOND REPORTING PERIOD)**
Secondary:	***Not in Compliance***
Full:	***Not Yet Assessed***

In the sixth reporting period, the City and the CPD maintained Preliminary compliance but did not achieve Secondary compliance due to incomplete review processes and a lack of sufficient input from marginalized groups regarding policing efforts and strategies. The IMT monitored the CPD's efforts to further refine the strategy development process to improve community conversations, and their use of other available engagement tools, such as social media and recent police interactions surveys.

The City and the CPD first met Preliminary compliance with ¶46 in the second reporting period by implementing a multi-faceted engagement approach within the six-month deadline. Since then, the City and CPD have maintained Preliminary compliance but have failed to meet Secondary compliance because the CPD has not developed methods to effectively engage a broader and more representative group of community members, namely there remains a lack of sufficient input from marginalized groups in the development process.

During the sixth reporting period, the CPD continued to use Beat meetings, community conversations, District Advisory Committee meetings, online surveys, and community policing officers to ascertain community input. The CPD reported that it is piloting a police officer contact survey in two Districts and hoping to launch them this summer.

Despite these efforts, many community members feel that the CPD does not always genuinely seek or seriously consider community input, suggesting a deficit in the engagement strategy. The CPD has stated that to address these concerns they will, "try to meet people where they are" and look for more creative ways to reach community members. The CPD also reported that it will work equally as hard to

ensure that everyone throughout the department will have heard and addressed the issues. The CPD also developed a draft community engagement policy and plan and has requested technical assistance to strengthen their engagement processes.

***

In sum, the CPD and City maintained Preliminary compliance with this paragraph but did not achieve Secondary compliance. To achieve Secondary compliance, The CPD needs to finalize guidance, enhance outreach efforts, and develop a broader and more effective community engagement strategy.

Paragraph 46 Compliance Progress History

FIRST REPORTING PERIOD	SECOND REPORTING PERIOD	THIRD REPORTING PERIOD
SEPTEMBER 1, 2019 – AUGUST 31, 2019	SEPTEMBER 1, 2019 – FEBRUARY 29, 2020	MARCH 1, 2020 – DECEMBER 31, 2020
COMPLIANCE PROGRESS:	COMPLIANCE PROGRESS:	COMPLIANCE PROGRESS:
Not Applicable	Preliminary	Preliminary

FOURTH REPORTING PERIOD	FIFTH REPORTING PERIOD	SIXTH REPORTING PERIOD
JANUARY 1, 2021 – JUNE 30, 2021	JULY 1, 2021 – DECEMBER 31, 2021	JANUARY 1, 2022 – JUNE 30, 2022
COMPLIANCE PROGRESS:	COMPLIANCE PROGRESS:	COMPLIANCE PROGRESS:
Preliminary	Preliminary	Preliminary

Community Policing: ¶47

47. *Within 180 days of the Effective Date, CPD will develop procedures to annually evaluate the effectiveness of the Department's efforts and strategies for building community partnerships and using problem-solving techniques aimed at reducing crime and improving quality of life. CPD will determine any necessary adjustments based on its annual evaluation.*

Compliance Progress

(Reporting Period: January 1, 2022, through June 30, 2022)

Recurring Schedule: Annual ☐ **Met** ☑ **Missed**

Preliminary: ***In Compliance*** **(THIRD REPORTING PERIOD)**
Secondary: ***Not in Compliance***
Full: ***Not Yet Assessed***

In the sixth reporting period, the City and the CPD maintained Preliminary compliance but failed to achieve Secondary compliance. To achieve Secondary compliance, the CPD needs to put in place mechanisms for tracking the development and assessing effectiveness of community partnerships, and determine necessary adjustments based on its annual evaluation.

The IMT first assessed ¶47 in the second reporting period but found that the City and the CPD did not meet Preliminary compliance because the SOP governing its performance management assessment process had not yet been finalized for implementation. The SOP was developed in the third reporting period, allowing the City and the CPD to meet Preliminary compliance. In the fourth reporting period, the IMT reviewed the Community Engagement Management System meeting notes that the CPD produced. The CPD did not use data variations to inform any needed adjustments in resource allocations, policing strategies, and tactics, and the IMT further noted that the system alone would not adequately capture partnership activity and development, so Preliminary compliance was maintained. No progress was made in the fifth reporting period, so the City and the CPD maintained Preliminary compliance.

During this reporting period, the IMT monitored the CPD's efforts to include partnership-related activity and development in their monthly reporting. We also assessed the CPD's efforts to consider other evaluation tools that may help them determine the effectiveness of their strategies and techniques in tracking and assessing effectiveness of partnerships.

The CPD reported that once a month several districts do a "deep dive" into the survey findings from ZenCity (previously ELUCD) and other related data as part of a performance assessment. The CPD performance management review process

does not specifically address the Department's efforts and strategies to build partnerships to expand problem solving capabilities. The CPD reports exploring efforts to utilize Community Engagement Management System to help track partnership activity.

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The CPD maintained Preliminary compliance but failed to achieve Secondary compliance. To achieve Secondary compliance, the CPD needs to put in place mechanisms for tracking the development and assessing effectiveness of community partnerships, and determine necessary adjustments based on its annual evaluation.

Paragraph 47 Compliance Progress History

FIRST REPORTING PERIOD	SECOND REPORTING PERIOD	THIRD REPORTING PERIOD
SEPTEMBER 1, 2019 – AUGUST 31, 2019	SEPTEMBER 1, 2019 – FEBRUARY 29, 2020	MARCH 1, 2020 – DECEMBER 31, 2020
COMPLIANCE PROGRESS:	COMPLIANCE PROGRESS:	COMPLIANCE PROGRESS:
Not Applicable	None	Preliminary
FOURTH REPORTING PERIOD	**FIFTH REPORTING PERIOD**	**SIXTH REPORTING PERIOD**
JANUARY 1, 2021 – JUNE 30, 2021	JULY 1, 2021 – DECEMBER 31, 2021	JANUARY 1, 2022 – JUNE 30, 2022
COMPLIANCE PROGRESS:	COMPLIANCE PROGRESS:	COMPLIANCE PROGRESS:
Preliminary	Preliminary	Preliminary

Community Policing: ¶48

48. *CPD will create opportunities to highlight, reward, and encourage officer, supervisory, and district performance on furthering community partnerships, engaging in problem-solving techniques, effective use of de-escalation, exemplary and effective supervision, and implementing community-oriented crime prevention strategies.*

Compliance Progress

(Reporting Period: January 1, 2022, through June 30, 2022)

Preliminary:	***In Compliance*** **(FOURTH REPORTING PERIOD)**
Secondary:	***Not in Compliance***
Full:	***Not Yet Assessed***

In the sixth reporting period, the City and the CPD maintained Preliminary compliance with this paragraph but did not achieve Secondary compliance by not developing specific opportunities to highlight, reward and encourage officer engagement in community policing practices.

The City and the CPD achieved Preliminary compliance with ¶48 in the fourth reporting period, the first time it was assessed, by finalizing versions of the *Community Mission, Vision* policy (G02-03) and the *Community Policing Office* policy (S02-03). In the fifth reporting period, the City and the CPD maintained Preliminary compliance with this paragraph but did not achieve Secondary compliance citing balancing workloads as a reason for the lack of progress.

During this reporting period, the IMT monitored the CPD's efforts to include more detailed guidance on identifying officer behavior, actions deserving of rewards, and the nature of those rewards. We also assessed the CPD's efforts to evaluate after one year of having a reward matrix in place to assess the impact of this awards-based policing.

The CPD indicated no efforts to implement the policy language addressing the requirements of this paragraph. They indicated working on ways to highlight and reward officers engaging in exemplary community policing practices, but none have been established or implemented.

***

In sum, the City and the CPD maintained Preliminary compliance with this paragraph. Moving forward, to achieve Secondary compliance, the IMT expects the CPD to demonstrate how these requirements can be consistently and effectively implemented by specifying ways to highlight and reinforce member exemplary community policing practices.

Paragraph 48 Compliance Progress History

FIRST REPORTING PERIOD	SECOND REPORTING PERIOD	THIRD REPORTING PERIOD
SEPTEMBER 1, 2019 – AUGUST 31, 2019	SEPTEMBER 1, 2019 – FEBRUARY 29, 2020	MARCH 1, 2020 – DECEMBER 31, 2020
COMPLIANCE PROGRESS:	COMPLIANCE PROGRESS:	COMPLIANCE PROGRESS:
Not Applicable	Not Applicable	Not Applicable
FOURTH REPORTING PERIOD	**FIFTH REPORTING PERIOD**	**SIXTH REPORTING PERIOD**
JANUARY 1, 2021 – JUNE 30, 2021	JULY 1, 2021 – DECEMBER 31, 2021	JANUARY 1, 2022 – JUNE 30, 2022
COMPLIANCE PROGRESS:	COMPLIANCE PROGRESS:	COMPLIANCE PROGRESS:
Preliminary	Preliminary	Preliminary

Appendix 2
Impartial Policing
Compliance Assessments, by Paragraph

Appendix 2
Impartial Policing
Compliance Assessments, by Paragraph

¶52 ¶53 ¶54 ¶55 ¶56 ¶57 ¶58 ¶59
¶60 ¶61 ¶62 ¶63 ¶64 ¶65 ¶66 ¶67
¶68 ¶69 ¶70 ¶71 ¶72 ¶73 ¶74 ¶75
¶76 ¶77 ¶78 ¶79 ¶80 ¶81 ¶82

Impartial Policing: ¶52

52. *In developing or revising policies and training referenced in this section, CPD will seek input from members of the community and community-based organizations with relevant knowledge and experience through community engagement efforts.*

Compliance Progress

(Reporting Period: January 1, 2022, through June 30, 2022)

Preliminary:	***In Compliance*** **(THIRD REPORTING PERIOD)**
Secondary:	***Under Assessment***
Full:	***Not Yet Assessed***

The City and the CPD maintained Preliminary compliance for ¶52. Although the City and the CPD demonstrated improvement in seeking input from the community on several polices related to Impartial Policing, they are still developing the *Community Input and Engagement Plan* and related procedures that will formalize this process. Near the end of this reporting period, the City and the CPD requested technical assistance related to developing the *Community Input and Engagement* plan, subsequent meetings and draft productions of the plan were produced at the end of the reporting period.

To assess community engagement, the IMT continues to examine several dimensions: (1) outreach; (2) meetings, interactions, and problem-solving; (3) follow-up and sustainability of partnerships, community policing, and problem-solving activities; and (4) general police-community interactions regardless of context. We also assessed the CPD's efforts to engage community members and organizations with relevant knowledge and experience regarding impartial policing. Our assessment of the City and the CPD's efforts during this reporting period in each of the areas listed above is provided below.

Progress before the Sixth Reporting Period

In the last reporting period, the City and the CPD maintained Preliminary compliance but did not reach Secondary compliance with the requirements of ¶52 because the CPD did not provide sufficient evidence to show it has established a sustainable community engagement process. The CPD reached Preliminary compliance in the third reporting period but then struggled to provide evidence that their community engagement model would ensure that specific groups, as well as the public, had the opportunity to be heard, and that the data was being used effectively in the review of policy and training.

We continue to emphasize the importance of community engagement in policy development and training and the need for the City and the CPD to create mechanisms for continued engagement with constitutionally protected classes

and their advocates. In prior reports, we have acknowledged the CPD's effort to engage certain segments of the community, but we have also underscored the limitations of these efforts and the need to engage a cross-section of community members and organizations with relevant knowledge and experience.

Progress in the Sixth Reporting Period

During this reporting period, we assessed the CPD's efforts to involve qualified CPD personnel in planning and executing community engagement tasks. On April 22, 2022, we conducted a site visit with the four community engagement coordinators within the Office of Community Policing and learned more about their current and planned efforts related to community engagement. While their efforts are commendable, we note that the Office of Community Policing will require increased staffing to continue to scale up this work and adequately assess its impact. We look forward to continued site visits with the coordinators to review progress and impact of these efforts.

We continue to stress the impediment that limited personnel resources within the Office of Community Policing has on its efforts to be responsive to the Consent Decree requirements. Shortages in staff have presented continued delays in the production of revised policies, development of related training, reviews of plans, documentation of annual reports, etc. In light of these staffing shortages, the IMT stresses the importance of prioritizing activities and developing a strategic plan to comply with this section of the Decree.

1. Outreach

The Office of Community Policing continued its outreach efforts during the sixth reporting period and sought input from the community on a number of the policies. These included G02-01, *Protection of Human Rights* (¶53 and ¶54); G02-04, *Prohibition Regarding Racial Profiling and Other Biased-Based Policing* (¶55 and 56); G08-06, *Sexual Misconduct* (¶63); S04-19, *Search Warrants* (¶¶53–55); and G02-01-05, *Religious Interactions* (¶60). The CPD sought feedback on these policies through different methodologies and provided the IMT with documentation of that outreach.

2. Meetings, Interactions, and Problem Solving

In this reporting period, the Office of Community Policing held a deliberative dialogue on the *Human Rights* policy and the *Prohibition of Racial Profiling* policy. This meeting was held virtually on January 20, 2022.

The IMT continues to encourage the CPD to create working groups that can oversee progress on specific topics or multiple topics in the Impartial Policing Section. As noted in the IMT's previous reports, sending policy and training materials to specific organizations for review and comment is another viable model of engagement.

3. Follow-up and Sustainability

The IMT continues to assess whether the CPD's community engagement includes sufficient follow-up and efforts to sustain meaningful partnerships and problem-solving activities with community members. During this reporting period, the CPD engaged in follow-up activities related to community input provided for its G02-01, *Protection of Human Rights*, G08-06, *Prohibitions of Sexual Misconduct*, and G02-01-05, *Religious Interactions*, policies. However, these follow-up activities were limited to sharing back with the community the revised policies and seeking further input. Documentation of how these policies were revised in response to the comments provided was provided to the IMT as part of the production process, but it was unclear if similar documentation or summaries of emergent themes from the feedback along with how the CPD revised policy in response to the feedback were 'shared-back" with the community.

The IMT continues to recommend that the CPD prepare brief public reports, based on community input, that describe emerging themes for different topics and how the CPD plans to address them. These reports would essentially become part of the CPD "share-back" process.

4. General Police-Community Interactions

Paragraph 52 requires that CPD "seek input from members of the community and community organizations with relevant knowledge and experience." As noted in previous reports, the IMT continues to recommend that the City seek to reliably and systematically gather feedback for policy and training purposes by outsourcing and sustaining a valid contact survey. With this wealth of data, the CPD can engage relevant subject-matter experts and community organizations in developing or refining policy and training.

During this reporting period, the IMT received a request for technical assistance regarding the development of the CPD's long-term community-engagement plan and policy. The request for assistance, dated May 20, 2022, included a draft community engagement plan and G01-03-01, *Community Engagement in Policy Development*. A meeting to discuss IMT's preliminary feedback on the draft plan and G01-03-01 with CPD was held on June 15, 2022. Much of the initial feedback centered on developing a broader organizational community engagement strategy, establishing performance measures for the plan, and including community input in the development of this plan. On June 30, 2022, the City and

the CPD submitted a revised *Community Engagement Plan* and requested a follow-on meeting to discuss the updated draft. The IMT looks forward to reviewing and collaborating with the CPD on the pending materials in future reporting periods to assess further levels of compliance with ¶52.

***

In sum, the CPD maintained Preliminary compliance but has yet to reach Secondary compliance. Although the CPD provides various community input methods, we suggest incorporating processes that offer community members early involvement in policy and training development. Some community members would like to generate policy and training considerations for the CPD, rather than just reacting to policies and training the CPD has already drafted. Some methods may address that point (*e.g.*, community conversations), but we think the CPD should provide more specifics on when community members will bring general policy considerations to the CPD's attention.

Furthermore, for various reasons, the CPD has struggled to engage groups that have the most interactions with the police for their input. Given those difficulties, we recommend including guidance on outreach strategies and participant selection processes. Codifying such policies will help the CPD track its outreach methods to identify what's working and what needs refinement. As noted in previous reports, the City and the CPD will achieve Full compliance when the CPD creates mechanisms for sustained, targeted community engagement. As noted in previous reports, the model should include a system of performance measurement that will (1) give Chicago communities an ongoing voice in evaluating police services in every police district and (2) provide the CPD with a reliable feedback loop that is used to shape police behavior, reduce all forms of bias on the street, and ultimately build public trust. This would include an expansion of community engagement to protected classes that may have been missed so far. Further, the IMT would like to stress the importance of timeliness in seeking input from the community in policy development and in the transition into training development. Engaging community stakeholders in policy development, as required by this paragraph, builds positive equity and works towards the CPD's efforts to establishing transparency and trust. But this positive equity may be negatively affected by lengthy timelines to develop or revise related training and, in turn, lead to further disengagement amongst the community. Finally, it will be critical for the CPD to provide sufficient staffing and resources to fulfill its community engagement plans.

Paragraph 52 Compliance Progress History

FIRST REPORTING PERIOD	SECOND REPORTING PERIOD	THIRD REPORTING PERIOD
SEPTEMBER 1, 2019 – AUGUST 31, 2019	SEPTEMBER 1, 2019 – FEBRUARY 29, 2020	MARCH 1, 2020 – DECEMBER 31, 2020
COMPLIANCE PROGRESS:	COMPLIANCE PROGRESS:	COMPLIANCE PROGRESS:
Not Applicable	Not Applicable	Preliminary

FOURTH REPORTING PERIOD	FIFTH REPORTING PERIOD	SIXTH REPORTING PERIOD
JANUARY 1, 2021 – JUNE 30, 2021	JULY 1, 2021 – DECEMBER 31, 2021	JANUARY 1, 2022 – JUNE 30, 2022
COMPLIANCE PROGRESS:	COMPLIANCE PROGRESS:	COMPLIANCE PROGRESS:
Preliminary	Preliminary	Preliminary

Impartial Policing: ¶53

53. *CPD will, consistent with this Agreement, ensure that its policies and practices prohibit discrimination on the basis of any protected class under federal, state, and local law, including race, color, sex, gender identity, age, religion, disability, national origin, ancestry, sexual orientation, marital status, parental status, military status, source of income, credit history, criminal record, or criminal history. CPD's policies and practices will prohibit retaliation consistent with Section 6-101 of the Illinois Human Rights Act (eff. Jan. 1, 2015) and Section 2-160-100 of the Municipal Code of Chicago (amended Oct. 11, 2017).*

Compliance Progress

(Reporting Period: January 1, 2022, through June 30, 2022)

Preliminary:	***Not in Compliance***
Secondary:	***Not Yet Assessed***
Full:	***Not Yet Assessed***

The City and the CPD produced revisions of G02-01, *Protection of Human Rights*, and G02-04, *Prohibition Against Racial Profiling and Other Bias-Based Policing*, to the IMT during the reporting period, and no objection notices for G02-01 and G02-04 were provided by the IMT and the Office of the Illinois Attorney General near the end of the sixth reporting period. However, further revisions to other policies—including S04-19, *Search Warrants*—are necessary for the City and the CPD to achieve Preliminary compliance with ¶53. The City and the CPD have taken significant steps to enhance community engagement on this policy and the most recent iteration reflects a number of improvements over the previous version, including an improved emphasis on de-escalation and the addition of specialized resources (including adding clarification regarding Crisis Intervention Team and resources for people with limited English proficiency). However, there are still deficiencies and a number of steps the CPD can take to enhance safety for the public and officers including clarifying uniform requirements for those involved in the service of a search warrant, enhancing accountability through sufficient written approvals, and by collecting and publicizing sufficient data about search warrants. The IMT looks forward to reviewing revisions to S04-19 and further community engagement related to the development of this policy in the coming reporting period.

To assess Preliminary compliance, we evaluated the CPD's efforts to codify the requirements of these paragraphs into policy (per the ¶¶626–41 review process) and engage the community as required by ¶52.

Progress before the Sixth Reporting Period

During previous periods, the IMT reviewed revised versions of CPD policies that they assert incorporate requirements, including G02-01, *Protection of Human Rights* (¶53 and ¶54); G02-04, *Prohibition Regarding Racial Profiling and Other Biased-Based Policing* (¶55 and ¶56); and G08-05, *Prohibition on Retaliation,* and S02-01-03, *Crime Victim Assistance*.

Progress in the Sixth Reporting Period

In this reporting period, the IMT commented on revised drafts of G02-01 and G02-04, which the CPD produced on March 16, 2022. While improved, these revised policies did not address all of IMT's previous concerns (¶53), including additional information and context regarding community input in the development of both directives. A subsequent production, submitted on June 2, 2022, included the additional information requested, and the IMT submitted a no-objection notice on June 17, 2022. Additionally, during this period, the IMT reviewed evidence of the community policing in-service training, which was produced on May 26, 2022.

Lastly, the IMT commented on a revised S04-19, *Search Warrants*, produced May 12, 2022. Initially, there was disagreement whether the Court had jurisdiction under the Consent Decree to address search-warrant policies under the review process of the Consent Decree. On March 2, 2021, during the pending resolution of this issue, the City and the CPD posted S04-19, *Search Warrants*, for a 15-day public comment period, and the IMT provided preliminary comments. On March 25, 2022, the City, the OAG, and the IMT, through stipulation, agreed that the Consent Decree applies to CPD's search warrant practices, and the Court approved the Stipulation.[1] Though the revised S04-19 reflects a number of improvements over the previous version of S04-19 (dated January 29, 2021)—including an improved emphasis on de-escalation and the addition of specialized resources (including Crisis Intervention Team and resources for people with limited English proficiency)—there is more work to be done. Also, as we raised in previous comments, the CPD should consider more consistently requiring written approvals and acknowledgements throughout the policy and better gather, analyze, and publicize data about search warrants for Chicago communities.

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[1] *See Stipulation Regarding Search Warrants, Consent Decree Timelines, and the Procedure for "Full and Effective Compliance"* (March 25, 2022), https://cpdmonitoringteam.com/wp-content/up-loads/2022/03/2022.03.25-Stipulation-Regarding-Search-Warrants-Consent-Decree-Timelin.._.pdf.

In sum, the City and the CPD did not meet Preliminary compliance with ¶¶53–56 because they have not completed the ¶¶626–41 review process for all relevant policies—although progress is underway.

The IMT continues to emphasize the fundamentals of police reform and the critical importance of measuring what matters for organizational success. As noted in the IMT's fifth reporting period, after policy revisions, the City and the CPD will need to focus on creating sustainable systems of community engagement, training, supervision, accountability, auditing, and performance assessment that are characteristic of evidence-based learning organizations. These systems will need to include methods to monitor the level of bias exhibited in police behavior and take corrective action as needed. For Full compliance, the IMT and the CPD must be able to ascertain whether the reforms have been impactful and are making a difference in the CPD's organizational culture and officers' daily interactions with the public.

Similarly, and as was noted in the fifth reporting period, the IMT continues to stress that the only manner in which CPD will be able to "measure what matters" to the organization is to commit to increasing staffing and resources dedicated to improving the organization's data analytic and research skills. This commitment is essential to improving CPD's ability to produce hard evidence regarding its performance. Continued failure to address these gaps will ultimately affect the agency's ability to demonstrate Full compliance after this, and other related paragraphs, move beyond policy and training development and implementation. The IMT continues to recommend that the CPD explore implementing fundamental ways to measure police performance, such as reviews of body worn cameras and asking community members about their experiences with CPD. CPD reported no updates on the progress of its work on developing a contact survey during this reporting period, as discussions around procurement and logistical processes continue to occur. The IMT recommends that the CPD update its project timeline and work plan on this effort and keep us abreast of ongoing developments.

Further, as was noted in ¶52, addressing staffing challenges will be key to the CPD effectively measuring what matters and ensuring that it has the staffing with the proper data analytic and research skills necessary to conduct data management and analysis and report on data required by the Consent Decree. This will be essential as the CPD looks forward to achieving Full compliance and in becoming a data driven organization.

In assessing Secondary compliance, we will evaluate the CPD's efforts to (1) incorporate the requirements of ¶¶53–56 into training; (2) evaluate said training; and (3) implement the training with CPD personnel. Assessing Full compliance will ultimately turn on the CPD's ability to measure what matters and

document improvements in officers' street-level behavior and decision making, including engaging in specific remedies to prevent bias-based policing and measuring changes in officers' levels of bias or impartial policing as a result of these remedies.

The IMT looks forward to further revisions to the community-engagement process initiated around the development of the training related to G02-01 and G02-04. Similarly, we look forward to additional revisions to the S04-19 to address the requirements in this paragraph in future reporting periods. Finally, the City and the CPD will need to find ways to reliably measure the things that matter to the public and that are needed to achieve policing without bias, as required by ¶¶53–56. Specifically, the CPD and the City will need to collect, analyze, and report data on the quality of police services and disparities in police actions for constitutionally protected classes, and use such data to create feedback loops within the organization designed to improve officer's performance on these dimensions.

Paragraph 53 Compliance Progress History

FIRST REPORTING PERIOD	SECOND REPORTING PERIOD	THIRD REPORTING PERIOD
SEPTEMBER 1, 2019 – AUGUST 31, 2019	SEPTEMBER 1, 2019 – FEBRUARY 29, 2020	MARCH 1, 2020 – DECEMBER 31, 2020
COMPLIANCE PROGRESS:	COMPLIANCE PROGRESS:	COMPLIANCE PROGRESS:
Not Applicable	Status Update	Status Update
FOURTH REPORTING PERIOD	**FIFTH REPORTING PERIOD**	**SIXTH REPORTING PERIOD**
JANUARY 1, 2021 – JUNE 30, 2021	JULY 1, 2021 – DECEMBER 31, 2021	JANUARY 1, 2022 – JUNE 30, 2022
COMPLIANCE PROGRESS:	COMPLIANCE PROGRESS:	COMPLIANCE PROGRESS:
None	None	None

Impartial Policing: ¶54

54. *CPD will continue to require that all CPD members interact with all members of the public in an unbiased, fair, and respectful manner. CPD will require that officers refrain from using language or taking action intended to taunt or denigrate an individual, including using racist or derogatory language.*

Compliance Progress

(Reporting Period: January 1, 2022, through June 30, 2022)

Preliminary:	***Not in Compliance***
Secondary:	***Not Yet Assessed***
Full:	***Not Yet Assessed***

As noted in ¶53, the City and the CPD did not meet Preliminary compliance with this paragraph. Although the City produced revisions of G02-01, G02-04, and S04-19 to the IMT during the reporting period, further revisions to S04-19, for example, are necessary for the City and the CPD to achieve Preliminary compliance.

To assess Preliminary compliance, we evaluated the CPD's efforts to codify the requirements of these paragraphs into policy (per the ¶¶626–41 review process) and engage the community as required by ¶52.

Progress before the Sixth Reporting Period

In previous reporting periods, we reviewed several policies that the CPD asserted incorporate requirements for ¶¶53-56. The following policies completed the review process (¶¶626–41) prior to this reporting period and became effective:

(1) General Order G08-05, Prohibition on Retaliation (eff. December 30, 2020), designed to prohibit retaliation by a CPD member against another CPD member or a member of the public, and

(2) Special Order S02-01-03, Crime Victim Assistance (eff. December 30, 2020), designed to provide CPD members with guidance regarding service and assistance to victims of crime.

However, to achieve Preliminary compliance, the CPD's revised Special Order S04-19 Search Warrants, must complete the review process and be based on adequate community engagement (¶52). As noted in the fourth reporting period, we

consider search warrants relevant to Impartial Policing paragraphs of the Consent Decree (especially 53 and 54). The Parties have since agreed to that effect.[2]

Progress in the Sixth Reporting Period

As mentioned above, the IMT reviewed revised versions of CPD policies that they assert incorporate these paragraphs' requirements including G02-01, *Protection of Human Rights* (¶53 and ¶54), and G02-04, *Prohibition Regarding Racial Profiling and Other Biased-Based Policing* (¶55 and ¶56). The IMT also reviewed and commented on S04-19, *Search Warrants*. While both G02-01 and G02-04 have received no-objection notices from both IMT and the OAG, the City and the CPD have yet to complete the Consent Decree review process for S04-19.

As discussed in ¶53, the IMT provided analysis, comments, and recommendations related to S04-19 in this reporting period, but the revised policies still require additional revision to meet the requirements of this paragraph.

The IMT looks forward to additional revisions to S04-19 and other policies to address the requirements in this paragraph in future reporting periods.

Paragraph 54 Compliance Progress History

FIRST REPORTING PERIOD	SECOND REPORTING PERIOD	THIRD REPORTING PERIOD
SEPTEMBER 1, 2019 – AUGUST 31, 2019	SEPTEMBER 1, 2019 – FEBRUARY 29, 2020	MARCH 1, 2020 – DECEMBER 31, 2020
COMPLIANCE PROGRESS:	COMPLIANCE PROGRESS:	COMPLIANCE PROGRESS:
Not Applicable	Not Applicable	Status Update
FOURTH REPORTING PERIOD	**FIFTH REPORTING PERIOD**	**SIXTH REPORTING PERIOD**
JANUARY 1, 2021 – JUNE 30, 2021	JULY 1, 2021 – DECEMBER 31, 2021	JANUARY 1, 2022 – JUNE 30, 2022
COMPLIANCE PROGRESS:	COMPLIANCE PROGRESS:	COMPLIANCE PROGRESS:
None	None	None

[2] *See Stipulation Regarding Search Warrants, Consent Decree Timelines, and the Procedure for "Full and Effective Compliance"* (March 25, 2022), https://cpdmonitoringteam.com/wp-content/up-loads/2022/03/2022.03.25-Stipulation-Regarding-Search-Warrants-Consent-Decree-Timelin.._.pdf.

Impartial Policing: ¶55

55. *CPD will prohibit officers from using race, ethnicity, color, national origin, ancestry, religion, disability, gender, gender identity, sexual orientation, immigration status, homeless status, marital status, parental status, military discharge status, financial status, or lawful source of income when making routine or spontaneous law enforcement decisions, except when such information is part of a specific subject description.*

Compliance Progress

(Reporting Period: January 1, 2022, through June 30, 2022)

Preliminary:	***Not in Compliance***
Secondary:	***Not Yet Assessed***
Full:	***Not Yet Assessed***

As noted in ¶53 and ¶54, the City and the CPD did not meet Preliminary compliance with ¶55. Although the City produced revisions of G02-01, G02-04, and S04-19 to the IMT during the reporting period, further revisions to S04-19, for example, are necessary for the City and the CPD to achieve Preliminary compliance. The City and the CPD did not meet Preliminary compliance for ¶55 because the policies that codifies this paragraph's requirement are still under ¶¶626–41 review. Please refer to ¶53 for an expanded analysis of the way we plan to assess the City and the CPD's efforts to comply with ¶¶53–56.

To assess Preliminary compliance, we evaluated the CPD's efforts to codify the requirements of these paragraphs into policy (per the ¶¶626–41 review process) and engage the community as required by ¶52.

Progress before the Sixth Reporting Period

In the fourth reporting period, the IMT reviewed a revised version of CPD's G02-04, *Prohibition Regarding Racial Profiling and Other Biased-Based Policing*, which it asserts incorporates this paragraph's requirements. However, the City and the CPD had yet to complete the Consent Decree review process for this policy by the end of the fifth reporting period.

At the beginning of the fifth reporting period, the IMT commented on G02-04, *Prohibition Regarding Racial Profiling and Other Biased-Based Policing*, as the CPD works towards compliance with this paragraph. While improved, the IMT holds that the revised directive needs to include mention of "age" as a factor that should be prohibited when making "routine or spontaneous law enforcement decisions"

to comply with every Impartial Policing paragraph of the Consent Decree, not just the requirements of this paragraph.[3]

Progress in the Sixth Reporting Period

At the beginning of this reporting period, the IMT commented on G02-01 and G02-04 and reiterated the need to include mention of "age" as a factor that should be prohibited when making "routine or spontaneous law enforcement decisions" to comply with every Impartial Policing paragraphs of the Consent Decree, not just the requirements of this paragraph.[4] In the sixth reporting period, the IMT reviewed further revised versions of the CPD's G02-01, *Protection of Human Rights*, G02-04, *Prohibition Regarding Racial Profiling and Other Biased-Based Policing*, and S04-19, *Search Warrants*, which it asserts incorporates this paragraph's requirements. The revisions noted to the City for G02-01 and G02-04 were made, and the IMT submitted no-objection notices on June 17, 2022.

Overall, we find the revised materials to have addressed a majority of the IMT's feedback. As noted above, S04-19 is still undergoing the review process. The IMT also reviewed evidence that certain CPD officers completed their in-service training for community policing.

Moving forward, we will continue to engage in the review process to ensure the CPD has policies that incorporate the requirements of these paragraphs. In assessing Secondary compliance, we will evaluate the CPD's efforts to (1) incorporate these requirements into training, (2) evaluate said training, and (3) implement the training with CPD personnel. Assessing Full compliance will ultimately turn on the CPD's ability to measure what matters and document improvements in officers' street-level behavior and decision making including engaging in specific remedies to prevent bias-based policing and measuring changes in officers' level of bias or impartial policing as a result of these remedies.

[3] See ¶¶50 and 53(requiring the CPD to (i) provide police services to all members of the public without bias and without reference to stereotypes based on many factors, including age and (ii) ensure its policies and practices prohibit discrimination on the basis of protected classes, including age).

[4] See ¶¶50 and 53(requiring the CPD to (i) provide police services to all members of the public without bias and without reference to stereotypes based on many factors, including age and (ii) ensure its policies and practices prohibit discrimination on the basis of protected classes, including age).

Paragraph 55 Compliance Progress History

FIRST REPORTING PERIOD
SEPTEMBER 1, 2019 – AUGUST 31, 2019
COMPLIANCE PROGRESS:
Not Applicable

SECOND REPORTING PERIOD
SEPTEMBER 1, 2019 – FEBRUARY 29, 2020
COMPLIANCE PROGRESS:
Not Applicable

THIRD REPORTING PERIOD
MARCH 1, 2020 – DECEMBER 31, 2020
COMPLIANCE PROGRESS:
Status Update

FOURTH REPORTING PERIOD
JANUARY 1, 2021 – JUNE 30, 2021
COMPLIANCE PROGRESS:
None

FIFTH REPORTING PERIOD
JULY 1, 2021 – DECEMBER 31, 2021
COMPLIANCE PROGRESS:
None

SIXTH REPORTING PERIOD
JANUARY 1, 2022 – JUNE 30, 2022
COMPLIANCE PROGRESS:
None

Impartial Policing: ¶56

56. *CPD will provide guidance, through training and supervision, that reinforces to officers that substitutes or stereotypes for the demographic categories listed above in Paragraph 55, such as manner of dress, mode of transportation, or language ability, is prohibited when making routine or spontaneous law enforcement decisions, except when such information is part of a specific subject description.*

Compliance Progress

(Reporting Period: January 1, 2022, through June 30, 2022)

Preliminary:	***In Compliance*** **(NEW)**
Secondary:	***Not in Compliance***
Full:	***Not Yet Assessed***

The City and the CPD met Preliminary compliance with ¶56. The City produced revisions of G02-01, *Protection of Human Rights*, and G02-04, *Prohibition Against Racial Profiling and Other Bias-Based Policing*, to the IMT during the reporting period, and after review, IMT submitted no-objection notices for both policies.

To assess Preliminary compliance, we evaluated the CPD's efforts to codify the requirements of these paragraphs into policy (per the ¶¶626–41 review process) and engage the community as required by ¶52.

Progress before the Sixth Reporting Period

In previous reporting periods, the IMT reviewed a revised version of CPD's G02-04, *Prohibition Regarding Racial Profiling and Other Biased-Based Policing*, which it asserts incorporates this paragraph's requirements. However, the City and CPD had not yet completed the Consent Decree review process for the policy due to the IMT concerns about G02-04 that were discussed earlier. In addition, the IMT wanted to see more community engagement related to development and refinement of the directive.

Progress in the Sixth Reporting Period

In this reporting period, the IMT commented on revised drafts of G02-01 and G02-04 produced March 16, 2022. While improved, this iteration of these revised policies did not address all of IMT's previous concerns (¶53), including additional information and context regarding community input in the development of both directives. A subsequent production, submitted on June 2, 2022, included the additional information requested, and as such, the IMT submitted a no-objection notice on June 17, 2022. On May 26, 2022, the City and the CPD produced evidence, which the IMT reviewed, evidencing that the community policing

training was delivered to in-service department officers. In sum, the City and the CPD met Preliminary compliance for ¶56 by finalizing G02-01 and G02-04.

Moving forward, in assessing Secondary compliance, we will continue to evaluate the CPD's efforts to (1) incorporate these requirements into training, (2) evaluate said training, and (3) implement the training with CPD personnel. Assessing Full compliance will ultimately turn on the CPD's ability to measure what matters and document improvements in officers' street-level behavior and decision making including engaging in specific remedies to prevent bias-based policing and measuring changes in officers' levels of bias or impartial policing as a result of these remedies.

Paragraph 56 Compliance Progress History

FIRST REPORTING PERIOD	SECOND REPORTING PERIOD	THIRD REPORTING PERIOD
SEPTEMBER 1, 2019 – AUGUST 31, 2019	SEPTEMBER 1, 2019 – FEBRUARY 29, 2020	MARCH 1, 2020 – DECEMBER 31, 2020
COMPLIANCE PROGRESS:	COMPLIANCE PROGRESS:	COMPLIANCE PROGRESS:
Not Applicable	Not Applicable	Status Update
FOURTH REPORTING PERIOD	**FIFTH REPORTING PERIOD**	**SIXTH REPORTING PERIOD**
JANUARY 1, 2021 – JUNE 30, 2021	JULY 1, 2021 – DECEMBER 31, 2021	JANUARY 1, 2022 – JUNE 30, 2022
COMPLIANCE PROGRESS:	COMPLIANCE PROGRESS:	COMPLIANCE PROGRESS:
None	None	Preliminary

Impartial Policing: ¶57

57. *CPD will continue to prohibit CPD members from posting, displaying, or transmitting content that is disparaging to a person or group based on race, religion, sexual orientation, or any other protected class on personal social media accounts.*

Compliance Progress

(Reporting Period: January 1, 2022, through June 30, 2022)

Preliminary: ***In Compliance*** **(THIRD REPORTING PERIOD)**
Secondary: ***Not in Compliance***
Full: ***Not Yet Assessed***

The City and the CPD maintained Preliminary compliance by having an implemented directive on this paragraph—G09-01-06, *Use of Social Media Outlet*—that has completed the Consent Decree review process. The CPD has not met Secondary compliance, because they did not submit any records reflecting the CPD's efforts (1) to complete a feedback loop with certain community organizations or (2) to train officers on G09-01-06 in this reporting period. The IMT notes that no further progress on this paragraph has been made since the third reporting period and stresses the importance for the City and the CPD to establish implementation priorities or a strategic plan for continuing progress on this paragraph and others in a similar state.

To assess Preliminary compliance, we evaluated the CPD's efforts to codify the requirements of this paragraph into policy (per the ¶¶626–41 review process), engage the community as required by ¶52, and translate the policy into training. To assess Secondary compliance, the IMT monitored the CPD's efforts to train officers on this specific directive and to create supervisory practices designed to ensure officers are implementing the policy as written.

Progress before the Sixth Reporting Period

In previous reporting periods, the CPD completed the ¶¶626–41 review process for G09-01-06, the CPD's social-media policy. We also acknowledged that the CPD sought input from Communities United, but the CPD did not incorporate many of their suggested edits. The training required by ¶57 was not developed.

Progress in the Sixth Reporting Period

Because the City and the CPD did not submit any records this period reflecting their efforts to comply with this paragraph, we cannot assess whether they moved into Secondary compliance during this period. To maintain Preliminary compliance, the CPD must submit records reflecting its efforts to comply with ¶52 in developing G09-01-06. For Secondary compliance, we will evaluate the CPD's

efforts to develop and implement training for officers on the G09-01-06, which includes evidence that 95% of officers have completed the training. The training assessment will be linked to compliance with ¶¶72 and 74 and will require ¶52 community engagement.

The IMT looks forward to working with the CPD as they develop training materials related to this paragraph to meet Secondary compliance.

Paragraph 57 Compliance Progress History

FIRST REPORTING PERIOD SEPTEMBER 1, 2019 – AUGUST 31, 2019 COMPLIANCE PROGRESS: Not Applicable	SECOND REPORTING PERIOD SEPTEMBER 1, 2019 – FEBRUARY 29, 2020 COMPLIANCE PROGRESS: Not Applicable	THIRD REPORTING PERIOD MARCH 1, 2020 – DECEMBER 31, 2020 COMPLIANCE PROGRESS: Preliminary
FOURTH REPORTING PERIOD JANUARY 1, 2021 – JUNE 30, 2021 COMPLIANCE PROGRESS: Preliminary	FIFTH REPORTING PERIOD JULY 1, 2021 – DECEMBER 31, 2021 COMPLIANCE PROGRESS: Preliminary	SIXTH REPORTING PERIOD JANUARY 1, 2022 – JUNE 30, 2022 COMPLIANCE PROGRESS: Preliminary

Impartial Policing: ¶58

58. *Within 90 days of the Effective Date, CPD will clarify in policy that CPD officers will permit members of the public to photograph and record CPD officers in the performance of their law enforcement duties in a public place, or in circumstances in which the officer has no reasonable expectation of privacy. The policy will also provide that officers may take reasonable action to maintain safety and control, secure crime scenes and accident sites, protect the integrity and confidentiality of investigations, and protect the safety of officers or others.*

Compliance Progress (Reporting Period: January 1, 2022, through June 30, 2022)

Preliminary:	***Not in Compliance***
Secondary:	***Not Yet Assessed***
Full:	***Not Yet Assessed***

In this reporting period, the City and the CPD did not meet Preliminary compliance with ¶58 because the CPD still has not provided community members with a meaningful opportunity to provide feedback regarding this paragraph's requirements. To assess Preliminary compliance, we evaluated the CPD's efforts to codify the requirements of this paragraph into policy (per the ¶¶626–41 review process) and engage the community as required by ¶52. In short, the City and the CPD did not achieve Preliminary compliance with ¶58 because community engagement has not been completed for the First Amendment policy.

Progress before the Sixth Reporting Period

In earlier reporting periods, we reviewed G02-01, *Human Rights and Human Resources*, and S03-14, *Body Worn Cameras*, but both directives still required additional revisions to meet requirements of this paragraph. In addition, the IMT recommended community engagement in the policy development processes for these directives. As of this reporting period, no revised draft of S03-14 had been produced.

Progress in the Sixth Reporting Period

At the beginning of the reporting period, the CPD submitted for review revisions to G02-01, *Protection of Human Rights*; G02-04, *Prohibition Regarding Racial Profiling and Other Bias-Based Policing*; *First Amendment eLearning*; and the *Constitutional Policing Course*. After a round of revisions, the IMT submitted to the City and the CPD a no-objection notice for G02-01 and G02-04. We were pleased that the CPD: (1) revised G02-04 to include age in the definition of potential bias-based policing practices per ¶53; and (2) submitted documentation to

demonstrate community engagement in the development of and revisions to G02-01 and G02-04. Further, the IMT also submitted comments to the City and the CPD on the Constitutional Policing Course. Of particular concern was making sure the Constitutional Policing Course implements additional discussion on ensuring impartial-policing practices during enforcement actions. Notably, however, the IMT has not seen documentation that the CPD has posted the *First Amendment Rights* policy for public comment per Paragraph 633 of the Consent Decree. To the extent the CPD revises the Policy based on community input, the training materials should reflect the final version of the corresponding policy. In light of the extensive dialogues with the Coalition concerning CPD's response to First Amendment activities over the past year and a half, consider soliciting and incorporating feedback from community members on the eLearning. Soliciting community input on this eLearning would be consistent with Paragraph 52 of the Consent Decree. To achieve Preliminary compliance, the CPD must engage the community as required by ¶52 regarding ¶58's requirements and complete the ¶¶626–41 policy review process for S03-14, *First Amendment eLearning* and the *Constitutional Policing Course*.

The IMT also looks forward to reviewing future iterations of *Constitutional Policing Course* and *First Amendment eLearning* for Preliminary compliance with this paragraph. Moving forward, we will assess Secondary and Full compliance based on the CPD's efforts to train officers on these requirements and ensure the policies and training are implemented in practice.

Paragraph 58 Compliance Progress History

FIRST REPORTING PERIOD SEPTEMBER 1, 2019 – AUGUST 31, 2019 COMPLIANCE PROGRESS: None	SECOND REPORTING PERIOD SEPTEMBER 1, 2019 – FEBRUARY 29, 2020 COMPLIANCE PROGRESS: None	THIRD REPORTING PERIOD MARCH 1, 2020 – DECEMBER 31, 2020 COMPLIANCE PROGRESS: None
FOURTH REPORTING PERIOD JANUARY 1, 2021 – JUNE 30, 2021 COMPLIANCE PROGRESS: None	FIFTH REPORTING PERIOD JULY 1, 2021 – DECEMBER 31, 2021 COMPLIANCE PROGRESS: None	SIXTH REPORTING PERIOD JANUARY 1, 2022 – JUNE 30, 2022 COMPLIANCE PROGRESS: None

Impartial Policing: ¶59

> ***59.*** *Consistent with the requirements in the Accountability and Transparency section of this Agreement and CPD policy, CPD will require that CPD members immediately report to a CPD supervisor all incidents where they observe other CPD members who have engaged in misconduct, including discrimination, profiling, or other bias-based policing.*

Compliance Progress (Reporting Period: January 1, 2022, through June 30, 2022)

Preliminary:	***In Compliance*** **(NEW)**
Secondary:	***Not Yet Assessed***
Full:	***Not Yet Assessed***

In this reporting period, the City and the CPD met Preliminary compliance with ¶59 by finalizing policies consistent with this paragraph's requirements.

To assess Preliminary compliance, we evaluated the CPD's efforts to codify the requirements of this paragraph into policy (per the ¶¶626–41 review process) and engage the community as required by ¶52.

Progress before the Sixth Reporting Period

As mentioned in ¶53, during previous periods, the IMT reviewed revised versions of CPD policies that they assert incorporate the requirements of ¶59, including G02-01, *Protection of Human Rights* (¶53 and ¶54), and G02-04, *Prohibition Regarding Racial Profiling and Other Biased-Based Policing* (¶55 and ¶56).

Progress in the Sixth Reporting Period

After review, the IMT found that many of its comments had been addressed and submitted a no-objection notice on June 17, 2022. Specifically, the IMT notes that the City and the CPD provided the requested evidence of community input on both directives and also notes the inclusion of age in the definition of potential bias-based policing practices. As such, the City and the CPD have met Preliminary compliance with this paragraph.

Moving forward, we will assess Secondary and Full compliance based on the CPD's efforts to train officers on these requirements and ensure the policies and training are implemented in practice.

Paragraph 59 Compliance Progress History

FIRST REPORTING PERIOD
SEPTEMBER 1, 2019 – AUGUST 31, 2019
COMPLIANCE PROGRESS:
Not Applicable

SECOND REPORTING PERIOD
SEPTEMBER 1, 2019 – FEBRUARY 29, 2020
COMPLIANCE PROGRESS:
Not Applicable

THIRD REPORTING PERIOD
MARCH 1, 2020 – DECEMBER 31, 2020
COMPLIANCE PROGRESS:
Not Applicable

FOURTH REPORTING PERIOD
JANUARY 1, 2021 – JUNE 30, 2021
COMPLIANCE PROGRESS:
Not Applicable

FIFTH REPORTING PERIOD
JULY 1, 2021 – DECEMBER 31, 2021
COMPLIANCE PROGRESS:
None

SIXTH REPORTING PERIOD
JANUARY 1, 2022 – JUNE 30, 2022
COMPLIANCE PROGRESS:
Preliminary

Impartial Policing: ¶60

60. *Within 365 days of the Effective Date, CPD will develop and implement a policy guiding officers' interactions with members of religious communities. The policy will include, but not be limited to, instruction on interacting and searching individuals with garments or coverings of religious significance.*

Compliance Progress (Reporting Period: January 1, 2022, through June 30, 2022)

Preliminary:	***In Compliance*** **(NEW)**
Secondary:	***Not in Compliance***
Full:	***Not Yet Assessed***

This is the first reporting period we have assessed the City's and the CPD's efforts to comply with ¶60 as reaching Preliminary compliance. The IMT concludes that the City and the CPD have achieved Preliminary compliance by finalizing G02-01-05, *Religious Interactions*.

To assess Preliminary compliance, we evaluated the CPD's efforts to codify the requirements of this paragraph into policy (per the ¶¶626–41 review process) and engage the community as required by ¶52.

Progress before the Sixth Reporting Period

In the previous reporting periods, we assessed the CPD's effort to engage faith-based community members and organizations in the development of G02-01-05 and incorporate this feedback into the policy development process. The CPD continued to make real progress by responding to faith-based organizations and, in the fifth reporting period, was also able to document and produce to the IMT how it used the feedback from faith-based organizations and surveys to improve the draft policy, resulting in a nearly finalized policy at the end of the fifth reporting period.

Progress in the Sixth Reporting Period

Throughout the review process, the CPD significantly improved G02-01-05, addressing various concerns raised by the IMT, the Office of the Illinois Attorney General, and community feedback, resulting in a policy effective at achieving its purpose: providing guidance regarding the proper treatment and accommodations of individuals with various religious backgrounds. The City and CPD received continual input from the community and involved stakeholders and has made various revisions to the policy to address this feedback. The IMT is reviewing the revised production of G02-01-05 and will report on its review in the next monitoring report. Moving forward, we will assess the CPD's efforts to train

its officers on the new policy, including community engagement, and ensure adequate supervisory oversight is in place to ensure the policy is implemented into practice.

Paragraph 60 Compliance Progress History

FIRST REPORTING PERIOD	SECOND REPORTING PERIOD	THIRD REPORTING PERIOD
SEPTEMBER 1, 2019 – AUGUST 31, 2019	SEPTEMBER 1, 2019 – FEBRUARY 29, 2020	MARCH 1, 2020 – DECEMBER 31, 2020
COMPLIANCE PROGRESS:	COMPLIANCE PROGRESS:	COMPLIANCE PROGRESS:
Not Applicable	None	None
FOURTH REPORTING PERIOD	**FIFTH REPORTING PERIOD**	**SIXTH REPORTING PERIOD**
JANUARY 1, 2021 – JUNE 30, 2021	JULY 1, 2021 – DECEMBER 31, 2021	JANUARY 1, 2022 – JUNE 30, 2022
COMPLIANCE PROGRESS:	COMPLIANCE PROGRESS:	COMPLIANCE PROGRESS:
None	None	Preliminary

Impartial Policing: ¶61

61. *Within 180 days of the Effective Date, CPD will review and, as necessary, revise its policies guiding CPD members' interactions with transgender, intersex, and gender nonconforming individuals, including protocols for arrests, pat downs and searches, transportation, and detention, in order to ensure that, at a minimum: a. terms are properly defined; b. CPD members address individuals, using the names, pronouns, and titles of respect appropriate to the individual's gender identity as expressed or clarified by the individual; c. CPD members refer to individuals in documentation by the name and gender identity as expressed or clarified by the individual, in addition to the information provided on the individual's government-issued identification; d. where same-sex pat downs or searches are required by law or CPD policy, CPD members will respect the gender identity as expressed or clarified by the individual and not rely on proof of the individual's gender identity, such as an identification card, except when a pat down is immediately necessary and waiting for an officer of the same gender would compromise officer or public safety; e. absent exigent circumstances, a transgender, intersex, or gender nonconforming individual is not transported or detained with individuals of a different gender, and that when determining the gender of that individual, CPD members will respect the gender identity as expressed or clarified by the individual and not rely on proof of the individual's gender identity, such as an identification card; and f. CPD members are prohibited from inquiring about intimate details of an individual's anatomy, or medical history, except as necessary to serve a valid law enforcement purpose.*

Compliance Progress

(Reporting Period: January 1, 2022, through June 30, 2022)

Preliminary:	***In Compliance*** **(FOURTH REPORTING PERIOD)**
Secondary:	***Not in Compliance***
Full:	***Not Yet Assessed***

In this reporting period, the City and the CPD maintained Preliminary compliance with ¶61 but did not achieve Secondary compliance with this paragraph.

To assess Preliminary compliance, we evaluated the CPD's efforts to codify the requirements of this paragraph into policy (per the ¶¶626–41 review process) and engage the community as required by ¶52.

Progress before the Sixth Reporting Period

The City and the CPD achieved Preliminary compliance in the fourth reporting period by finalizing and completing the public comment period for G02-01-03, *Interactions with Transgender, Intersex, and Gender Nonconforming (TIGN) Individuals* and G06-01-01, *Field Arrests*, and by engaging community members and organizations with relevant knowledge for their input on those policy revisions. The final revised version of G02-01-03 became effective on the last day of the fourth reporting period.

Progress in the Sixth Reporting Period

The only training materials produced in this reporting period related to this paragraph were for the *Constitutional Policing Course,* but as referenced in previous paragraph assessments, there are still improvements to be made. Part of our Secondary compliance review process includes not only the content of the materials but also the quality of training evaluations associated with the training. We also seek updates from the CPD regarding any changes in practices and in the development of training related to G02-01-03, *Interactions with Transgender, Intersex, and Gender Nonconforming (TIGN) Individuals* and the related General Order G06-01-01, *Field Arrest Procedures*. The IMT also monitors the CPD's supervisory oversight methods (*e.g.*, discipline, coaching, and other interventions) employed to ensure the policy is implemented as written.

As previously stated, in this reporting period, the City and the CPD provided training materials for the *Constitutional Policing Course* on May 19, 2022, and the IMT submitted comments on June 18, 2022. While the training course is comprehensive and includes many best practices, the IMT continues to push the CPD to implement additional discussion on ensuring impartial-policing practices during enforcement actions. In sum, the City and the CPD maintained Preliminary compliance but still need to develop good training and internal accountability measures to ensure that the policy is well implemented in practice. *See* ¶765. In addition, the TIGN Working Group expressed a desire to continue providing feedback as the CPD develops training related to this policy, and the CPD has agreed to this arrangement. By the end of this reporting period, collaboration with the TIGN working group has been limited, mostly due to changes in staff and leadership amongst the community organizations participating in the working group. The CPD has noted that it will seek to re-engage the working group and other community stakeholders as it works on the related training.

As noted in ¶52, the IMT continues to stress the importance of timeliness and continued engagement of these community stakeholders on policies and training. Extended timelines between finalizing policy and developing training material presents issues in continued engagement and interest and can lead to the

dissolution of community-police relationships. We look forward to following these developments as we assess Secondary compliance during the seventh reporting period.

For Full compliance, we will monitor whether the policy and training have been sufficiently implemented such that the CPD can demonstrate a positive impact on how CPD officers interact with TIGN individuals. Measuring the impact of the policy and training may involve a review of (1) police reports to ensure that CPD officers are completing them as proscribed in G02-01-03 and (2) contact survey responses from people who have had recent contact with a CPD officer.

Paragraph 61 Compliance Progress History

FIRST REPORTING PERIOD	SECOND REPORTING PERIOD	THIRD REPORTING PERIOD
SEPTEMBER 1, 2019 – AUGUST 31, 2019	SEPTEMBER 1, 2019 – FEBRUARY 29, 2020	MARCH 1, 2020 – DECEMBER 31, 2020
COMPLIANCE PROGRESS:	COMPLIANCE PROGRESS:	COMPLIANCE PROGRESS:
Not Applicable	None	None

FOURTH REPORTING PERIOD	FIFTH REPORTING PERIOD	SIXTH REPORTING PERIOD
JANUARY 1, 2021 – JUNE 30, 2021	JULY 1, 2021 – DECEMBER 31, 2021	JANUARY 1, 2022 – JUNE 30, 2022
COMPLIANCE PROGRESS:	COMPLIANCE PROGRESS:	COMPLIANCE PROGRESS:
Preliminary	Preliminary	Preliminary

Impartial Policing: ¶62

62. *CPD will require that officers comply with CPD policies related to officer response to allegations of sexual assault, sexual abuse, stalking, and domestic violence. All officers will receive in-service training every three years to ensure CPD's response to allegations of gender-based violence, including dispatch response, initial officer response, and on-scene and follow-up investigation, is both effective and unbiased.*

Compliance Progress

(Reporting Period: January 1, 2022, through June 30, 2022)

Recurring Schedule:	Every Three Years (December 31, 2022)	☑ **Not Yet Applicable**
Preliminary:	***Not In Compliance***	
Secondary:	***Not Yet Assessed***	
Full:	***Not Yet Assessed***	

The IMT finds that the City and the CPD has not yet achieved Preliminary compliance with ¶62. Although the City and the CPD have produced the *Gender Based Violence In-Service Training* developed by the National Policing Institute, to which the IMT reviewed and subsequently a no-objection notice on this training was submitted on June 17, 2022, the City and the CPD have yet to produce a comprehensive Gender Based Violence policy.

To assess Preliminary compliance, we evaluated the CPD's efforts to codify the requirements of this paragraph into policy (per the ¶¶626–41 review process) and engage the community as required by ¶52.

Progress before the Sixth Reporting Period

In the previous reporting periods, the CPD has experienced difficulty engaging the community in its policy development process. Community engagement continues to be a significant stumbling block to the CPD's compliance with this paragraph, as the CPD has not followed through on its plan to create a working group to allow organizations with knowledge and expertise to have a voice in this reform process.

The CPD has made tremendous strides in previous reporting periods, including introducing an eight-hour online training titled, *Trauma-informed Response to Sexual Assault*; drafting an eight-hour online training titled, *The Psychology of Domestic Violence*; and receiving a grant from the U.S. Department of Justice, Office of Violence Against Women (OVAW) that includes proposed training on responses to gender-based violence. However, we once again reiterate the need for the CPD to seek input from community members and organizations with relevant experience and knowledge in training development (¶52). The CPD

previously partnered with the National Police Foundation (NPF) to engage local stakeholders to identify CPD training needs around gender-based violence. A dozen virtual or in-person focus groups were completed, including meetings with survivors, advocates, prosecutors, and CPD officers (including Domestic Violence Liaison officers).

In previous reports, the IMT also encouraged the CPD to create a special unit, a sex crimes unit, composed of officers and civilians with specialized knowledge and skills focused solely on sexual assault, sexual abuse, stalking, and domestic violence. A sex crimes unit would help to ensure the CPD's compliance with this paragraph by effectively investigating crimes of gender-based violence. Along the same line, the IMT continues to recommend that the CPD publish an annual report on the characteristics of these events (e.g., types of sexual assault) and the investigatory outcomes so that everyone may consider the implications for preventative strategies, victim services, justice/deterrence, CPD policy, and CPD training.

Progress in the Sixth Reporting Period

In this reporting period, the City and the CPD submitted documentation on the feedback and themes gathered from the virtual and in-person focus groups conducted by the National Police Foundation. The IMT found the documentation on this community engagement informative and recommends that the CPD consider similar engagement efforts as it develops the related policy and seeks community input.

The CPD produced a revised version of the directives, S11-10, *Department Training*; S11-10-01, *Recruit Training*; S11-10-02, *Pre-Service Training*; and S11-10-03, *In-Service Training*, to the IMT on December 14, 2021, and the IMT submitted a no-objection notice and feedback on February 15, 2022. In previous reporting periods, the IMT stated the CPD had not given sufficient attention and guidance about integrating impartial policing concepts into CPD training courses, specifically that lesson plans and course materials must include the guiding principles of procedural justice, de-escalation, impartial policing, and community policing. We continue to emphasize that CPD training could benefit from incorporating proven adult education strategies, such as modeling, repetitive practice, and individualized feedback. Role-play scenarios give officers the opportunity to practice their communication skills. Further, while important that such training concepts were incorporated into the above noted directives, we continue to stress the importance of developing a comprehensive gender-based violence policy.

To achieve Preliminary compliance with ¶62, we reviewed documentation of the CPD's efforts to engage stakeholders on gender-based violence and the CPD's proposal, with stakeholder support, that clarifies how the CPD will ensure that

officers comply with CPD policies related to officer response to allegations of sexual assault, sexual abuse, stalking, and domestic violence.

Moving forward, preliminary compliance will depend on developing a comprehensive Gender Based Violence Policy. The IMT recommends the City and the CPD consider seeking targeted technical assistance in the development of this policy and related resources.[5] To assess further compliance, the IMT will review documentation demonstrating that officers have received the training on the courses developed.

Paragraph 62 Compliance Progress History

FIRST REPORTING PERIOD	SECOND REPORTING PERIOD	THIRD REPORTING PERIOD
SEPTEMBER 1, 2019 – AUGUST 31, 2019	SEPTEMBER 1, 2019 – FEBRUARY 29, 2020	MARCH 1, 2020 – DECEMBER 31, 2020
COMPLIANCE PROGRESS:	COMPLIANCE PROGRESS:	COMPLIANCE PROGRESS:
Not Applicable	Not Applicable	Status Update
FOURTH REPORTING PERIOD	**FIFTH REPORTING PERIOD**	**SIXTH REPORTING PERIOD**
JANUARY 1, 2021 – JUNE 30, 2021	JULY 1, 2021 – DECEMBER 31, 2021	JANUARY 1, 2022 – JUNE 30, 2022
COMPLIANCE PROGRESS:	COMPLIANCE PROGRESS:	COMPLIANCE PROGRESS:
None	None	None

[5] In Independent Monitoring Report 5, the IMT recommended CPD consider adopting the *Response-to-Sexual-Assault-Report Review Checklist* developed by the International Association of Chiefs of Police (IACP). *See Response to Sexual Assault Report Review Checklist*, IACP (January 1, 2017), https://www.theiacp.org/resources/document/response-to-sexual-assault-report-review-checklist.

Impartial Policing: ¶63

63. *Within 180 days of the Effective Date, CPD will develop and implement a policy that prohibits sexual misconduct by CPD members. The policy will be consistent with best practices and applicable law and will provide definitions of various types of sexual offenses, including those that are not criminal in nature.*

Compliance Progress (Reporting Period: January 1, 2022, through June 30, 2022)

Preliminary:	***Not in Compliance***
Secondary:	***Not Yet Assessed***
Full:	***Not Yet Assessed***

The City and the CPD have not met Preliminary compliance with ¶63 because the CPD has not yet completed the required ¶¶626–41 review process for General Order G08-06, *Prohibition of Sexual Misconduct*.[6]. The City and the CPD provided a revised draft of G08-06 for review on April 28, 2022. Although the draft was improved from previous versions, we encourage the CPD to address our concerns raised by the IMT related to ¶444 and further reiterate the need for the CPD to engage community members in the policy's development.

To assess Preliminary compliance, we evaluated the CPD's efforts to codify the requirements of this paragraph into policy (per the ¶¶626–41 review process) and engage the community as required by ¶52. The IMT has assessed Preliminary compliance based on the quality of directive G08-06 and the extent of community engagement in its development.

Progress before the Sixth Reporting Period

During previous reporting periods, the CPD submitted a draft directive of G08-06 on February 28, 2020, for early consultation review. The IMT provided comments on March 29, 2020. On April 22, 2020, the CPD submitted a revised version of the directive, and the IMT provided additional comments on May 22, 2020. After engaging community leaders and victim advocates, the CPD produced a revised G08-06 on October 6, 2021, and the IMT provided additional comments to the City on November 19, 2021.

Progress in the Sixth Reporting Period

During this reporting period, the City and the CPD provided a revised draft of G08-06 for review. On March 28, 2022, the CPD asked the IMT and OAG to withhold review and comment until receiving a further revised draft. In the meantime, the

[6] The CPD originally numbered this policy G08-05 but has numbered it G08-06 since the May 5, 2021 draft.

IMT provided informal comments on April 5, 2022. On April 28, 2022, the City and the CPD provided a further revised G08-06 (dated April 7, 2022). Overall, we found this draft of G08-06 to be improved from the previous versions. We appreciate the CPD's efforts to revise this policy to date, and we look forward to reviewing updated iterations of this policy.

In future reporting periods, the IMT looks forward to seeing training materials developed on G08-06. Secondary compliance will depend on the quality of the training lesson plans, the level of community engagement in developing the training, the quality of the training delivered, and the evaluations used to measure effectiveness.

Paragraph 63 Compliance Progress History

FIRST REPORTING PERIOD	SECOND REPORTING PERIOD	THIRD REPORTING PERIOD
SEPTEMBER 1, 2019 – AUGUST 31, 2019	SEPTEMBER 1, 2019 – FEBRUARY 29, 2020	MARCH 1, 2020 – DECEMBER 31, 2020
COMPLIANCE PROGRESS:	COMPLIANCE PROGRESS:	COMPLIANCE PROGRESS:
Not Applicable	None	None
FOURTH REPORTING PERIOD	**FIFTH REPORTING PERIOD**	**SIXTH REPORTING PERIOD**
JANUARY 1, 2021 – JUNE 30, 2021	JULY 1, 2021 – DECEMBER 31, 2021	JANUARY 1, 2022 – JUNE 30, 2022
COMPLIANCE PROGRESS:	COMPLIANCE PROGRESS:	COMPLIANCE PROGRESS:
None	None	None

Impartial Policing: ¶64

64. *Within 180 days of the Effective Date, CPD will review and, to the extent necessary, revise its language access policy to provide meaningful access to CPD programs and services for individuals who have a limited ability to speak, read, write, or understand English. CPD will ensure that its language access policy provides timely and meaningful access to police services for individuals with limited English proficiency ("LEP"). CPD will also require that qualified and Department-authorized interpreters are used in accordance with CPD policy, including for the provision of Miranda warnings. CPD will publish its language access policy on its website and, consistent with the requirements of Paragraph 28 of the Community Policing section of this Agreement, make the policy available to community-based group serving LEP communities in Chicago.*

Compliance Progress

(Reporting Period: January 1, 2022, through June 30, 2022)

Preliminary:	***Not in Compliance***
Secondary:	***Not Yet Assessed***
Full:	***Not Yet Assessed***

The City and the CPD did not meet Preliminary compliance with ¶64 because the CPD did not produce a revised version of its language access policy, Special Order S02-01-05, *Limited English Proficiency*, in the sixth reporting period.

To assess Preliminary compliance, we evaluated the CPD's efforts to codify the requirements of this paragraph into policy (per the ¶¶626–41 review process) and engage the community as required by ¶52. The IMT has assessed Preliminary compliance based on the quality of directive S02-01-05 and extent of community engagement in its development.

Progress before the Sixth Reporting Period

During the previous reporting periods, the IMT reviewed and commented on drafts of S02-01-05 and monitored the CPD's efforts to implement targeted community engagement for input on revising the policy. We also reviewed the City's Language Access Coordinator's actions and the CPD's Language Access Coordinator's status reports, recommendations, and implementation plans. Those records reflect an excellent roadmap of changes that we hoped the CPD would incorporate in the next iteration of S02-01-05. Throughout the various reviews of S02-01-05, we noted significant improvements to the policy but highlighted significant issues, such as the CPD's lack of analysis of community feedback and the absence of a mechanism or process for verification and certification for

Department-Authorized interpreters. We continue to reiterate that this paragraph requires that the CPD ensure that qualified and Department-authorized interpreters are used.

Progress in the Sixth Reporting Period

In this reporting period, the IMT attended a site visit on May 11, 2022, that included significant discussion of the LanguageLine pilot, a mobile application that can provide immediate translation services in a variety of languages, including those required in the Consent Decree, and attendance from the CPD Language Access Coordinator.

As of October 20, 2022, over 1,600 officers had received training on the availability and capabilities of LanguageLine and CPD had activated almost 2,000 devices that could use this service in the field. In addition, usage statistics from the application indicated that officers made over 500 requests for translation for 40 spoken languages as well as American Sign Language translation. Almost half of the requests were for Spanish translation services. The IMT appreciates the usage data that is available through LanguageLine, as it should inform CPD interpreter needs for the future, although CPD will need to ensure that the program is being used consistently, without bias, across different communities with limited English proficiency.

The City's and the CPD's ability to provide meaningful access to CPD services for individuals with limited English proficiency will depend, in part, on their ability to track language access needs data across different units and districts. In other words, access to language services should be based on a needs assessment, which in turn should be based on good data from the CPD and the Office of Emergency Management and Communications. Thus, we continue to encourage the CPD to codify tracking procedures on persistent and emerging translation needs within Chicago communities and incorporate them in S02-01-05.

While the IMT recognizes the immense value of LanguageLine availability and use to the CPD to meet requirements of this paragraph, the IMT continues to recommend that the CPD use LanguageLine as a supplemental service when "qualified and Department-authorized" interpreter services are unavailable, have a finalized S02-01-05 guide the use of this service, and ensure that subsequent training is based on the finalized policy. Until these actions have been taken, we are concerned that the use of such services will be applied inconsistently across districts to those who need it during interactions with CPD. For these reasons, we recommend that the CPD audit LanguageLine usage by CPD officers, per ¶65.

Other than the May 11, 2022 site visit, the CPD did not provide the IMT with any information during this reporting period to evaluate Preliminary compliance with the requirements of this paragraph.

In future reporting periods, we will continue to monitor the CPD's effort to seek input from community members and organizations with relevant experience and knowledge in revision S02-01-05. Evidence of such engagement should include an analysis of how the CPD used community input to inform S02-01-05 policy revisions. We will also assess the CPD's efforts to finalize S02-01-05 according to the ¶¶626–41 review process. Once S02-01-05 is finalized and implemented, we will monitor the CPD's efforts to train its officers in how to provide community members with meaningful access to the City's limited English proficiency programs and services. Moving forward, we will review the CPD's process of verifying and certifying that Department-Authorized interpreters have the skills and proficiencies and evaluate the CPD's success with the citywide rollout of LanguageLine's InSight application.

Paragraph 64 Compliance Progress History

FIRST REPORTING PERIOD SEPTEMBER 1, 2019 – AUGUST 31, 2019 COMPLIANCE PROGRESS: Not Applicable	SECOND REPORTING PERIOD SEPTEMBER 1, 2019 – FEBRUARY 29, 2020 COMPLIANCE PROGRESS: None	THIRD REPORTING PERIOD MARCH 1, 2020 – DECEMBER 31, 2020 COMPLIANCE PROGRESS: None
FOURTH REPORTING PERIOD JANUARY 1, 2021 – JUNE 30, 2021 COMPLIANCE PROGRESS: None	FIFTH REPORTING PERIOD JULY 1, 2021 – DECEMBER 31, 2021 COMPLIANCE PROGRESS: None	SIXTH REPORTING PERIOD JANUARY 1, 2022 – JUNE 30, 2022 COMPLIANCE PROGRESS: None

Impartial Policing: ¶65

65. *Within 180 days of the Effective Date, the City will designate a language access coordinator who will coordinate with CPD and review CPD's compliance with its language access policy and Section 2-40 of the Municipal Code of Chicago. The City's language access coordinator will assess the effectiveness and efficiency of CPD's policies on an ongoing basis and will report to the Superintendent or his or her designee any recommendations to revise policy, if necessary.*

Compliance Progress (Reporting Period: January 1, 2022, through June 30, 2022)

Preliminary:	***In Compliance*** **(SECOND REPORTING PERIOD)**
Secondary:	***Not in Compliance***
Full:	***Not Yet Assessed***

In this reporting period, the CPD maintained Preliminary compliance, which it achieved with the hiring of the Language Access Coordinator, but has yet to achieve Secondary compliance because the Language Access Coordinator (also known as LAC) has yet to establish a system of review to "assess the effectiveness and efficacy of CPD's policies on an ongoing basis."

To evaluate Preliminary compliance, the IMT assessed whether the City and the CPD established and hired a language access coordinator, which they accomplished in the second reporting period. To evaluate Secondary compliance, we monitored the CPD's efforts to develop a system of data collection to assess limited English proficiency needs and services, including changes to CPD reports and CPD policy. We also reviewed the City's or CPD's efforts to evaluate/audit the delivery of language access services to ensure complete and impartial coverage.

Progress before the Sixth Reporting Period

In previous reporting periods, we credited the City's and the CPD's Language Access Coordinator for developing a working relationship within the Department and has roles clearly delineated in S02-01-05, *Limited English Proficiency*.[7] CPD's Language Access Coordinator has offered a number of proposals to enhance the CPD's responsiveness to the needs of individuals with limited English proficiency and has developed a language access plan in April 2021 that guides assessment of language needs for the department and operating procedures for translation and interpretation services. The Language Access Plan did not, however, provide the

[7] The language access policy indicates that CPD's Language Access Coordinator is expect to "establish a monitoring program to ensure compliance with the LEP policy, including the: implementation of the policy; assignment, and use of multilingual Department members; and necessity of translating Department forms, publications, and distribution materials."

process of data collection and the metrics by which the CPD's Language Access Coordinator will assess the effectiveness and efficacy of the CPD's policies as required by this paragraph. Furthermore, the CPD's Language Access Coordinator developed a website geared towards individuals with limited English proficiency and posted materials, ranging from feedback and complaint forms to victim assistance, in five different languages.[8]

Progress in the Sixth Reporting Period

While the CPD maintained Preliminary compliance with this paragraph, the City did not produce any materials for assessment for additional levels of compliance in this reporting period. However, the IMT received an update on Language Access Coordinator actions during a virtual site visit on May 11, 2022, indicating that the CPD is working to improve data collection processes to understand and monitor language access needs in Chicago communities such as collecting language requests during community interactions or calls for service as well as improving language service requests processes and forms. During the site visit, the CPD also provided updates on the development of criteria for selecting CPD-authorized interpreters, a key outstanding point from the IMT regarding codifying language access requirements of the Consent Decree. *See* ¶64 for more details on the site visit. The CPD expects to address this in revised submissions in the seventh reporting period.

To assess Secondary compliance, the IMT reviewed whether the Language Access Coordinator established a system of review to "assess the effectiveness and efficacy of CPD's policies on an ongoing basis." No new materials were produced for this paragraph during this reporting period, so the IMT could not further assess Secondary compliance and the CPD maintains Preliminary compliance.

In assessing Secondary compliance in future reporting periods, we will monitor the CPD's efforts to develop a system of data collection to assess limited English proficiency needs and services, including changes to CPD reports and CPD policy. This system is necessary to Language Access Coordinator's ability to evaluate the CPD's compliance with S02-01-05 and Section 4-40 of the Municipal Code of Chicago and to assess the effectiveness and efficiency of CPD's policies as they relate to the provision of impartial and timely access to high-quality limited English proficiency services.

[8] *See Language Access Policy of the Chicago Police Department*, CHICAGO POLICE DEPARTMENT, https://home.chicagopolice.org/community-policing-group/language-access/.

Paragraph 65 Compliance Progress History

FIRST REPORTING PERIOD
SEPTEMBER 1, 2019 – AUGUST 31, 2019
COMPLIANCE PROGRESS:
Not Applicable

SECOND REPORTING PERIOD
SEPTEMBER 1, 2019 – FEBRUARY 29, 2020
COMPLIANCE PROGRESS:
Preliminary

THIRD REPORTING PERIOD
MARCH 1, 2020 – DECEMBER 31, 2020
COMPLIANCE PROGRESS:
Preliminary

FOURTH REPORTING PERIOD
JANUARY 1, 2021 – JUNE 30, 2021
COMPLIANCE PROGRESS:
Preliminary

FIFTH REPORTING PERIOD
JULY 1, 2021 – DECEMBER 31, 2021
COMPLIANCE PROGRESS:
Preliminary

SIXTH REPORTING PERIOD
JANUARY 1, 2022 – JUNE 30, 2022
COMPLIANCE PROGRESS:
Preliminary

Impartial Policing: ¶66

66. *Within 365 days of the Effective Date, OEMC will provide training to its police communication supervisors, call-takers, and dispatchers (collectively, "tele-communicators") that is adequate in quality, quantity, type, and scope, and that addresses procedures consistent with CPD policy for responding to calls requiring language access services.*

Compliance Progress

(Reporting Period: January 1, 2022, through June 30, 2022)

Preliminary: ***In Compliance*** **(SECOND REPORTING PERIOD)**
Secondary: ***Not in Compliance***
Full: ***Not Yet Assessed***

The City and the Office of Emergency Management and Communications (OEMC) maintained Preliminary compliance with this paragraph. They did not achieve Secondary compliance because the OEMC may need to update its training to ensure the procedures are (1) consistent with the CPD's S02-01-05, *Limited English Proficiency*, which is still undergoing the ¶¶626–41 review process; and (2) respond to the data collection needs that provide the foundation for improved limited English Proficiency services in Chicago.

To evaluate Preliminary compliance, the IMT examined whether OEMC developed a training directive to meet requirements of this paragraph and in alignment with current CPD policy S02-01-05. To evaluate Secondary compliance, the IMT examined development, implementation, and evaluation of said training materials.

Progress before the Sixth Reporting Period

During the previous reporting period, OEMC produced a revised Training Notice 19-004 to address requirements of this paragraph. As mentioned in previous paragraphs, CPD is actively revising S02-01-05; thus, trainings to meet requirements of this paragraph must also include alignment with the finalized policy to ensure the training is fully "consistent with CPD policy."

Progress in the Sixth Reporting Period

In this reporting period, OEMC produced an updated draft of OEMC TNG 19-004, Limited English Proficiency on June 2, 2022. In review of this production, the IMT found that OEMC addressed the last outstanding comments regarding expectations for dispatchers as well as differentiated training content for all three articulated roles in this paragraph. While the IMT is satisfied with the current content of this training, the OEMC needs to conduct an alignment assessment with

the finalized CPD S02-01-05, expected in the seventh reporting period, as a part of meeting Secondary compliance with this paragraph.

The City and the OEMC maintained Preliminary compliance but have not met Secondary compliance. Moving forward, we will assess the OEMC's efforts to update TNG 19-004 based on CPD's final S02-01-05, and any feedback that the CPD receives from relevant community stakeholders. After finalizing an updated TNG 19-004, we will assess the OEMC's implementation and evaluation of the training.

Paragraph 66 Compliance Progress History

FIRST REPORTING PERIOD	SECOND REPORTING PERIOD	THIRD REPORTING PERIOD
SEPTEMBER 1, 2019 – AUGUST 31, 2019	SEPTEMBER 1, 2019 – FEBRUARY 29, 2020	MARCH 1, 2020 – DECEMBER 31, 2020
COMPLIANCE PROGRESS:	COMPLIANCE PROGRESS:	COMPLIANCE PROGRESS:
Not Applicable	Preliminary	Preliminary
FOURTH REPORTING PERIOD	**FIFTH REPORTING PERIOD**	**SIXTH REPORTING PERIOD**
JANUARY 1, 2021 – JUNE 30, 2021	JULY 1, 2021 – DECEMBER 31, 2021	JANUARY 1, 2022 – JUNE 30, 2022
COMPLIANCE PROGRESS:	COMPLIANCE PROGRESS:	COMPLIANCE PROGRESS:
Preliminary	Preliminary	Preliminary

Impartial Policing: ¶67

67. *Within 180 days of the Effective Date, and as necessary thereafter, CPD will translate its language access policy into any non-English language spoken by a limited or non-English proficient population that constitutes 5% or 10,000 individuals, whichever is less, in Chicago, as outlined in Section 2-40-020 of the Chicago Municipal Code. CPD will publish translated versions of its language access policy on its website.*

Compliance Progress

(Reporting Period: January 1, 2022, through June 30, 2022)

Preliminary:	***In Compliance*** **(SECOND REPORTING PERIOD)**
Secondary:	***In Compliance*** **(THIRD REPORTING PERIOD)**
Full:	***Not in Compliance***

The City and the CPD maintained Secondary compliance with this paragraph because the CPD's Language Access Plan sufficiently provides for a schedule and system to consistently review language access data to determine whether additional translations are necessary and to make revisions as needed to Special Order S02-01-05, *Limited English Proficiency*.

The City and the CPD have not met Full compliance because we have not assessed whether the day-to-day operations and supervisory over-sight suffices to determine that the translations' review schedule and system of review for S02-01-05 have been institutionalized. As of the end of the sixth reporting period, there have been no opportunities for the CPD to put the review process in practice considering that S02-01-05 is still under ¶¶626–41 review.

Progress before the Sixth Reporting Period

In previous reporting periods, the City and the CPD met Preliminary compliance because the CPD translated its Special Order S02-01-05 into Spanish, Polish, Chinese, and Arabic. In the third reporting period, the City and the CPD met Secondary compliance by providing evidence that it has the managerial practices in place to confirm that the languages selected for translations represent all groups that meet the criteria outlined in this paragraph. The CPD approved its Language Access Coordinator's *Language Access Plan* during the fourth reporting period. The Plan outlines an annual schedule and system to review language access data to determine if additional translations are needed. During the fifth reporting period, the City and the CPD did not produce any materials related to additional levels of compliance for this paragraph.

Progress in the Sixth Reporting Period

In this reporting period, the City and the CPD did not produce any additional materials for review related to this paragraph. As a result, the IMT maintains its assessment of this paragraph from the previous reporting period. The CPD has maintained Secondary compliance and has made good efforts to institutionalize the translations review and revision process. During the May 11, 2022 virtual site visit with the Language Access Coordinator, the CPD indicated final revisions to S02-01-05 will incorporate outstanding elements as required by this paragraph.

The IMT will need to continue our assessment to determine whether the record of those operations reflects a consistent adherence to the process. Since the annual review has not yet been completed, we cannot yet say the City and the CPD have reached Full compliance. The IMT acknowledges issues in staffing and the impact of these shortages on tasks like the completion of the annual review of the Language Access Plan and continues to stress to the City and the CPD the importance of addressing these shortages in reaching compliance with the Consent Decree.

Moving forward, we will continue to monitor the CPD's efforts to adhere to the translation and review process outlined in the Language Access Plan, including the CPD's efforts to translate S02-01-05 once it is finalized including community engagement on this directive and outstanding comments from the IMT. We look forward to any updates on the "non-English proficient population that constitutes 5% or 10,000 individuals, whichever is less, in Chicago" as a result of the 2020 Census.

Paragraph 67 Compliance Progress History

FIRST REPORTING PERIOD	SECOND REPORTING PERIOD	THIRD REPORTING PERIOD
SEPTEMBER 1, 2019 – AUGUST 31, 2019	SEPTEMBER 1, 2019 – FEBRUARY 29, 2020	MARCH 1, 2020 – DECEMBER 31, 2020
COMPLIANCE PROGRESS:	COMPLIANCE PROGRESS:	COMPLIANCE PROGRESS:
Not Applicable	Preliminary	Secondary
FOURTH REPORTING PERIOD	**FIFTH REPORTING PERIOD**	**SIXTH REPORTING PERIOD**
JANUARY 1, 2021 – JUNE 30, 2021	JULY 1, 2021 – DECEMBER 31, 2021	JANUARY 1, 2022 – JUNE 30, 2022
COMPLIANCE PROGRESS:	COMPLIANCE PROGRESS:	COMPLIANCE PROGRESS:
Secondary	Secondary	Secondary

Impartial Policing: ¶68

68. *Before January 1, 2020, CPD will review and, to the extent necessary, revise its policies and practices for ensuring effective communication and meaningful access to CPD programs, services, and activities for individuals with physical, mental, or developmental disabilities. These policies will identify specific procedures and responsibilities applicable to circumstances in which CPD officers encounter persons with intellectual or developmental disabilities, autism, dementia, blindness, deafness, hearing loss, and mobility disabilities, including, but not limited to: a. properly defining terms related to individuals with disabilities and the disability community; b. providing reasonable accommodations, to the extent safe and feasible, in order to facilitate CPD officer encounters with individuals with a disability; c. the arrest and transport of individuals with disabilities or who require the assistance of ambulatory devices; and d. using qualified and Department-authorized interpreters, consistent with CPD policy, to communicate with people who are deaf, hard of hearing, or who have a speech impairment, including for the provision of Miranda warnings.*

Compliance Progress (Reporting Period: January 1, 2022, through June 30, 2022)

Preliminary:	***Not in Compliance***
Secondary:	***Not Yet Assessed***
Full:	***Not Yet Assessed***

The City and the CPD did not meet Preliminary compliance regarding this paragraph because the CPD has not finished revising its policies for ensuring effective communication and meaningful access to CPD services for individuals with physical, mental, or developmental disabilities.

To assess Preliminary compliance, the IMT assessed compliance based on the quality of directive S02-01-01, *People with Disabilities,* and extent of community engagement in its development.

Progress before the Sixth Reporting Period

In previous reporting periods, the City and the CPD did not meet Preliminary compliance because the CPD had not started or completed the ¶¶626–41 review process regarding Special Order S02-01-01, *People with Disabilities*. The IMT's primary concerns regarding the submitted policy is that it could benefit from clearer and more precise language regarding use and certification of interpreters for deaf and hard-of-hearing individuals as specified in ¶68(d). Further, as of the

end of the reporting period, the City and the CPD were still working on revisions to the Constitutional Policing Course.

Progress in the Sixth Reporting Period

In this reporting period, there were no productions by the CPD related to compliance of this paragraph, specifically regarding revisions to S02-01-01, as well as to any efforts related to CPD's partnership with the Mayor's Office and the establishment of the two advisory committees focused on people with disabilities. CPD and the City produced the Constitutional Policing Course, which includes training concepts ancillary to this paragraph.

IMT looks forward to reviewing revised drafts of S02-01-01, the Constitutional Policing Course, and progress in establishing the two advisory committees in the seventh reporting period. Moving forward, we will assess the CPD's efforts to finalize S02-01-01 and incorporate these into training. We will also continue to assess the CPD's efforts to engage relevant disability communities and their advocates, considering the concerns we raised in the previous monitoring report regarding the limitations to the focus group model. After the CPD finalizes S02-01-01 and any other policies related to this paragraph, we will assess the CPD's efforts to train its officers on the updated policies, including the extent to which training aligns with the CPD's efforts to comply with ¶69.

Paragraph 68 Compliance Progress History

FIRST REPORTING PERIOD	SECOND REPORTING PERIOD	THIRD REPORTING PERIOD
SEPTEMBER 1, 2019 – AUGUST 31, 2019	SEPTEMBER 1, 2019 – FEBRUARY 29, 2020	MARCH 1, 2020 – DECEMBER 31, 2020
COMPLIANCE PROGRESS:	COMPLIANCE PROGRESS:	COMPLIANCE PROGRESS:
Not Applicable	None	None
FOURTH REPORTING PERIOD	**FIFTH REPORTING PERIOD**	**SIXTH REPORTING PERIOD**
JANUARY 1, 2021 – JUNE 30, 2021	JULY 1, 2021 – DECEMBER 31, 2021	JANUARY 1, 2022 – JUNE 30, 2022
COMPLIANCE PROGRESS:	COMPLIANCE PROGRESS:	COMPLIANCE PROGRESS:
None	None	None

Impartial Policing: ¶69

69. *Before January 1, 2020, CPD will develop a training bulletin that provides CPD members guidance on interactions with people with disabilities, including: a. recognizing and responding to conduct or behavior that is related to an individual's disability, including qualifying medical conditions such as Alzheimer's disease and diabetes; b. providing effective communication and minimizing barriers to communication, including by incorporating sign language and other modes of communication used by people who are deaf, hard of hearing, or who have a speech impairment during police-community interactions; c. attending to the specific needs of individuals with disabilities, such as mobility devices, prosthetics, and service animals; and d. recognizing and responding to identified abuse, neglect, or exploitation of individuals with disabilities, including making any notifications required by CPD policy or the law.*

Compliance Progress (Reporting Period: January 1, 2022, through June 30, 2022)

Preliminary:	***Not in Compliance***
Secondary:	***Not Yet Assessed***
Full:	***Not Yet Assessed***

The City and the CPD did not meet Preliminary compliance during this reporting period because the CPD has not finished developing its training bulletins on interactions with people with disabilities.

To assess Preliminary compliance, the IMT assessed whether the CPD had finalized training bulletins on topics specified in this paragraph.

Progress before the Sixth Reporting Period

During previous reporting periods, the CPD produced the following draft training bulletins: (1) *People with Disabilities*; (2) *Autism and Police Response*; (3) *Interacting with the Deaf Community; (4) What is a Service Animal?*; (5) *Understanding Diabetes, (6) A Law Enforcement Perspective*; and *Alzheimer's Disease and Related Dementias*. The ADA Liaison was meaningfully involved in the bulletin-development process, providing initial content for the general training bulletin on individuals with disabilities. However, the guiding policies for these training bulletins, most notably Special Order S02-01-01, *People with Disabilities,* had not been finalized, and thus, the IMT could not assess if these bulletins aligned with S02-01-01. We also monitored the CPD's continuing efforts to engage community members and organizations with relevant knowledge and experience in developing and revising the relevant training bulletins. In the fifth reporting

period, the CPD indicated they planned to resume revisions and submissions related to this paragraph once they finalize S02-01-01 as recommended by the IMT.

Progress in the Sixth Reporting Period

During this reporting period, the CPD did not produce any additional productions related to this paragraph.

Special Order S02-01-01, *People with Disabilities*, has not been finalized, and thus the IMT could not assess if these training bulletins aligned with the policy. We have encouraged the CPD to not finalize these training bulletins until they can reflect the most accurate and up-to-date guidance from CPD's policy or Special Orders. We look forward to reviewing the revisions to S02-01-01, the associated training bulletins, and CPD's efforts to engage the community in the development of these productions.

Paragraph 69 Compliance Progress History

FIRST REPORTING PERIOD	SECOND REPORTING PERIOD	THIRD REPORTING PERIOD
SEPTEMBER 1, 2019 – AUGUST 31, 2019	SEPTEMBER 1, 2019 – FEBRUARY 29, 2020	MARCH 1, 2020 – DECEMBER 31, 2020
COMPLIANCE PROGRESS:	COMPLIANCE PROGRESS:	COMPLIANCE PROGRESS:
Not Applicable	None	None
FOURTH REPORTING PERIOD	**FIFTH REPORTING PERIOD**	**SIXTH REPORTING PERIOD**
JANUARY 1, 2021 – JUNE 30, 2021	JULY 1, 2021 – DECEMBER 31, 2021	JANUARY 1, 2022 – JUNE 30, 2022
COMPLIANCE PROGRESS:	COMPLIANCE PROGRESS:	COMPLIANCE PROGRESS:
None	None	None

Impartial Policing: ¶70

70. *Within 180 days of the Effective Date, CPD will designate at least one member as an Americans with Disabilities Act ("ADA") liaison who will coordinate CPD's efforts to comply with the ADA and: a. regularly review the effectiveness and efficiency of CPD's policies and training as they relate to individuals with disabilities and report to the Superintendent, or his or her designee, any recommended revisions, if necessary, to ensure compliance with the law and this Agreement; b. serve as a resource to assist CPD members in providing meaningful access to police services for individuals with disabilities; and c. act as a liaison between CPD and individuals with disabilities.*

Compliance Progress

(Reporting Period: January 1, 2022, through June 30, 2022)

Preliminary:	***In Compliance*** **(THIRD REPORTING PERIOD)**
Secondary:	***Not in Compliance***
Full:	***Not Yet Assessed***

The City and the CPD maintained Preliminary compliance regarding ¶70 because the CPD designated an ADA Liaison in the third reporting period. However, the CPD did not meet Secondary compliance for the current reporting period because the CPD still needs to demonstrate that the ADA Liaison is integrated into CPD processes and practices.

To evaluate Preliminary compliance, we assessed the CPD's efforts to designate an ADA Liaison. To evaluate Secondary compliance, we assessed the CPD's efforts to integrate the ADA Liaison into CPD processes and practices specific to this paragraph, as well as CPD policies that codify the role of the ADA Liaison, most specifically in S02-01-01. Annual reports and the implementation plan will be used to determine the extent to which the ADA Liaison is integrated into CPD processes and practices.

Progress before the Sixth Reporting Period

In previous reporting periods, we acknowledged that the CPD's designated ADA Liaison is qualified for the role, having 27 years of police experience, including experience with ADA issues while at the CPD. The CPD also provided S02-01-01 and two standard operating procedures covering the ADA Liaison's role and responsibilities. However, these productions were still in revision due to S02-01-01 not being final.

Progress in the Sixth Reporting Period

In this reporting period, the CPD did not produce any materials related to additional levels of compliance for this paragraph. That said, the IMT held a virtual site-visit with the ADA Liaison on June 08, 2022, to discuss progress on related paragraphs. During this site visit, the ADA Liaison summarized her experience, the accomplishments over the last year, goals for the next year, and challenges she has faced in developing the implementation plan and annual report. During this site visit the ADA Liaison also noted that the CPD does not collect or maintain statistics on ADA complaints or other related activities (*e.g.*, assistance provided) and is working with various divisions internal and external to the CPD to capture the data needed for the annual report. The Liaison also noted that the Implementation Plan would be ready to share later this year. Other challenges noted by the ADA Liaison included shortages in staffing, an issue noted throughout Independent Monitoring Report 5. This staffing shortage has presented problems in the ability for CPD to complete capture and analyze the data and complete tasks in a timely manner.

The City and the CPD maintained Preliminary compliance because the ADA Liaison's activities and efforts align with the requirements outlined in this paragraph. Moving forward, for Secondary compliance, we will assess the CPD's effort to finalize the relevant policies and procedures codifying the ADA Liaison's role and responsibilities. We will also assess the CPD's effort to implement supervisory oversight to ensure that the policies and procedures are implemented and effective. Finally, we will look for the collection of data on the effectiveness of CPD's polices and training regarding CPD's responses to individuals with disabilities. The CPD will need to a method for determining whether these individuals are being treated with dignity and respect by CPD personnel and receiving the services they need. Further, we also look forward to reviewing upcoming drafts of the Implementation Plan and the Annual Report.

Paragraph 70 Compliance Progress History

FIRST REPORTING PERIOD	SECOND REPORTING PERIOD	THIRD REPORTING PERIOD
SEPTEMBER 1, 2019 – AUGUST 31, 2019	SEPTEMBER 1, 2019 – FEBRUARY 29, 2020	MARCH 1, 2020 – DECEMBER 31, 2020
COMPLIANCE PROGRESS:	COMPLIANCE PROGRESS:	COMPLIANCE PROGRESS:
Not Applicable	None	Preliminary
FOURTH REPORTING PERIOD	**FIFTH REPORTING PERIOD**	**SIXTH REPORTING PERIOD**
JANUARY 1, 2021 – JUNE 30, 2021	JULY 1, 2021 – DECEMBER 31, 2021	JANUARY 1, 2022 – JUNE 30, 2022
COMPLIANCE PROGRESS:	COMPLIANCE PROGRESS:	COMPLIANCE PROGRESS:
Preliminary	Preliminary	Preliminary

Impartial Policing: ¶71

71. *Within 180 days of the Effective Date, CPD will develop a policy for transporting arrested or detained individuals that requires CPD officers to notify OEMC of the start and end of a transport and whether the individual is a juvenile or adult.*

Compliance Progress (Reporting Period: January 1, 2022, through June 30, 2022)

Preliminary:	***In Compliance*** **(THIRD REPORTING PERIOD)**
Secondary:	***Not in Compliance***
Full:	***Not Yet Assessed***

The City and the CPD maintained Preliminary compliance regarding ¶71 because the CPD implemented a policy addressing the requirements in this paragraph. *See* G04-01, *Preliminary Investigations* (effective December 30, 2020).

To assess Preliminary compliance, the IMT assessed compliance based on the quality of directive G04-01 and extent of community engagement in its development. To assess Secondary compliance, the IMT assessed training materials developed based on the policy, such as the *Constitutional Policing Course*.

Progress in the Sixth Reporting Period

During previous reporting periods, we assessed the CPD's efforts to review and revise G04-01 and related policies that reinforce the requirements of this paragraph. Because this paragraph is a relatively straightforward requirement, we were satisfied with the CPD's limited method of community engagement.

Progress in the Sixth Reporting Period

On May 19, 2022, the City and the CPD submitted Constitutional Policing Course in relation to this paragraph. On June 18, 2022, IMT provided our comments on this production. While we found that the training course was comprehensive, we noted additional improvements were necessary, particularly around including additional discussion on ensuring impartial-policing practices during enforcement actions and noting the importance of reinforcing these concepts and referencing related CPD directives to demonstrating how impartial policing builds positive community perspectives and improves legitimacy. However, while the IMT is not prepared to provide a Secondary compliance assessment for this paragraph while the materials are not yet finalized, draft training materials included mention of the requirements of this paragraph. The IMT will fully assess the requirements of this paragraph once the CPD revises and finalizes the training materials.

The City and the CPD maintained Preliminary compliance because the implemented G04-01 codifies the requirement that officers notify the Office of Emergency Management and Communications (OEMC) of the start and end of a transport and whether the individual is a juvenile or an adult. Moving forward, for Secondary compliance, we will assess the CPD's efforts to train officers on these requirements and collect evaluation data on implementation of this training. For Full compliance, we will assess whether the CPD has sufficiently implemented the requirement by evaluating the CPD's efforts to assess whether officers are complying with the requirements of ¶71 and adjust policy and training to address any concerns regarding their effectiveness.

Paragraph 71 Compliance Progress History

FIRST REPORTING PERIOD	SECOND REPORTING PERIOD	THIRD REPORTING PERIOD
SEPTEMBER 1, 2019 – AUGUST 31, 2019	SEPTEMBER 1, 2019 – FEBRUARY 29, 2020	MARCH 1, 2020 – DECEMBER 31, 2020
COMPLIANCE PROGRESS:	COMPLIANCE PROGRESS:	COMPLIANCE PROGRESS:
Not Applicable	None	Preliminary
FOURTH REPORTING PERIOD	**FIFTH REPORTING PERIOD**	**SIXTH REPORTING PERIOD**
JANUARY 1, 2021 – JUNE 30, 2021	JULY 1, 2021 – DECEMBER 31, 2021	JANUARY 1, 2022 – JUNE 30, 2022
COMPLIANCE PROGRESS:	COMPLIANCE PROGRESS:	COMPLIANCE PROGRESS:
Preliminary	Preliminary	Preliminary

Impartial Policing: ¶72

72. *The Parties recognize that training is a necessary component of impartial policing. CPD will integrate the concept of impartial policing into related CPD training courses when appropriate, including, but not limited to, use of force courses, weapons training courses, and Fourth Amendment subjects courses.*

Compliance Progress (Reporting Period: January 1, 2022, through June 30, 2022)

Preliminary:	***Not in Compliance***
Secondary:	***Not Yet Assessed***
Full:	***Not Yet Assessed***

The City and the CPD did not meet Preliminary compliance with ¶72 during this reporting period because the CPD did not provide a training plan or policy that adequately incorporates the concept of impartial policing into related CPD training courses.

To assess Preliminary compliance, the IMT assessed whether and how CPD training materials meaningfully integrate the concept of impartial policing. This includes the time devoted to topics such as impartial policing, procedural justice, and de-escalation. To assess Secondary compliance, the IMT assessed the integration and delivery of these topics into trainings.

Progress before the Sixth Reporting Period

In previous reporting periods, we assessed the CPD's efforts to review its training courses to determine which ones are related to impartial policing and create a plan to integrate the concept of impartial policing into those related courses. In the fifth reporting period, the CPD produced several training directives relevant to ¶72 and 74. Namely, the CPD produced S11-10, *Department Training*; S11-10-01, *Recruit Training*; S11-10-02, *Pre-Service Training*; and *In-Service Training*, S11-10-03 (collectively "Training Directives"). Although the IMT has indicated no objection to S11-10-01 for a set of paragraphs, we expressed serious concerns about CPD efforts to integrate Impartial Policing into these training directives or curricula.

Progress in the Sixth Reporting Period

As noted in previous reports, the CPD has yet to develop a course that effectively integrates the skills training necessary for impartial policing. To address this gap, the CPD could include guidance in a separate directive on how to achieve this requirement. For in-service training, effectively incorporating impartial policing into training requires adequate attention to developing officers' and course instructors' interpersonal communication skills. We continue to recommend that

the CPD develop and/or incorporate into its training plan its efforts to integrate impartial policing into its training courses. This training policy or plan should outline the courses in which impartial policing has been integrated into said training, the number of training hours, and specific topics covered.

As noted in previous reports, we remain concerned that instructors for classes where integration is required lack knowledge on the subject, are not dedicated to impartial policing or procedural justice, and are not experienced in teaching difficult or uncomfortable subjects. Therefore, we encourage the CPD to make a concerted effort to retain the core of their procedural justice trainers. These trainers can help co-teach the related trainings and, ideally, partake in a larger effort to create a higher standard of teaching at the CPD.

Similar to instructor development, the CPD could benefit from devoting sufficient resources to ensure that the virtual trainings are thoughtful and well developed. As we have discussed before, we discourage the CPD from becoming overly dependent on training bulletins and asynchronous online trainings that do not allow for dynamic interactions and skill development.

In the sixth reporting period, the IMT reviewed revised training directives including S11-10, *Department Training*; S11-10-02, *Pre-Service Training*; and *In-Service Training*, S11-10-03. The IMT provided no-objection notices on these directives on February 15, 2022, to accompany the no-objection notice for S11-10-01 in the previous reporting period to complete the "Training Suite" provided by the City. In addition, the City provided a Bureau of Internal Affairs (BIA) eLearning as well as a Constitutional Policing 2022 for review under this paragraph. While the IMT did not have any substantive comments related to this paragraph regarding the eLearning, the IMT had substantive comments regarding the Constitutional Policing course. Specifically, the IMT recommends that the course provide sufficient depth on impartial policing practices during enforcement activities, including reinforcing how impartial policing practices build positive community perspectives and improve legitimacy with the community.

During this reporting period, the City and the CPD made progress integrating impartial policing concepts into trainings. However, while the provided materials incorporate aspects of impartial policing and the requirements of this paragraph, integration of impartial policing concepts requires not only these efforts but also lasting direction on this issue. The IMT continues to recommend that the CPD develop a training plan or policy that would guide integration of these principles throughout the trainings specified in this paragraph. Without sufficient policy direction on this issue, the City and the CPD will not meet Preliminary compliance metrics.

Full compliance will depend on the CPD's ability to demonstrate that it sufficiently and effectively incorporated the concept of impartial policing into related CPD

training courses. In other words, the CPD will need to measure effectiveness, in part, by assessing the quality of the training delivered, changes in officers' attitudes and behavior prior to leaving the training session, and changes in behavior while on the job. The CPD will need an evaluation system where it or its partners can quickly analyze survey and test data and quickly feed the analysis back to Training Division administrators and instructors to allow for immediate adjustments in particular classes and for long-term planning. This type of evaluation system does not currently exist.

Paragraph 72 Compliance Progress History

FIRST REPORTING PERIOD	SECOND REPORTING PERIOD	THIRD REPORTING PERIOD
SEPTEMBER 1, 2019 – AUGUST 31, 2019	SEPTEMBER 1, 2019 – FEBRUARY 29, 2020	MARCH 1, 2020 – DECEMBER 31, 2020
COMPLIANCE PROGRESS:	COMPLIANCE PROGRESS:	COMPLIANCE PROGRESS:
Not Applicable	Status Update	None

FOURTH REPORTING PERIOD	FIFTH REPORTING PERIOD	SIXTH REPORTING PERIOD
JANUARY 1, 2021 – JUNE 30, 2021	JULY 1, 2021 – DECEMBER 31, 2021	JANUARY 1, 2022 – JUNE 30, 2022
COMPLIANCE PROGRESS:	COMPLIANCE PROGRESS:	COMPLIANCE PROGRESS:
None	None	None

Impartial Policing: ¶73

73. *The Parties acknowledge that CPD has developed, with the aid of subject-matter experts, a three-part course called Procedural Justice, which covers certain impartial policing subjects including the principles of procedural justice, the importance of police legitimacy, and the existence of and methods for minimizing the impact of implicit bias. By the end of the year 2020, all officers, including supervisors, will complete the Procedural Justice course.*

Compliance Progress

(Reporting Period: January 1, 2022, through June 30, 2022)

Preliminary:	***In Compliance*** **(FOURTH REPORTING PERIOD)**
Secondary:	***In Compliance*** **(NEW)**
Full:	***Not Yet Assessed***

The City and the CPD maintained Preliminary compliance and met Secondary compliance with this paragraph because it ensured that all officers, including supervisors, completed the Procedural Justice (also known as PJ) courses.

To assess Preliminary compliance, we assessed the CPD's efforts to ensure its officers completed the training. We also reviewed the materials and observed classes to assess the quality of its content. To assess Secondary compliance, the IMT assessed how the CPD implemented the training of Procedural Justice courses and assessed the results.

Progress before the Sixth Reporting Period

From 2018 to early 2021, the CPD offered a three-part procedural justice training as part of the CPD's in-service program. The course embodied concepts of impartial policing. Based on our review of the materials, we found that the procedural justice training offered a strong introduction to the concepts for all officers. We observed the Procedural Justice training, and Parts I and II were taught largely by CPD instructors who exhibited a solid understanding of how procedural justice can be applied to police work. The CPD out-sourced Part III's instruction to the Anti-Defamation League (ADL) Midwest. The ADL provided a solid 4-module training on implicit bias and strategies for managing it to 11,500 officers.

In the fifth reporting period, only 88% of the CPD officers had completed the Procedural Justice Part III (also known PJ-3) course. As a result, the CPD and the Anti-Defamation League (ADL) Midwest, the provider of the initial Procedural Justice courses for CPD, developed a curriculum on "Inclusive Policing" that is

available to officers who did not receive the original Procedural Justice III.[9] IMT reviewed the training materials and we are satisfied with the content, thus CPD remained in Preliminary compliance. However, the CPD did not achieve Secondary compliance in previous reporting periods.

Progress in the Sixth Reporting Period

At the end of this reporting period, the CPD produced documents demonstrating completion of the Inclusive Policing Procedural Justice III training, as well as evidence of completion of community policing in-service training, and evidence of use of force in-service training. As noted in previous reports, the IMT continues to recommend that the CPD continue conducting procedural justice training courses periodically and/or more definitively integrate procedural justice principles into its training plans.

Secondary compliance was achieved during this reporting period with the completion of the Inclusive Policing Procedural Justice III. Full compliance will require that CPD provide data to indicate that CPD officers are engaging in procedurally just behaviors in the field. Further, full compliance will also be contingent on the extent to which CPD incorporates the feedback and evaluation of this training into its annual training plans. The outcome data gathered from the field should be used to measure successes and inform future training. Thus, we encourage CPD to use its new contact survey to measure these outcomes.

As was noted in IMR-5, the CPD has indicated no plans to continue this type of coursework in the future now that the three-part procedural justice training is complete. Moving forward, we will assess the CPD's efforts to use the foundation established with this Procedural Justice course as it works to comply with ¶¶72 and 74.

Paragraph 73 Compliance Progress History

FIRST REPORTING PERIOD SEPTEMBER 1, 2019 – AUGUST 31, 2019 COMPLIANCE PROGRESS: Not Applicable	SECOND REPORTING PERIOD SEPTEMBER 1, 2019 – FEBRUARY 29, 2020 COMPLIANCE PROGRESS: Not Applicable	THIRD REPORTING PERIOD MARCH 1, 2020 – DECEMBER 31, 2020 COMPLIANCE PROGRESS: Not Applicable
FOURTH REPORTING PERIOD JANUARY 1, 2021 – JUNE 30, 2021 COMPLIANCE PROGRESS: Preliminary	FIFTH REPORTING PERIOD JULY 1, 2021 – DECEMBER 31, 2021 COMPLIANCE PROGRESS: Preliminary	SIXTH REPORTING PERIOD JANUARY 1, 2022 – JUNE 30, 2022 COMPLIANCE PROGRESS: Secondary

[9] ADL no longer has proprietary ownership over the original Procedural Justice III course, so they needed to develop a new course. The Inclusive Policing class is also called Procedural Justice III Training 2021–2022.

Impartial Policing: ¶74

74. *Consistent with the requirements set forth in the Training section of this Agreement, CPD will incorporate the concept of impartial policing into its annual in-service training for all officers, including supervisors and command staff, by providing training on the following topics: a. CPD's anti-bias and impartial policing policies, including, but not limited to, the policies referenced in this section unless otherwise required; b. refreshers of topics covered in Procedural Justice; c. appropriate use of social media; d. cultural competency training that prepares officers to interact effectively with people from diverse communities including, but not limited to, people of color, LGBTQI individuals, religious minorities, and immigrants; e. recognizing when a person has a physical, intellectual, developmental or mental disability, including protocols for providing timely and meaningful access to police services for individuals with disabilities; and f. the specific history and racial challenges in the City of Chicago.*

Compliance Progress (Reporting Period: January 1, 2022, through June 30, 2022)

Preliminary:	***In Compliance*** **(NEW)**
Secondary:	***Not in Compliance***
Full:	***Not Yet Assessed***

In the sixth reporting period, the City and the CPD reached Preliminary compliance with this paragraph because the CPD codified the paragraph's requirements into policy. The CPD has not met Secondary compliance because it has not drafted In-service training that adequately incorporates Impartial Policing.

To assess compliance, we reviewed the CPD's efforts to comply with this paragraph, noting that we will use the ADDIE model (Analysis, Design, Development, Implementation, and Evaluation) to assess the CPD's training programs. Secondary compliance is judged based on the Development, Implementation, and Evaluation phases of training.

Progress before the Sixth Reporting Period

In previous reporting periods, the CPD submitted a draft version of Special Order S11-10-03, *In-Service Training*, reflecting its efforts to codify ¶74's requirements. However, previous versions of this directive did not describe the topics that the annual in-service impartial policing training will cover and S11-10 was still under ¶¶626–41. Both factors resulted in this paragraph not being in Preliminary compliance in previous reporting periods.

In this reporting period, the IMT reviewed a revised S11-10-03 and provided a no-objection notice on February 15, 2022, on this directive. This updated directive addresses the requirements of this paragraph.

In addition, the City and the CPD provided a training titled *Constitutional Policing 2022* for review under this paragraph. On June 18, 2022, the IMT provided comments on this training specific to this paragraph. Overall, the training reflects many of the requirements of this paragraph and recommendations the IMT has made on previous trainings about pedagogy and delivery such as class exercises, knowledge checks, scenarios, and discussions on external and internal procedural justice.

However, the IMT recommends revisions to this training to fully reflect the requirements of this paragraph. For example, the IMT recommends the CPD include not only examples of proper pat downs but also illustrative examples of improper pat downs. The IMT also recommends additional content and discussion on the nuanced distinctions between legally acceptable actions versus CPD policy, which can be more specific. The IMT also finds the evaluations and assessments for this course to not be sufficient or comprehensive for this training, particularly with communication during law enforcement actions.

Progress in the Sixth Reporting Period

During this reporting period, the City and the CPD also submitted evidence of completion of its *2021 Use of Force In-Service Training* and the community policing in service training.

The City and CPD achieved Preliminary compliance with this paragraph during this reporting period. The City and the CPD ensured that its annual in-service trainings courses incorporate the concepts and principles of impartial policing, including any additional training courses developed, *i.e.*, constitutional policing course. For further levels of compliance with this paragraph, it is important that the City and the CPD provide the training materials and have the trainings be effectively evaluated by conducting comprehensive and systemic evaluations involving surveys, knowledge tests, and observations by supervisors and community members. The results from these evaluations will be essential to ensure that the revisions to the trainings are made on an ongoing basis.

As we consider the trainings developed for this paragraph, the IMT again emphasizes the need to incorporate proven adult education strategies, such as modeling, repetitive practice, and individualized feedback. Role-play scenarios allow officers to practice their communication skills. Along these lines, we discourage the CPD from becoming overly dependent on training bulletins and asynchronous online trainings that do not allow for dynamic interactions and the refinement of interpersonal skills.

As noted in previous reports, the IMT will continue to monitor whether CPD has a sufficient number of trainers with specific educational backgrounds, skills, and understanding of procedural justice, impartial policing, and de-escalation strategies and tactics. Also, the IMT will examine whether CPD has employed a sufficient number of qualified analysts to ensure that the in-service and other training programs can be properly evaluated.

Paragraph 74 Compliance Progress History

FIRST REPORTING PERIOD	SECOND REPORTING PERIOD	THIRD REPORTING PERIOD
SEPTEMBER 1, 2019 – AUGUST 31, 2019	SEPTEMBER 1, 2019 – FEBRUARY 29, 2020	MARCH 1, 2020 – DECEMBER 31, 2020
COMPLIANCE PROGRESS:	COMPLIANCE PROGRESS:	COMPLIANCE PROGRESS:
Not Applicable	Status Update	Status Update
FOURTH REPORTING PERIOD	**FIFTH REPORTING PERIOD**	**SIXTH REPORTING PERIOD**
JANUARY 1, 2021 – JUNE 30, 2021	JULY 1, 2021 – DECEMBER 31, 2021	JANUARY 1, 2022 – JUNE 30, 2022
COMPLIANCE PROGRESS:	COMPLIANCE PROGRESS:	COMPLIANCE PROGRESS:
None	None	Preliminary

Impartial Policing: ¶75

75. *OEMC currently provides diversity awareness training to all new telecommunicators which, among other things, addresses the existence of and methods for minimizing the impact of implicit bias. OEMC will continue to provide training on this topic to all new tele-communicators and, beginning in 2020, will provide all tele-communicators with refresher training every two years on this topic that is adequate in quantity, quality, type, and scope.*

Compliance Progress

(Reporting Period: January 1, 2022, through June 30, 2022)

Recurring Schedule:	Every Two Years	✓	**Not Yet Applicable**
Preliminary:	***Not in Compliance***		
Secondary:	***Not Yet Assessed***		
Full:	***Not Yet Assessed***		

The City did not reach Preliminary compliance. No formal productions for this paragraph were provided during this reporting period. Although the City and OEMC submitted to the IMT documentation related to the revised Diversity Awareness Training on July 06, 2022, it did so informally.

To assess Preliminary compliance, the IMT assessed whether the OEMC had a finalized training on topics specified in this paragraph.

Progress before the Sixth Reporting Period

In previous reporting periods, we assessed the OEMC's efforts to codify this paragraph's requirements into training. We reviewed multiple versions of the Diversity Awareness Training and noted OEMC's collaboration with the Mayor's Office of Equity and Racial Justice on the development of the training.

During the fifth reporting period, the IMT reviewed another iteration of the *Diversity Awareness Training* to meet requirements of this paragraph. On December 31, 2021, the IMT provided additional comments related to this training. The updated slide deck addressed a number of our previous concerns related to the application of concepts to the work of OEMC telecommunicators. Overall, the current training, if executed properly, will provide a solid introduction to implicit bias and a foundation for future training on related topics. Some of the remaining IMT comments center on instructional time devoted to discussion and reflection.

Progress in the Sixth Reporting Period

The City and OEMC informally produced revised training materials on Diversity Awareness and a Standard Operating Procedure just after the reporting period. In a preliminary review of the production and documentation provided the IMT notes that additional revisions to this training may be necessary to provide more instructional time to discuss tools that OEMC employees can use to minimize the effects of implicit bias in practice, including additional practical applications and scenarios. A more comprehensive and formal review will be conducted for IMR-7. The IMT also encourages the City and OEMC to review their document production processes to ensure that productions are not overlooked and provided to the IMT in a timely manner.

The City and the OEMC did not meet Preliminary compliance because they did not finalize a training codifying this paragraph's requirements during this reporting period. Moving forward, we will assess the OEMC's efforts to address our concerns regarding the Training materials and the related standard operation procedure. We will then assess the OEMC's efforts to ensure all telecommunicators receive the Training and refresher training.

Paragraph 75 Compliance Progress History

FIRST REPORTING PERIOD	SECOND REPORTING PERIOD	THIRD REPORTING PERIOD
SEPTEMBER 1, 2019 – AUGUST 31, 2019	SEPTEMBER 1, 2019 – FEBRUARY 29, 2020	MARCH 1, 2020 – DECEMBER 31, 2020
COMPLIANCE PROGRESS:	COMPLIANCE PROGRESS:	COMPLIANCE PROGRESS:
Not Applicable	Not Applicable	Not Applicable
FOURTH REPORTING PERIOD	**FIFTH REPORTING PERIOD**	**SIXTH REPORTING PERIOD**
JANUARY 1, 2021 – JUNE 30, 2021	JULY 1, 2021 – DECEMBER 31, 2021	JANUARY 1, 2022 – JUNE 30, 2022
COMPLIANCE PROGRESS:	COMPLIANCE PROGRESS:	COMPLIANCE PROGRESS:
None	None	None

Impartial Policing: ¶76

> ***76.*** *By January 1, 2020, CPD will review and, to the extent necessary, revise its policies and procedures to ensure that allegations and complaints of hate crimes, as defined by federal, state, and local law, are comprehensively investigated.*

Compliance Progress (Reporting Period: January 1, 2022, through June 30, 2022)

Preliminary:	***In Compliance*** **(FOURTH REPORTING PERIOD)**
Secondary:	***Not in Compliance***
Full:	***Not Yet Assessed***

The City and CPD maintained Preliminary compliance with this paragraph but did not achieve Secondary compliance in this reporting period. The training related to this paragraph, Hate Crimes e-Learning is still undergoing revisions.

To assess Secondary compliance, the IMT assessed whether CPD had developed, implemented, and evaluated a training on this paragraph.

Progress before the Sixth Reporting Period

During the previous reporting periods, CPD developed a supplemental standard operating procedure that responded to both community and IMT concerns about hate crime investigations.[10] The CPD developed a standard operating procedure to clarifying the role of supervisors to ensure a complete and timely investigation of the crime, while being sensitive to the needs of the crime victim. This standard operating procedure is helpful, but we did not see any evidence in this standard operating procedure or the hate crime policy indicating that CPD will seek to educate the community about what constitutes a hate crime and how to report it.

In the fifth reporting period, the CPD provided an eLearning training titled Hate Crimes Refresher for review under this paragraph. The version the IMT reviewed included many revisions the IMT requested previously, such as the inclusion of various hate crime laws and their applicability, as well as clarifying the roles of officers in preliminary investigations. However, the IMT remained concerned that there did not seem to be any cross-section of community members and organizations that provided input on this training as required by ¶52.

Progress in the Sixth Reporting Period

In this reporting period, the City and the CPD produced a revised *Hate Crimes Refresher* eLearning training materials on June 9, 2022. While this draft of

[10] This standard operating procedure is titled *Hate Crimes – Responses, Reporting, Investigating and Outreach.*

materials addressed some of our substantive comments regarding the training, the IMT remains concerned regarding community engagement for these materials, including how the CPD used the community input to revise the materials they provided. In addition, the CPD has also yet to adequately address what specialized training and content the Civil Rights Unit or Area Detective investigators will receive on this important issue given their roles in this area.

Looking forward, for Secondary compliance, we will assess the CPD's efforts to train its officers on the guidance provided in G04-06 and the related standard operating procedures as well as finalizing the eLearning. Assessing Secondary compliance will overlap with our assessment of ¶77.

Paragraph 76 Compliance Progress History

FIRST REPORTING PERIOD	SECOND REPORTING PERIOD	THIRD REPORTING PERIOD
SEPTEMBER 1, 2019 – AUGUST 31, 2019	SEPTEMBER 1, 2019 – FEBRUARY 29, 2020	MARCH 1, 2020 – DECEMBER 31, 2020
COMPLIANCE PROGRESS:	COMPLIANCE PROGRESS:	COMPLIANCE PROGRESS:
Not Applicable	None	None
FOURTH REPORTING PERIOD	**FIFTH REPORTING PERIOD**	**SIXTH REPORTING PERIOD**
JANUARY 1, 2021 – JUNE 30, 2021	JULY 1, 2021 – DECEMBER 31, 2021	JANUARY 1, 2022 – JUNE 30, 2022
COMPLIANCE PROGRESS:	COMPLIANCE PROGRESS:	COMPLIANCE PROGRESS:
Preliminary	Preliminary	Preliminary

Impartial Policing: ¶77

77. *CPD will ensure that all officers receive in-service training every two years on methods, strategies, and techniques for recognizing and responding to hate crimes, including CPD's procedures for processing reports and complaints.*

Compliance Progress

(Reporting Period: January 1, 2022, through June 30, 2022)

Deadline:	December 31, 2022	✓	**Not Yet Applicable**
Recurring Schedule:	Every Two Years	✓	**Not Yet Applicable**

Preliminary:	***In Compliance*** **(NEW)**
Secondary:	***Not Yet Assessed***
Full:	***Not Yet Assessed***

In the sixth reporting period, the City and the CPD met Preliminary compliance as it finalized the directive that CPD asserts codifies the requirements, S11-10 *Department Training*, and S11-10-03, *In Service Training.*

During this reporting period, we assessed the CPD's efforts to codify this paragraph's requirements into policy, and we provided an assessment of the hate-crime training.

Progress before the Sixth Reporting Period

In previous reporting periods, the CPD submitted a draft Special Order S11-10, *Department Training*, which provides that officers will receive in-service training every two years on topics regarding hate crimes. We noted that S11-10 does not provide the same level of specificity required by this paragraph and recommended that the CPD reconcile that inconsistency.

During the fifth reporting period, the CPD produced another training directive relevant to ¶74 and ¶77—*In-Service Training*, S11-10-03. However, the CPD did not give sufficient attention to integrating of impartial policing and biased policing concepts into CPD training courses as required by ¶72 and ¶74. Based on that version, the effective incorporation of impartial policing concepts, including hate crime, will require more than simply mentioning these guiding principles in training materials. These topics must be deeply integrated into the lesson plans for the In-service training.

In addition, to be responsive to ¶77, the CPD has provided a Hate Crimes eLearning Refresher Training. As mentioned above, CPD addressed many of our prior concerns, but we did not see sufficient records to show that, in developing these materials, the CPD sought input from a cross-section of community members and

community-based organizations with knowledge and experience relevant to hate crimes. *See* ¶52.

Progress in the Sixth Reporting Period

In this reporting period, the IMT provided no-objection notices to both S11-10 *Department Training* and S11-10-03, *In Service Training.* As a result of finalizing these directives, including completing community input and public comment on these policies in the fifth reporting period, the City and the CPD achieved Preliminary compliance with the requirements of this paragraph.

The City and the CPD reached Preliminary compliance for ¶77 through codifying the policy into training while further revisions to the *Hate Crime eLearning* remain for additional levels of compliance. We will continue to assess the CPD's efforts to comply with the community engagement requirements of ¶52 as it revises the Refresher Training. For Secondary compliance, we will assess the CPD's efforts to develop quality training that is both interactive and followed by rigorous evaluation metrics.

Paragraph 77 Compliance Progress History

FIRST REPORTING PERIOD	SECOND REPORTING PERIOD	THIRD REPORTING PERIOD
SEPTEMBER 1, 2019 – AUGUST 31, 2019	SEPTEMBER 1, 2019 – FEBRUARY 29, 2020	MARCH 1, 2020 – DECEMBER 31, 2020
COMPLIANCE PROGRESS:	COMPLIANCE PROGRESS:	COMPLIANCE PROGRESS:
Not Applicable	None	None
FOURTH REPORTING PERIOD	**FIFTH REPORTING PERIOD**	**SIXTH REPORTING PERIOD**
JANUARY 1, 2021 – JUNE 30, 2021	JULY 1, 2021 – DECEMBER 31, 2021	JANUARY 1, 2022 – JUNE 30, 2022
COMPLIANCE PROGRESS:	COMPLIANCE PROGRESS:	COMPLIANCE PROGRESS:
None	None	Preliminary

Impartial Policing: ¶78

78. *Within 180 days following the expiration of each calendar year of the term of this Agreement, CPD will publish an annual report summarizing reported hate crimes and non-criminal incidents motivated by hate during the previous calendar year ("CPD Hate Crime Report"). The CPD Hate Crime Report will provide information regarding the total number of reported hate crimes and non-criminal incidents motivated by hate, organized by type of crime, classification of bias motivation, and disposition of hate crime investigations in each district.*

Compliance Progress (Reporting Period: January 1, 2022, through June 30, 2022)

Deadline:	Annual	✓ **Not Yet Applicable**

Preliminary:	***In Compliance*** **(FIFTH REPORTING PERIOD)**
Secondary:	***Not in Compliance***
Full:	***Not Yet Assessed***

In the sixth reporting period, the City and the CPD maintained Preliminary compliance. However, the City and the CPD did not achieve Secondary compliance in the sixth reporting period. The CPD did not submit, nor publish an annual hate crimes report within 180 days of the end of the calendar year 2021.

For Secondary compliance, the IMT assessed submission of the annual report as well as whether the reports addressed this paragraph's requirements and the quality of data that the CPD used to develop the report.

Progress before the Sixth Reporting Period

In previous reporting periods, we received the *Hate Crime in Chicago: 2019 Annual Report* and *Hate Crime in Chicago: 2020 Annual Report*. Neither of these reports included important disposition data as required by ¶78 and as requested by the IMT. The 2019 and 2020 reports did not include important information regarding the disposition of hate-crime investigations. The only disposition data included in the 2019 and 2020 Reports was whether the hate crime incident was "Bona Fide," "Undetermined," or "Unfounded." However, the IMT and the public expected additional disposition data, such as whether the CPD conducted a follow-up investigation; whether a suspect was identified, arrested, charged with a hate crime and convicted; and whether the investigation remains open. Also, we continued to encourage the CPD to break down these dispositions by the protected classes to ensure the public that CPD's decisions and actions do not reflect any bias.

In the fifth reporting period, the City and the CPD finalized G04-06, which included annual reporting requirements of this paragraph. The IMT provided a no-objection notice to this policy on December 23, 2020, and on July 21, 2021, the City provided a package of community engagement materials that included the posting of the policy to the CPD website as well as comments received. As a result, the City and the CPD achieved Preliminary compliance with this paragraph in the last reporting period.

Progress in the Sixth Reporting Period

In this reporting period, the CPD did not submit a 2021 annual hate-crimes report to review. While not submitted in this reporting period, the IMT notes that the CPD needs to include dispositional data and ensure the subsequent reports also include dispositional data. We also encourage the CPD to engage community members and organizations with relevant knowledge who can provide feedback regarding the hate-crimes data-collection efforts and the information included in the annual report and dashboard. We strongly encourage the CPD to prioritize timely and regular development of these annual reports to ensure compliance with this paragraph in the future.

While the CPD has yet to produce or publish the annual hate-crimes report for 2021, the City and the CPD produced the outline for the 2022 report in the reporting period. The IMT provided comments on the outline on May 4, 2022. While the IMT strongly urges that CPD needs to stay on top of the current reporting requirements of this paragraph, the IMT appreciates the preparation and consultation for the 2022 report in the planning stages to ensure alignment with requirements of this paragraph.

As noted in previous reports, we encourage the CPD to engage community members and organizations with relevant knowledge who can provide feedback regarding the hate-crimes data-collection efforts and the information included in the annual report and dashboard.

Paragraph 78 Compliance Progress History

FIRST REPORTING PERIOD	SECOND REPORTING PERIOD	THIRD REPORTING PERIOD
SEPTEMBER 1, 2019 – AUGUST 31, 2019	SEPTEMBER 1, 2019 – FEBRUARY 29, 2020	MARCH 1, 2020 – DECEMBER 31, 2020
COMPLIANCE PROGRESS:	COMPLIANCE PROGRESS:	COMPLIANCE PROGRESS:
Not Applicable	Not Applicable	None

FOURTH REPORTING PERIOD	FIFTH REPORTING PERIOD	SIXTH REPORTING PERIOD
JANUARY 1, 2021 – JUNE 30, 2021	JULY 1, 2021 – DECEMBER 31, 2021	JANUARY 1, 2022 – JUNE 30, 2022
COMPLIANCE PROGRESS:	COMPLIANCE PROGRESS:	COMPLIANCE PROGRESS:
None	Preliminary	Preliminary

Impartial Policing: ¶¶79–82

79. *By April 1, 2020, and every year thereafter, CPD will conduct an assessment of the relative frequency of all misdemeanor arrests and administrative notices of violation ("ANOVs") effectuated by CPD members of persons in specific demographic categories, including race and gender.*

80. *Prior to conducting this assessment, CPD will share its proposed methodology, including any proposed factors to be considered as part of the assessment, with the Monitor for review and approval. The Monitor will approve CPD's proposed methodology provided that the Monitor determines that CPD's methodology comports with published, peer-reviewed methodologies and this Agreement. Upon completion of the assessment, CPD will identify any modifications to CPD's practices to address the findings in the assessment and develop a timeline for implementation, subject to Monitor review and approval. Upon completion of the assessment, CPD will publish the underlying data, excluding personal identifying information (e.g., name, address, contact information), via a publicly accessible, web-based data platform.*

81. *If at any point, the City's obligations under the August 6, 2015 Investigatory Stop and Protective Pat Down Settlement Agreement ("ACLU Agreement") terminate, CPD will include all stops effectuated by CPD members that were subject to the ACLU Agreement in the assessment required by this Part.*

82. *Nothing in this Part will be interpreted to require CPD to analyze statistical data beyond that currently collected and maintained in electronic databases unless otherwise required under this Agreement. In instances in which race or gender data is not maintained in an electronic database, CPD may use geographic data in its assessment. For purposes of this paragraph, information contained solely in a scanned PDF document or other image of a document, and not otherwise collected and maintained in an electronic database, is not considered data maintained in an electronic database.*

Compliance Progress (Reporting Period: January 1, 2022, through June 30, 2022)

Recurring Schedule:	Annual	☐ **Met** ☑ **Missed**
	¶¶79/82	¶¶80/82
Preliminary:	***Not in Compliance***	***Not in Compliance***
Secondary:	***Not Yet Assessed***	***Not Yet Assessed***
Full:	***Not Yet Assessed***	***Not Yet Assessed***

The City and the CPD continue to not meet Preliminary compliance for ¶¶79 or 80 because no revisions to the proposed methodology, as required by this paragraph were provided and no report was prepared.[11]

To assess Preliminary compliance, the IMT assesses the methodology CPD will use to comply with requirements of ¶¶79 and 80 for administrative notices of violation (ANOVs) and misdemeanor arrests.

Progress before the Sixth Reporting Period

In previous reporting periods, we monitored the CPD's efforts to assess misdemeanor arrest and ANOVs, focusing mostly on the CPD's proposed methodologies. We did not approve the CPD's preliminary methodology, as required by ¶80.

Progress in the Sixth Reporting Period

During this reporting period, we continued to inquire about the CPD's efforts to revise the methodology based on our earlier feedback. On June 16, 2022, the CPD and the City provided a memo on the circumstances surrounding the lack of progress regarding the requirements of this paragraph—specifically, the developed but not produced draft ANOVs report as required by this paragraph. The memo noted a lack of reliable data and lack of change in the results over the five-year period examined.

For context and as noted in previous reporting periods, the CPD's report on misdemeanor arrests and ANOVs was drafted in 2020 (absent IMT approved methodology) but because of internal CPD disagreements over how to present the findings, including large racial disparities, the report was never released, nor produced to the IMT. Given these circumstances, the CPD outsourced this project. However, over two years later, the CPD has yet to identify a research partner to

[11] Paragraph 81 does not require a compliance assessment at this time since the ACLU Agreement remains in effect. If, however, the ACLU Agreement is terminated, ¶81 will be activated and IMT will expect the same data and apply the same standards. Independent of ¶81, the IMT reserves the right to request investigatory stops data to assess outcomes specified in the Consent Decree regarding impartial policing and other reforms.

assist with this project. The IMT will assess the qualifications and independence of any outside organization the City selects to perform the functions required by ¶¶79–82.

While the IMT appreciates the production of a memo on the circumstances of this report, the IMT remains concerned that there has still been no update or planned timeline for progress on this paragraph. The provided memo does not materially relate to the lack of an IMT-approved methodology for this paragraph, nor the lack of progress on this paragraph. For the IMT to consider compliance with this paragraph, the City and the CPD must provide a proposed methodology for the ANOVs report, as a starting point. Given the length of time since the IMT reviewed but never approved these methodologies, the IMT recommends a renewed discussion during regular check-ins with the City and the CPD on the requirements of this paragraph.

As the IMT has emphasized repeatedly, this annual report is important as it provides transparency regarding low-level enforcement practices, where officers have the most discretion, and will shed light on disparities by race, age, and gender.[12] ANOVs and misdemeanor arrests raise critical issues about constitutionally guaranteed freedoms. Americans have a Fourth Amendment right not to be stopped, questioned, and searched without sufficient justification. Within the context of impartial policing, these enforcement actions can lead to unequal treatment. Good data and careful documentation are essential to monitor disparities and identify patterns.

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In sum, the City and the CPD did not meet Preliminary compliance with these paragraphs because the CPD did not provide a revised proposed methodology for us to review, nor has the CPD developed a plan to address the remaining concerns, including a plan and timeline to eventually automate the collection and electronic storage of ANOVs demographic data (*e.g.*, race, age, and gender). Moving forward, we will monitor the CPD's efforts to revise its methodology for approval. After we approve the methodology, we will assess the CPD's efforts to conduct the ¶79 assessment and publish the findings.

[12] When officers have limited discretion (*e.g.*, deciding whether to stop someone who runs a red light at 80 miles per hour or arrest someone they observe shooting another person), policing bias is much less likely to appear. But for lower-level violations of the law, where officers can decide whether or not to take enforcement action, race and other characteristics are more likely to play a role.

Paragraph 79–82 Compliance Progress History[13]

FIRST REPORTING PERIOD SEPTEMBER 1, 2019 – AUGUST 31, 2019 COMPLIANCE PROGRESS:	SECOND REPORTING PERIOD SEPTEMBER 1, 2019 – FEBRUARY 29, 2020 COMPLIANCE PROGRESS:	THIRD REPORTING PERIOD MARCH 1, 2020 – DECEMBER 31, 2020 COMPLIANCE PROGRESS:
Not Applicable	Not Applicable	None

FOURTH REPORTING PERIOD JANUARY 1, 2021 – JUNE 30, 2021 COMPLIANCE PROGRESS:	FIFTH REPORTING PERIOD JULY 1, 2021 – DECEMBER 31, 2021 COMPLIANCE PROGRESS:	SIXTH REPORTING PERIOD JANUARY 1, 2022 – JUNE 30, 2022 COMPLIANCE PROGRESS:
None	None	None

[13] As above, ¶81 does not require a compliance assessment at this time since the ACLU Agreement remains in effect. If, however, the ACLU Agreement is terminated, ¶81 will be activated and IMT will expect the same data and apply the same standards. Independent of ¶81, the IMT reserves the right to request investigatory stops data to assess outcomes specified in the Consent Decree regarding impartial policing and other reforms.

Appendix 3
Crisis Intervention
Compliance Assessments, by Paragraph

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Crisis Intervention
Compliance Assessments, by Paragraph

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Crisis Intervention: ¶87

87. *The Crisis Intervention Team ("CIT") Program will continue to be responsible for CPD's crisis intervention response functions, including, but not limited to: a. developing CIT strategy and initiatives; b. supporting officers in the districts who respond to incidents involving individuals in crisis; c. engaging the community and community stakeholders to raise awareness of the CIT Program and issues involving individuals in crisis; d. coordinating among City agencies that respond to individuals in crisis; e. recruiting officers to apply for CIT training; f. developing and delivering CPD's Basic CIT Training and other CIT training, including Advanced CIT (e.g., youth, veterans) and refresher trainings, in accordance with the requirements of the Training section of this Agreement; g. delivering roll call trainings and mental health awareness initiatives; h. compiling and retaining the reports identified in Part F of this section and collecting and maintaining the appropriate CPD data related to incidents involving individuals in crisis to support and evaluate the effectiveness of the CIT Program and CPD's response to incidents identified as involving individuals in crisis, including identifying any district-level and department wide trends; i. coordinating data and information sharing with OEMC; and j. communicating with and soliciting feedback from crisis intervention-related community stakeholders, Certified CIT Officers, and OEMC call-takers and dispatchers regarding the effectiveness of CPD's CIT Program.*

Compliance Progress (Reporting Period: January 1, 2022, through June 31, 2022)

Preliminary:	***In Compliance*** **(NEW)**
Secondary:	***Not in Compliance***
Full:	***Not in Compliance***

In the sixth reporting period, the City and the CPD achieved Preliminary compliance with ¶87.

To achieve Preliminary compliance with ¶87, the City and the CPD must implement sufficient policies, procedures, or written guidance through the process described in the Consent Decree (¶¶626–41), which outlines applicable consultation, resolution, workout, and public-comment periods. These paragraphs detail various requirements, including that policies must be "plainly written, logically organized,

and use clearly defined terms." The CPD achieved preliminary compliance by incorporating ¶87's requirements into S05-14, *Crisis Intervention Team (CIT) Program*.

Progress before the Sixth Reporting Period

During the third reporting period, the IMT submitted to the CPD recommended revisions to the CPD's standard-operating procedures (SOPs) several of which were not adequately revised. At the end of the fourth reporting period, several standard-operating procedures designed to memorialize the specific requirements of ¶87 were not finalized and published for community input.

In the fifth reporting period, the CPD made significant revisions to these policies to distinguish between department-wide directives and standard-operating procedures that are relevant only to the Crisis Intervention Unit. As part of this redesign, the CPD substantially expanded the S05-14, *Crisis Intervention Team (CIT) Program,* which the City and the CPD originally submitted on July 28, 2021. Specifically, the CPD expanded S05-14 to include elements that were previously included in SOPs.

Progress in the Sixth Reporting Period

During the sixth reporting period, the CPD produced and received a no objection on a fully-revised S05-14. The CPD adequately addressed each of the requirements of ¶87 within the policy and adhered to the review process with the Chicago Council on Mental Health Equity (*see* ¶¶135 and 137). Moreover, the Chicago Council on Mental Health Equity provided substantive feedback, to which the CPD mostly responded. However, moving forward, the CPD must fully explain to the Chicago Council on Mental Health Equity which comments were not included and why, as required by ¶131. And while the CPD sought public comment, as required by ¶633, it did so prematurely. At the end of the sixth reporting period, the CPD received substantive public comment on the policy, and has determined it will delay implementation until public comments can be fully assessed. The IMT encouraged the CPD to submit policy S05-14 for further IMT review and no-objection after the public comment period has ended and substantive comments can be assessed. Prematurely requesting a no-objection can cause additional delays in policy implementation.

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As reflected throughout this section, ¶87 is an overarching paragraph and compliance efforts for this paragraph affect compliance for several other paragraphs in the Crisis Intervention section.

To achieve Secondary compliance, the City and the CPD must provide comprehensive training for Area-level CIT District, Operations, and Community Support (CIT DOCS) personnel, who are responsible for nearly all of ¶87's requirements. To date, efforts have focused on Preliminary compliance, and the City and the CPD have not provided records demonstrating comprehensive training with a consistent approach across the CIT DOCS sergeants, who have remained severely understaffed during this reporting period. Because there are many critical requirements of ¶87, the IMT strongly recommends the CPD develop an implementation plan outlining how each component will be accomplished and measured which should include a staffing analysis.

Finally, we reiterate our recommendation that the CPD expand its community engagement efforts for directives, SOPs, training, and operational practices related to crisis response. The IMT seeks evidence that the CPD is sufficiently seeking and considering public comments and incorporating those comments into its policies, training, and operational practices, as appropriate.

The Chicago Council on Mental Health Equity provided substantial feedback during this reporting period's policy-review process. While the CPD did a better job of informing the Chicago Council on Mental Health Equity which comments were and were not included, the CPD fell short of articulating to the Chicago Council on Mental Health Equity why specific comments were not incorporated. This is essential for building knowledge and trust. The CPD should consider how public comments and community feedback will both advance its overall community-engagement goals and will build trust among a wide range of advocacy and treatment providers.

Paragraph 87 Compliance Progress History

FIRST REPORTING PERIOD	SECOND REPORTING PERIOD	THIRD REPORTING PERIOD
SEPTEMBER 1, 2019 – AUGUST 31, 2019	SEPTEMBER 1, 2019 – FEBRUARY 29, 2020	MARCH 1, 2020 – DECEMBER 31, 2020
COMPLIANCE PROGRESS:	COMPLIANCE PROGRESS:	COMPLIANCE PROGRESS:
Not Applicable	Not Applicable	None

FOURTH REPORTING PERIOD	FIFTH REPORTING PERIOD	SIXTH REPORTING PERIOD
JANUARY 1, 2021 – JUNE 30, 2021	JULY 1, 2021 – DECEMBER 31, 2021	JANUARY 1, 2022 – JUNE 30, 2022
COMPLIANCE PROGRESS:	COMPLIANCE PROGRESS:	COMPLIANCE PROGRESS:
None	None	Preliminary

Crisis Intervention: ¶88

88. *The CIT Program will serve to meet the objectives of: a. improving CPD's competency and capacity to effectively respond to individuals in crisis; b. de-escalating crises to reduce the need to use force against individuals in crisis; c. improving the safety of officers, individuals in crisis, family members, and community members; d. promoting community-oriented solutions to assist individuals in crisis; e. reducing the need for individuals in crisis to have further involvement with the criminal justice system; and f. developing, evaluating, and improving CPD's crisis intervention-related policies and trainings to better identify and respond to individuals in crisis.*

Compliance Progress

(Reporting Period: January 1, 2022, through June 31, 2022)

Preliminary:	***In Compliance*** **(NEW)**
Secondary:	***Not in Compliance***
Full:	***Not Yet Assessed***

In the sixth reporting period, the City and the CPD achieved Preliminary compliance with ¶88. The IMT reviewed the CPD's policy S05-14, *Crisis Intervention Team (CIT) Program* and found that it adequately incorporates the requirements of ¶88, thereby enabling the CPD to achieve Preliminary compliance.

Progress before the Sixth Reporting Period

In previous reporting periods, the City and the CPD made significant progress toward compliance with ¶88 by adhering to policy review processes that were designed to memorialize the specific requirements of ¶88.

During the third reporting period, we provided the CPD with recommended revisions to the CPD's SOPs, several of which were not adequately revised. At the end of the fourth reporting period, several SOPs designed to memorialize ¶88's specific requirements were not finalized and published for community input.

In the fifth reporting period, the CPD made significant revisions to these policies to distinguish between the department-wide directives and the SOPs that are relevant only to the Crisis Intervention Unit. As part of this redesign, S05-14 *CIT Program,* which was originally submitted to the IMT on July 28, 2021, was substantially expanded to include policies that were previously included in SOPs.

Further, the text of ¶88 mostly relates to outcome-based metrics, which are tied to successfully implementing other paragraphs in the Crisis Intervention section.

Currently, the data dashboards that the CPD has developed relate to particular paragraph requirements (*e.g.*, ¶108 relates to the CIT response rates). However, the CPD should also focus on developing ways to measure ¶88's concepts. Developing these measures will require the CPD to answer complex research questions, as well as rigorously measure progress related to ¶88. Initial data from the CIT Report will be useful in this development process. In addition, as with ¶87, we reiterate our recommendation that the CPD expand its community input process for crisis response.

Progress in the Sixth Reporting Period.

During the sixth reporting period, the CPD finalized a fully-revised S05-14, *CIT Program* policy after the IMT's review. The CPD adequately incorporated each of ¶88's requirements into the policy. The CPD also adhered to the review process with the Chicago Council on Mental Health Equity, as required under ¶¶135 and 137. The Chicago Council on Mental Health Equity provided substantive feedback, to which the CPD mostly responded. However, moving forward, the CPD must fully explain to the Chicago Council on Mental Health Equity which comments were not included and why, as required by ¶131. The CPD also sought public comment as required by ¶633, but it did so prematurely. As a result, the CPD determined that it will delay implementing S05-14 until it can fully assess the public comments received. The IMT also encouraged the CPD to submit policies for IMT review and no-objection after the public comment period has ended and substantive comments can be assessed. Prematurely requesting a no-objection may cause additional delays in policy implementation.

As the CPD moves toward Secondary compliance with ¶88, the IMT will assess whether the City is collecting, tracking, and maintaining data, as required under this paragraph. Further, the CPD must develop metrics that, when tracked, adequately demonstrate the CPD's success under ¶88. For the IMT to assess Full compliance, the CPD must identify which factors will contribute to achieving compliance and how those factors, and the CPD's progress toward compliance, will be measured. The IMT is seeking outcome-based metrics. These metrics will establish a floor by which the CPD's progress toward operational compliance can be assessed.

Paragraph 88 Compliance Progress History

FIRST REPORTING PERIOD	SECOND REPORTING PERIOD	THIRD REPORTING PERIOD
SEPTEMBER 1, 2019 – AUGUST 31, 2019	SEPTEMBER 1, 2019 – FEBRUARY 29, 2020	MARCH 1, 2020 – DECEMBER 31, 2020
COMPLIANCE PROGRESS:	COMPLIANCE PROGRESS:	COMPLIANCE PROGRESS:
Not Applicable	Not Applicable	None

FOURTH REPORTING PERIOD	FIFTH REPORTING PERIOD	SIXTH REPORTING PERIOD
JANUARY 1, 2021 – JUNE 30, 2021	JULY 1, 2021 – DECEMBER 31, 2021	JANUARY 1, 2022 – JUNE 30, 2022
COMPLIANCE PROGRESS:	COMPLIANCE PROGRESS:	COMPLIANCE PROGRESS:
None	None	Preliminary

Crisis Intervention: ¶89

89. *The CIT Program, through the CIT Coordinator, will annually review and, if necessary, revise its policies and practices to ensure the program's compliance with the objectives and functions of the CIT Program.*

Compliance Progress

(Reporting Period: January 1, 2022, through June 31, 2022)

Recurring Schedule: Annually ☑ **Met** ☐ **Missed**

Preliminary: ***In Compliance*** **(THIRD REPORTING PERIOD)**
Secondary: ***In Compliance*** **(THIRD REPORTING PERIOD)**
Full: ***Not Yet Assessed***

During the sixth monitoring period, the CPD maintained Preliminary and Secondary compliance with ¶89.

To achieve Preliminary compliance with ¶89, the City and the CPD must implement sufficient policies, procedures, or written guidance through the process described in the Consent Decree (¶¶626–41), which outlines applicable consultation, resolution, workout, and public-comment periods. These paragraphs detail various requirements, including that policies must be "plainly written, logically organized, and use clearly defined terms." The CPD achieved preliminary compliance by incorporating ¶89's requirements into S05-14, *Crisis Intervention Team (CIT) Program*.

To assess Secondary compliance with ¶89, the IMT evaluated whether the CPD has qualified personnel fulfilling the responsibilities that are needed to achieve ¶89's requirements and the Consent Decree's goals.

Progress before the sixth reporting period

In the third reporting period, the IMT reviewed the CPD's S05-14 and determined that it satisfied ¶89's requirements. This policy also detailed the manner and scope of review expected for a comprehensive assessment on an annual basis, which provides a training mechanism for reviewers.

Moreover, while the Chicago Council on Mental Health Equity reviewed all of the CIT-related policies during the fifth reporting period, issues arose when the Chicago Council on Mental Health Equity had difficulty achieving a quorum. This lack of quorum in the fifth reporting period delayed a vote on the remaining two policies, both of which required a vote. These two policies were not approved until April 25, 2022 — during the sixth reporting period — when a quorum was eventually reached.

Progress in the Sixth Reporting Period

During this reporting period, after members of the Chicago Council on Mental Health Equity expressed concerns about their expertise being under-utilized, its co-chairs presented a proposal at the quarterly meeting on April 25, 2022. The proposal sought to separate the Chicago Council on Mental Health Equity into two groups: those members (1) interested in the Consent Decree, and (2) interested in crisis-system collaboration. The Chicago Council on Mental Health Equity co-chairs should be commended for this proposal, which appeared to solicit a healthy discussion and to activate members' engagement. The IMT looks forward to the Chicago Council on Mental Health Equity further developing these changes in an effort to yield greater involvement and purpose.

The Chicago Council on Mental Health Equity also provided substantial feedback during the most recent policy review process. While the CPD did a better job of informing the Chicago Council on Mental Health Equity which comments were and were not incorporated, the CPD fell short in the sixth reporting period of articulating to the Chicago Council on Mental Health Equity why specific comments were *not* incorporated. This is essential for building knowledge and trust. The CPD should consider how public comments and community feedback will both advance its overall community-engagement goals and build trust among a wide range of advocacy and treatment providers.

In future monitoring periods, the IMT will determine whether the reviews (and potential revisions) occurred in a manner consistent with the process identified in the Consent Decree, including a response by the CPD to each suggested revision voted on by the Chicago Council on Mental Health Equity. Should the CPD review both SOPs and directives in accordance with Consent Decree requirements, we would find the CPD to have substantially complied with the requirements of this paragraph so long as a more-robust public comment period and response also occurs. The Crisis Intervention Unit (CIU) remains highly understaffed, which must be considered for the Unit, or the CIT coordinator to carry out the requirements of ¶89.

The CPD also sought public comment on S05-14, as required by ¶633, however it did so prematurely. The CPD received substantive public comment on the policy but decided it will delay implementation until public comments can be fully assessed.

The IMT has generally encouraged the CPD to submit policy for IMT review and no-objection after the public comment period has ended, when substantive comments can be assessed. Prematurely requesting a no-objection can cause additional delays in policy implementation.

To achieve Full compliance with ¶89, the CPD must demonstrate that the annual review process thoughtfully considers public and community comment. This annual review process should include a feedback loop developed to clearly distinguish which comments the CPD incorporates into policy and which it does not. Additionally, the CPD should consider sharing relevant data with the community and key stakeholders. This data sharing would improve transparency and encourage feedback, while also demonstrating whether the policies are achieving their intended operational purpose. As appropriate, the CPD must consider whether it requires new policies to guide responses and address operational deficiencies, changes in programs, or the launch of new programs (e.g., the CPD's Crisis Assistance Response Engagement (CARE) pilot program).

Paragraph 89 Compliance Progress History

FIRST REPORTING PERIOD	SECOND REPORTING PERIOD	THIRD REPORTING PERIOD
SEPTEMBER 1, 2019 – AUGUST 31, 2019	SEPTEMBER 1, 2019 – FEBRUARY 29, 2020	MARCH 1, 2020 – DECEMBER 31, 2020
COMPLIANCE PROGRESS:	COMPLIANCE PROGRESS:	COMPLIANCE PROGRESS:
Not Applicable	None	Secondary

FOURTH REPORTING PERIOD	FIFTH REPORTING PERIOD	SIXTH REPORTING PERIOD
JANUARY 1, 2021 – JUNE 30, 2021	JULY 1, 2021 – DECEMBER 31, 2021	JANUARY 1, 2022 – JUNE 30, 2022
COMPLIANCE PROGRESS:	COMPLIANCE PROGRESS:	COMPLIANCE PROGRESS:
Secondary	Secondary	Secondary

Crisis Intervention: ¶90

90. *The City and CPD will ensure that the CIT Program is provided with: a. the resources and access to data and information necessary to fulfill the objectives and functions of the CIT Program; and b. a qualified, centralized staff, including supervisors, officers, and civilian employees, that is necessary to oversee the department-wide operation of the CIT Program, carry out the overall mission of the CIT Program, and perform the objectives and functions of the CIT Program.*

Compliance Progress (Reporting Period: January 1, 2022, through June 31, 2022)

Preliminary:	***In Compliance*** **(FOURTH REPORTING PERIOD)**
Secondary:	***In Compliance*** **(FOURTH REPORTING PERIOD)**
Full:	***Not in Compliance***

During the sixth monitoring period, the City and the CPD maintained both Preliminary and Secondary compliance with ¶90.

To maintain Preliminary compliance with ¶90, the City and the CPD must implement sufficient policies, procedures, or written guidance through the process described in the Consent Decree (¶¶626–41), which outlines applicable consultation, resolution, workout, and public-comment periods. These paragraphs detail various requirements, including that policies must be "plainly written, logically organized, and use clearly defined terms."

The IMT assessed Secondary compliance with ¶90 by confirming records sufficient to show that the City and the CPD are responding to the identified needs and objectives of the CIT program and through interviews with relevant CPD personnel, such as District Commanders, the CIT Coordinator, CIT DOCS sergeants, and CIT Patrol officers.

Progress before the Sixth Reporting Period

Paragraph 90's requirements were adequately addressed in the previous version of the CPD's S05-14, *Crisis Intervention Team (CIT) Program,* for which the CPD achieved preliminary compliance. However, the CPD made substantial revisions to S05-14 in the fourth reporting period, and the revised S05-14 neglected critical requirements of ¶90, including "a. the resources and access to data and information necessary to fulfill the objectives and functions of the CIT Program; and b. a qualified, centralized staff, including supervisors, officers, and civilian employees." The CPD further revised S05-14 in the fifth reporting period by identifying

"dedicated district level resources," but the CPD failed to include "centralized" staff.

As noted elsewhere in this report (*e.g.,* ¶91), the CPD's SOPs related to CIT district-level approaches provide more detail regarding the CPD's specific approaches to how resources, data, and information will be used to support the success of the CIT program. These SOPs are still in the review process.

Progress in the Sixth Reporting Period

In the sixth reporting period, the IMT conducted site visits with the CPD that bolstered our ongoing concerns on whether the CPD is assigning the personnel necessary to support the CIT program's mission. CIT District, Operations, and Community Support (CIT DOCS) sergeants are stretched far too thin. Each CIT DOCS sergeant is covering multiple Districts, and the number of CIT DOCS personnel has declined considerably. This is problematic because the role and function of the CIT DOCS sergeants is integral to the CIT Program's overall mission. Therefore, the number of positions should be increased. To increase the effectiveness of the CIT DOCS personnel, the CPD should consider providing them with vehicles and other support functions. The roles and responsibilities of the CIT DOCS personnel as outlined in S05-14 simply cannot be accomplished under the present staffing level.

Further, while the CPD has maintained a data analyst, it is unclear whether the analyst has the "resources and access to data" necessary to effectively analyze the relevant data. The CPD needs data metrics and outputs necessary to determine whether adequate resources have been dedicated to the CIT Program. Without adequate "data and information," the IMT is unable to assess whether staff or additional resources are needed.

Finally, the CPD has determined that all patrol officers will receive the 40-hour CIT curriculum. The IMT remains concerned about the CPD having an appropriate number of CIT-training personnel. The IMT looks forward to receiving an update from the CPD's training division on its staffing resources that will be used to accomplish the CPD's goal of all patrol officers receiving the 40-hour CIT curriculum. To date, site visits have indicated insufficient staffing.

Relatedly, community engagement at the neighborhood level has been, and continues to be, a high priority for Chicagoans. This concern has been mentioned repeatedly by members of the Chicago Council on Mental Health Equity and Coalition. The CPD needs adequate staffing support in order to effectively fulfill the mission of the CIT Program.

The IMT will assess Full compliance with ¶90's requirements by reviewing whether the CPD has adequate staffing and resources to carry out the functions and mission

of the CIT Program. The CPD's staffing and resources must also allow it to manage department-wide operations. To assess Full compliance, the IMT will consider data analysis, site visits, and community feedback. The CPD's decision to train all officers in 40-hours of CIT will require significant resources, and we are concerned about the number of CIT DOCS sergeants, the CIT Training Team and the CIT Coordinator to fulfill the extensive responsibilities outlined under each of them in S05-14. Finally, the IMT is interested in understanding how the CPD will assess whether its CIT objectives are being met. We hope to see clear data and metrics to that end in future reporting periods.

Paragraph 90 Compliance Progress History

FIRST REPORTING PERIOD	SECOND REPORTING PERIOD	THIRD REPORTING PERIOD
SEPTEMBER 1, 2019 – AUGUST 31, 2019	SEPTEMBER 1, 2019 – FEBRUARY 29, 2020	MARCH 1, 2020 – DECEMBER 31, 2020
COMPLIANCE PROGRESS:	COMPLIANCE PROGRESS:	COMPLIANCE PROGRESS:
Not Applicable	Not Applicable	Not Applicable
FOURTH REPORTING PERIOD	**FIFTH REPORTING PERIOD**	**SIXTH REPORTING PERIOD**
JANUARY 1, 2021 – JUNE 30, 2021	JULY 1, 2021 – DECEMBER 31, 2021	JANUARY 1, 2022 – JUNE 30, 2022
COMPLIANCE PROGRESS:	COMPLIANCE PROGRESS:	COMPLIANCE PROGRESS:
Secondary	Secondary	Secondary

Crisis Intervention: ¶91

91. *Additionally, the City and CPD will ensure that the CIT Program has sufficient, dedicated district-level resources, consistent with the needs of each district identified by the District Commander and the CIT Coordinator, and approved by the Chief of the Bureau of Patrol, as needed to carry out the overall objectives and functions of the CIT Program at the district-level, which include, but are not limited to: a. supporting officers in the district with incidents involving individuals in crisis; b. delivering CIT Program-approved roll call trainings and mental health awareness initiatives; c. establishing relationships between the district and local service providers and healthcare agencies; d. referring and, when appropriate, connecting individuals in crisis with local service providers; e. engaging with the community to raise awareness of the CIT Program and issues involving individuals in crisis; and f. providing administrative support to the coordinator of the CIT Program.*

Compliance Progress

(Reporting Period: January 1, 2022, through June 31, 2022)

Preliminary:	***In Compliance*** **(NEW)**
Secondary:	***Not in Compliance***
Full:	***Not Yet Assessed***

In the sixth reporting period, the City and the CPD achieved Preliminary compliance with ¶91.

To assess Preliminary compliance, the IMT reviewed the CPD's S05-14, *Crisis Intervention Team (CIT) Program* policy, which adequately incorporated ¶91's requirements thereby achieving Preliminary compliance.

Progress before the Sixth Reporting Period

During the fourth monitoring period, the CPD provided a revised draft version of Special Order SO20-04, *District-Level Strategy for Crisis Intervention Team (CIT) Program*. The requirements of ¶91 were memorialized into this draft version.

In the fifth reporting period, the CPD opted to distinguish between department-wide directives relevant to the entire CPD and SOPs relevant only to the Crisis Intervention Unit. As a part of this redesign, ¶91's requirements were fully included into the revised version of S05-14, which received a no-objection notice during the sixth reporting period.

Progress in the Sixth Reporting Period

However, the IMT is concerned with whether the CIT DOCS personnel— who are responsible for many of ¶91's requirements— are adequately staffed. Presently, these positions appear to be significantly understaffed. The current individuals in these roles are dedicated and work hard to fulfill the duties and responsibilities of their role. The IMT appreciates that these sergeants have conducted some roll call trainings and are sometimes responding to requests by patrol officers to follow up with high frequency utilizers of police services via the new CIT Report. However, based on the conversations the IMT had during our site visits in the sixth reporting period, the IMT has ongoing concerns regarding adequate personnel resources being allocated to support the mission of the CIT Program. CIT DOCS personnel are stretched far too thin. Each CIT DOCS sergeant is responsible for covering multiple Districts and the number of positions has declined this reporting period. We also note that there has also been high turnover in these positions. The number of CIT DOCS personnel must be increased because the role and function of CIT DOCS is integral to the overall mission of the CIT program. In addition, to facilitate their effectiveness, the CPD should consider providing vehicles and other support functions to CIT DOCS personnel.

The IMT looks forward to a briefing on utilization rates of the CIT Report in the next reporting period as well as data supporting district-level needs and trends.

Additionally, the CPD must determine and articulate how it intends to assess whether it has "sufficient, dedicated district-level resources, consistent with the needs of each district identified by the District Commander and the CIT Coordinator" as required by ¶91. Data analytics capabilities are not only required by ¶¶120 and 121 but are also necessary to support data metrics and outputs necessary to inform whether adequate resources have been dedicated to each district. Without adequate data, the IMT is unable to assess whether the CPD is providing sufficient district-level resources.

Moreover, ¶91 outlines specific objectives that can be used in assessing ¶91 compliance. At the end of the fifth reporting period, the CPD produced a plan outlining some initial district level strategies. While the IMT appreciates the CPD's progress towards providing a CIT DOCS Strategy Plan and a quarterly progress update, both the strategy and corresponding update should be developed further. The IMT recommends that in future monitoring periods the CPD engage in more robust efforts, such as seeking more detail from the Chicago Council on Mental Health Equity, defining measurable outcomes, and prioritizing feedback relating to community engagement and program strategy. These efforts will continue to elude the CPD so long as the CIT DOCS personnel are understaffed.

Moving forward, as the CPD moves toward Secondary compliance, the IMT will seek evidence that 95% of district-level personnel are adequately trained and that

district commanders understand the appropriate assessment of the CIT district needs. Data supporting use of district level resources by patrol officers will also be evaluated in addition to data supporting the linkage of individuals in crisis to local service providers and robust community engagement. The IMT will also consider whether the CPD is reliably assessing each district's unique needs and providing data demonstrating how those needs are being met.

Paragraph 91 Compliance Progress History

FIRST REPORTING PERIOD	SECOND REPORTING PERIOD	THIRD REPORTING PERIOD
SEPTEMBER 1, 2019 – AUGUST 31, 2019	SEPTEMBER 1, 2019 – FEBRUARY 29, 2020	MARCH 1, 2020 – DECEMBER 31, 2020
COMPLIANCE PROGRESS:	COMPLIANCE PROGRESS:	COMPLIANCE PROGRESS:
Not Applicable	None	None

FOURTH REPORTING PERIOD	FIFTH REPORTING PERIOD	SIXTH REPORTING PERIOD
JANUARY 1, 2021 – JUNE 30, 2021	JULY 1, 2021 – DECEMBER 31, 2021	JANUARY 1, 2022 – JUNE 30, 2022
COMPLIANCE PROGRESS:	COMPLIANCE PROGRESS:	COMPLIANCE PROGRESS:
None	None	Preliminary

Crisis Intervention: ¶92

> ***92.*** *Certified CIT Officers are officers who receive specialized training in responding to individuals in crisis. Certified CIT Officers retain their standard assignment and duties but may also take on specialized crisis intervention duties and are prioritized to respond to calls in the field identified as involving individuals in crisis, as assigned.*

Compliance Progress (Reporting Period: January 1, 2022, through June 31, 2022)

Preliminary:	***In Compliance*** **(THIRD REPORTING PERIOD)**
Secondary:	***In Compliance*** **(THIRD REPORTING PERIOD)**
Full:	***Not in Compliance***

In the sixth reporting period, the City and the CPD maintained Preliminary and Secondary compliance with ¶92.

To achieve Preliminary compliance with ¶92, the City and the CPD must implement sufficient policies, procedures, or written guidance through the process described in the Consent Decree (¶¶626–41), which outlines applicable consultation, resolution, workout, and public-comment periods. These paragraphs detail various requirements, including that policies must be "plainly written, logically organized, and use clearly defined terms."

The IMT assessed Preliminary compliance by reviewing relevant CPD policies. The IMT assessed Secondary compliance by evaluating whether the CPD has qualified personnel fulfilling the responsibilities to achieve the goals of the Consent Decree and the requirements of ¶92. In addition, the IMT reviewed the City's and the CPD's level of data collection, tracking, analysis, and management, as required under the Consent Decree. The IMT "triangulate[s]" the data by comparing multiple data sources, yielding a more robust understanding of the requirements of ¶92.

Progress before the Sixth Reporting Period

As noted throughout this report, the CPD has memorialized the Crisis Intervention Team in Special Order S05-14, *Crisis Intervention Team (CIT) Program*. The CIT Program has also adequately trained Designated CIT Officers based on our review of training material and observation of the CIT Basic Training. Based on the CPD's policy and training, we are confident that the CPD has reinforced the importance of Designated CIT Officers responding to individuals in crisis.

While we are satisfied with how the CPD views the specialized nature of Designated CIT Officers, the CPD is in the early stages of moving from a strictly voluntary

CIT model to a partially mandated "train-all" model where all patrol officers are provided the 40-hour CIT basic curriculum. Several agencies across the nation use a train-all model, which has distinct benefits, as well as potential shortcomings when an advanced voluntary specialized response is not incorporated into the overall model. Primarily, a train-all model negates the specialized nature of the Designated CIT Officers, who by design have volunteered for the CIT because of their desire to serve those living with mental health conditions. These officers also have the demonstrated skill set to perform the duties of a specialized response. In communities where a "train all" model has been implemented it is best practice to elevate a specialized cadre of volunteer officers with a demonstrated skill set to respond to higher level calls for service involving a mental health component. Without such a cadre, a "specialized" response, as ¶92 requires, is difficult.

For example, community members who request CIT officers may be met with officers not well suited for the unique nature of these calls, which undermines the purpose of a specialized response. Community members requesting CIT officers rightfully expect an officer suited for the task. Since more than one in five people fatally shot by police are living with serious mental health conditions,[1] specialized response is crucial.

Progress in the Sixth Reporting Period

In the sixth reporting period, the IMT reviewed the CPD's CIT training model that includes three tiers: (1) volunteer officers; (2) recently promoted sergeants, lieutenants, and field training officers; and (3) mandatorily-assigned officers. The IMT remains concerned with the latter tier (mandatorily assigned officers) because the mandatory nature of their assignment suggests they may lack the volunteer officers' proactive desire and skill set to serve the mental health community. The CPD indicated that these mandatorily assigned officers who "opt out" of being voluntary will still be deemed "CIT Certified Officers." While the CPD and the OEMC will be tracking which officers volunteer for CIT and which officers participate in mandated training, the lack of distinction operationally is concerning.

In the fifth reporting period, the IMT observed the Basic CIT training course where officers were publicly called upon to state whether they would like the CIT application to voluntarily be a CIT officer, or if they would like to submit a "to/from" memo to opt out of being a certified officer "which would be reviewed by the Deputy Chief." This process unfolded in the first hour of the 40-hour Basic CIT

[1] *See* Fuller, D., Lamb, R., Biasotti, M. & Snook, J., *Overlooked in the Undercounted: The Role of Mental Illness in Fatal Law Enforcement Encounters*, *Office of Research & Public Affairs* (2015), https://www.treatmentadvoca-cycenter.org/storage/documents/overlooked-in-the-undercounted.pdf.

training, prior to any of the officers receiving any substantive training. The IMT shared our concerns with the CPD.

During this reporting period, the CPD agreed to wait until the end of the 40-hour training to ask those questions and has developed an application that allows officers to check a box identifying their status, but the IMT has remained concerned with this process. The CPD developed two applications: one for voluntary officers to complete before the training (CPD form 15.519, *Request for Crisis Intervention Team Officer Designation*) and a different one for all remaining officers to complete at the end of the training (CPD form 15.518, *Request for Crisis Intervention Team Training*) to indicate whether they would like to opt in or opt out of becoming a Certified CIT officer.

The IMT is concerned that two applications may create confusion. At the end of the reporting period, the City, the CPD, and the IMT discussed these deep concerns and initial steps that could be taken to mitigate them. The IMT encouraged the CPD to utilize the CIT application only for those wishing to volunteer to become Certified CIT Officers. At the end of the reporting period, the CPD opted to keep both applications, with revisions. Additionally, the CPD has determined it will identify voluntary CIT officers as "designated" CIT officers and not "certified" CIT officers. While the IMT commends the City and the CPD for engaging in dialogue with the IMT and responding to our suggestions about how to rectify program deficiencies and clarify the concept of "specialization," we remain concerned and available for further consultation on these complex issues.

The overall philosophy of the CIT program in relation to specialized response will need to be closely monitored by the CPD, with the input of advocacy groups, service providers, and persons with lived experience prioritized. To assist both the CPD and the IMT in assessing the CIT's specialized response, the IMT recommends that the CPD revise its attendance records under ¶92 to align with the eligibility criteria and training requirements established by the Consent Decree, as well as with the CPD's forms 15.518, *Request for CIT Training*, and 15.519, *Request for CIT Officer Designation*. Specifically, the CPD should consider including a separate excel sheet that captures data such as: (a) Officer name and District of assignment; (b) newly promoted to Rank of [sergeant/lieutenant]; (c) promotion date; (d) CIT Basic training completion date; (e) CIT Refresher training completion date; (f) mandatory requirement; (g) whether the officer opted in or out of CIT Designated Officer; and (h) if opted out, the officer's reason for opting out (consider a drop down menu to include options such as "Disciplinary History Exclusion," "Did not want to be prioritized for response," or "Officer believes skill set is not suited to be a specialized CIT officer"). The CPD should consider capturing these recommended data points on separate excel sheets for the 40-hour Basic CIT Training, CIT Refresher Training, CIT Advanced Training (such as Youth, Veteran), In-service Training covering CIT topics, and Recruit Training.

While the CPD has maintained Preliminary and Secondary compliance with ¶92, we strongly suggest that the CPD ensure the following to keep this tiered model's fidelity to a specialized response: (1) the CPD should require mandated officers to "opt in" through the completion of the CIT application as a volunteer officer after careful explanation about what that means operationally as opposed to "opt out," and to do so at the end of the 40-hour CIT training so that officers have context knowledge for the program, and (2) the CPD should avoid listing those mandated officers who do not opt in to be still considered a "Certified CIT Officer." This undermines the program and what community members expect to receive when requesting a CIT officer.

Additionally, the CPD should further engage the OEMC for dispatch. Prioritization for responses to calls for service should be given in the following order: first to voluntary "designated" CIT Officers, second to mandated CIT trained officers who have opted out of being a voluntary designated CIT Officer and last, officers who have received no CIT training. In future assessments, the IMT will consider the system by which officers are dispatched reflecting the tiered system.

Paragraph 92 Compliance Progress History

FIRST REPORTING PERIOD	SECOND REPORTING PERIOD	THIRD REPORTING PERIOD
SEPTEMBER 1, 2019 – AUGUST 31, 2019	SEPTEMBER 1, 2019 – FEBRUARY 29, 2020	MARCH 1, 2020 – DECEMBER 31, 2020
COMPLIANCE PROGRESS:	COMPLIANCE PROGRESS:	COMPLIANCE PROGRESS:
Not Applicable	None	Secondary

FOURTH REPORTING PERIOD	FIFTH REPORTING PERIOD	SIXTH REPORTING PERIOD
JANUARY 1, 2021 – JUNE 30, 2021	JULY 1, 2021 – DECEMBER 31, 2021	JANUARY 1, 2022 – JUNE 30, 2022
COMPLIANCE PROGRESS:	COMPLIANCE PROGRESS:	COMPLIANCE PROGRESS:
Secondary	Secondary	Secondary

Crisis Intervention: ¶93

93. *To be eligible for consideration as a Certified CIT Officer, applicants must have at least 18 months of experience as a CPD officer and no longer be on probationary status. CPD will assess each applicant's fitness to serve as a Certified CIT Officer by considering the applicant's application, performance history, and disciplinary history.*

Compliance Progress

(Reporting Period: January 1, 2022, through June 31, 2022)

Preliminary:	***In Compliance*** **(NEW)**
Secondary:	***Not in Compliance***
Full:	***Not in Compliance***

In the sixth reporting period, the City and the CPD achieved Preliminary compliance with the requirements of ¶93. To assess Preliminary compliance, the IMT reviewed CPD's policy S05-14 *Crisis Intervention Team (CIT) Program*, which adequately incorporates the requirements of ¶93.

Progress before the Sixth Reporting Period

In the fourth monitoring period, the IMT reviewed CPD's Special Order SO20-02, *CIT Training Schedule, Attendance, Eligibility, and Recruitment*. This Special Order was never finalized because it required further revisions on the guidance for assessing the CIT applicants.

However, in the fifth reporting period, the CPD opted to distinguish department-wide directives relevant to the entire CPD from those relevant only to the Crisis Intervention Unit. As a part of this re-design, ¶93's requirements were incorporated into the CPD's S05-14, *Crisis Intervention Team (CIT) Program*.

The CPD had previously proposed that officers be deemed ineligible to become a Certified CIT officer if they (1) had received a sustained misconduct complaint resulting in a suspension of more than seven days within the preceding 12 months, or (2) had three or more sustained misconduct complaints resulting in suspension within the past five years.

The IMT raised concerns regarding these low eligibility thresholds, which would result in very few officers being ineligible to serve in this specialized role serving vulnerable populations. In response, during the fifth monitoring period, the CPD provided the IMT with a substantially revised version of S05-14, *Crisis Intervention Team (CIT) Program*. That directive revised a portion of the eligibility criteria, lowering the sustained misconduct complaint suspension period from seven to three

days, thereby ensuring a higher standard of eligibility assessment. While the paragraph does not delineate minimum qualifications, we believe it is incumbent on the City to provide standards that would more adequately exclude officers who have demonstrated they are unlikely to be a good match for a specialized role serving vulnerable populations. This is especially important as the CPD continues to transition to a mandatory CIT model. While the IMT appreciated this reconsideration of the eligibility standard, we believe the CPD should apply the same thresholds required for SROs to Certified CIT Officers, which are more aligned with specialized roles for vulnerable individuals.

Progress in the Sixth Reporting Period

In the sixth reporting period, the CPD adopted these same thresholds as SRO officers, and incorporated those thresholds into policy. The IMT commends the CPD's responsiveness on this important issue.

Looking ahead to Secondary compliance with ¶93, the CPD must train 95% of its officers appropriately and develop metrics that, when tracked, will adequately demonstrate the CPD's success under ¶93. The IMT recommends that the CPD revise its attendance records under ¶93 to align with the eligibility criteria and training requirements established by the Consent Decree, as well as with the CPD's forms 15.518, *Request for CIT Training*, and 15.519, *Request for CIT Officer Designation*. Specifically, the CPD should consider including a separate excel sheet that captures data such as: (a) Officer name and District of assignment; (b) newly promoted to Rank of [sergeant/lieutenant]; (c) promotion date; (d) CIT Basic training completion date; (e) CIT Refresher training completion date; (f) mandatory requirement; (g) whether the officer opted in or out of CIT Designated Officer; and (h) if opted out, the officer's reason for opting out (consider a drop down menu to include options such as "Disciplinary History Exclusion," "Did not want to be prioritized for response," or "Officer believes skill set is not suited to be a specialized CIT officer"). The CPD should consider capturing these recommended data points on separate excel sheets for the 40-hour Basic CIT Training, CIT Refresher Training, CIT Advanced Training (such as Youth, Veteran), In-service Training covering CIT topics, and Recruit Training. This data will permit the IMT to assess Secondary compliance with ¶93 in an effective and efficient manner.

For the IMT to assess Full compliance, the CPD must indicate which factors will contribute to achieving compliance and how those factors, and the CPD's progress toward compliance, will be measured. The CPD's process should track metrics related to a CIT Officer's disciplinary history and performance history which may remove officers from a Certified CIT Officer daily roster if/when the CIT Officer does not meet ¶93's requirements.

Paragraph 93 Compliance Progress History

FIRST REPORTING PERIOD	SECOND REPORTING PERIOD	THIRD REPORTING PERIOD
SEPTEMBER 1, 2019 – AUGUST 31, 2019	SEPTEMBER 1, 2019 – FEBRUARY 29, 2020	MARCH 1, 2020 – DECEMBER 31, 2020
COMPLIANCE PROGRESS:	COMPLIANCE PROGRESS:	COMPLIANCE PROGRESS:
Not Applicable	Not Applicable	None

FOURTH REPORTING PERIOD	FIFTH REPORTING PERIOD	SIXTH REPORTING PERIOD
JANUARY 1, 2021 – JUNE 30, 2021	JULY 1, 2021 – DECEMBER 31, 2021	JANUARY 1, 2022 – JUNE 30, 2022
COMPLIANCE PROGRESS:	COMPLIANCE PROGRESS:	COMPLIANCE PROGRESS:
None	None	Preliminary

Crisis Intervention: ¶94

94. *Under the direction of the CIT Coordinator, supervisors and instructors teaching crisis intervention-related topics will assist in identifying and recruiting qualified officers with apparent or demonstrated skills and abilities in crisis de-escalation and interacting with individuals in crisis to apply to receive CIT training.*

Compliance Progress

(Reporting Period: January 1, 2022, through June 31, 2022)

Preliminary:	***In Compliance*** **(NEW)**
Secondary:	***Not in Compliance***
Full:	***Not Yet Assessed***

In the sixth reporting period, the City and the CPD achieved Preliminary compliance with the requirements of ¶94. To assess Preliminary compliance, the IMT reviewed CPD's policy S05-14 *Crisis Intervention Team (CIT) Program*, which adequately incorporates the requirements of ¶94.

Progress before the Sixth Reporting Period

During the fourth reporting period, the IMT reviewed CPD's CIU Special Order SO20-02 *CIT Training Schedule, Attendance, Eligibility, and Recruitment*, which sufficiently contained the requirements of ¶94. However, in the fifth reporting period, the CPD opted to distinguish department-wide directives relevant to the entire CPD from those relevant only to the Crisis Intervention Unit. As part of this redesign, a portion of ¶94's requirements were incorporated into the CPD's revised S05-14 *Crisis Intervention Program*.

The requirements for this paragraph were not satisfactorily memorialized within the revised S05-14 directive. The draft S05-14 failed to include supervisors into the responsibility for assisting with recruiting qualified candidates for the CIT role as required by this paragraph, and instead positioned this responsibility under the Crisis Intervention Team Training Section (CITTS). Supervisors in the field overseeing patrol officers are uniquely positioned to help actively recruit officers with the skill set to serve in this role in which they interact with vulnerable populations.

Progress in the Sixth Reporting Period

In the sixth reporting period, the City and the CPD incorporated the requirements of ¶94 in its revised S05-14, which was finalized. The IMT will assess Secondary compliance by reviewing documentation that reflects 95% of relevant personnel have been trained on the requirements of ¶ 94.

To that end, the IMT recommends that the CPD revise its attendance records under ¶94 to align with the eligibility criteria and training requirements established by the Consent Decree, as well as with the CPD's forms 15.518, *Request for CIT Training*, and 15.519, *Request for CIT Officer Designation*. Specifically, the CPD should consider including a separate excel sheet that captures data such as: (a) Officer name and District of assignment; (b) newly promoted to Rank of [sergeant/lieutenant]; (c) promotion date; (d) CIT Basic training completion date; (e) CIT Refresher training completion date; (f) mandatory requirement; (g) whether the officer opted in or out of CIT Designated Officer; and (h) if opted out, the officer's reason for opting out (consider a drop down menu to include options such as "Disciplinary History Exclusion," "Did not want to be prioritized for response," or "Officer believes skill set is not suited to be a specialized CIT officer"). The CPD should consider capturing these recommended data points on separate excel sheets for the 40-hour Basic CIT Training, CIT Refresher Training, CIT Advanced Training (such as Youth, Veteran), In-service Training covering CIT topics, and Recruit Training. This data will permit the IMT to assess Secondary compliance with ¶94 in an effective and efficient manner.

Paragraph 94 Compliance Progress History

FIRST REPORTING PERIOD	SECOND REPORTING PERIOD	THIRD REPORTING PERIOD
SEPTEMBER 1, 2019 – AUGUST 31, 2019	SEPTEMBER 1, 2019 – FEBRUARY 29, 2020	MARCH 1, 2020 – DECEMBER 31, 2020
COMPLIANCE PROGRESS:	COMPLIANCE PROGRESS:	COMPLIANCE PROGRESS:
Not Applicable	Not Applicable	None

FOURTH REPORTING PERIOD	FIFTH REPORTING PERIOD	SIXTH REPORTING PERIOD
JANUARY 1, 2021 – JUNE 30, 2021	JULY 1, 2021 – DECEMBER 31, 2021	JANUARY 1, 2022 – JUNE 30, 2022
COMPLIANCE PROGRESS:	COMPLIANCE PROGRESS:	COMPLIANCE PROGRESS:
None	None	Preliminary

Crisis Intervention: ¶95

95. *Certified CIT Officers, at a minimum, must complete the specialized 40-hour Basic CIT Training ("Basic CIT Training") and receive CIT certification by the Illinois Law Enforcement Training and Standards Board before being identified as a "Certified CIT Officer." To maintain the Certified CIT Officer designation, officers must receive a minimum of eight hours of CIT refresher training ("CIT Refresher Training") every three years and maintain the eligibility requirements established by the CIT Program.*

Compliance Progress

(Reporting Period: Jul. 1, 2021, through Dec. 31, 2021)

Preliminary:	***In Compliance*** **(NEW)**
Secondary:	***Not in Compliance***
Full:	***Not Yet Assessed***

In the sixth reporting period, the City and the CPD achieved Preliminary compliance with the requirements of ¶95. To assess Preliminary compliance, the IMT reviewed CPD's S05-14, *Crisis Intervention Team (CIT) Program*, which adequately incorporates the requirements of ¶95.

Progress before the Sixth Reporting Period

In the fifth reporting period, the CPD opted to distinguish department-wide directives relevant to the entire CPD from SOPs that are relevant only to the Crisis Intervention Unit. As part of this redesign, ¶95's requirements were incorporated into the CPD's revised S05-14, *Crisis Intervention Team (CIT) Program*.

Moreover, during the fifth monitoring period the CPD launched CIT Refresher Training while also continuing to provide the 40-hour Basic CIT Training. However, as indicated in previous paragraphs, the specialized nature of the CIT officer, as intended in the spirit of this consent decree and best practice, is undermined by the CPD's move towards a mandated "train-all" CIT model. This is especially true when many officers received their 40-hour Basic CIT Training many years ago, without receiving refresher training since their original CIT training. In fact, 20.36% of all current Certified CIT Officers were trained over ten years ago, with no refresher training since their original training, one-third of all Certified CIT Officers were trained over seven years ago, and nearly half (46.51%) of Certified CIT Officers were trained six or more years ago with no refresher since their original training. This is not in keeping with national best practices and does not meet best practice standards for a specialized CIT model.

Presently, the CPD prioritizes for Refresher Training those who have received the Basic CIT training in the last 3 years. Therefore, nearly half of the CIT officers who received Basic CIT Training more than six years ago are not presently being prioritized for the Refresher or to re-take the Basic CIT Training course. To better align with best practice, the IMT recommends that all Certified CIT Officers who have not received the Basic 40-hour class in the past three to five years be prioritized to re-take the Basic 40-hour training, and then fall into the required refresher cadence. This would be a significant step towards best practice.

The IMT is concerned about the CPD's training records system and its ability to reliably track the training certifications, as required under ¶95. The IMT looks forward to the City and the CPD's progress toward exploring a specialized CIT program that prioritizes the specialized nature of CIT designation.

To assess Secondary compliance, the IMT will review whether the CPD and the Crisis Intervention Unit have a reliable training certification system, including ongoing provision of the 40-hour Basic CIT Training. The IMT will also review records demonstrating that 95% of current "designated" CIT officers have received the required refresher training. The 95% threshold for refresher training is essential for Secondary compliance because there are a significant percentage of CIT officers who have received no refresher training in many years. Further, the IMT recommends that CIT officers who received the 40-hour Basic CIT training several years ago be prioritized for CIT Refresher Training or to re-take the forty hour Basic CIT.

Going forward, the IMT recommends that the CPD revise its attendance records under ¶95 to align with the eligibility criteria and training requirements established by the Consent Decree, as well as with the CPD's forms 15.518, *Request for CIT Training*, and 15.519, *Request for CIT Officer Designation*. Specifically, the CPD should consider including a separate excel sheet that captures data such as: (a) Officer name and District of assignment; (b) newly promoted to Rank of [sergeant/lieutenant]; (c) promotion date; (d) CIT Basic training completion date; (e) CIT Refresher training completion date; (f) mandatory requirement; (g) whether the officer opted in or out of CIT Designated Officer; and (h) if opted out, the officer's reason for opting out (consider a drop down menu to include options such as "Disciplinary History Exclusion," "Did not want to be prioritized for response," or "Officer believes skill set is not suited to be a specialized CIT officer"). The CPD should consider capturing these recommended data points on separate excel sheets for the 40-hour Basic CIT Training, CIT Refresher Training, CIT Advanced Training (such as Youth, Veteran), In-service Training covering CIT topics, and Recruit Training. This data will permit the IMT to assess Secondary compliance with ¶95 in an effective and efficient manner.

Paragraph 95 Compliance Progress History

FIRST REPORTING PERIOD	SECOND REPORTING PERIOD	THIRD REPORTING PERIOD
SEPTEMBER 1, 2019 – AUGUST 31, 2019	SEPTEMBER 1, 2019 – FEBRUARY 29, 2020	MARCH 1, 2020 – DECEMBER 31, 2020
COMPLIANCE PROGRESS:	COMPLIANCE PROGRESS:	COMPLIANCE PROGRESS:
Not Applicable	Not Applicable	Not Applicable
FOURTH REPORTING PERIOD	**FIFTH REPORTING PERIOD**	**SIXTH REPORTING PERIOD**
JANUARY 1, 2021 – JUNE 30, 2021	JULY 1, 2021 – DECEMBER 31, 2021	JANUARY 1, 2022 – JUNE 30, 2022
COMPLIANCE PROGRESS:	COMPLIANCE PROGRESS:	COMPLIANCE PROGRESS:
Not Applicable	None	Preliminary

Crisis Intervention: ¶96

96. *CPD's Basic CIT Training is an in-depth, specialized course that teaches officers how to recognize and effectively respond to individuals in crisis. In addition to the crisis intervention-related topics covered in the training provided to all officers, the Basic CIT Training will address signs and symptoms of individuals in crisis, suicide intervention, community resources, common mental health conditions and psychotropic medications, the effects of drug and alcohol abuse, perspectives of individuals with mental conditions and their family members, the rights of individuals with mental conditions, civil commitment criteria, crisis de-escalation, and scenario-based exercises.*

Compliance Progress (Reporting Period: January 1, 2022, through June 31, 2022)

Preliminary:	***In Compliance*** **(THIRD REPORTING PERIOD)**
Secondary:	***In Compliance*** **(THIRD REPORTING PERIOD)**
Full:	***Not in Compliance***

In the sixth reporting period, the City and the CPD maintained Preliminary and Secondary compliance with the requirements of ¶96.

The IMT assessed Preliminary compliance by reviewing relevant CPD policies. The IMT assessed Secondary compliance with ¶96 by reviewing training development, implementation, and evaluation in accordance with ¶286 of the Consent Decree, which incorporates the following evaluation criteria: training needs assessment, curriculum design, curriculum development, training implementation (training delivery), and training evaluation.

Progress before the Sixth Reporting Period

In the third reporting period, the IMT reviewed the CPD's Special Order S05-14, *Crisis Intervention Team (CIT) Program*, which states that the Crisis Intervention Team Training Section is responsible for developing, reviewing, and revising the CIT curricula, as well as the administration and delivery of the Basic CIT Training. The IMT submitted a no-objection notice on S05-14 on November 24, 2020. In the fourth reporting period, the IMT reviewed CPD's policy SO20-02, *CIT Training, Scheduling, Attendance, Eligibility, and Recruitment,* which addressed the requirements of ¶96. This Special Order was still under review when the CPD determined that many of the components of SO 20-02 would be moved into a substantially

revised S05-14, *Crisis Intervention Team (CIT) Program*. However, ¶96's requirements were not adequately memorialized in the revised S05-14, and ¶96's requirements were instead memorialized in policy during the sixth reporting period.

The IMT observed the curricula-revision process in the third reporting period and found that the CIT Unit included key community stakeholders to gather comments and recommendations for improving the training. Overall, we found these efforts to be consistent with ¶96's requirements.

The IMT observed the updated training in the fifth reporting period to verify that delivery is in-line with the approved lesson plans and presentation material. We found that ¶96's required topics were included in the curriculum and were given sufficient attention during the training. Overall, the IMT found the training well done. Additionally, the CPD invited Chicago Council on Mental Health Equity members to observe the training and provide feedback, which several members provided. Given the shift to a mandated CIT training model by the CPD, the IMT will closely monitor training resources.

To assess Full compliance, the IMT will review the CPD's use of training evaluation and district-needs assessments to inform training revisions. To support full and effective compliance, the CPD should continue inviting Chicago Council on Mental Health Equity to attend training and to offer feedback, and the CPD should maintain sufficient staff to support CIT training.

Paragraph 96 Compliance Progress History

FIRST REPORTING PERIOD	SECOND REPORTING PERIOD	THIRD REPORTING PERIOD
SEPTEMBER 1, 2019 – AUGUST 31, 2019	SEPTEMBER 1, 2019 – FEBRUARY 29, 2020	MARCH 1, 2020 – DECEMBER 31, 2020
COMPLIANCE PROGRESS:	COMPLIANCE PROGRESS:	COMPLIANCE PROGRESS:
Not Applicable	Not Applicable	Secondary
FOURTH REPORTING PERIOD	**FIFTH REPORTING PERIOD**	**SIXTH REPORTING PERIOD**
JANUARY 1, 2021 – JUNE 30, 2021	JULY 1, 2021 – DECEMBER 31, 2021	JANUARY 1, 2022 – JUNE 30, 2022
COMPLIANCE PROGRESS:	COMPLIANCE PROGRESS:	COMPLIANCE PROGRESS:
Secondary	Secondary	Secondary

Crisis Intervention: ¶97

97. *CPD's CIT Refresher Training is a specialized, advanced training to further develop and expand Certified CIT Officers' skills in recognizing and appropriately responding to calls for service that involve individuals in crisis. The CIT Refresher Training will include a review of the concepts, techniques, and practices offered in the Basic CIT Training as well as relevant and/or emerging topics in law enforcement responses to individuals in crisis, general and specific to CPD. Additionally, the CIT Refresher Training may cover the content included in the in-service crisis intervention training.*

Compliance Progress (Reporting Period: January 1, 2022, through June 31, 2022)

Preliminary:	***In Compliance*** **(THIRD REPORTING PERIOD)**
Secondary:	***In Compliance*** **(FOURTH REPORTING PERIOD)**
Full:	***Not in Compliance***

In the sixth reporting period, the City and the CPD maintained Preliminary and Secondary compliance with requirements of ¶97.

The IMT assessed Preliminary compliance by reviewing relevant CPD policies. The IMT assessed Secondary compliance with ¶97 by reviewing training development, implementation, and evaluation in accordance with ¶286 of the Consent Decree, which incorporates the following evaluation criteria: training needs assessment, curriculum design, curriculum development, training implementation (training delivery), and training evaluation.

Progress before the Sixth Reporting Period

An early version of the CPD's Special Order S05-14, *Crisis Intervention Team (CIT) Program*, stated that the Crisis Intervention Team Training Section is responsible for developing, reviewing, and revising the Crisis Intervention Team curricula, as well as the administration and delivery of the CIT Refresher Training. In the fifth reporting period, the City and the CPD submitted a substantially-revised S05-14, which maintained the same language noted above.

The CPD began delivering the CIT Refresher Training in the fourth reporting period. The IMT observed the training in the fifth monitoring period and confirmed the refresher training curriculum includes ¶97's requirements. However, we note that a substantial portion of the training is dedicated to officer wellness topics (Officer Exposure to Trauma; Self Care Issues, Practices and Resources; Employee Assistance Programs (EAP)). While these are critically important topics, the City should

consider moving these topics to annual in-service training that ensures all officers, not just CIT Certified Officers, are receiving this information, and instead dedicate more of the CIT Refresher Training curriculum to relevant CIT topics. Further, since a substantial portion of officers receiving the CIT Refresher Training received their original 40-hour Basic CIT training over eight years ago and have not received any refresher training since, maximizing the time spent on refreshing crisis-intervention related topics is of the utmost importance to the CIT Refresher Training.

To strengthen both the integrity of the CIT program and officers' knowledge retention, the CPD should consider sending officers back to the Basic 40-hour CIT training if those officers received the Basic 40-hour CIT training over three to five years ago. This would bring officers into compliance with best practices, policy updates, and program changes. With the IMT continuing to observe the trainings virtually in light of the ongoing COVID-19 pandemic, training group activities (*e.g.*, Scenario-Based Role Play and officer discussion on field-related challenges with CIT) were difficult to hear. The IMT appreciates the time dedicated to scenario-based role play. As the IMT indicated in our last report, we appreciate information that helps us understand the themes articulated during the "CIT Troubleshooting" and the "CIT Group Problem Solving" portions of the training, which is important to measuring and improving the overall CIT program.

However, it is also important to reiterate some of the comments the IMT heard while observing the training, such as concerns about the OEMC lacking updated lists of CIT officers on duty; officers not knowing where to take people in crisis; and the need for more community outreach about the program.

Moreover, we also observed an officer discussion about incentivizing and maintaining officer interest in the program. Officers' suggestions included things like incentive pay, shift preference, extra points on promotional exams, a different title, a special room for de-compression after stressful CIT related calls for service, with time allocated to make use of it, and paid overtime for eLearning.

To assess Full compliance with the requirements of ¶97, the IMT will review all CIT training documentation, as well as reviewing the feedback from both officers and non-CPD personnel. Regarding the CIT training documentation, the IMT recommends that the CPD revise its attendance records under ¶97 to align with the eligibility criteria and training requirements established by the Consent Decree, as well as with the CPD's forms 15.518, *Request for CIT Training*, and 15.519, *Request for CIT Officer Designation*. Specifically, the CPD should consider including a separate excel sheet that captures data such as: (a) Officer name and District of assignment; (b) newly promoted to Rank of [sergeant/lieutenant]; (c) promotion date; (d) CIT Basic training completion date; (e) CIT Refresher training completion date; (f) mandatory requirement; (g) whether the officer opted in or out of CIT Designated Officer; and (h) if opted out, the officer's reason for opting out (consider a

drop down menu to include options such as "Disciplinary History Exclusion," "Did not want to be prioritized for response," or "Officer believes skill set is not suited to be a specialized CIT officer"). The CPD should consider capturing these recommended data points on separate excel sheets for the 40-hour Basic CIT Training, CIT Refresher Training, CIT Advanced Training (such as Youth, Veteran), In-service Training covering CIT topics, and Recruit Training. This data will permit the IMT to assess compliance with ¶97 in an effective and efficient manner.

Last, regarding feedback from both officers and non-CPD personnel, the IMT has yet to receive training evaluations for those who have completed the CIT Refresher Training, nor have we received information about the number of people from the community who have attended the training, what feedback members of the community provided, and what the CPD intends to do with such feedback. The community's feedback, combined with officer feedback, should be integrated into the next 3-year iteration of CIT Refresher Training.

Paragraph 97 Compliance Progress History

FIRST REPORTING PERIOD SEPTEMBER 1, 2019 – AUGUST 31, 2019 COMPLIANCE PROGRESS: Not Applicable	SECOND REPORTING PERIOD SEPTEMBER 1, 2019 – FEBRUARY 29, 2020 COMPLIANCE PROGRESS: Not Applicable	THIRD REPORTING PERIOD MARCH 1, 2020 – DECEMBER 31, 2020 COMPLIANCE PROGRESS: Preliminary
FOURTH REPORTING PERIOD JANUARY 1, 2021 – JUNE 30, 2021 COMPLIANCE PROGRESS: Secondary	FIFTH REPORTING PERIOD JULY 1, 2021 – DECEMBER 31, 2021 COMPLIANCE PROGRESS: Secondary	SIXTH REPORTING PERIOD JANUARY 1, 2022 – JUNE 30, 2022 COMPLIANCE PROGRESS: Secondary

Crisis Intervention: ¶98

98. *Certified CIT Officers may satisfy the in-service training requirements, as outlined in Part H, by completing the CIT Refresher Training.*

Compliance Progress

(Reporting Period: January 1, 2022, through June 31, 2022)

Preliminary:	***In Compliance* (FIFTH REPORTING PERIOD)**
Secondary:	***Not in Compliance***
Full:	***Not Yet Assessed***

The City and the CPD maintained Preliminary compliance with the requirements of ¶98 in the sixth reporting period.

To assess Preliminary compliance, the IMT reviewed S11-10-03, *In-Service Training* and concluded that the CPD had adequately memorialized ¶98's requirements. Additionally, CPD has memorialized this requirement in the newly revised policy, S05-14, *Crisis Intervention Team (CIT) Program*, which was finalized during this reporting period.

To assess Secondary compliance, the IMT will review the CPD's training records for its CIT Refresher Training. The IMT notes that a 95% completion rate will be necessary to achieve Secondary compliance.

Moreover, the IMT recommends that the CPD revise its attendance records under ¶98 to align with the eligibility criteria and training requirements established by the Consent Decree, as well as with the CPD's forms 15.518, *Request for CIT Training*, and 15.519, *Request for CIT Officer Designation*. Specifically, the CPD should consider including a separate excel sheet that captures data such as: (a) Officer name and District of assignment; (b) newly promoted to Rank of [sergeant/lieutenant]; (c) promotion date; (d) CIT Basic training completion date; (e) CIT Refresher training completion date; (f) mandatory requirement; (g) whether the officer opted in or out of CIT Designated Officer; and (h) if opted out, the officer's reason for opting out (consider a drop down menu to include options such as "Disciplinary History Exclusion," "Did not want to be prioritized for response," or "Officer believes skill set is not suited to be a specialized CIT officer"). The CPD should consider capturing these recommended data points on separate excel sheets for the 40-hour Basic CIT Training, CIT Refresher Training, CIT Advanced Training (such as Youth, Veteran), In-service Training covering CIT topics, and Recruit Training. This data will permit the IMT to assess Secondary compliance with ¶98 in an effective and efficient manner.

Paragraph 98 Compliance Progress History

FIRST REPORTING PERIOD	SECOND REPORTING PERIOD	THIRD REPORTING PERIOD
SEPTEMBER 1, 2019 – AUGUST 31, 2019	SEPTEMBER 1, 2019 – FEBRUARY 29, 2020	MARCH 1, 2020 – DECEMBER 31, 2020
COMPLIANCE PROGRESS:	COMPLIANCE PROGRESS:	COMPLIANCE PROGRESS:
Not Applicable	Not Applicable	Not Applicable

FOURTH REPORTING PERIOD	FIFTH REPORTING PERIOD	SIXTH REPORTING PERIOD
JANUARY 1, 2021 – JUNE 30, 2021	JULY 1, 2021 – DECEMBER 31, 2021	JANUARY 1, 2022 – JUNE 30, 2022
COMPLIANCE PROGRESS:	COMPLIANCE PROGRESS:	COMPLIANCE PROGRESS:
Not Applicable	Preliminary	Preliminary

Crisis Intervention: ¶99

99. *Within 365 days of the Effective Date, the CIT Program staff, in coordination with the Education and Training Division will develop the CIT Refresher Training. The CIT Program staff will review and revise the CIT Refresher Training as necessary to ensure that Certified CIT Officers receive up-to-date training. The CIT Program will seek input from the Advisory Committee in the development of the refresher training.*

Compliance Progress

(Reporting Period: January 1, 2022, through June 31, 2022)

Preliminary:	***In Compliance*** **(SECOND REPORTING PERIOD)**
Secondary:	***In Compliance*** **(FOURTH REPORTING PERIOD)**
Full:	***Not Yet Assessed***

In the sixth reporting period, the City and the CPD maintained Preliminary and Secondary compliance with the requirements of ¶99.

To assess Preliminary compliance, the IMT reviewed the CPD's S05-14, *Crisis Intervention Team (CIT) Program*, which states that the Crisis Intervention Team Training Section is responsible for developing, reviewing, and revising the Crisis Intervention Team curricula and for delivering the refresher training.

Progress before the Sixth Reporting Period

During the fourth reporting period, the CPD began delivering the CIT Refresher Training, which the IMT observed in the fifth monitoring period. *See* ¶97 assessment, above. As we stated in Independent Monitoring Report 4, the CPD achieved Secondary compliance through initiating the CIT Refresher Training and by seeking the Chicago Council on Mental Health Equity's review of and comment on the curriculum.

Progress in the Sixth Reporting Period

In the sixth reporting period, the CPD finalized a substantially-revised S05-14, *Crisis Intervention Team (CIT) Program*, which maintained this same language as the previous version of S05-14 that memorialized the requirements of ¶99.

Additionally, the Chicago Council on Mental Health Equity members were invited to attend the CIT Refresher Training during this reporting period, and to provide feedback. This is a commendable step by the CPD. We look forward to receiving

the Chicago Council on Mental Health Equity's feedback on their observations of the CIT Refresher Training during the next monitoring period.

As we indicate throughout this section of the report, the IMT strongly recommends that officers who have not received CIT training in a significant number of years be prioritized to receive the CIT Refresher Training. For instance, the IMT reviewed a data dashboard and spreadsheet indicating that a fairly significant percentage of Certified CIT officers were trained more than 8 years ago and have not received any formal refresher training since. This lack of formal refresher training results in a diluted, non-best practice model.

To strengthen both the integrity of the CIT program and officers' knowledge retention, the CPD should consider sending officers back to the Basic 40-hour CIT training if those officers, with no refresher, received the Basic 40-hour CIT training over three to five years ago. In fact, as outlined in this section of the report, 20.36% of all current certified CIT officers were trained over ten years ago (2004-2012) with no refresher since. Approximately a third of all certified CIT officers were trained more than seven years ago (2004-2015) with no refresher training, and nearly half (46.51%) of certified CIT officers were trained six or more years ago (2004-2016) with no refresher training. These gaps in training are not best practice and fail to meet best practice standards for a specialized model. However, the CPD is currently prioritizing Refresher Training for those officers who received Basic CIT training in the last three years. This means that the CIT officers who received Basic CIT more than six years ago, without refresher training, are not being prioritized for the Refresher, nor are they retaking the Basic CIT course. To better align with best practice, the CPD should prioritize all Certified CIT Officers who have not received the Basic 40-hour training in more than three to five years to re-take that Basic 40-hour training. Once those officers have retaken the Basic 40-hour training, they should then fall into the required refresher training cadence of every three years.

This would bring officers into compliance with best practices, policy updates, and program changes. It may also afford the CPD the opportunity to move into the cadence of refresher training every three years.

The IMT will assess Full compliance with the requirements of ¶99 by reviewing CPD's efforts to train all Certified CIT Officers and to collect meaningful feedback from officers, as well as non-CPD personnel. Community feedback, combined with officer feedback, would be an invaluable tool when planning the next 3-year iteration of refresher training. The IMT will continue to assess the CPD's process for ensuring best practices are followed in prioritization and delivery of refresher training in the next reporting period.

To that end, the IMT recommends that the CPD revise its attendance records under ¶99 to align with the eligibility criteria and training requirements established by

the Consent Decree, as well as with the CPD's forms 15.518, *Request for CIT Training*, and 15.519, *Request for CIT Officer Designation*. Specifically, the CPD should consider including a separate excel sheet that captures data such as: (a) Officer name and District of assignment; (b) newly promoted to Rank of [sergeant/lieutenant]; (c) promotion date; (d) CIT Basic training completion date; (e) CIT Refresher training completion date; (f) mandatory requirement; (g) whether the officer opted in or out of CIT Designated Officer; and (h) if opted out, the officer's reason for opting out (consider a drop down menu to include options such as "Disciplinary History Exclusion," "Did not want to be prioritized for response," or "Officer believes skill set is not suited to be a specialized CIT officer"). The CPD should consider capturing these recommended data points on separate excel sheets for the 40-hour Basic CIT Training, CIT Refresher Training, CIT Advanced Training (such as Youth, Veteran), In-service Training covering CIT topics, and Recruit Training. This data will permit the IMT to assess compliance with ¶99 in an effective and efficient manner.

Paragraph 99 Compliance Progress History

FIRST REPORTING PERIOD	SECOND REPORTING PERIOD	THIRD REPORTING PERIOD
SEPTEMBER 1, 2019 – AUGUST 31, 2019	SEPTEMBER 1, 2019 – FEBRUARY 29, 2020	MARCH 1, 2020 – DECEMBER 31, 2020
COMPLIANCE PROGRESS:	COMPLIANCE PROGRESS:	COMPLIANCE PROGRESS:
Not Applicable	Preliminary	Preliminary

FOURTH REPORTING PERIOD	FIFTH REPORTING PERIOD	SIXTH REPORTING PERIOD
JANUARY 1, 2021 – JUNE 30, 2021	JULY 1, 2021 – DECEMBER 31, 2021	JANUARY 1, 2022 – JUNE 30, 2022
COMPLIANCE PROGRESS:	COMPLIANCE PROGRESS:	COMPLIANCE PROGRESS:
Secondary	Secondary	Secondary

Crisis Intervention: ¶100

100. *All Certified CIT Officers who completed the Basic CIT Training before the development of the CIT Refresher Training must complete their first CIT Refresher Training within four years of the date that the CIT Refresher Training is developed. All Certified CIT Officers who complete Basic CIT Training on or after the date that the CIT Refresher Training is developed must complete their first CIT Refresher Training within three years of receiving the Basic CIT Training.*

Compliance Progress

(Reporting Period: January 1, 2022, through June 31, 2022)

Recurring Schedule: Moving ✓ **Not Yet Applicable**

Preliminary: ***In Compliance*** **(FIFTH REPORTING PERIOD)**
Secondary: ***Not in Compliance***
Full: ***Not Yet Assessed***

During the sixth monitoring period, the City and the CPD maintained Preliminary compliance with the requirements of ¶100.

Progress before the Sixth Reporting Period

In the fourth monitoring period, the IMT reviewed a revised draft version of CIU Special Order 20-02 (CIU SO-02), *CIT Training Scheduling, Attendance, Eligibility, and Recruitment*, which memorializes the requirements of ¶100. However, CIU SO 20-02 was not finalized, which prevented the CPD from achieving Preliminary compliance with ¶100 at that time.

In the fifth monitoring period, the CPD substantially revised S05-14, *Crisis Intervention Team Program*, and subsumed components of CIU SO 20-02 into the revised S05-14 directive. The CPD has also memorialized this requirement into S11-10-03, *In-Service Training,* enabling the CPD to achieve Preliminary compliance.

Due to limitations in their current electronic system, training records can only be updated quarterly to remove officers who no longer meet the eligibility requirements for certified CIT Officers.

Going forward, the IMT recommends that the CPD revise its attendance records under ¶100 to align with the eligibility criteria and training requirements established by the Consent Decree, as well as with the CPD's forms 15.518, *Request for CIT Training*, and 15.519, *Request for CIT Officer Designation*. Specifically, the CPD

should consider including a separate excel sheet that captures data such as: (a) Officer name and District of assignment; (b) newly promoted to Rank of [sergeant/lieutenant]; (c) promotion date; (d) CIT Basic training completion date; (e) CIT Refresher training completion date; (f) mandatory requirement; (g) whether the officer opted in or out of CIT Designated Officer; and (h) if opted out, the officer's reason for opting out (consider a drop down menu to include options such as "Disciplinary History Exclusion," "Did not want to be prioritized for response," or "Officer believes skill set is not suited to be a specialized CIT officer"). The CPD should consider capturing these recommended data points on separate excel sheets for the 40-hour Basic CIT Training, CIT Refresher Training, CIT Advanced Training (such as Youth, Veteran), In-service Training covering CIT topics, and Recruit Training. This data will permit the IMT to assess compliance with ¶100 in an effective and efficient manner.

To achieve Secondary compliance, the CPD's system must demonstrate effective and timely notification to the OEMC regarding officers whose certifications may have expired. The IMT notes that a functioning system should help remind officers that their expiration date is approaching. We also note that the requirements of ¶100 are also incorporated into the eLearning that the CPD intends to deliver in the next reporting period, which will ensure all officers understand the requirements of ¶100.

Paragraph 100 Compliance Progress History

FIRST REPORTING PERIOD	SECOND REPORTING PERIOD	THIRD REPORTING PERIOD
SEPTEMBER 1, 2019 – AUGUST 31, 2019	SEPTEMBER 1, 2019 – FEBRUARY 29, 2020	MARCH 1, 2020 – DECEMBER 31, 2020
COMPLIANCE PROGRESS:	COMPLIANCE PROGRESS:	COMPLIANCE PROGRESS:
Not Applicable	Not Applicable	Not Applicable
FOURTH REPORTING PERIOD	**FIFTH REPORTING PERIOD**	**SIXTH REPORTING PERIOD**
JANUARY 1, 2021 – JUNE 30, 2021	JULY 1, 2021 – DECEMBER 31, 2021	JANUARY 1, 2022 – JUNE 30, 2022
COMPLIANCE PROGRESS:	COMPLIANCE PROGRESS:	COMPLIANCE PROGRESS:
None	Preliminary	Preliminary

Crisis Intervention: ¶101

101. *Certified CIT Officers who fail to complete the CIT Refresher Training within three years of taking their most recently required CIT Training, whether the Basic CIT Training or a prior CIT Refresher Training, will be deemed out of compliance with the CIT Program's CIT Refresher Training requirement. CPD will confirm on a quarterly basis that Certified CIT Officers remain in compliance with the CIT Refresher Training requirement. Any Certified CIT Officer found to be out of compliance during the quarterly review may not continue to be identified by CPD as a Certified CIT Officer and may not continue to be prioritized to respond to calls for service involving individuals in crisis. Each quarter, CPD will inform OEMC of officers who are out of compliance with the CIT Refresher Training requirement. An officer out of compliance with the CIT Refresher Training requirement must complete the most recently offered version of the CIT Refresher Training before CPD may resume identifying the officer as a Certified CIT Officer and before OEMC may resume prioritizing that officer to respond in the field to calls involving individuals in crisis.*

Compliance Progress

(Reporting Period: January 1, 2022, through June 31, 2022)

Recurring Schedule: Quarterly ☑ **Not Yet Applicable**

Preliminary: ***In Compliance*** **(NEW)**
Secondary: ***Not in Compliance***
Full: ***Not in Compliance***

In the sixth reporting period, the City and the CPD achieved Preliminary compliance with the requirements of ¶101. The IMT reviewed the CPD's policy, S05-14, *Crisis Intervention Team (CIT) Program,* which adequately addresses the requirements of ¶101.

Progress before the Sixth Reporting Period

In the fourth monitoring period, the IMT reviewed a revised draft version of Crisis Intervention Unit (CIU) Special Order 20-02, *CIT Training Scheduling, Attendance, Eligibility, and Recruitment*, which memorialized the requirements of ¶101. However, in the fifth monitoring period, the CPD substantially revised S05-14, *Crisis Intervention Team Program,* and subsumed components of CIU SO 20-02 into the

revised S05-14 directive, which was finalized the sixth reporting period. The requirements of ¶101 are incorporated into S05-14.

Progress in the Sixth Reporting Period

The draft versions of both CIU SO 20-02 and S05-14 indicate that the CPD will utilize their Learning Management System to track when CIT officers need CIT Refresher Training to ensure CIT officers are being prioritized for dispatch.. Due to limitations in its current electronic system, the CPD's training records can only be updated quarterly to remove officers who no longer meet the eligibility requirements for certified CIT Officers.

Going forward, the IMT recommends that the CPD revise its attendance records under ¶101 to align with the eligibility criteria and training requirements established by the Consent Decree, as well as with the CPD's forms 15.518, *Request for CIT Training*, and 15.519, *Request for CIT Officer Designation*. Specifically, the CPD should consider including a separate excel sheet that captures data such as: (a) Officer name and District of assignment; (b) newly promoted to Rank of [sergeant/lieutenant]; (c) promotion date; (d) CIT Basic training completion date; (e) CIT Refresher training completion date; (f) mandatory requirement; (g) whether the officer opted in or out of CIT Designated Officer; and (h) if opted out, the officer's reason for opting out (consider a drop down menu to include options such as "Disciplinary History Exclusion," "Did not want to be prioritized for response," or "Officer believes skill set is not suited to be a specialized CIT officer"). The CPD should consider capturing these recommended data points on separate excel sheets for the 40-hour Basic CIT Training, CIT Refresher Training, CIT Advanced Training (such as Youth, Veteran), In-service Training covering CIT topics, and Recruit Training. This data will permit the IMT to assess compliance with ¶101 in an effective and efficient manner.

Moreover, as noted in this section of the report, 20.36% of all current certified CIT officers were trained over ten years ago (2004-2012) with no refresher since. Approximately a third of all certified CIT officers were trained more than seven years ago (2004-2015) with no refresher training, and nearly half (46.51%) of certified CIT officers were trained six or more years ago (2004-2016) with no refresher training. These gaps in training are not best practice and fail to meet best practice standards for a specialized model. However, the CPD is currently prioritizing Refresher Training for those officers who received Basic CIT training in the last three years. This means that the CIT officers who received Basic CIT more than six years ago, without refresher training, are not being prioritized for the Refresher, nor are they retaking the Basic CIT course. To better align with best practice, the CPD should prioritize all Certified CIT Officers who have not received the Basic 40-hour training in more than three to five years to re-take that Basic 40-hour training. Once those officers have retaken the Basic 40-hour training, they should then fall

into the required refresher training cadence of every three years. This will go a long way toward best practice.

To achieve Secondary compliance, the CPD's system must demonstrate effective and timely notification to OEMC regarding officers whose certifications may have expired. The IMT notes that a functioning system should help remind officers that their expiration date is approaching. We also note that the requirements of ¶101 are also incorporated into the eLearning that the CPD intends to deliver in the next reporting period, which will ensure all officers understand the requirements of ¶101.

Paragraph 101 Compliance Progress History

FIRST REPORTING PERIOD	SECOND REPORTING PERIOD	THIRD REPORTING PERIOD
SEPTEMBER 1, 2019 – AUGUST 31, 2019	SEPTEMBER 1, 2019 – FEBRUARY 29, 2020	MARCH 1, 2020 – DECEMBER 31, 2020
COMPLIANCE PROGRESS:	COMPLIANCE PROGRESS:	COMPLIANCE PROGRESS:
Not Applicable	Not Applicable	Not Applicable
FOURTH REPORTING PERIOD	**FIFTH REPORTING PERIOD**	**SIXTH REPORTING PERIOD**
JANUARY 1, 2021 – JUNE 30, 2021	JULY 1, 2021 – DECEMBER 31, 2021	JANUARY 1, 2022 – JUNE 30, 2022
COMPLIANCE PROGRESS:	COMPLIANCE PROGRESS:	COMPLIANCE PROGRESS:
None	None	Preliminary

Crisis Intervention: ¶102

102. *All newly assigned Field Training Officers ("FTOs") and promoted Sergeants and Lieutenants will continue to receive the Basic CIT Training. To be considered Certified CIT Officers, FTOs, Sergeants, and Lieutenants must meet the eligibility criteria and training requirements established by the CIT Program and this Agreement.*

Compliance Progress

(Reporting Period: January 1, 2022, through June 31, 2022)

Preliminary: ***In Compliance*** **(FIFTH REPORTING PERIOD)**
Secondary: ***Not in Compliance***
Full: ***Not in Compliance***

During the sixth monitoring period, the City and the CPD maintained Preliminary compliance with the requirements of ¶102.

Progress before the Sixth Reporting Period

In the fourth monitoring period, the IMT reviewed a revised draft version of Crisis Intervention Unit (CIU) Special Order 20-02, *CIT Training Scheduling, Attendance, Eligibility, and Recruitment*, which memorialized the requirements of ¶102, but was not finalized at that time. Additionally, the requirements of ¶102 were memorialized under, S11-10-02, *Pre-Service Training*, which was finalized during the fifth reporting period, allowing the CPD to achieve Preliminary compliance. In the fifth monitoring period, components of CIU SO 20-02 were subsumed into a revised directive S05-14, which was finalized during the sixth reporting period.

Additionally, in the third reporting period, the CPD had made progress on developing its new CIT dashboard, which includes data specific to ¶102. However, the CPD has regressed in its data collection and analysis. The CPD's former data analyst resigned at the end of the third reporting period, and the CPD hired and onboarded a new analyst in the fifth reporting period. The IMT has not yet received sufficient evidence to demonstrate that robust data analysis has fully resumed. Consequently, data reporting and analysis appears to remain stagnant. The IMT's review of the CIT dashboard, with the ability to ask comprehensive questions, will be an important part of future compliance assessments with Consent Decree requirements.

Progress in the Sixth Reporting Period

The CPD achieved Preliminary compliance with ¶102 by memorializing its requirements in policy S11-10-02, *Pre-Service Training*. As we noted above, the CPD also memorialized the requirements of ¶102 into S05-14 during the sixth reporting period.

To achieve Secondary compliance with ¶102, the CPD's system must demonstrate its ability to track whether newly assigned Field Training Officers ("FTOs") and promoted Sergeants and Lieutenants complete the requisite training and meet the CIT Program's eligibility requirements. The IMT will review whether the system clearly articulates who has been newly promoted during a given reporting period and their training completion dates.

The IMT recommends that the CPD revise its attendance records under ¶102 to align with the eligibility criteria and training requirements established by the Consent Decree, as well as with the CPD's forms 15.518, *Request for CIT Training*, and 15.519, *Request for CIT Officer Designation*. Specifically, the CPD should consider including a separate excel sheet that captures data on FTO and Pre-Service Promotion, so that the CPD's attendance records reflect data such as: (a) Officer name and District of assignment; (b) newly promoted to Rank of [sergeant/lieutenant]; (c) promotion date; (d) CIT Basic training completion date; (e) CIT Refresher training completion date; (f) mandatory requirement; (g) whether the officer opted in or out of CIT Designated Officer; and (h) if opted out, the officer's reason for opting out (consider a drop down menu to include options such as "Disciplinary History Exclusion," "Did not want to be prioritized for response," or "Officer believes skill set is not suited to be a specialized CIT officer"). The CPD should consider capturing these recommended data points on separate excel sheets for the 40-hour Basic CIT Training, CIT Refresher Training, CIT Advanced Training (such as Youth, Veteran), In-service Training covering CIT topics, and Recruit Training. This data will permit the IMT to assess compliance with ¶102 in an effective and efficient manner.

The CPD must provide evidence of its effective and timely notification to the OEMC regarding officers whose certifications may have expired. The IMT notes that a functioning system should help remind officers that their expiration date is approaching.

Paragraph 102 Compliance Progress History

FIRST REPORTING PERIOD	SECOND REPORTING PERIOD	THIRD REPORTING PERIOD
SEPTEMBER 1, 2019 – AUGUST 31, 2019	SEPTEMBER 1, 2019 – FEBRUARY 29, 2020	MARCH 1, 2020 – DECEMBER 31, 2020
COMPLIANCE PROGRESS:	COMPLIANCE PROGRESS:	COMPLIANCE PROGRESS:
Not Applicable	Not Applicable	None

FOURTH REPORTING PERIOD	FIFTH REPORTING PERIOD	SIXTH REPORTING PERIOD
JANUARY 1, 2021 – JUNE 30, 2021	JULY 1, 2021 – DECEMBER 31, 2021	JANUARY 1, 2022 – JUNE 30, 2022
COMPLIANCE PROGRESS:	COMPLIANCE PROGRESS:	COMPLIANCE PROGRESS:
None	Preliminary	Preliminary

Crisis Intervention: ¶103

103. *The CIT Program staff responsible for the CIT training curriculum will, where it would add to the quality or effectiveness of the training and when feasible and appropriate, encourage and seek the participation of professionals and advocates who work with individuals in crisis, and persons with lived experiences of behavioral or mental health crisis, including those with involvement in the criminal justice system, in developing and delivering CPD CIT trainings.*

Compliance Progress

(Reporting Period: January 1, 2022, through June 31, 2022)

Preliminary:	***In Compliance*** **(NEW)**
Secondary:	***Under Assessment***
Full:	***Not in Compliance***

In the sixth reporting period, the City and the CPD achieved Preliminary compliance with the requirements of ¶103.

Progress before the Sixth Reporting Period

In the fourth monitoring period, the IMT reviewed a revised draft version of Crisis Intervention Unit (CIU) Special Order 20-02, *CIT Training Scheduling, Attendance, Eligibility, and Recruitment*, which memorialized the requirements of ¶103. However, in the fifth monitoring period, components of CIU SO 20-02 were subsumed into the CPD's substantially revised directive S05-14, *Crisis Intervention Program*, which was finalized during the sixth reporting period.

Progress in the Sixth Reporting Period

As noted in our prior reports, the CPD has incorporated the input of mental health professionals, stakeholders, and people with lived experience into the development and delivery of the 40-hour Basic CIT Training and the CIT Refresher Training. The CPD previously convened a working group to review curricula and provide feedback on training. Additionally, professionals and people with lived experience are involved in the CIT trainings as both instructors and participants. In our last report, we recommended that the CPD invite members of the Chicago Council on Mental Health Equity and other community representatives to observe the training's delivery and to provide feedback.

During this reporting period, Chicago Council on Mental Health Equity members were invited to attend both training courses and provide feedback. While the IMT

appreciates this effort, we stress that the CPD must improve its community engagement efforts. The CPD must go beyond extending invitations by actively seeking out observations and feedback on its training sessions. During site visits in the sixth reporting period, the IMT continued to be concerned about the CPD connecting with community and hearing community voices. We hope the CPD continues to improve in this area.

In the fifth reporting period, the IMT observed both the 40-hour CIT Training and the CIT Refresher Training and, overall, found them both to be well done. However, we note that a substantial portion of the Refresher training is dedicated to officer wellness topics (*e.g.*, Officer Exposure to Trauma; Self Care Issues, Practices and Resources; Employee Assistance Programs (EAP)). While these are critically important topics, the City should consider moving these topics to annual in-service training to ensure all officers, not just the CIT Certified Officers, are receiving this critically important information. Additionally, since a substantial portion of officers receiving this refresher training underwent their original 40-hour Basic CIT training over eight years ago without any refresher training since, maximizing the time spent on refreshing crisis intervention related topics is of the utmost importance.

To assess Full compliance, the IMT will continue to review how the CPD incorporates the input of professionals and of people with lived experience, including the feedback received by community participants who have observed the training. In addition, we will assess how the CPD has furthered its outreach to include additional perspectives. It is important for the CPD to actively invite relevant members of the community to observe their training and provide feedback. Advocacy groups, people with lived experience, members of the Coalition (*see* ¶669), and community partners represent important viewpoints. Finally, the IMT encourages the CPD to consider developing a short community member evaluation form to gather input after community members observe training sessions.

Paragraph 103 Compliance Progress History

FIRST REPORTING PERIOD	SECOND REPORTING PERIOD	THIRD REPORTING PERIOD
SEPTEMBER 1, 2019 – AUGUST 31, 2019	SEPTEMBER 1, 2019 – FEBRUARY 29, 2020	MARCH 1, 2020 – DECEMBER 31, 2020
COMPLIANCE PROGRESS:	COMPLIANCE PROGRESS:	COMPLIANCE PROGRESS:
Not Applicable	Not Applicable	Status Update

FOURTH REPORTING PERIOD	FIFTH REPORTING PERIOD	SIXTH REPORTING PERIOD
JANUARY 1, 2021 – JUNE 30, 2021	JULY 1, 2021 – DECEMBER 31, 2021	JANUARY 1, 2022 – JUNE 30, 2022
COMPLIANCE PROGRESS:	COMPLIANCE PROGRESS:	COMPLIANCE PROGRESS:
None	None	Preliminary

Crisis Intervention: ¶104

104. *CPD will develop policies regarding the criteria for ongoing participation as a Certified CIT Officer, consistent with this Agreement.*

Compliance Progress

(Reporting Period: January 1, 2022, through June 31, 2022)

Preliminary:	***In Compliance*** **(NEW)**
Secondary:	***Not in Compliance***
Full:	***Not in Compliance***

In the sixth reporting period, the City and the CPD achieved Preliminary compliance with the requirements of ¶104.

Progress before the Sixth Reporting Period

In the fourth monitoring period, the CPD provided the IMT with Special Order SO20-02, *CIT Training Schedule, Attendance, Eligibility, and Recruitment*, which memorialized the requirements of ¶104. However, in the fifth monitoring period, components of CIU SO 20-02 were subsumed under a revised S05-14, *Crisis Intervention Program* policy.

The CPD had previously proposed that officers be deemed ineligible to become a Certified CIT officer if they (1) have received a sustained misconduct complaint resulting in a suspension of more than seven days within the preceding 12 months, or (2) have three or more sustained misconduct complaints resulting in suspension within the past five years.

The IMT raised concerns regarding these low eligibility thresholds, which would result in few officers being deemed ineligible to serve in this specialized role that serves vulnerable populations. During the fifth monitoring period, the CPD responded to the IMT's concerns by providing the IMT with a substantially revised version of S05-14, *Crisis Intervention Team (CIT) Program*. That directive revised a portion of the eligibility criteria, lowering the sustained misconduct complaint suspension period from seven to three days, thereby ensuring a higher standard of eligibility assessment. While the paragraph does not delineate minimum qualifications, we believe it is incumbent on the City to provide standards that would more adequately exclude officers who have demonstrated they are unlikely to be a good match for a specialized role serving vulnerable populations. This is especially important as the CPD continues to transition to a mandatory CIT model. While the IMT appreciated the CPD's reconsideration of the eligibility standard, we recom-

mended that the CPD apply the same thresholds required for School Resource Officers to Certified CIT Officers, which are more aligned with specialized roles for vulnerable individuals.

In the sixth reporting period, the CPD adopted the same thresholds for CIT Officers as School Resource Officers, and it incorporated those thresholds into policy. The CPD should be commended for this. S05-14 was finalized during this reporting period. The CPD also developed eLearning materials intended to educate all officers on the CIT program, including policy changes which affect the entire department. This eLearning addresses the requirements of ¶104.

Looking forward, to achieve secondary compliance, the CPD must demonstrate that 95% of officers complete the eLearning and develop outcome-based metrics to establish a floor by which progress toward operational compliance may be assessed. The IMT will review records that demonstrate that the CPD has properly qualified personnel serving as CIT officers. To that end, the IMT recommends that the CPD revise its attendance records under ¶104 to align with the eligibility criteria and training requirements established by the Consent Decree, as well as with the CPD's forms 15.518, *Request for CIT Training*, and 15.519, *Request for CIT Officer Designation*. Specifically, the CPD should consider including a separate excel sheet that captures data such as: (a) Officer name and District of assignment; (b) newly promoted to Rank of [sergeant/lieutenant]; (c) promotion date; (d) CIT Basic training completion date; (e) CIT Refresher training completion date; (f) mandatory requirement; (g) whether the officer opted in or out of CIT Designated Officer; and (h) if opted out, the officer's reason for opting out (consider a drop down menu to include options such as "Disciplinary History Exclusion," "Did not want to be prioritized for response," or "Officer believes skill set is not suited to be a specialized CIT officer"). The CPD should consider capturing these recommended data points on separate excel sheets for the 40-hour Basic CIT Training, CIT Refresher Training, CIT Advanced Training (such as Youth, Veteran), In-service Training covering CIT topics, and Recruit Training.

Paragraph 104 Compliance Progress History

FIRST REPORTING PERIOD	SECOND REPORTING PERIOD	THIRD REPORTING PERIOD
SEPTEMBER 1, 2019 – AUGUST 31, 2019	SEPTEMBER 1, 2019 – FEBRUARY 29, 2020	MARCH 1, 2020 – DECEMBER 31, 2020
COMPLIANCE PROGRESS:	COMPLIANCE PROGRESS:	COMPLIANCE PROGRESS:
Not Applicable	Not Applicable	None

FOURTH REPORTING PERIOD	FIFTH REPORTING PERIOD	SIXTH REPORTING PERIOD
JANUARY 1, 2021 – JUNE 30, 2021	JULY 1, 2021 – DECEMBER 31, 2021	JANUARY 1, 2022 – JUNE 30, 2022
COMPLIANCE PROGRESS:	COMPLIANCE PROGRESS:	COMPLIANCE PROGRESS:
None	None	Preliminary

Crisis Intervention: ¶105

105. *CPD will continue to maintain an up-to-date list of Certified CIT Officers, including their unit of assignment.*

Compliance Progress

(Reporting Period: January 1, 2022, through June 31, 2022)

Preliminary:	***In Compliance*** **(THIRD REPORTING PERIOD)**
Secondary:	***Not in Compliance***
Full:	***Not Yet Assessed***

In the sixth reporting period, the City and the CPD maintained Preliminary compliance with the requirements of ¶105.

The CPD's Special Order S05-14, *Crisis Intervention Team (CIT) Program*, clearly states that the Training Division is responsible for updating officer training records regarding the completion of Basic, Advanced, and Refresher CIT training.

The CPD and the OEMC continue to utilize multiple approaches for informing the OEMC telecommunicators which CPD members are CIT certified. For example, the OEMC personnel may access the roster of CIT officers available on a per-shift basis based on the CPD's and the OEMC's auto-generated software platforms. Additionally, watch supervisors can provide a list of CIT officers to the OEMC utilizing a separate dataset. In a CIT Refresher course observed by the IMT during this reporting period, some officers expressed concern regarding the accuracy of officers on patrol designated as "Certified CIT Officers" (*see* ¶¶92-95).

Progress before the Sixth Reporting Period

In previous reports, we noted that Secondary compliance would depend on the development of a system plan to ensure that officers who violate the eligibility criteria or who allow their required CIT training to lapse are removed from the list of "Certified CIT Officers" in the CPD's CLEAR and eLearning systems. In response, the CPD provided CIU S.O. 20-02, *CIT Training Schedule, Attendance, Eligibility, and Recruitment*, in the fourth reporting period. SO 20-02 and S05-14 indicate that the CPD will use the CPD's Learning Management System to track when CIT officers need CIT Refresher Training, so that those officers may avoid being removed from the Certified CIT Officers list prioritized for dispatch. Due to limitations in their current electronic system, training records can only be updated quarterly to remove officers who no longer meet the eligibility requirements for certified CIT Officers.

Progress in the Sixth Reporting Period

To achieve Secondary compliance, the CPD must demonstrate evidence of a functioning system that identifies and removes ineligible officers from the list of Certified CIT officers. Further, the IMT will review whether the CPD has plans to ensure that officers who violate the Certified CIT Officer eligibility criteria, or who allow their required CIT training to lapse, are undesignated in the CLEAR and eLearning systems. The IMT will also review whether the CPD has clearly designated who is responsible for maintaining an up-to-date list of Certified CIT Officers. Presently, this function is assigned to the CIT Training team, which is understaffed. To assess Secondary compliance, the IMT must review not only a current list of Certified CIT officers, but also a system for tracking officer status. The IMT will also assess whether the CPD tracks the number of officers who were "undesignated" as CIT responders each reporting period, including why those officers were undesignated.

Going forward, the IMT recommends that the CPD revise its attendance records under ¶105 to align with the eligibility criteria and training requirements established by the Consent Decree, as well as with the CPD's forms 15.518, *Request for CIT Training*, and 15.519, *Request for CIT Officer Designation*. Specifically, the CPD should consider including a separate excel sheet that captures data such as: (a) Officer name and District of assignment; (b) newly promoted to Rank of [sergeant/lieutenant]; (c) promotion date; (d) CIT Basic training completion date; (e) CIT Refresher training completion date; (f) mandatory requirement; (g) whether the officer opted in or out of CIT Designated Officer; and (h) if opted out, the officer's reason for opting out (consider a drop down menu to include options such as "Disciplinary History Exclusion," "Did not want to be prioritized for response," or "Officer believes skill set is not suited to be a specialized CIT officer"). The CPD should consider capturing these recommended data points on separate excel sheets for the 40-hour Basic CIT Training, CIT Refresher Training, CIT Advanced Training (such as Youth, Veteran), In-service Training covering CIT topics, and Recruit Training. This data will permit the IMT to assess Secondary compliance with ¶105 in an effective and efficient manner.

Paragraph 105 Compliance Progress History

FIRST REPORTING PERIOD	SECOND REPORTING PERIOD	THIRD REPORTING PERIOD
SEPTEMBER 1, 2019 – AUGUST 31, 2019	SEPTEMBER 1, 2019 – FEBRUARY 29, 2020	MARCH 1, 2020 – DECEMBER 31, 2020
COMPLIANCE PROGRESS:	COMPLIANCE PROGRESS:	COMPLIANCE PROGRESS:
Not Applicable	Not Applicable	Preliminary
FOURTH REPORTING PERIOD	**FIFTH REPORTING PERIOD**	**SIXTH REPORTING PERIOD**
JANUARY 1, 2021 – JUNE 30, 2021	JULY 1, 2021 – DECEMBER 31, 2021	JANUARY 1, 2022 – JUNE 30, 2022
COMPLIANCE PROGRESS:	COMPLIANCE PROGRESS:	COMPLIANCE PROGRESS:
Preliminary	Preliminary	Preliminary

Crisis Intervention: ¶106

106. *CPD will require that, when available, at least one Certified CIT Officer will respond to any incident identified as involving an individual in crisis. Certified CIT Officers will continue to be prioritized for dispatch to incidents identified as involving individuals in crisis, as assigned. CPD will review and revise the appropriate policies to ensure that, in situations in which a Certified CIT Officer is not available to respond to a call or incident identified as involving an individual in crisis, the responding officer engages in crisis intervention response techniques, as appropriate and consistent with CPD policy and their training, throughout the incident. Responding officers will document all incidents involving an individual in crisis in a manner consistent with this Agreement.*

Compliance Progress

(Reporting Period: January 1, 2022, through June 31, 2022)

Preliminary:	***In Compliance*** **(THIRD REPORTING PERIOD)**
Secondary:	***Not in Compliance***
Full:	***Not in Compliance***

During the sixth monitoring period, the City and the CPD maintained Preliminary compliance with the requirements of ¶106.

To assess Preliminary compliance, the IMT reviewed the CPD's relevant directives, such as S04-20, *Recognizing and Responding to Individuals in Crisis*, which adequately addresses the requirements of ¶106. Additionally, the CPD has developed an eLearning course intended for all officers that educates them on CIT-related policy and program changes; we anticipate this training to be delivered in the next reporting period. The City has also developed and implemented a comprehensive *Crisis Intervention Team (CIT) Report* for officers to document incidents involving an individual in mental health crisis.

To assess Secondary compliance, the IMT reviewed the CPD's relevant training efforts. While the IMT appreciates the CPD's efforts to update and develop CIT curricula, the CPD has not yet achieved Secondary compliance with ¶106. For example, non-Certified CIT Officers have yet to receive updated training on responding to calls for service involving individuals in mental health crisis. Moreover, the CPD has not trained its officers on how to properly complete the *Crisis Intervention Team (CIT) Report*. Both of these topics are addressed in the CIT eLearning course that has yet to be delivered. To achieve Secondary compliance, the CPD must demonstrate that 95% of officers have completed the CIT eLearning training. Ad-

ditionally, we note that the CPD has strengthened its annual *De-escalation, Response to Resistance, and Use of Force* training, allocating additional training time to de-escalation and crisis intervention, which also addresses some of the requirements of ¶106. The 8-hour crisis intervention training, required as part of the 2022 annual in-service, is also now underway. The IMT anticipates that the CPD will achieve Secondary compliance with ¶106 when 95% of officers have completed the required annual in-service for 2022. This would equip all officers with the skills and knowledge required under ¶106.

Looking toward assessing Full compliance, the IMT will review the CPD's efforts to capture, manage, and analyze valid and reliable data, as well as the CPD's dispatch prioritization of Certified CIT Officers. As we have mentioned throughout this section, the CPD is moving toward a "train all" mandated CIT model; the IMT will remain focused on the prioritization of officers dispatched to crisis and mental health-related calls for service.

Paragraph 106 Compliance Progress History

FIRST REPORTING PERIOD	SECOND REPORTING PERIOD	THIRD REPORTING PERIOD
SEPTEMBER 1, 2019 – AUGUST 31, 2019	SEPTEMBER 1, 2019 – FEBRUARY 29, 2020	MARCH 1, 2020 – DECEMBER 31, 2020
COMPLIANCE PROGRESS:	COMPLIANCE PROGRESS:	COMPLIANCE PROGRESS:
Not Applicable	Not Applicable	Preliminary
FOURTH REPORTING PERIOD	**FIFTH REPORTING PERIOD**	**SIXTH REPORTING PERIOD**
JANUARY 1, 2021 – JUNE 30, 2021	JULY 1, 2021 – DECEMBER 31, 2021	JANUARY 1, 2022 – JUNE 30, 2022
COMPLIANCE PROGRESS:	COMPLIANCE PROGRESS:	COMPLIANCE PROGRESS:
Preliminary	Preliminary	Preliminary

Crisis Intervention: ¶107

107. *Within 180 days of the Effective Date, and quarterly thereafter, CPD will collect and analyze the number of calls for service identified as involving individuals in crisis for every watch in each district to evaluate the number of Certified CIT Officers needed to timely respond. The number of Certified CIT Officers on each watch in every district will be driven by the demand for crisis intervention services for the particular watch and district.*

Compliance Progress

(Reporting Period: January 1, 2022, through June 31, 2022)

Recurring Schedule:	Quarterly	☐ **Met**	☑ **Missed**

Preliminary:	***Not in Compliance***
Secondary:	***Not in Compliance***
Full:	***Not in Compliance***

During the sixth monitoring period, the CPD did not achieve Preliminary compliance with ¶107.

Progress before the Sixth Reporting Period

During the fourth monitoring period, the CPD provided a revised draft of Special Order 20-05, *CIT Officer Implementation Plan.* However, S020-05 required additional revisions before it could be finalized. For example, we had requested that the CPD define the term "timely," as used in ¶107 (i.e., "timely respond"), to determine the number of CIT officers needed in a particular district and watch. Upon completing the necessary revisions, we anticipate the CPD will achieve Preliminary compliance with ¶107.

During the fifth reporting period, the CPD regressed in its data collection and analysis. Its former data analyst resigned at the end of the third reporting period. While the CPD has now hired and onboarded a new analyst, the IMT has yet to receive data analysis that demonstrates robust data reporting and analysis required by this paragraph.

As the CPD builds its capacity for more sophisticated analysis to address the requirements of this paragraph, we encourage the Crisis Intervention Unit to engage in simple analyses that provide some foundational understanding. The CPD should then use this foundational understanding to further build its analysis. For example, if 5% of all CIT calls occur in a certain district, the CPD could reasonably expect approximately 5% of all CIT officers to be in that same district. This straightforward analysis would begin to inform the "demand for crisis intervention services," which

the CPD is required to understand under ¶107. The IMT is concerned that the CIU, who is presently responsible for this function, is understaffed. We look forward to an update on the staffing capability and observing the Crisis Intervention Unit's improved analytical functions in the next reporting period.

Paragraph 107 Compliance Progress History

FIRST REPORTING PERIOD	SECOND REPORTING PERIOD	THIRD REPORTING PERIOD
SEPTEMBER 1, 2019 – AUGUST 31, 2019	SEPTEMBER 1, 2019 – FEBRUARY 29, 2020	MARCH 1, 2020 – DECEMBER 31, 2020
COMPLIANCE PROGRESS:	COMPLIANCE PROGRESS:	COMPLIANCE PROGRESS:
Not Applicable	None	None

FOURTH REPORTING PERIOD	FIFTH REPORTING PERIOD	SIXTH REPORTING PERIOD
JANUARY 1, 2021 – JUNE 30, 2021	JULY 1, 2021 – DECEMBER 31, 2021	JANUARY 1, 2022 – JUNE 30, 2022
COMPLIANCE PROGRESS:	COMPLIANCE PROGRESS:	COMPLIANCE PROGRESS:
None	None	None

Crisis Intervention: ¶108

108. *Within 180 days of the Effective Date, CPD will develop an implementation plan ("CIT Officer Implementation Plan") based on, at a minimum, its analysis of the demand for crisis intervention services for each watch in each district. The CIT Officer Implementation Plan will identify the number of Certified CIT Officers necessary, absent extraordinary circumstances, to meet the following response ratio targets: a. a sufficient number of Certified CIT Officers to ensure that Certified CIT Officers are available on every watch in each district to timely respond to at least 50% of the calls for service identified as involving individuals in crisis, absent extraordinary circumstances ("initial response ratio target"); and b. a sufficient number of Certified CIT Officers to ensure that Certified CIT Officers are available on every watch in each district to timely respond to at least 75% of the calls for service identified as involving individuals in crisis, absent extraordinary circumstances ("second response ratio target").*

Compliance Progress

(Reporting Period: January 1, 2022, through June 31, 2022)

Preliminary:	***Not in Compliance***
Secondary:	***Not in Compliance***
Full:	***Not in Compliance***

In the sixth monitoring period, the CPD did not achieve Preliminary compliance with ¶108.

To achieve Preliminary compliance with ¶108, the City and the CPD must develop and finalize policies that incorporate ¶108's requirements. Specifically, the City and the CPD must implement sufficient policies, procedures, or written guidance through the process described in the Consent Decree (¶¶626–41).

Progress before the Sixth Reporting Period

During the fourth monitoring period, the IMT reviewed a revised draft of Special Order 20-05, *CIT Officer Implementation Plan*. However, SO20-05 required additional revisions before it could be finalized. For example, the IMT requested that the CPD define the term "timely," as used in ¶108, to determine the number of CIT officers needed in a particular district and watch. Upon the necessary revisions, the CPD will achieve Preliminary compliance with ¶108.

During the fifth reporting period, the CPD regressed in its data collection and analysis. Its former data analyst resigned at the end of the third reporting period. While the CPD hired and onboarded a new analyst during the sixth reporting period, the IMT has yet to receive data that demonstrates the Crisis Intervention Unit's capacity for robust data reporting and analysis.

We note that another 6-month monitoring period has passed without the completion of the *CIT Officer Implementation Plan*, as required by ¶108 "within 180 days of the Effective Date," which was March 2019. While the IMT understands the CPD's delaying of this plan until the CPD is able to support the plan with reliable data and a more-robust strategy, the CPD should focus on the actions necessary to produce this vital plan. Moreover, the plan should detail how the CPD is to achieve the required response-ratio targets, as required by this paragraph.

Paragraph 108 Compliance Progress History

FIRST REPORTING PERIOD SEPTEMBER 1, 2019 – AUGUST 31, 2019 COMPLIANCE PROGRESS: Not Applicable	SECOND REPORTING PERIOD SEPTEMBER 1, 2019 – FEBRUARY 29, 2020 COMPLIANCE PROGRESS: None	THIRD REPORTING PERIOD MARCH 1, 2020 – DECEMBER 31, 2020 COMPLIANCE PROGRESS: None
FOURTH REPORTING PERIOD JANUARY 1, 2021 – JUNE 30, 2021 COMPLIANCE PROGRESS: None	FIFTH REPORTING PERIOD JULY 1, 2021 – DECEMBER 31, 2021 COMPLIANCE PROGRESS: None	SIXTH REPORTING PERIOD JANUARY 1, 2022 – JUNE 30, 2022 COMPLIANCE PROGRESS: None

Crisis Intervention: ¶109

109. *The CIT Officer Implementation Plan will further identify the steps that are necessary to meet and maintain the initial response ratio target by January 1, 2020, and the second response ratio target by January 1, 2022 and the strategies, methods, and actions CPD will implement to make progress to timely achieve and maintain these response ratio targets.*

Compliance Progress

(Reporting Period: January 1, 2022, through June 31, 2022)

Recurring Schedule:	March 6, 2022	☐ **Met**	☑ **Missed**
	*Extended from January 1, 2022, due to COVID-19		
Preliminary:	***Not in Compliance***		
Secondary:	***Not in Compliance***		
Full:	***Not in Compliance***		

In the sixth monitoring period, the CPD did not achieve Preliminary compliance with ¶109. To achieve Preliminary compliance with ¶109, the City and the CPD must develop and finalize policies that incorporate ¶109's requirements.

Progress before the Sixth Reporting Period

During the fourth monitoring period, the CPD provided a revised draft of Special Order 20-05, *CIT Officer Implementation Plan*. However, SO20-05 required additional revisions before it could be finalized. For example, we have requested that the CPD define the term "timely," as used in ¶¶107-08, to determine the number of CIT members needed in a particular district and watch. Upon completing the necessary revisions, we anticipate the CPD will achieve Preliminary compliance with ¶109.

During the fifth reporting period, the CPD regressed in its data collection and analysis. Its former data analyst resigned at the end of the third reporting period. While the CPD has now hired and onboarded a new analyst, the IMT has yet to receive data that demonstrates the type of robust data reporting and analysis required by ¶109. During the sixth reporting period, the CPD had still not dedicated the necessary effort to cleaning and analyzing the data required by ¶108, nor has it used the analyses data to inform the *CIT Officer Implementation Plan* required by ¶109.

We will continue to assess the CPD's efforts to ensure that its CIT data is reliable. To achieve Secondary compliance with ¶109, the CPD must demonstrate that the *CIT Officer Implementation Plan* is complete and includes the number of Certified CIT Officers necessary to satisfy the requisite response ratios.

Paragraph 109 Compliance Progress History

FIRST REPORTING PERIOD	SECOND REPORTING PERIOD	THIRD REPORTING PERIOD
SEPTEMBER 1, 2019 – AUGUST 31, 2019	SEPTEMBER 1, 2019 – FEBRUARY 29, 2020	MARCH 1, 2020 – DECEMBER 31, 2020
COMPLIANCE PROGRESS:	COMPLIANCE PROGRESS:	COMPLIANCE PROGRESS:
Not Applicable	None	Status Update

FOURTH REPORTING PERIOD	FIFTH REPORTING PERIOD	SIXTH REPORTING PERIOD
JANUARY 1, 2021 – JUNE 30, 2021	JULY 1, 2021 – DECEMBER 31, 2021	JANUARY 1, 2022 – JUNE 30, 2022
COMPLIANCE PROGRESS:	COMPLIANCE PROGRESS:	COMPLIANCE PROGRESS:
None	None	None

Crisis Intervention: ¶110

110. *Within 180 days of completing the CIT Officer Implementation Plan, and annually thereafter, CPD will submit a report to the Monitor and the Office of the Attorney General ("OAG") regarding the progress the Department has made to meet: (a) the response ratio targets ("Implementation Plan Goals") identified in the Implementation Plan and (b) the number of Certified CIT Officers identified as necessary to achieve the response ratio targets. The Monitor and OAG will have 30 days to respond in writing to CPD's progress report. The Monitor and CPD will publish CPD's report and the Monitor's and OAG's response, if any, within in 45 days of the date CPD submitted the progress report to the Monitor and OAG.*

Compliance Progress

(Reporting Period: January 1, 2022, through June 31, 2022)

Recurring Schedule: Moving ☑ **Not Yet Applicable**

Preliminary: ***Not in Compliance***
Secondary: ***Not in Compliance***
Full: ***Not in Compliance***

In the sixth monitoring period, the City and the CPD did not achieve any level of compliance with ¶110. Because this paragraph's requirements are tied to the CPD's completion of the *CIT Officer Implementation Plan,* these requirements are not yet applicable.

To achieve Preliminary compliance with ¶110, the City and the CPD must develop and finalize policies that incorporate ¶110's requirements and are in keeping with Consent Decree requirements ¶¶626-41, including the requirement that policies be "plainly written, logically organized, and use clearly defined terms." We have requested, for example, that the CPD clearly define "timely," as used in ¶¶107-08, in its draft of the *CIT Officer Implementation Plan*.

Progress before the Sixth Reporting Period

During the fourth monitoring period, the IMT reviewed a revised draft of Special Order 20-05, *CIT Officer Implementation Plan*. However, SO20-05 required additional revisions before it could be finalized.

During the fifth reporting period, the CPD regressed in its data collection and analysis. Its former data analyst resigned at the end of the third reporting period. While

the CPD has now hired and onboarded a new analyst in the sixth reporting period, the IMT has yet to receive data from the CPD that demonstrates the robust data reporting and analysis required by ¶110.

Paragraph 110 Compliance Progress History

FIRST REPORTING PERIOD	SECOND REPORTING PERIOD	THIRD REPORTING PERIOD
SEPTEMBER 1, 2019 – AUGUST 31, 2019	SEPTEMBER 1, 2019 – FEBRUARY 29, 2020	MARCH 1, 2020 – DECEMBER 31, 2020
COMPLIANCE PROGRESS:	COMPLIANCE PROGRESS:	COMPLIANCE PROGRESS:
Not Applicable	None	None

FOURTH REPORTING PERIOD	FIFTH REPORTING PERIOD	SIXTH REPORTING PERIOD
JANUARY 1, 2021 – JUNE 30, 2021	JULY 1, 2021 – DECEMBER 31, 2021	JANUARY 1, 2022 – JUNE 30, 2022
COMPLIANCE PROGRESS:	COMPLIANCE PROGRESS:	COMPLIANCE PROGRESS:
None	None	None

Crisis Intervention: ¶111

111. *Through the execution of the CIT Officer Implementation Plan, CPD will ensure that it maintains a sufficient number of Certified CIT Officers on duty on every watch of each district to help ensure that a Certified CIT Officer is available to timely respond to each incident identified as involving individuals in crisis, absent extraordinary circumstances.*

Compliance Progress

(Reporting Period: January 1, 2022, through June 31, 2022)

Preliminary:	***Not in Compliance***
Secondary:	***Not in Compliance***
Full:	***Not in Compliance***

In the sixth monitoring period, the City and the CPD did not achieve Preliminary compliance with the requirements of ¶111.

To achieve Preliminary compliance with ¶111, the City and the CPD must develop and finalize policies that incorporate ¶111's requirements. Specifically, the City and the CPD must implement sufficient policies, procedures, or written guidance through the process described in the Consent Decree (¶¶626–41), which outlines applicable consultation, resolution, workout, and public-comment periods. These paragraphs detail various requirements, including that policies are "plainly written, logically organized, and use clearly defined terms."

During the fourth monitoring period, the CPD provided a revised draft of Special Order SO20-05, *CIT Officer Implementation Plan*. However, the SO20-05 required additional revisions before it could be finalized. For example, we have requested that the CPD define the term "timely," as used in ¶111, to determine the number of CIT officers needed in a particular district and watch. Upon implementing the necessary revisions, the CPD will achieve Preliminary compliance with ¶111.

During the fifth reporting period, the CPD regressed in its data collection and analysis. Its former data analyst resigned at the end of the third reporting period. While the CPD has now hired and onboarded a new analyst, the IMT has yet to receive data that demonstrates the CPD's robust data reporting and analysis required by this paragraph.

To assess Secondary compliance, the IMT will also make reasonable efforts to ensure that the CPD's Crisis Intervention Unit data is reliable. Moving forward, Secondary compliance will also depend on the completion of the *CIT Officer Implementation Plan*, including the CPD's determination of the number of Certified CIT Officers necessary to satisfy the requisite response ratios. As indicated in previous paragraph assessments, the IMT is concerned with the under-staffing of the CIU.

Paragraph 111 Compliance Progress History

FIRST REPORTING PERIOD	SECOND REPORTING PERIOD	THIRD REPORTING PERIOD
SEPTEMBER 1, 2019 – AUGUST 31, 2019	SEPTEMBER 1, 2019 – FEBRUARY 29, 2020	MARCH 1, 2020 – DECEMBER 31, 2020
COMPLIANCE PROGRESS:	COMPLIANCE PROGRESS:	COMPLIANCE PROGRESS:
Not Applicable	Not Applicable	Preliminary

FOURTH REPORTING PERIOD	FIFTH REPORTING PERIOD	SIXTH REPORTING PERIOD
JANUARY 1, 2021 – JUNE 30, 2021	JULY 1, 2021 – DECEMBER 31, 2021	JANUARY 1, 2022 – JUNE 30, 2022
COMPLIANCE PROGRESS:	COMPLIANCE PROGRESS:	COMPLIANCE PROGRESS:
Not Applicable	Not Applicable	None

Crisis Intervention: ¶112

112. *If the Monitor determines that CPD has not made material progress toward achieving the CIT Officer Implementation Plan Goals during any given reporting period, CPD will review and revise the CIT Officer Implementation Plan as necessary to enable CPD to make material progress to achieve the Implementation Plan Goals.*

Compliance Progress

(Reporting Period: January 1, 2022, through June 31, 2022)

Preliminary:	***Not in Compliance***
Secondary:	***Not in Compliance***
Full:	***Not in Compliance***

In the sixth monitoring period, the City and the CPD did not achieve Preliminary compliance with ¶112.

To achieve Preliminary compliance with ¶112, the City and the CPD must develop and finalize policies that incorporate ¶112's requirements and the goals of the *CIT Officer Implementation Plan.*

During the fourth monitoring period, the CPD provided a revised draft of Special Order SO20-05, *CIT Officer Implementation Plan*. However, SO20-05 required additional revisions before it could be finalized. For example, we have requested that the CPD define the term "timely," as used in ¶¶107-08, to determine the number of CIT officers needed in a particular district and watch. Upon completing the necessary revisions, we anticipate the CPD will be in Preliminary compliance with ¶112.

The IMT remains concerned that the CPD has not yet completed the *CIT Officer Implementation Plan*, required by ¶¶108-112. While the IMT appreciates delaying progress on the Plan until it is supported by valid and reliable data and a more robust strategy, the CPD should focus on what actions it must take to produce the Plan. Without a completed *CIT Officer Implementation Plan*, the IMT cannot assess the requirements of ¶112.

Paragraph 112 Compliance Progress History

FIRST REPORTING PERIOD
SEPTEMBER 1, 2019 – AUGUST 31, 2019
COMPLIANCE PROGRESS:
Not Applicable

SECOND REPORTING PERIOD
SEPTEMBER 1, 2019 – FEBRUARY 29, 2020
COMPLIANCE PROGRESS:
Not Applicable

THIRD REPORTING PERIOD
MARCH 1, 2020 – DECEMBER 31, 2020
COMPLIANCE PROGRESS:
Preliminary

FOURTH REPORTING PERIOD
JANUARY 1, 2021 – JUNE 30, 2021
COMPLIANCE PROGRESS:
Not Applicable

FIFTH REPORTING PERIOD
JULY 1, 2021 – DECEMBER 31, 2021
COMPLIANCE PROGRESS:
Not Applicable

SIXTH REPORTING PERIOD
JANUARY 1, 2022 – JUNE 30, 2022
COMPLIANCE PROGRESS:
None

Crisis Intervention: ¶113

113. *CPD will require that responding Certified CIT Officers will take the lead in interacting with individuals in crisis, once on scene, when appropriate and with supervisory approval, if required by CPD policy. If an officer who is not a CIT-Certified Officer has assumed responsibility for the scene, the officer will seek input from the on-scene Certified CIT Officer on strategies for resolving the crisis, when it is safe and practical to do so.*

Compliance Progress

(Reporting Period: January 1, 2022, through June 31, 2022)

Preliminary:	***In Compliance*** **(THIRD REPORTING PERIOD)**
Secondary:	***Not in Compliance***
Full:	***Not in Compliance***

In the sixth monitoring period, the CPD maintained Preliminary compliance with the requirements of ¶113.

The IMT has reviewed the CPD's policy S04-20, *Recognizing and Responding to Individuals in Crisis*, which clearly states that officers assigned to incidents with mental-health components will request a Certified CIT-trained officer to assist, if available. We note, however, that the policy does not require the Certified CIT Officer to take the lead in interacting with individuals in crisis; the IMT encourages the CPD to consider adding language that clarifies this requirement.

To achieve Secondary compliance with ¶113, the CPD must demonstrate that 95% of officers have received the CIT eLearning, which addresses the requirements of this paragraph. Looking forward, the IMT will assesses whether the City has qualified personnel fulfilling the CIT responsibilities to achieve the goals of the Consent Decree. The IMT will also assess the City on resource allocation, staffing capacity, and efforts to fill any vacant positions. The IMT remains concerned about insufficient staffing in the Crisis Intervention Unit.

Paragraph 113 Compliance Progress History

FIRST REPORTING PERIOD	SECOND REPORTING PERIOD	THIRD REPORTING PERIOD
SEPTEMBER 1, 2019 – AUGUST 31, 2019	SEPTEMBER 1, 2019 – FEBRUARY 29, 2020	MARCH 1, 2020 – DECEMBER 31, 2020
COMPLIANCE PROGRESS:	COMPLIANCE PROGRESS:	COMPLIANCE PROGRESS:
Not Applicable	Not Applicable	Preliminary
FOURTH REPORTING PERIOD	**FIFTH REPORTING PERIOD**	**SIXTH REPORTING PERIOD**
JANUARY 1, 2021 – JUNE 30, 2021	JULY 1, 2021 – DECEMBER 31, 2021	JANUARY 1, 2022 – JUNE 30, 2022
COMPLIANCE PROGRESS:	COMPLIANCE PROGRESS:	COMPLIANCE PROGRESS:
Preliminary	Preliminary	Preliminary

Crisis Intervention: ¶114

114. *Certified CIT Officers will receive ongoing feedback from the CIT Program and unit supervisors regarding their responses to incidents identified as involving individuals in crisis.*

Compliance Progress

(Reporting Period: January 1, 2022, through June 31, 2022)

Preliminary:	***In Compliance*** **(THIRD REPORTING PERIOD)**
Secondary:	***Not in Compliance***
Full:	***Not Yet Assessed***

In the sixth monitoring period, the CPD maintained Preliminary compliance with the requirements of ¶114.

To assess Preliminary compliance, the IMT reviewed the CPD's Special Order S05-14, *Crisis Intervention Team (CIT) Program*, which requires that area-level personnel within the CIT Unit will provide advice, guidance, and feedback on incidents involving people in crisis, and will follow up on mental and behavioral health-related events beyond the preliminary investigation.

However, in the fifth reporting period, the CPD's Special Order S05-14, *Crisis Intervention Team (CIT) Program* underwent significant revisions. Under the newly revised S05-14, the CIT District, Operations, and Community Support (CIT DOCS) unit is responsible for "providing members with feedback." This revised draft version neglected to include supervisors (*i.e.*, officers' shift sergeants and lieutenants) into the responsibility for providing feedback, as required by ¶114. Field supervisors overseeing patrol officers are uniquely positioned to help provide crucial feedback to CIT officers, whose service occurs alongside vulnerable populations. Additionally, the CIT DOCS unit is significantly understaffed, making the responsibilities designated to them under ¶114 challenging.

In the sixth reporting period, the CPD incorporated the requirements of ¶114 – including field supervisors – into S05-14. The IMT appreciates this further revision.

To assess Secondary compliance, the IMT will assess evidence that unit supervisors (*i.e.*, members' shift sergeant and lieutenant) and CIT DOCS personnel are providing ongoing feedback after officers interact with people in mental-health crisis. The CPD supervisors should receive the 40-hour Basic CIT training in order to provide this valuable feedback. Further, Unit supervisors should be provided training on the responsibilities required by ¶114. While the CPD's eLearning training being developed for all CPD officers includes a detailed review of relevant policy changes, that eLearning training lacks supervisor-specific details on the process of reviewing reports and evaluating officer responses to calls involving a person in mental

health crisis. *See* ¶119. Additionally, the supervisor promotion training does not cover any topic related to CIT.

Paragraph 114 Compliance Progress History

FIRST REPORTING PERIOD	SECOND REPORTING PERIOD	THIRD REPORTING PERIOD
SEPTEMBER 1, 2019 – AUGUST 31, 2019	SEPTEMBER 1, 2019 – FEBRUARY 29, 2020	MARCH 1, 2020 – DECEMBER 31, 2020
COMPLIANCE PROGRESS:	COMPLIANCE PROGRESS:	COMPLIANCE PROGRESS:
Not Applicable	Not Applicable	Preliminary

FOURTH REPORTING PERIOD	FIFTH REPORTING PERIOD	SIXTH REPORTING PERIOD
JANUARY 1, 2021 – JUNE 30, 2021	JULY 1, 2021 – DECEMBER 31, 2021	JANUARY 1, 2022 – JUNE 30, 2022
COMPLIANCE PROGRESS:	COMPLIANCE PROGRESS:	COMPLIANCE PROGRESS:
Preliminary	Preliminary	Preliminary

Crisis Intervention: ¶115

115. *CPD has designated and will maintain a Certified CIT Officer, at the rank of Lieutenant or above, with the sole responsibility to act as a Crisis Intervention Team Program Coordinator ("CIT Coordinator"). The CIT Coordinator will work to increase the effectiveness of CPD's CIT Program, improve CPD's responses to incidents involving individuals in crisis, and facilitate community engagement between CPD and crisis intervention-related stakeholders.*

Compliance Progress

(Reporting Period: January 1, 2022, through June 31, 2022)

Preliminary: ***In Compliance*** **(NEW)**
Secondary: ***Not in Compliance***
Full: ***Not in Compliance***

In the sixth reporting period, the City and the CPD achieved Preliminary compliance with the requirements of ¶115. The IMT reviewed CPD policy S05-14 *Crisis Intervention Team (CIT) Program*, which adequately incorporates the requirements of ¶115.

We note that ¶115 requires the CPD to "designate and … maintain a Certified CIT Officer, at the rank of Lieutenant or above, with the *sole* responsibility to act as a Crisis Intervention Team Program Coordinator" (emphasis added). In a previous monitoring period, the designated CIT Coordinator was promoted to Deputy Chief overseeing the Education and Training Division. This resulted in the CIT Coordinator's duties being significantly expanded. During a previous submission of S05-14, the policy did not specify this important function of "sole" responsibility, but in the sixth reporting period this function was included in the revised S05-14, which was finalized during this reporting period.

During the fifth reporting period, the CPD onboarded a new CIT Coordinator with the sole responsibility of overseeing the CIT Program, as required by ¶115. The IMT reviewed the new CIT Coordinator's credentials and believes he is sufficiently qualified to serve in this important role. However, the IMT has had limited engagement with the new Coordinator during the sixth reporting period, interacting with the newly appointed CIT coordinator only once in the beginning of the reporting period. Additionally, ¶115 requires the CIT Coordinator to "work to increase the effectiveness of CPD's CIT Program, improve CPD's responses to incidents involving individuals in crisis, and facilitate community engagement between CPD and crisis intervention-related stakeholders." The IMT has not seen evidence demonstrating that the new CIT Coordinator is focusing on these responsibilities.

The IMT understands that onboarding is a process, however, moving forward, the IMT expects to see more evidence of the CIT Coordinator's active engagement and leadership. As indicated, ¶115 requires outcomes, including community engagement and demonstrating the CIT Program's increasing effectiveness. Secondary compliance with ¶115 will require the CPD to produce such evidence. Because the CIU is significantly understaffed, the IMT is concerned that the CIT coordinator will have the band-width to accomplish the responsibilities outlined in ¶115.

Paragraph 115 Compliance Progress History

FIRST REPORTING PERIOD	SECOND REPORTING PERIOD	THIRD REPORTING PERIOD
SEPTEMBER 1, 2019 – AUGUST 31, 2019	SEPTEMBER 1, 2019 – FEBRUARY 29, 2020	MARCH 1, 2020 – DECEMBER 31, 2020
COMPLIANCE PROGRESS:	COMPLIANCE PROGRESS:	COMPLIANCE PROGRESS:
Not Applicable	Not Applicable	Not Applicable
FOURTH REPORTING PERIOD	**FIFTH REPORTING PERIOD**	**SIXTH REPORTING PERIOD**
JANUARY 1, 2021 – JUNE 30, 2021	JULY 1, 2021 – DECEMBER 31, 2021	JANUARY 1, 2022 – JUNE 30, 2022
COMPLIANCE PROGRESS:	COMPLIANCE PROGRESS:	COMPLIANCE PROGRESS:
None	None	Preliminary

Crisis Intervention: ¶116

116. *The CIT Coordinator will receive initial and refresher professional development training that is adequate in quality, quantity, type, frequency, and scope to prepare the CIT Coordinator to take on the role and responsibilities of the CIT Coordinator, in addition to the Basic CIT training.*

Compliance Progress

(Reporting Period: January 1, 2022, through June 31, 2022)

Preliminary:	***In Compliance*** **(SECOND REPORTING PERIOD)**
Secondary:	***In Compliance*** **(THIRD REPORTING PERIOD)**
Full:	***Not in Compliance***

During the sixth monitoring period, the CPD maintained Preliminary and Secondary compliance with the requirements of ¶116.

To assess Preliminary compliance, the IMT reviewed the CPD's policy S05-14, *Crisis Intervention Team (CIT) Program*, which adequately reflects the requirements of ¶116. Moreover, the CPD achieved Secondary compliance in the third reporting period because the previous CIT Program Coordinator had both adequate training and the requisite background to fulfill the role.

Progress before the Sixth Reporting Period

As noted previously in this report, the former CIT Program Coordinator had been promoted to Deputy Chief over the Training Division and was assuming multiple roles, which contradicts ¶115's requirement that the CIT Program be the "sole responsibility" of the "designated" CIT Coordinator. In the fifth reporting period, the CPD onboarded a new CIT Coordinator, whose sole responsibility is the CIT Program.

The new coordinator also has adequate training and the requisite background to fulfill the CIT Coordinator role. The IMT has reviewed documentation indicating that the CIT Coordinator received initial 40-hour Basic CIT Training in 2016 and CIT Refresher Training in 2021.

While we encouraged the CPD to evaluate the CIT Coordinator's on-the-street experience as a CIT officer as a part of the selection criteria for a CIT Coordinator, the CPD opted to not consider this experience of CIT Coordinator candidates. The IMT continues to encourage the CPD to consider this recommendation, as we believe such experience adds to the foundational effectiveness of any CIT Coordinator who oversees the CIT program. On-the-ground context knowledge is important for any supervisory role, and the CIT Coordinator is no exception.

Moreover, the IMT has had limited engagement with the new CIT Coordinator during the sixth reporting period, interacting with him once in the beginning of the reporting period. The IMT understands that onboarding is a process, however, moving forward, the IMT expects to see more evidence of the CIT Coordinator's active engagement and leadership. The IMT remains concerned that the CIU is severely understaffed, thereby not allowing the CIT coordinator to complete the requirements of the role. *See* ¶ 115. As indicated, ¶115 requires outcomes, including community engagement and demonstrating the CIT Program's increasing effectiveness. Secondary compliance with ¶115 will require the CPD to produce such evidence.

To achieve Full compliance, the CIT Program Coordinator must provide evidence that the requirements of ¶¶115–17 are being met, demonstrating the CIT Coordinator is effectively engaged in the roles and responsibilities outlined for this position.

Paragraph 116 Compliance Progress History

FIRST REPORTING PERIOD	SECOND REPORTING PERIOD	THIRD REPORTING PERIOD
SEPTEMBER 1, 2019 – AUGUST 31, 2019	SEPTEMBER 1, 2019 – FEBRUARY 29, 2020	MARCH 1, 2020 – DECEMBER 31, 2020
COMPLIANCE PROGRESS:	COMPLIANCE PROGRESS:	COMPLIANCE PROGRESS:
Not Applicable	Preliminary	Secondary
FOURTH REPORTING PERIOD	**FIFTH REPORTING PERIOD**	**SIXTH REPORTING PERIOD**
JANUARY 1, 2021 – JUNE 30, 2021	JULY 1, 2021 – DECEMBER 31, 2021	JANUARY 1, 2022 – JUNE 30, 2022
COMPLIANCE PROGRESS:	COMPLIANCE PROGRESS:	COMPLIANCE PROGRESS:
Secondary	Secondary	Secondary

Crisis Intervention: ¶117

117. *The responsibilities of the CIT Coordinator will include, at a minimum: a. developing and managing a uniform CIT Program strategy; b. researching and identifying best practices to incorporate into CPD response to individuals in crisis; c. reviewing and, when necessary to meet the requirements of this Agreement, enhancing the CIT training curricula; d. selecting and removing Certified CIT Officers from the CIT Program consistent with the requirements of this Agreement; e. overseeing crisis intervention-related data collection, analysis, and reporting; f. developing and implementing CPD's portion of any Crisis Intervention Plan; g. supervising CIT Program staff; h. participating in the Advisory Committee; i. encouraging the public recognition of the efforts and successes of the CIT Program and individual Certified CIT Officers; and j. regularly communicating and interacting with relevant CPD command staff to recommend improvements to Department crisis intervention-related strategies, staffing and deployment, policies, procedures, and training.*

Compliance Progress

(Reporting Period: January 1, 2022, through June 31, 2022)

Preliminary:	***In Compliance*** **(THIRD REPORTING PERIOD)**
Secondary:	***Not in Compliance***
Full:	***Not Yet Assessed***

During the sixth monitoring period, the CPD maintained Preliminary compliance with ¶117.

As described throughout this Section, the CPD's substantially revised S05-14 *Crisis Intervention Team (CIT) Program* subsumed content from the previously submitted SOPs and incorporated the requirements of this paragraph. However, we note that the CIT Coordinator is operating without tangible, written, operational guidance for how the Coordinator is expected to execute his or her duties. To achieve Secondary compliance with ¶117, the CPD must develop training plans and operational guidance that address ¶117's requirements and provide evidence of progress toward the requirements of ¶117. While the CPD has produced documents demonstrating that the new CIT Coordinator is sufficiently qualified for the role, it has not demonstrated how it will operationalize ¶117's requirements.

The CPD introduced the IMT to the new CIT Coordinator early in the sixth reporting period, but the IMT otherwise saw limited active participation or engagement from the new CIT Coordinator during the rest of the reporting period. Further, it is

unclear whether there has been sufficient scope of training and coaching to "prepare the CIT Coordinator to take on the role and responsibilities of the CIT Coordinator," per ¶116. Under ¶117, the CIT Coordinator's roles and responsibilities are expansive, as outlined in both this paragraph and in policy. The IMT awaits evidence from the CPD showing the CIT Coordinator's progress in meeting these responsibilities. While the IMT understands there is an onboarding process, the IMT would expect to see more active engagement and leadership in the identified roles and responsibilities moving forward. Full compliance will require the CPD to produce such evidence. As stated throughout this report, the CIU is understaffed, making it challenging for the CIT coordinator to fulfill the responsibilities assigned to the role.

For the IMT to assess Full compliance, the CPD must indicate which tangible factors will contribute to achieving compliance and how those factors, and the CPD's progress toward compliance, will be measured.

Paragraph 117 Compliance Progress History

FIRST REPORTING PERIOD	SECOND REPORTING PERIOD	THIRD REPORTING PERIOD
SEPTEMBER 1, 2019 – AUGUST 31, 2019	SEPTEMBER 1, 2019 – FEBRUARY 29, 2020	MARCH 1, 2020 – DECEMBER 31, 2020
COMPLIANCE PROGRESS:	COMPLIANCE PROGRESS:	COMPLIANCE PROGRESS:
Not Applicable	Not Applicable	Preliminary

FOURTH REPORTING PERIOD	FIFTH REPORTING PERIOD	SIXTH REPORTING PERIOD
JANUARY 1, 2021 – JUNE 30, 2021	JULY 1, 2021 – DECEMBER 31, 2021	JANUARY 1, 2022 – JUNE 30, 2022
COMPLIANCE PROGRESS:	COMPLIANCE PROGRESS:	COMPLIANCE PROGRESS:
Preliminary	Preliminary	Preliminary

Crisis Intervention: ¶118

118. *By January 1, 2020, CPD will require that, after responding to an incident involving an individual in crisis, the assigned CPD officer completes a CIT Report, or any similar form of documentation CPD may implement. The CIT Report, or similar documentation, at a minimum, will include: a. the nature of the incident; b. the date, time, and location of the incident; c. the subject's age, gender, and race/ethnicity; d. whether the subject is or claims to be a military veteran, if known; e. the relationship to the subject, if any and if known, of the individual calling for service; f. whether the subject has had previous interactions with CPD, if known; g. whether the subject is observed or reported to be experiencing symptoms of a mental illness, intellectual or developmental disability, co-occurring condition such as a substance use disorder, or other crisis; h. the behaviors observed during the incident, including whether the subject used or displayed a weapon; i. the name(s) and star (i.e., badge) number(s) of the assigned CPD officer(s) and whether any of the assigned officers are Certified CIT Officers; j. the name(s) and star (i.e., badge) number(s) of any supervisor responding to the scene; k. the skills, techniques, or equipment used by the responding CPD officers; l. whether a reportable use of force was documented on a Tactical Response Reports ("TRR"), or whatever similar form of documentation CPD may implement, for the incident ; m. a narrative describing the CPD officer's interaction with the subject, when no other CPD report captures a narrative account of the incident; and n. the disposition of the incident, including whether the individual was transported to municipal or community services, transported to a hospital, subject to a voluntary or involuntary commitment, or arrested.*

Compliance Progress

(Reporting Period: January 1, 2022, through June 31, 2022)

Preliminary:	***In Compliance*** **(THIRD REPORTING PERIOD)**
Secondary:	***Not in Compliance***
Full:	***Not Yet Assessed***

In the sixth reporting period, the CPD maintained Preliminary compliance with the requirements of ¶118.

To assess Preliminary compliance with ¶118, the IMT reviewed the CPD's relevant policies incorporating ¶118's requirements. The CPD achieved Preliminary compliance in the third reporting period when ¶118's requirements were memorialized into S04-20, *Recognizing and Responding to Individuals in Crisis*, which clearly states that officers must complete a *CIT Report* when they determine that a call for service includes a mental-health component.

The IMT also reviewed the CPD's CIT eLearning addressing policy changes, including the requirement that officers complete a *CIT Report* for any mental health related call for service. Previously, this requirement had only been memorialized for CIT officers in certain situations (*e.g.*, when no other report was completed).

The CPD will achieve Secondary compliance when 95% of officers have received and passed the CIT eLearning training course. Subsequent levels of compliance will require operational integrity that 95% of officers are completing the CIT Report when required, thereby informing reliable data collection. Moreover, the IMT has learned via site visits and ride-alongs with the CPD that there are challenges with completing the CIT report. For example, the CPD regularly receives service calls that are not easily categorized into whether or not they have a mental-health component. Despite this ambiguity, responding officers can only clear calls by checking a "yes" or "no" box regarding the mental-health component, even when the call has no bearing on being a mental-health call. Going forward, the CPD should consider addressing such operational challenges.

Paragraph 118 Compliance Progress History

FIRST REPORTING PERIOD	SECOND REPORTING PERIOD	THIRD REPORTING PERIOD
SEPTEMBER 1, 2019 – AUGUST 31, 2019	SEPTEMBER 1, 2019 – FEBRUARY 29, 2020	MARCH 1, 2020 – DECEMBER 31, 2020
COMPLIANCE PROGRESS:	COMPLIANCE PROGRESS:	COMPLIANCE PROGRESS:
Not Applicable	None	Preliminary

FOURTH REPORTING PERIOD	FIFTH REPORTING PERIOD	SIXTH REPORTING PERIOD
JANUARY 1, 2021 – JUNE 30, 2021	JULY 1, 2021 – DECEMBER 31, 2021	JANUARY 1, 2022 – JUNE 30, 2022
COMPLIANCE PROGRESS:	COMPLIANCE PROGRESS:	COMPLIANCE PROGRESS:
Preliminary	Preliminary	Preliminary

Crisis Intervention: ¶119

119. *CPD will require that a supervisory member reviews and approves completed CIT Reports, or any similar form of documentation CPD may implement to document incidents involving an individual in crisis, before submitting them to the CIT Program.*

Compliance Progress

(Reporting Period: January 1, 2022, through June 31, 2022)

Preliminary:	***In Compliance*** **(FOURTH REPORTING PERIOD)**
Secondary:	***Not in Compliance***
Full:	***Not Yet Assessed***

In the sixth reporting period, the City and the CPD maintained Preliminary compliance with ¶119.

To achieve Preliminary compliance with ¶119, the City and the CPD developed and finalized policies that partially incorporated ¶119's requirements. The CPD's policies were plainly written, logically organized, and used clearly defined terms, as required by ¶626. Moreover, and the policies and procedures submitted to the IMT allowed the parties to engage in a collaborative revision process. To maintain Preliminary compliance going forward, the City and the CPD will need to fully incorporate ¶119's requirements into similar policies.

Progress before the Sixth Reporting Period

To achieve Secondary compliance with ¶119, the CPD must finalize their Crisis Intervention Team (CIT) eLearning materials and ensure that ¶119's requirements are fully integrated into those materials. At least 95% of officers must receive and pass the CIT eLearning. In addition, the CPD produced the pre-service training for Sergeants and Lieutenants on August 11, 2022. Unfortunately, it does not include any content on the Crisis Intervention Program, including the requirements under ¶119. The IMT recommends that the CPD incorporate a module on the Crisis Intervention Unit and the Crisis Intervention Program to this pre-service training, which should include the responsibilities of supervisors. The 40-hour Basic CIT program that is required for pre-service is not intended for this purpose and does not cover supervisor responsibilities. Secondary compliance will be achieved when both 95% of the eLearning is completed and supervisor responsibilities under the Crisis intervention Program are fully integrated into appropriate training curricula. CIT In-service training and Pre-service training would be good considerations for achieving Secondary compliance.

The CPD's policy S04-20, *Recognizing and Responding to Individuals in Crisis*, states that supervisors will "review and *if appropriate*, approve the completed Crisis Intervention Team (CIT) Report submitted for their approval" (emphasis added). The IMT previously noted that ¶119 *requires* approval of the *CIT Report,* not just "if appropriate." This must be addressed and included in future policy revisions, as well as incorporated into training.

The IMT also reviewed the CPD's CIT eLearning, which addresses the IMT's recommended policy changes, including policy changes resulting from ¶119. The IMT noted that the eLearning covers little information specific to supervisors, including how they are expected to conduct the reviews required by ¶119.

Progress in the Sixth Reporting Period

The CPD has made progress in developing its CIT eLearning materials and *CIT In-Service Training*, which all CPD officers are required to take. These trainings thoroughly addressed the CPD's Crisis Intervention Team Program and how to respond to individuals in crisis. At the end of the sixth reporting period, the CPD's eLearning materials were still under review.

There is room for improvement regarding the CPD's eLearning materials, particularly regarding clarifying supervisor responsibilities. The IMT recommends that more information specific to supervisors be included, including how or when supervisors are expected to complete reviews of the CIT report, or other similar documents, under by ¶119. The IMT observed this ambiguity during site visit interviews in the sixth reporting period.

During the sixth reporting period, the CPD maintained preliminary compliance with ¶119. Secondary compliance will be partially achieved once 95% of the CPD officers and supervisors have received and passed the CIT eLearning. However, to achieve Secondary compliance with ¶119, supervisors will still require training on how and when to conduct the reviews of CIT Reports and similar documentation. The CPD should consider adding this information to the pre-service training for Sergeants and Lieutenants, along with the CIT In-Service training.

Full compliance will require operational integrity that the *CIT Reports* are indeed being reviewed and approved before they are submitted to the CIT Unit, thereby informing reliable data collection.

Paragraph 119 Compliance Progress History

FIRST REPORTING PERIOD	SECOND REPORTING PERIOD	THIRD REPORTING PERIOD
SEPTEMBER 1, 2019 – AUGUST 31, 2019	SEPTEMBER 1, 2019 – FEBRUARY 29, 2020	MARCH 1, 2020 – DECEMBER 31, 2020
COMPLIANCE PROGRESS:	COMPLIANCE PROGRESS:	COMPLIANCE PROGRESS:
Not Applicable	Not Applicable	Not Applicable
FOURTH REPORTING PERIOD	**FIFTH REPORTING PERIOD**	**SIXTH REPORTING PERIOD**
JANUARY 1, 2021 – JUNE 30, 2021	JULY 1, 2021 – DECEMBER 31, 2021	JANUARY 1, 2022 – JUNE 30, 2022
COMPLIANCE PROGRESS:	COMPLIANCE PROGRESS:	COMPLIANCE PROGRESS:
Preliminary	Preliminary	Preliminary

Crisis Intervention: ¶120

120. *CPD will collect, analyze, and report data regarding the number and types of incidents involving individuals in crisis and responses of CPD officers to such events to assess staffing and deployment of Certified CIT Officers and department-wide responses to individuals in crisis. The CIT Program will review the data contained within the submitted CIT Reports, or any similar form of documentation CPD may implement, to evaluate the overall response and effectiveness by CPD officers and identify any district-level and department-wide trends regarding responses to incidents identified as involving individuals in crisis.*

Compliance Progress

(Reporting Period: January 1, 2022, through June 31, 2022)

Preliminary:	***In Compliance*** **(NEW)**
Secondary:	***Not In Compliance***
Full:	***Not Yet Assessed***

In the sixth reporting period, the City and the CPD achieved Preliminary compliance with ¶120. The IMT reviewed CPD policy S05-14 *Crisis Intervention Team (CIT) Program*, which adequately incorporates the requirements of ¶120.

To achieve Preliminary compliance with ¶120, the City and the CPD must develop and finalize policies that incorporate ¶120's requirements. Specifically, the City and the CPD must implement sufficient policies, procedures, or written guidance through the process described in the Consent Decree (¶¶626–41), which outlines applicable consultation, resolution, workout, and public-comment periods. These paragraphs detail various requirements, including that policies are "plainly written, logically organized, and use clearly defined terms."

Progress before the Sixth Reporting Period

The requirements of ¶120 are found in several directives and forms which, when viewed together, largely memorialize the CPD's responsibilities for collecting, analyzing, and reporting data. The CPD's SO20-05, *CIT Officer Implementation Plan*, previously submitted in the fourth reporting period, memorialized ¶120's requirements but was never finalized.

During the fifth reporting period, SO20-05 was subsumed into a substantially revised version of S05-14, *Crisis Intervention Team Program* (S05-14), which also did not adequately incorporate ¶120's requirements.

Progress before the Sixth Reporting Period

In the sixth reporting period, the CPD produced a substantially revised version of S05-14 that addressed the IMT's outstanding comments, incorporating ¶120's requirements therein. This substantially revised version of S05-14 was finalized and the City and the CPD therefore achieved Preliminary compliance with ¶120.

Moving forward, Secondary compliance with ¶120 will require adequate methodologies for reviewing data related to the *CIT Officer Implementation Plan*, as well as data collected from the *Crisis Intervention Report*. The CPD must verify the *Crisis Intervention Report's* data, including its integrity, reliability, and comprehensiveness. Based on conversations with the CPD, we are aware that the previous *Crisis Intervention Reports* were rarely completed, especially given the number of crisis calls. The CPD must seek to ensure that officers are completing the updated CIT Report as required by policy. Additionally, 95% of officers must complete the CPD's CIT eLearning. Full compliance will require the CPD to demonstrate that district-level and department-wide trends are (1) being identified and (2) being comprehensively addressed.

Paragraph 120 Compliance Progress History

FIRST REPORTING PERIOD	SECOND REPORTING PERIOD	THIRD REPORTING PERIOD
SEPTEMBER 1, 2019 – AUGUST 31, 2019	SEPTEMBER 1, 2019 – FEBRUARY 29, 2020	MARCH 1, 2020 – DECEMBER 31, 2020
COMPLIANCE PROGRESS:	COMPLIANCE PROGRESS:	COMPLIANCE PROGRESS:
Not Applicable	Status Update	None

FOURTH REPORTING PERIOD	FIFTH REPORTING PERIOD	SIXTH REPORTING PERIOD
JANUARY 1, 2021 – JUNE 30, 2021	JULY 1, 2021 – DECEMBER 31, 2021	JANUARY 1, 2022 – JUNE 30, 2022
COMPLIANCE PROGRESS:	COMPLIANCE PROGRESS:	COMPLIANCE PROGRESS:
None	None	Preliminary

Crisis Intervention: ¶121

121. *CPD will identify and assign a sufficient number of data analysts to collect and analyze data related to the CIT Program and CPD's response to incidents involving individuals in crisis.*

Compliance Progress

(Reporting Period: January 1, 2022, through June 31, 2022)

Preliminary:	***In Compliance*** **(FOURTH REPORTING PERIOD)**
Secondary:	***Not In Compliance***
Full:	***Not Yet Assessed***

In the sixth reporting period, the CPD maintained Preliminary compliance with the requirements of ¶121.

To achieve Preliminary compliance with ¶121, the CPD was required to identify the number of data analysts that it believed was sufficient to address the CIT Program's data needs consistent with ¶121's requirements. Secondary compliance with ¶121 will depend on whether the CPD has maintained enough data analysts assigned to the CIT Program and whether sufficient resources have been allocated to these positions.

Progress before the Sixth Reporting Period

The CPD has memorialized ¶121's requirements into the substantially revised S05-14, *Crisis Intervention Team (CIT) Program*, which underwent revisions in previous reporting periods.

The CPD's designated data analyst, a crucial, centralized position, resigned in the fourth reporting period. The new data analyst was onboarded in the fifth reporting period. The CPD had previously assigned one analyst to the Crisis Intervention Unit to collect and analyze data regarding the CIT Program and the CPD's response to incidents involving individuals in crisis.

Progress in the Sixth Reporting Period

The substantially revised S05-14 was finalized this reporting period, therefore maintaining Preliminary compliance with ¶121.

The Crisis Intervention Unit is in the process of integrating district-level resources to collect and analyze district-specific data, including the requirement that officers complete the CIT report on all calls involving a mental health component. The data contained in this report will be instrumental to the overall CIT Program, and for the new CIT data analyst.

At this time, the CPD has determined that one analyst is sufficient to satisfy ¶121's requirements. While the IMT has met and interviewed the newly onboarded data analyst, we have not had the opportunity to review the quality of her work. Without reviewing the quality of her work, it is difficult for the IMT to assess whether a single analyst is indeed sufficient. Our future compliance assessments will depend on the CPD finalizing the CIT dashboard and integrating the data from the unit and district levels. Based on the quality of this work, the CPD will then need to conduct ongoing assessments to determine if more analysts are necessary for Full compliance.

To achieve Secondary compliance, it is crucial that the new analyst collect and robustly analyze data of responses to incidents involving individuals in crisis. This data should be both in writing and presented to the IMT so that the IMT can ask questions and assess the quality of data collection and analysis, as required under ¶121. Additionally, the *CIT Officer Implementation Plan* and the City's *Crisis Intervention Plan* required under ¶¶122—23 have not been completed over the last several reporting periods. These reports contain important data, much of which would be the data analyst's responsibility.

Paragraph 121 Compliance Progress History

FIRST REPORTING PERIOD	SECOND REPORTING PERIOD	THIRD REPORTING PERIOD
SEPTEMBER 1, 2019 – AUGUST 31, 2019	SEPTEMBER 1, 2019 – FEBRUARY 29, 2020	MARCH 1, 2020 – DECEMBER 31, 2020
COMPLIANCE PROGRESS:	COMPLIANCE PROGRESS:	COMPLIANCE PROGRESS:
Not Applicable	Status Update	Status Update

FOURTH REPORTING PERIOD	FIFTH REPORTING PERIOD	SIXTH REPORTING PERIOD
JANUARY 1, 2021 – JUNE 30, 2021	JULY 1, 2021 – DECEMBER 31, 2021	JANUARY 1, 2022 – JUNE 30, 2022
COMPLIANCE PROGRESS:	COMPLIANCE PROGRESS:	COMPLIANCE PROGRESS:
Preliminary	Preliminary	Preliminary

Crisis Intervention: ¶122

122. *Within 365 days of the Effective Date, and on an annual basis thereafter, the City will publish a written Crisis Intervention Plan. The development of the Crisis Intervention Plan will be based on the regular review of aggregate data and a sample of incidents conducted by CPD and OEMC. The CIT Coordinator will consider quantitative crisis-intervention data, qualitative data on officers' and community members' perception of the effectiveness of the CIT Program, CPD member feedback regarding crisis intervention-related training, actual incident information, staffing and deployment analysis of available Certified CIT officers, research reflecting the latest in best practices for police responses to individuals in crisis, and any feedback and recommendations from the Advisory Committee. OEMC will consider the response to, identification of, and dispatch of calls for service involving individuals in crisis by OEMC tele-communicators, research reflecting the latest in best practices for tele-communicator responses to individuals in crisis, and any feedback and recommendations from the Advisory Committee.*

Compliance Progress

(Reporting Period: January 1, 2022, through June 31, 2022)

Recurring Schedule: Annual ☐ **Met** ☑ **Missed**

Preliminary: ***Not in Compliance***
Secondary: ***Not in Compliance***
Full: ***Not in Compliance***

During the sixth monitoring period, the City did not reach any level of compliance with the requirements of ¶122.

Paragraph 122 requires annual submission of the *Crisis Intervention Plan*. Preliminary compliance will hinge on both the implementation of CPD policy S05-14, *Crisis Intervention Team (CIT) Program* and the City's required submission of the *Crisis Intervention Plan*.

During this reporting period, the substantially revised S05-14 fully incorporated the requirements of ¶122.

Progress before the Sixth Reporting Period

In the fourth monitoring period, the IMT reviewed a draft version of the Crisis Intervention Unit Special Order 20-03 (CIU SO 20-03), which clearly identified the steps necessary to complete the CPD's portion of the City's *Crisis Intervention Plan*. In the fifth reporting period, the CPD's CIU SO 20-03 was subsumed under the substantially revised S05-14 *Crisis Intervention Team Program,* which memorialized many, but not all, of ¶122's requirements. Moreover, the *Crisis Intervention Plan* must be submitted annually, but it has not been submitted since the third reporting period, which ended December 2020.

Both the CPD and the City have gone another reporting period without submitting a *CIT Officer Implementation Plan* or a *Crisis Intervention Plan*, as required by ¶¶108 and 122. While the IMT appreciates delaying these reports so that they can be supported by reliable data and a more robust strategy, the CPD should focus on what actions it needs to take to produce these reports annually. Despite these shortcomings, it is important to note that the City has made strides in the scope of the *Crisis Intervention Plan's* evaluation, as well as the transparency of data included in the same.

One such improvement was the City's incorporation of information on primary and secondary CIT officer response, which provided more transparency on response-ratio requirements. The report also identified deficiencies in officers hitting the "on scene" key, which makes it difficult to reliably assess when a CIT officer arrives on scene, whether that arrival is primary or secondary, and how long into the call arrival occurs. Finally, the last submitted *Crisis Intervention Plan* the City completed (during the third reporting period) broke down response ratios by CIT officers across districts and watches. Public trust relies on transparency, even when deficiencies are present, and we would expect this transparency to continue in future iterations of the *Crisis Intervention Plan*.

Moreover, the City's *Crisis Intervention Plan* must continue to include information and feedback from all stakeholders within the City's crisis response system, including the CPD, the Chicago Council on Mental Health Equity, the Chicago Fire Department, the OEMC, and the Chicago Department of Public Health. In the last written draft, each entity identified its accomplishments, which continue to be substantial.

As previously indicated in this report, the CPD's designated data analyst, a crucial position, resigned in the fourth reporting period. In the fifth reporting period, a new analyst was hired and onboarded. The data analysis required to meet ¶122's requirements requires evidence that the analyst has the data needed to perform reliable, robust analysis.

Progress in the Sixth Reporting Period

While the *Crisis Intervention Plan* was not submitted this reporting period, the IMT can attest to the significant strides the City has made toward improving crisis services to Chicagoans. For example, thirty-two organizations that provide mental health services to Chicagoans have been allocated $8 million in grants to expand behavioral health services to individuals who are unsheltered and those living with or affected by mental and behavioral health conditions. Services including team-based care, trauma-informed care, co-responder, non-law enforcement models, multi-disciplinary-team responses, and a significant expansion of the CIT program either have all been recently launched or are pending launch.

The IMT has received a preliminary presentation on the status and early outcomes of the Crisis Assistance Response and Engagement CARE program. The IMT looks forward to updates on the other efforts under the $8 million in grants. Additionally, the IMT has received notification of a pending public dashboard identifying outcomes of the CARES pilot, which we appreciate. The IMT also appreciates the Chicago Council on Mental Health Equity's robust work, which is voluntary and unpaid. There is exceptional professional and lived experience in the Chicago Council on Mental Health Equity, whose work is vital to the City's response strategies.

The IMT appreciates the City and its partner agencies for their methodical and comprehensive approach to collecting information to evaluate the City's mental health response system. The IMT encourages more proactive communication with community members, the Chicago Council on Mental Health Equity and the Coalition on these efforts.

Finally, since the *Crisis Intervention Plan* is a City Requirement, which encompasses both the CPD and the OEMC, the IMT encouraged the City to address all requirements of ¶122 in policy, including the OEMC's responsibilities. The CPD's S05-14, *Crisis Intervention Team (CIT) Program*, included the OEMC's responsibilities, a good initial effort at increasing communication between the CPD and the OEMC.

This reporting period, ¶122's requirements were memorialized into policy. The IMT looks forward to reviewing a *Crisis Intervention Plan* in the near future. Future levels of compliance will hinge on reliable and transparent data and timely submission of the report as required under ¶122.

Paragraph 122 Compliance Progress History

FIRST REPORTING PERIOD	SECOND REPORTING PERIOD	THIRD REPORTING PERIOD
SEPTEMBER 1, 2019 – AUGUST 31, 2019	SEPTEMBER 1, 2019 – FEBRUARY 29, 2020	MARCH 1, 2020 – DECEMBER 31, 2020
COMPLIANCE PROGRESS:	COMPLIANCE PROGRESS:	COMPLIANCE PROGRESS:
Not Applicable	None	None

FOURTH REPORTING PERIOD	FIFTH REPORTING PERIOD	SIXTH REPORTING PERIOD
JANUARY 1, 2021 – JUNE 30, 2021	JULY 1, 2021 – DECEMBER 31, 2021	JANUARY 1, 2022 – JUNE 30, 2022
COMPLIANCE PROGRESS:	COMPLIANCE PROGRESS:	COMPLIANCE PROGRESS:
None	None	None

Crisis Intervention: ¶123

123. *The purpose of the Crisis Intervention Plan will be to evaluate the City's identification of and response to incidents involving individuals in crisis and recommend any changes to staffing and deployment, policy, or training to ensure consistency with CPD and OEMC policy, this Agreement, and best practices. CPD will implement the Crisis Intervention Plan in accordance with the specified timeline for implementation. The Crisis Intervention Plan will: a. report the number, type, and outcome of incidents involving individuals in crisis, the number of Certified CIT Officers available and on duty in each district and on each watch, the percentage of calls for service involving individuals in crisis for which Certified CIT Officers were the first officers to respond to the scene for each watch in every district, and the response times for calls for service involving individuals in crisis for each watch in every district; b. evaluate the CIT Program's compliance with the objectives and functions identified above; c. identify strategies to ensure that CPD has a sufficient number of Certified CIT Officers to meet its response ratio targets for calls for service involving individuals in crisis; d. describe any additional resources, including program staff or equipment, the CIT Program needs to perform its functions; e. identify safety issues and trends regarding interactions between individuals in crisis and officers; f. identify deficiencies and opportunities for improvement in identifying and dispatching calls for service involving individuals in crisis; g. recognize and highlight CIT Program and Certified CIT Officer successes, including successful individual officer performance; h. develop response strategies for repeat calls for service involving individuals who are frequently in crisis; i. recommend any changes to crisis intervention-related strategies, policies, and procedures; j. recommend any changes to CPD and OEMC trainings related to individuals in crisis, including any case studies and teaching scenarios; and k. include a timeline and plan for implementing recommended changes.*

Compliance Progress (Reporting Period: January 1, 2022, through June 31, 2022)

Preliminary:	***Not in Compliance***
Secondary:	***Not in Compliance***
Full:	***Not in Compliance***

During the sixth monitoring period, the City did not reach any level of compliance with the requirements of ¶123.

Paragraph 123 requires annual submission of the *Crisis Intervention Plan*. Preliminary compliance will hinge on both the enactment of the CPD's policy S05-14, *Crisis Intervention Team (CIT) Program*, which occurred this reporting period, and the required annual submission of the City's *Crisis Intervention Plan*.

Progress before the Sixth Reporting Period

The IMT reviewed a draft version of Crisis Intervention Unit Special Order SO20-03, *Crisis Intervention Team (CIT) Plan*, which clearly identified the steps necessary to complete the CPD's portion of the *Crisis Intervention Plan*.

However, in the fifth reporting period, the CPD's standard operating procedure SO20-03 was subsumed under the substantially revised S05-14, *Crisis Intervention Plan,* which memorialized many requirements of ¶123. However, key requirements were missing. For example, the functions of the OEMC identified in ¶122 were not memorialized.

Additionally, both the CPD and the City have gone another reporting period without submitting a *CIT Officer Implementation Plan* or a *Crisis Intervention Plan*, as required by ¶¶108 and 122. While the IMT appreciates delaying these reports until they can be supported by reliable data and a more robust strategy, the CPD should focus on what actions it needs to take to produce these reports annually. Despite these shortcomings, it is important to note that the City has made substantial strides in the scope of the *Crisis Intervention Plan*'s evaluation, as well as the transparency of data included in the same.

One such improvement was that the City's incorporation of information on primary and secondary CIT officer response, which provided more transparency on response-ratio requirements. The report also identified deficiencies in officers hitting the "on scene" key, which makes it difficult to reliably assess when a CIT officer arrives on scene, whether that arrival is primary or secondary, and how long into the call arrival occurs. Finally, the report broke down response ratios by CIT officers across districts and watches. Public trust relies on transparency, even when deficiencies are present, and we would expect this transparency to continue in future iterations of the City's *Crisis Intervention Plan*.

The IMT appreciates the City and its partner agencies for their methodical and comprehensive approach to collecting information to evaluate the City's mental health response system. The IMT encourages more proactive communication with community members, the Chicago Council on Mental Health Equity, and the Coalition on these efforts.

Progress in the Sixth Reporting Period

Since the *Crisis Intervention Plan* is a City Requirement, which encompasses both the CPD and the OEMC, the IMT encouraged the City to include all of ¶123's requirements into policy, including the OEMC's responsibilities. The CPD's revised S05-14 adopted the IMT's recommendation and included OEMC's responsibilities. This was a good initial effort at increasing communication between the CPD and the OEMC.

The CPD's policy S05-14 *Crisis Intervention Team (CIT) Program* received a no objection this reporting period. The IMT looks forward to reviewing the *Crisis Intervention Plan*, which is necessary for the City and the CPD to achieve Preliminary compliance with ¶123.

Paragraph 123 Compliance Progress History

FIRST REPORTING PERIOD	SECOND REPORTING PERIOD	THIRD REPORTING PERIOD
SEPTEMBER 1, 2019 – AUGUST 31, 2019	SEPTEMBER 1, 2019 – FEBRUARY 29, 2020	MARCH 1, 2020 – DECEMBER 31, 2020
COMPLIANCE PROGRESS:	COMPLIANCE PROGRESS:	COMPLIANCE PROGRESS:
Not Applicable	Status Update	Status Update
FOURTH REPORTING PERIOD	**FIFTH REPORTING PERIOD**	**SIXTH REPORTING PERIOD**
JANUARY 1, 2021 – JUNE 30, 2021	JULY 1, 2021 – DECEMBER 31, 2021	JANUARY 1, 2022 – JUNE 30, 2022
COMPLIANCE PROGRESS:	COMPLIANCE PROGRESS:	COMPLIANCE PROGRESS:
None	None	None

Crisis Intervention: ¶124

124. *The data included in the Crisis Intervention Plan will not include any personal identifying information.*

Compliance Progress

(Reporting Period: January 1, 2022, through June 31, 2022)

Preliminary:	***In Compliance*** **(NEW)**
Secondary:	***Not In Compliance***
Full:	***Not Yet Assessed***

In the sixth reporting period, the City and the CPD achieved Preliminary compliance with the requirements of ¶124.

To achieve Preliminary compliance with ¶124, the City and the CPD must implement sufficient policies, procedures, or written guidance through the process described in the Consent Decree (¶¶626–41), which outlines applicable consultation, resolution, workout, and public-comment periods. These paragraphs detail various requirements, including that policies are "plainly written, logically organized, and use clearly defined terms." To achieve Preliminary compliance with ¶124, the City and the CPD must develop and finalize policies that incorporate ¶124's requirements.

Progress before the Sixth Reporting Period

During the fourth monitoring period, the CPD provided the IMT with SO20-03, *Crisis Intervention Plan*, which included ¶124's requirements but was never finalized.

In the fifth monitoring period, SO20-03 was subsumed under a substantially revised S05-14, *Crisis Intervention Team (CIT) Program*, which did not memorialize ¶124's requirements.

During the fourth monitoring period, the CPD provided the IMT with SO20-03, *Crisis Intervention Plan*, which included ¶124's requirements but was not finalized.

In the fifth monitoring period, SO20-03 was subsumed under a substantially revised S05-14 *Crisis Intervention Team (CIT) Program*, which did not memorialize ¶124's requirements.

Progress in the Sixth Reporting Period

However, in the sixth reporting period, the City and the CPD achieved Preliminary compliance when ¶124's requirements which were incorporated into a revised

S05-14, *Crisis Intervention Team (CIT) Program*. We await the City's next *Crisis Intervention Plan.* Upon finalizing the *Crisis Intervention Plan*, we anticipate the City and the CPD will achieve Secondary and Full compliance with this paragraph.

Paragraph 124 Compliance Progress History

FIRST REPORTING PERIOD	SECOND REPORTING PERIOD	THIRD REPORTING PERIOD
SEPTEMBER 1, 2019 – AUGUST 31, 2019	SEPTEMBER 1, 2019 – FEBRUARY 29, 2020	MARCH 1, 2020 – DECEMBER 31, 2020
COMPLIANCE PROGRESS:	COMPLIANCE PROGRESS:	COMPLIANCE PROGRESS:
Not Applicable	Not Applicable	Status Update
FOURTH REPORTING PERIOD	**FIFTH REPORTING PERIOD**	**SIXTH REPORTING PERIOD**
JANUARY 1, 2021 – JUNE 30, 2021	JULY 1, 2021 – DECEMBER 31, 2021	JANUARY 1, 2022 – JUNE 30, 2022
COMPLIANCE PROGRESS:	COMPLIANCE PROGRESS:	COMPLIANCE PROGRESS:
None	None	Preliminary

Crisis Intervention: ¶125

125. *The CIT Coordinator will have CPD's portion of the Crisis Intervention Plan reviewed and approved by the Chief of the Bureau of Patrol within 60 days of the plan's completion.*

Compliance Progress (Reporting Period: January 1, 2022, through June 31, 2022)

Preliminary:	***In Compliance*** **(NEW)**
Secondary:	***Not In Compliance***
Full:	***Not In Compliance***

In the sixth reporting period, the City and the CPD achieved Preliminary compliance with ¶125.

To achieve Preliminary compliance with ¶125, the IMT assessed the City's and the CPD's data collection, tracking, analysis, and management, as required under the Consent Decree. The IMT also reviewed the *Crisis Intervention Team (CIT) Program* policy (S05-14), which the CPD finalized during this monitoring period.

Progress before the Sixth Reporting Period

In previous reporting periods, the IMT reviewed a draft version of Crisis Intervention Unit Special Order SO20-03, *Crisis Intervention Plan*, which clearly stated the requirement for the CPD's portion of the *Crisis Intervention Plan* to be reviewed and approved by the Chief of the Bureau of Patrol.

Progress in the Sixth Reporting Period

During this monitoring period, the CPD standard operating procedure SO20-03 was subsumed under the substantially revised S05-14. The requirements of ¶125 were memorialized into S05-14, although the designated person to review and approve the *Crisis Intervention Plan* is identified as the Executive Director, Office of Constitutional Policing and Reform.

In the sixth monitoring period, the City and CPD met Preliminary compliance with ¶125 by finalizing and implementing S05-14.

Secondary and Full compliance will depend on continuous evidence that the CPD's portion of the *Crisis Intervention Plan* was indeed reviewed and approved by the Executive Director of the CPD's Office of Constitutional Policing and Reform. The City and the CPD must make strides to produce the *Crisis Intervention Plan*, which has not been completed since the third reporting period.

Paragraph 125 Compliance Progress History

FIRST REPORTING PERIOD	SECOND REPORTING PERIOD	THIRD REPORTING PERIOD
SEPTEMBER 1, 2019 – AUGUST 31, 2019	SEPTEMBER 1, 2019 – FEBRUARY 29, 2020	MARCH 1, 2020 – DECEMBER 31, 2020
COMPLIANCE PROGRESS:	COMPLIANCE PROGRESS:	COMPLIANCE PROGRESS:
Not Applicable	Status Update	Status Update

FOURTH REPORTING PERIOD	FIFTH REPORTING PERIOD	SIXTH REPORTING PERIOD
JANUARY 1, 2021 – JUNE 30, 2021	JULY 1, 2021 – DECEMBER 31, 2021	JANUARY 1, 2022 – JUNE 30, 2022
COMPLIANCE PROGRESS:	COMPLIANCE PROGRESS:	COMPLIANCE PROGRESS:
None	None	Preliminary

Crisis Intervention: ¶126

126. *Consistent with the requirements set forth in the Training section of this Agreement, all officers will receive in-service training, every three years, regarding responding to individuals in crisis that is adequate in quality, quantity, and scope for officers to demonstrate competence in the subject matter. This in-service training will include, but not be limited to, the following topics: a. a history of the mental health system; b. how to recognize and respond to individuals in crisis, including, but not limited to, identifying types of mental health conditions, signs and symptoms of mental health conditions, common treatments and medications, and common characteristics, behaviors, or conduct associated with individuals in crisis; c. the potential interactions officers may have on a regular basis with individuals in crisis, their families, and service providers, including steps to ensure effective communication and avoid escalating an interaction with an individual in crisis; d. techniques to safely de-escalate a potential crisis situation; e. the circumstances in which a Certified CIT Officer should be dispatched or consulted; and f. local resources that are available to provide treatment, services, or support for individuals in crisis, including available pre- and post-arrest diversion programs, and when and how to draw upon those resources.*

Compliance Progress

(Reporting Period: January 1, 2022, through June 31, 2022)

Preliminary:	***In Compliance* (FIFTH REPORTING PERIOD)**
Secondary:	***Not In Compliance***
Full:	***Not Yet Assessed***

In the sixth monitoring period, the City and the CPD maintained Preliminary compliance with the requirements of ¶126

To achieve Preliminary compliance with ¶126, the City and the CPD implemented sufficient policies, procedures, or written guidance through the process described in the Consent Decree (¶¶626–41), which outlines applicable consultation, resolution, workout, and public-comment periods. These paragraphs detail various requirements, including that policies are "plainly written, logically organized, and use clearly defined terms." The City and the CPD developed S11-10-03 *In-Service Training,* which incorporated ¶126's requirements and was finalized in the fifth reporting period.

The City and the CPD achieved Preliminary compliance because S11-10-03 was finalized during the fifth reporting period. Moreover, the CPD produced a substantially revised S05-14, *Crisis Intervention Team (CIT) Program* in the fifth reporting period, but that directive, in relevant part, only stated that the Crisis Intervention Team Training Section will "provid[e] expertise and support to the Training Division with inservice . . . training." This did not sufficiently identify the "quantity, quality, and scope" of training that all officers will receive, including the topics identified in ¶126. However, the topics identified in ¶126 were captured under S11-10-03. The CPD may want to also consider fully including ¶126's requirements into S05-14. Incorporating the requirements into S05-14 will help the City and the CPD maintain Preliminary compliance with ¶126 even if significant changes occur in the Training section of the Consent Decree.

The IMT will assess future levels of compliance by reviewing training records that indicate 95% of all officers received training, officer evaluations of the training, and the outcome metrics the CPD will develop to assess the effectiveness of the training. Additionally, as appropriate, the IMT encourages the CPD to invite members of the Chicago Council on Mental Health Equity to observe this portion of the training to provide feedback.

Paragraph 126 Compliance Progress History

FIRST REPORTING PERIOD	SECOND REPORTING PERIOD	THIRD REPORTING PERIOD
SEPTEMBER 1, 2019 – AUGUST 31, 2019	SEPTEMBER 1, 2019 – FEBRUARY 29, 2020	MARCH 1, 2020 – DECEMBER 31, 2020
COMPLIANCE PROGRESS:	COMPLIANCE PROGRESS:	COMPLIANCE PROGRESS:
Not Applicable	Not Applicable	Not Applicable
FOURTH REPORTING PERIOD	**FIFTH REPORTING PERIOD**	**SIXTH REPORTING PERIOD**
JANUARY 1, 2021 – JUNE 30, 2021	JULY 1, 2021 – DECEMBER 31, 2021	JANUARY 1, 2022 – JUNE 30, 2022
COMPLIANCE PROGRESS:	COMPLIANCE PROGRESS:	COMPLIANCE PROGRESS:
Not Applicable	Preliminary	Preliminary

Crisis Intervention: ¶127

127. *All new recruits will receive training that is adequate in quantity, quality, and scope regarding responding to individuals in crisis. It will include, but not be limited to, training on the subjects identified above.*

Compliance Progress

(Reporting Period: January 1, 2022, through June 31, 2022)

Preliminary: ***In Compliance*** **(FIFTH REPORTING PERIOD)**
Secondary: ***Not In Compliance***
Full: ***Not Yet Assessed***

During the sixth monitoring period, the City and the CPD maintained Preliminary compliance with the requirements of ¶127. The CPD achieved Preliminary compliance with ¶127 in the last reporting period by developing and finalizing its policy S011-10-01 *Recruit Training*, which incorporates ¶127's requirements.

Progress before the Sixth Reporting Period

In the fourth reporting period, the IMT reviewed recruit training curricula related to responding to individuals in crisis. Overall, the content of the training was well done, but there was still room for improvement. For example, the IMT recommended that the recruit training's scenario-based training emphasize scenarios that end in de-escalation without the use of force, which is how most service calls conclude.

During the fifth monitoring period, the IMT reviewed a draft version of S11-10-01, *Recruit Training*, which clearly memorialized ¶127's requirements.

Moreover, while the CPD produced a substantially revised S05-14, *Crisis Intervention Team (CIT) Program* in the fifth reporting period, that directive, in relevant part, only states that the Crisis Intervention Team Training Section will "provid[e] expertise and support to the Training Division with recruit…training." This does not sufficiently identify the "quantity, quality, and scope" of training recruits will receive, including the training topics required by ¶126.

Additionally, during the sixth reporting period the CPD fully incorporated the requirements of ¶127 into S05-14 *Crisis Intervention Team (CIT) Program*.

Future compliance will hinge on demonstrating that the training has been delivered to a minimum of one recruit academy cohort and that recruit feedback is incorporated into future training material.

Moreover, as appropriate, the IMT encourages the CPD to invite members of the Chicago Council on Mental Health Equity to observe this portion of the recruit training so that they can provide feedback. Last, the IMT will also assess the CPD's outcome metrics, which will be used by the CPD to evaluate the effectiveness of the training.

Paragraph 127 Compliance Progress History

FIRST REPORTING PERIOD	SECOND REPORTING PERIOD	THIRD REPORTING PERIOD
SEPTEMBER 1, 2019 – AUGUST 31, 2019	SEPTEMBER 1, 2019 – FEBRUARY 29, 2020	MARCH 1, 2020 – DECEMBER 31, 2020
COMPLIANCE PROGRESS:	COMPLIANCE PROGRESS:	COMPLIANCE PROGRESS:
Not Applicable	Not Applicable	Status Update
FOURTH REPORTING PERIOD	**FIFTH REPORTING PERIOD**	**SIXTH REPORTING PERIOD**
JANUARY 1, 2021 – JUNE 30, 2021	JULY 1, 2021 – DECEMBER 31, 2021	JANUARY 1, 2022 – JUNE 30, 2022
COMPLIANCE PROGRESS:	COMPLIANCE PROGRESS:	COMPLIANCE PROGRESS:
None	Preliminary	Preliminary

Crisis Intervention: ¶128

128. *The City will have a crisis intervention response advisory committee ("Advisory Committee") with subject matter expertise and experience that will assist in identifying problems and developing solutions and interventions designed to improve outcomes for individuals in crisis who require City services. The Parties acknowledge that the City has formed the City-wide Mental Health Steering Committee and that the City may draw upon those resources to satisfy the requirements of this Agreement.*

Compliance Progress

(Reporting Period: January 1, 2022, through June 31, 2022)

Preliminary:	***In Compliance*** **(SECOND REPORTING PERIOD)**
Secondary:	***Not In Compliance***
Full:	***Not Yet Assessed***

In the sixth monitoring period, the City maintained Preliminary compliance with ¶128.

To achieve Preliminary compliance with ¶128, the IMT assessed whether the City has qualified personnel fulfilling the responsibilities to achieve the goals of the Consent Decree. Specifically, the IMT examined whether the City has created the requisite Advisory Committee with appropriate expertise and experience. The City created the requisite Advisory Committee, known as the Chicago Council on Mental Health Equity (also known as the CCMHE). The IMT also assessed the City on resource allocation, staffing capacity, efforts to fill any vacant positions and improved processes designed to build trust, improve transparency, and seek greater consensus building. Going forward, further levels of compliance will depend on substantive reviews by the Chicago Council on Mental Health Equity on data, policies, training, community engagement, and operational practices that help to inform the "identification of problems and developing solutions and interventions designed to improve outcomes for individuals in crisis."

Progress before the Sixth Reporting Period

The Advisory Committee that is responsive to the requirements of ¶128 has evolved from the Crisis Intervention Advisory Committee (also known as the CIAC) into the Chicago Council on Mental Health Equity. The Crisis Intervention Advisory Committee narrowly focused on police responses, whereas the Chicago Council on Mental Health Equity expanded its mission to include the City's broader crisis response systems. The Chicago Council on Mental Health Equity is largely comprised of representatives from the Crisis Intervention Advisory Committee, and therefore

the IMT believes the Chicago Council on Mental Health Equity members' qualifications are adequate, as evidenced by the members' institutional knowledge.

Historically, the IMT has had concerns with the Chicago Council on Mental Health Equity, including: failing to adequately review or vote on subcommittee recommendations; a lack of bylaws; an inadequate feedback loop to the Chicago Council on Mental Health Equity regarding the outcome of its proposed policy revisions; insufficient number of persons with lived experience; lack of clarity on the role/function of the Chicago Council on Mental Health Equity's members; the need for additional staff resources so that this voluntary, unpaid committee can complete their work; insufficient community engagement; and meetings often feeling reactive, as opposed to a proactive use of time and resources.

The IMT notes that the Chicago Council on Mental Health Equity is a group of esteemed professionals and key community members who have the experience and credibility to be a crucial force in developing effective crisis response systems.

Progress in the Sixth Reporting Period

During the sixth reporting period, the City and the CPD have made efforts to address these concerns, but there is more work to be done.

During the last two monitoring periods, the City took important steps toward the requirements of ¶¶128 and 137 by inviting the Chicago Council on Mental Health Equity to review and submit feedback on twelve Crisis Intervention standard operating procedures (S04-20; S04-20-02; S04-20-03; S04-20-04; S04-20-05; S05-14; S.O. 20-01; S.O. 20-02; S.O. 20-03; S.O. 20-04; S.O. 21-01; S.O. 21-02). This was an important step for inclusion of feedback, making the process more transparent, providing the time necessary for productive review and giving participants a voice.

The CPD significantly improved their process of reviewing the Chicago Council on Mental Health Equity's comments and to reporting back to which comments were and were not incorporated. The IMT understands the challenges inherent with leading a group of this size, however, improvements need to be made to explain why certain Chicago Council on Mental Health Equity feedback was not incorporated, as required by ¶¶130 and 131. The City and the CPD must continue to gain trust by listening and responding to legitimate concerns and continuing to improve the process. However, the IMT appreciates the City's and the CPD's more robust approach to policy review by the Chicago Council on Mental Health Equity during this reporting period.

Additionally, the City invited Chicago Council on Mental Health Equity members to attend relevant training and to provide feedback. While this was an important

step, the City must increase efforts toward better attendance and feedback by Chicago Council on Mental Health Equity members. This experiential observation and feedback create transparency and invite ongoing improvements. The City should continue to prioritize and cultivate attendance at CPD and OEMC training sessions, even if it means implementing more proactive requests along with general invitations. For example, prioritizing subcommittee chairs and people with lived experience to attend may be useful. Additionally, prioritizing interagency participation in these trainings (for example, the Chicago Fire Department, the OEMC, and the CPD) would be useful increasing communication between these agencies.

Important to the requirements of ¶128, the Chicago Council on Mental Health Equity must have access to relevant polices, operational practices, and data. The City has improved in increasing access this reporting period. For instance, the City introduced the Chicago Council on Mental Health Equity to the OEMC's policy, as well as to the new Crisis Assistance Response and Engagement (CARE) program. The IMT expects this increased communication and access to continue in the next reporting period.

During this reporting period, the IMT also met with members of the Chicago Council on Mental Health Equity, who continued to voice concerns over how the City and the CPD intend to seek feedback from neighborhood stakeholders, as well as how individual communities will know when there are meetings or public postings for policies, CIT data, and updates on the CARE pilot. Further, as discussed in previous reports, the manner in which the City and the CPD solicit community input in light of the Open Meetings Act needs to be revised so as to promote community engagement (e.g., the city requires community members to submit comments 24 hours before the meetings start, which given the almost exclusive lack of any public comment, deters community participation).

Moreover, in response to consistent concerns by members of the Chicago Council on Mental Health Equity about their role and function, including declining participation to the point that a quorum has been difficult in the last few quarterly meetings, the co-chairs have engaged a meaningful dialogue this reporting period about a possible restructuring of the committee to address these concerns. The IMT appreciates these efforts.

Although the Chicago Council on Mental Health Equity is still unable to meet in person due to the COVID-19 pandemic, the IMT has participated in all subcommittee and full committee virtual meetings.

In the sixth monitoring period, the City maintained Preliminary compliance with ¶128. Once the Chicago Council on Mental Health Equity's bylaws are implemented, formalizing the structure of this important body, the City will move into Secondary compliance. Moving forward, further levels of compliance will depend on substantive reviews by the Chicago Council on Mental Health Equity on data,

policies, training, community engagement, and operational practices informing recommendations on response to individuals in crisis.

In the next reporting period, the IMT anticipates receiving and reviewing the Chicago Council on Mental Health Equity's bylaws to confirm that the committee's voting processes are consistent with best practices. The IMT also recommends that the Chicago Council on Mental Health Equity bylaws include provisions for more meaningful community engagement. The draft bylaws still contained restrictive language regarding community members' opportunities to ask questions or give feedback. Finally, the IMT looks forward to additional restructurings of the committee, if any, to address members' concerns. Regular City and CPD "report outs" to the Chicago Council on Mental Health Equity on system updates (for example, the CARE program) would both keep members informed and also proactively solicit feedback.

Paragraph 128 Compliance Progress History

FIRST REPORTING PERIOD	SECOND REPORTING PERIOD	THIRD REPORTING PERIOD
SEPTEMBER 1, 2019 – AUGUST 31, 2019	SEPTEMBER 1, 2019 – FEBRUARY 29, 2020	MARCH 1, 2020 – DECEMBER 31, 2020
COMPLIANCE PROGRESS:	COMPLIANCE PROGRESS:	COMPLIANCE PROGRESS:
Not Applicable	Preliminary	Preliminary
FOURTH REPORTING PERIOD	**FIFTH REPORTING PERIOD**	**SIXTH REPORTING PERIOD**
JANUARY 1, 2021 – JUNE 30, 2021	JULY 1, 2021 – DECEMBER 31, 2021	JANUARY 1, 2022 – JUNE 30, 2022
COMPLIANCE PROGRESS:	COMPLIANCE PROGRESS:	COMPLIANCE PROGRESS:
Preliminary	Preliminary	Preliminary

Crisis Intervention: ¶129

129. *The Advisory Committee, at a minimum, will meet quarterly to review and recommend improvements to the City's overall response to individuals in crisis, with consideration to areas such as coordinated crisis response; data collection and evaluation; community engagement and awareness; service outreach and prevention; and the CIT Program.*

Compliance Progress

(Reporting Period: January 1, 2022, through June 31, 2022)

Recurring Schedule: Quarterly ☑ **Met** ☐ **Missed**

Preliminary: ***In Compliance*** **(SECOND REPORTING PERIOD)**
Secondary: ***Not in Compliance***
Full: ***Not Yet Assessed***

In the sixth monitoring period, the City maintained Preliminary compliance with the requirements of ¶129 by convening meetings of the Chicago Council on Mental Health Equity in both February and April 2022.

To achieve Preliminary compliance with ¶129, the IMT assessed the City's level of data collection, tracking, analysis, and management as required under the Consent Decree. Specifically, the IMT examined whether the City created the requisite Advisory Committee with appropriate expertise and experience, and whether the Chicago Council on Mental Health Equity meetings are occurring at least quarterly. Going forward, further levels of compliance will depend on substantive reviews by the Chicago Council on Mental Health Equity on data, policies, training, community engagement, and operational practices informing recommendations on overall response to individuals in crisis.

Progress before the Sixth Reporting Period

Over the course of the Consent Decree, the Advisory Committee that is responsive to the requirements of ¶129 has evolved from the Crisis Intervention Advisory Committee (also known as the CIAC) into the Chicago Council on Mental Health Equity at the beginning of 2020. The Crisis Intervention Advisory Committee narrowly focused on police responses, whereas the Chicago Council on Mental Health Equity has expanded its mission to the City's broader crisis response systems. The Chicago Council on Mental Health Equity is largely comprised of representatives from the Crisis Intervention Advisory Committee, and therefore the IMT does not have any concerns about the Chicago Council on Mental Health Equity members' qualifications, nor do we have concerns about the maintenance of institutional knowledge being transferred to the new committee.

Historically, the IMT has voiced ongoing concerns with the Chicago Council on Mental Health Equity, including: failing to adequately review or vote on subcommittee recommendations; a lack of bylaws to guide the Committee's work; an inadequate feedback loop regarding the outcomes in relation to policy revisions and recommendations; failure to include persons with lived experience; lack of clarity on the role and function of the Chicago Council on Mental Health Equity's members; the need for additional staff resources so that this voluntary, unpaid committee can complete its work; lack of community engagement; and meetings often feeling reactive, as opposed to a proactive use of time and resources.

Progress in the Sixth Reporting Period

During the sixth reporting period, efforts to address these concerns have been made though there is more work to be done.

During the last two monitoring periods, the City took important steps toward the requirements of ¶128 and 137 by inviting the Chicago Council on Mental Health Equity to review and submit feedback on twelve Crisis Intervention standard operating procedures (S04-20; S04-20-02; S04-20-03; S04-20-04; S04-20-05; S05-14; S.O. 20-01; S.O. 20-02; S.O. 20-03; S.O. 20-04; S.O. 21-01; S.O. 21-02). This was an important step for inclusion of feedback, making the process more transparent, providing the time necessary for productive review and giving participants a voice.

The CPD significantly improved its process to review these comments and to report back to the Chicago Council on Mental Health Equity what was and was not incorporated. The IMT understands the challenges inherent with leading a group of this size, however, the CPD needs to make improvements to explain why certain Chicago Council on Mental Health Equity feedback was not incorporated, as required by ¶130 and 131. The City and the CPD must continue to gain trust by listening and responding to legitimate concerns and continuing to improve the process. However, the IMT appreciates the City's and the CPD's more robust approach to policy review by the Chicago Council on Mental Health Equity this reporting period.

Additionally, the City invited Chicago Council on Mental Health Equity members to attend relevant training sessions and to provide feedback. While this was an important step, the City should work toward better attendance and feedback by Chicago Council on Mental Health Equity members. This experiential observation and feedback creates transparency and invites ongoing improvements. The City should continue to prioritize and cultivate attendance at CPD and OEMC training sessions, even if it means implementing more proactive requests along with general invitations. For example, prioritizing subcommittee chairs and people with lived experience to attend may be useful. Additionally, prioritizing interagency participation in these trainings (for example, the Chicago Fire Department, the OEMC, and the CPD) would be useful increasing communication between these agencies.

Important to the requirements of ¶128, the Chicago Council on Mental Health Equity must have access to relevant polices, operational practices, and data. The City has done a better job increasing access this reporting period. For instance, the City introduced the Chicago Council on Mental Health Equity to the OEMC's policy, as well as to the new Crisis Assistance Response and Engagement (CARE) program. The IMT expects this communication and access to continue in the next reporting period.

The IMT also met with the Chicago Council on Mental Health Equity during this reporting period, and members continue to voice concerns about how the City and the CPD intend to seek feedback from neighborhood stakeholders, as well as how individual communities will know when there are meetings or public postings for policies, CIT data, and updates on the CARE pilot. Further, as discussed in previous reports, the manner in which the City and the CPD solicit community input in light of the Illinois Open Meetings Act needs to be revised so as to promote community engagement (e.g., the city requires community members to submit comments 24 hours before the meetings start, which given the almost exclusive lack of any public comment, deters community trust).

Moreover, in response to consistent concerns Chicago Council on Mental Health Equity members about their role and function, including declining participation to the point that a quorum has been difficult in the last few quarterly meetings, the co-chairs have engaged a meaningful dialogue this reporting period about a possible restructuring of the committee to address these concerns. The IMT appreciates these efforts.

Although the Chicago Council on Mental Health Equity is still unable to meet in person due to the COVID-19 pandemic, the IMT has participated in all subcommittee and full committee virtual meetings.

In the sixth monitoring period, the City maintained Preliminary compliance with ¶129. Once the bylaws are implemented, formalizing the structure of this important body, the City will move into Secondary compliance. Going forward, further levels of compliance will depend on substantive reviews by the Chicago Council on Mental Health Equity on data, policies, training, community engagement, and operational practices informing recommendations on response to individuals in crisis.

Paragraph 129 Compliance Progress History

FIRST REPORTING PERIOD	SECOND REPORTING PERIOD	THIRD REPORTING PERIOD
SEPTEMBER 1, 2019 – AUGUST 31, 2019	SEPTEMBER 1, 2019 – FEBRUARY 29, 2020	MARCH 1, 2020 – DECEMBER 31, 2020
COMPLIANCE PROGRESS:	COMPLIANCE PROGRESS:	COMPLIANCE PROGRESS:
Not Applicable	Preliminary	Preliminary

FOURTH REPORTING PERIOD	FIFTH REPORTING PERIOD	SIXTH REPORTING PERIOD
JANUARY 1, 2021 – JUNE 30, 2021	JULY 1, 2021 – DECEMBER 31, 2021	JANUARY 1, 2022 – JUNE 30, 2022
COMPLIANCE PROGRESS:	COMPLIANCE PROGRESS:	COMPLIANCE PROGRESS:
Preliminary	Preliminary	Preliminary

Crisis Intervention: ¶130

130. *The City will request that the Advisory Committee provide guidance on crisis response-related policies, procedures, and training of City agencies, including CPD and OEMC, and assist the City in developing and expanding current strategies for responding to individuals in crisis, including reducing the need for police-involved responses to individuals in crisis and developing municipal and community resources, such as pre- and post-arrest diversion resources and alternative response options (like drop-off centers, mobile crisis teams, a central nonemergency crisis line). The City will further request that in providing the guidance detailed above the Advisory Committee will consider specific strategies for responding to children and youth when they experience a behavioral or mental health crisis.*

Compliance Progress

(Reporting Period: January 1, 2022, through June 31, 2022)

Preliminary:	***In Compliance*** **(SECOND REPORTING PERIOD)**
Secondary:	***Not in Compliance***
Full:	***Not Yet Assessed***

In the sixth monitoring period, the City maintained Preliminary compliance with the requirements of ¶130.

To achieve Preliminary compliance with ¶130, the IMT assessed the City's level of data collection, tracking, analysis, and management as required under the Consent Decree. Specifically, the IMT examined whether the City created the requisite Advisory Committee with appropriate expertise and experience, and whether the Chicago Council on Mental Health Equity meetings are occurring at least quarterly. Going forward, further levels of compliance will depend on substantive reviews by the Chicago Council on Mental Health Equity on data, policies, training, community engagement, and operational practices informing recommendations on overall response to individuals in crisis. A critical component of compliance with this Paragraph, which the IMT will assess, is the Chicago Council on Mental Health Equity's engagement with the OEMC, the CPD, and other crisis-related policies, procedures, and training.

Progress before the Sixth Reporting Period

Over the course of the Consent Decree, the Advisory Committee that is responsive to the requirements of ¶130 has evolved from the Crisis Intervention Advisory Committee (also known as the CIAC) into the Chicago Council on Mental Health

Equity at the beginning of 2020. The Crisis Intervention Advisory Committee narrowly focused on police responses, whereas the Chicago Council on Mental Health Equity has expanded its mission to the City's broader crisis response systems. The Chicago Council on Mental Health Equity is largely comprised of representatives from the Crisis Intervention Advisory Committee, and therefore the IMT does not have any concerns about the Chicago Council on Mental Health Equity members' qualifications. Nor do we have concerns about the maintenance of institutional knowledge being transferred to the new committee.

Historically, there have been ongoing concerns with the Chicago Council on Mental Health Equity, including: failing to adequately review or vote on subcommittee recommendations; a lack of bylaws; an inadequate feedback loop to the Chicago Council on Mental Health Equity regarding the outcome of its in relation to policy revisions; failure to include persons with lived experience; lack of clarity on the role/function of Chicago Council on Mental Health Equity members; the need for additional staff resources so that this voluntary, unpaid committee can complete their work; lack of community engagement; and meetings often feeling reactive, as opposed to a proactive use of time and resources.

Progress in the Sixth Reporting Period

During the sixth reporting period, efforts to address these concerns have been made though there is more work to be done.

During the last two monitoring periods, the City took important steps toward the requirements of ¶130 and 137 by inviting the Chicago Council on Mental Health Equity to review and submit feedback on twelve Crisis Intervention standard operating procedures (S04-20; S04-20-02; S04-20-03; S04-20-04; S04-20-05; S05-14; S.O. 20-01; S.O. 20-02; S.O. 20-03; S.O. 20-04; S.O. 21-01; S.O. 21-02). This was an important step for inclusion of feedback, making the process more transparent, providing the time necessary for productive review and giving participants a voice.

The CPD significantly improved their process to review these comments and to report back to the Chicago Council on Mental Health Equity what was and was not incorporated. The IMT understands the inherent challenges that come with leading a group of this size, however, improvements need to be made to explain why certain Chicago Council on Mental Health Equity feedback was not incorporated, as required by ¶130 and 131. The City and the CPD must continue to gain trust by listening and responding to legitimate concerns and continuing to improve the process. However, the City and the CPD should be commended for their more robust approach to policy review by the Chicago Council on Mental Health Equity this reporting period.

Additionally, the City invited Chicago Council on Mental Health Equity members to attend relevant training and to provide feedback. While this was an important step, the City must increase efforts toward better attendance and feedback by Chicago Council on Mental Health Equity members. This experiential observation and feedback creates transparency and invites ongoing improvements. The City should continue to prioritize and cultivate attendance at CPD and OEMC training sessions, even if it means implementing more proactive requests along with general invitations. For example, prioritizing subcommittee chairs and people with lived experience to attend may be useful. Additionally, prioritizing interagency participation in these trainings (for example, the Chicago Fire Department, the OEMC, and the CPD) would be useful increasing communication between these agencies.

Important to the requirements of ¶130, the Chicago Council on Mental Health Equity must have access to relevant polices, operational practices, and data. The City has done a better job increasing access this reporting period. For instance, the City introduced the Chicago Council on Mental Health Equity to the OEMC's policy, as well as to the new Crisis Assistance Response and Engagement (CARE) program. The IMT expects this to continue in the next reporting period.

The IMT also met with the Chicago Council on Mental Health Equity this reporting period, and members continue to voice concerns over how the City and the CPD intend to seek feedback from neighborhood stakeholders, as well as how individual communities will know when there are meetings or public postings for policies, CIT data, and updates on the CARE pilot. Further, as discussed in previous reports, the manner in which the City and the CPD solicit community input in light of the Open Meetings Act needs to be revised so as to promote community engagement (e.g., the city requires community members to submit comments 24 hours before the meetings start, which given the almost exclusive lack of any public comment, deters community trust).

Moreover, in response to consistent concerns by members of the Chicago Council on Mental Health Equity about their role and function, including declining participation to the point that a quorum has been difficult in the last few quarterly meetings, the co-chairs have engaged a meaningful dialogue this reporting period about a possible restructuring of the committee to address these concerns. The IMT appreciates these efforts.

Although the Chicago Council on Mental Health Equity is still unable to meet in person due to the COVID-19 pandemic, the IMT has participated in all subcommittee and full committee virtual meetings.

In the sixth monitoring period, the City maintained Preliminary compliance with ¶130. Once the bylaws are implemented, formalizing the structure of this important body, the City will move into Secondary compliance. Going forward, fur-

ther levels of compliance will depend on substantive reviews by the Chicago Council on Mental Health Equity on data, policies, training, community engagement, and operational practices informing recommendations on response to individuals in crisis by the CPD, the OEMC and other City entities.

Paragraph 130 Compliance Progress History

FIRST REPORTING PERIOD	SECOND REPORTING PERIOD	THIRD REPORTING PERIOD
SEPTEMBER 1, 2019 – AUGUST 31, 2019	SEPTEMBER 1, 2019 – FEBRUARY 29, 2020	MARCH 1, 2020 – DECEMBER 31, 2020
COMPLIANCE PROGRESS:	COMPLIANCE PROGRESS:	COMPLIANCE PROGRESS:
Not Applicable	Preliminary	Preliminary
FOURTH REPORTING PERIOD	**FIFTH REPORTING PERIOD**	**SIXTH REPORTING PERIOD**
JANUARY 1, 2021 – JUNE 30, 2021	JULY 1, 2021 – DECEMBER 31, 2021	JANUARY 1, 2022 – JUNE 30, 2022
COMPLIANCE PROGRESS:	COMPLIANCE PROGRESS:	COMPLIANCE PROGRESS:
Preliminary	Preliminary	Preliminary

Crisis Intervention: ¶131

131. *Within 365 days of the Effective Date, the City will request that the Advisory Committee identify and evaluate in writing any opportunities to develop or enhance crisis response-related policies, procedures, and training of City agencies, including CPD, OEMC, and the Chicago Fire Department, and increase municipal and community resources and alternative response options, including rapid-access clinics, drop-off centers, mobile crisis teams, a central non-emergency crisis line, other pre- and post-arrest diversion efforts, and strategies targeted at children and youth. The City will also request that the Advisory Committee identify and evaluate the steps necessary to develop non-criminal justice responses to individuals in crisis, including, but not limited to, a behavioral health unit to provide alternative non-criminal justice responses to individuals in crisis. In evaluating potential community resources and strategies, the Advisory Committee will identify challenges and opportunities for improvement, if any, and make recommendations. The City will address the feedback and recommendations identified by the Advisory Committee, including identifying recommendations that it will adopt, and the plan for implementation, in the Crisis Intervention Plan. The City will respond to each of the recommendations made by the Advisory Committee. The response will include a description of the actions that CPD has taken or plans to take with respect to the issues raised in the recommendations. If the City declines to implement a recommendation, it will explain the reason(s) for declining.*

Compliance Progress

(Reporting Period: January 1, 2022, through June 31, 2022)

Preliminary:	***In Compliance*** **(SECOND REPORTING PERIOD)**
Secondary:	***Not In Compliance***
Full:	***Not Yet Assessed***

In the sixth monitoring period, the City maintained Preliminary compliance with the requirements of ¶131.

To achieve Preliminary compliance with ¶131, the IMT assessed the City's level of data collection, tracking, analysis, and management as required under the Consent Decree. Specifically, the IMT examined whether the City has made the requisite requests of the Advisory Committee, which is now referred to as the Chicago Council on Mental Health Equity, and that the Chicago Council on Mental Health Equity

is providing the requisite guidance in return. Going forward, further levels of compliance will depend on the Chicago Council on Mental Health Equity's substantive reviews on data, policies, training, community engagement, and operational practices informing recommendations on responses to individuals in crisis. A critical component of compliance with this Paragraph, which the IMT will assess, is the Chicago Council on Mental Health Equity's engagement with the OEMC, the CPD, and other crisis-related policies, procedures, and training.

Progress before the Sixth Reporting Period

In previous reporting periods, the City requested that the Crisis Intervention Advisory Committee (also known as the CIAC) (now the Chicago Council on Mental Health Equity, *see analysis for* ¶128) provide recommendations on the CPD's and the OEMC's policies, procedures, and training. In addition, the Crisis Intervention Advisory Committee provided recommendations for improving the City's broader mental-health-response system. These recommendations were universally accepted by the City. In its draft *Crisis Intervention Plan* submitted in the third monitoring period, the City provided updates on its implementation of some—but not all—of these recommendations. We understand that the City may not include every recommendation in the first *Crisis Intervention Plan*, but we look forward to further discussions between the City and the Chicago Council on Mental Health Equity to understand how the entirety of Crisis Intervention Advisory Committee's recommendations will be addressed. This should be prioritized in the next reporting period.

Progress in the Sixth Reporting Period

During this monitoring period, the City did not produce the next iteration of the *Crisis Intervention Plan*, which is required to be produced annually under ¶131. Therefore, the City is unable to reach any further compliance level for ¶131.

The Chicago Council on Mental Health Equity, being the most recent iteration of the City's advisory committee, is still a relatively new body and has a broader focus on citywide crisis-response systems. The IMT has observed each of the Chicago Council on Mental Health Equity virtual meetings and maintains that the Chicago Council on Mental Health Equity represents a sound opportunity for the City to develop and implement a comprehensive citywide crisis response system. There is robust leadership by the City in this effort, with dedicated experts from the field leading subcommittee work. There is still some confusion by newer members about their role and function, and some legitimate concerns with processes that must be addressed in the future (*see analysis for ¶¶128-129)*. In addition, the City is still navigating the function of the Open Meetings Act (OMA), and it is expected that there will be a learning curve on both fronts. Going forward, we will continue

to assess the Chicago Council on Mental Health Equity meetings and subcommittee meetings, along with direct input from the subcommittee chairs provided under ¶¶128-129.

The IMT also recommends that the Chicago Council on Mental Health Equity bylaws include provisions for meaningful community engagement. We are concerned, as are members of the Chicago Council on Mental Health Equity, about the quality of interactions with the greater community and with robust representation of individuals with lived experience.

Additionally, as discussed in previous paragraphs and monitoring reports, the way community input is solicited because of the OMA needs additional consideration to better promote engagement. For example, the city requires community members to submit comments 24 hours before the meetings start. This may, however, deter community input and erode community trust, therefore the Chicago Council on Mental Health Equity should reconsider this approach. The draft bylaws that were submitted in the fourth reporting period still contained restrictive language regarding a community member's opportunity to ask questions or to give feedback. The IMT submitted formal comments back to the city, but we have not received another draft of the bylaws since then. We look forward to reviewing the final draft of the bylaws.

The City invited members of the Chicago Council on Mental Health Equity to observe the OEMC and the CPD Mental Health related training during the fifth and sixth reporting period, which the IMT appreciates. We hope the City makes this a regular practice moving forward.

The IMT also encourages the City to provide a robust data presentation to the Chicago Council on Mental Health Equity in an effort to build knowledge content for the council's members so that they can better provide recommendations for crisis response as required under ¶131. This would include data presented by the OEMC, the CPD and other City-related entities.

The City has launched the CARE alternative response pilot program which is an important step in the City's evolution in crisis response. However, key members of the Chicago Council on Mental Health Equity, although supportive, expressed being unaware of the process that went into developing such key programs that speak directly to ¶131. The IMT met with the Coalition this reporting period, and this was also an expressed concern.

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In the sixth monitoring period, the City maintained Preliminary compliance with ¶131. To achieve Secondary compliance with ¶131, the City must demonstrate sufficient efforts toward substantive reviews by the Chicago Council on Mental

Health Equity on data, policies, training, community engagement, and operational practices informing recommendations on overall response to individuals in crisis. The IMT still awaits the Chicago Council on Mental Health Equity's bylaws to confirm that the committee's voting processes are consistent with best practices.

It is important to note that the City just finished a policy review process with the Chicago Council on Mental Health Equity. Valuable feedback was given by the professionals and persons with lived experience that make up the Chicago Council on Mental Health Equity. As required under ¶¶130–31, the City and the CPD must review and respond to this feedback, even if the response is only to explain why the council's comments were not incorporated. While the City and the CPD did a far better job on the policy revision process, the CPD must do a better job explaining to the Chicago Council on Mental Health Equity why certain recommendations were not included in the revisions. This is a crucial part of building knowledge, trust, and strengthening directives, training, and operational practices.

We believe the City is on the right path. It is considering complicated issues while also taking important steps to be inclusive in its policy-revision process and training observation. We look forward to reviewing the final draft of the Chicago Council on Mental Health Equity bylaws, which should support continued efforts to promote inclusion and transparency. The City and the CPD could further these efforts by dedicating a quarterly meeting reviewing the CIT Dashboard to members, which would also be a useful step toward compliance with ¶131. Moreover, spending time reviewing the CARE program, the council's structure, and the City's progress with the Chicago Council on Mental Health Equity's recommendations would also be useful efforts.

Paragraph 131 Compliance Progress History

FIRST REPORTING PERIOD	SECOND REPORTING PERIOD	THIRD REPORTING PERIOD
SEPTEMBER 1, 2019 – AUGUST 31, 2019	SEPTEMBER 1, 2019 – FEBRUARY 29, 2020	MARCH 1, 2020 – DECEMBER 31, 2020
COMPLIANCE PROGRESS:	COMPLIANCE PROGRESS:	COMPLIANCE PROGRESS:
Not Applicable	Preliminary	Preliminary
FOURTH REPORTING PERIOD	**FIFTH REPORTING PERIOD**	**SIXTH REPORTING PERIOD**
JANUARY 1, 2021 – JUNE 30, 2021	JULY 1, 2021 – DECEMBER 31, 2021	JANUARY 1, 2022 – JUNE 30, 2022
COMPLIANCE PROGRESS:	COMPLIANCE PROGRESS:	COMPLIANCE PROGRESS:
Preliminary	Preliminary	Preliminary

Crisis Intervention: ¶132

132. *The Advisory Committee will be chaired by the Mayor's Office. The Mayor's Office will invite individuals who have personally experienced a behavioral or mental health crisis, people with experience working with individuals in crisis, and experts with knowledge in law enforcement responses to individuals in crisis. At a minimum, the Mayor's Office will invite individuals from the following groups: first responders; the CIT Coordinator; OEMC; county and city hospitals, health care providers, and mental health professionals; the Cook County State's Attorney's Office; the Cook County Public Defender's Office; at least one academic research entity; community behavioral and mental health professionals; advocacy groups for consumers of behavioral and mental health services; behavioral and mental health service providers; homeless service providers; substance abuse service providers; persons with lived experiences of behavioral or mental health crises; and other similar groups.*

Compliance Progress

(Reporting Period: January 1, 2022, through June 31, 2022)

Preliminary:	***In Compliance*** **(SECOND REPORTING PERIOD)**
Secondary:	***In Compliance*** **(THIRD REPORTING PERIOD)**
Full:	***Not Yet Assessed***

In the sixth monitoring period, the City maintained Preliminary and Secondary compliance with ¶132.

To achieve Preliminary compliance with ¶132, the City and the CPD must implement sufficient policies, procedures, or written guidance through the process described in the Consent Decree (¶¶626–41), which outlines applicable consultation, resolution, workout, and public-comment periods. These paragraphs detail various requirements, including that policies are "plainly written, logically organized, and use clearly defined terms." In addition, the IMT assesses whether the City has qualified personnel fulfilling the responsibilities to achieve the goals of the Consent Decree. The IMT also assesses the City on resource allocation, staffing capacity, and efforts to fill any vacant positions. Specifically, the IMT examines whether the City has created the requisite Advisory Committee with appropriate expertise and experience.

Progress before the Sixth Reporting Period

Both chairs of the Chicago Council on Mental Health Equity continue to be well qualified to meet the requirements of ¶132. The IMT believes that they have the necessary background, experience, and commitment to the Chicago Council on Mental Health Equity process. Additionally, the Chicago Council on Mental Health Equity membership includes representatives from each of the groups listed in ¶132. There is ongoing concern about the low representation of people with lived experience. Active participation continues to be low, and the City should consider additional ways to improve participation of people with lived experience. There are many professionals serving on this committee who would be a good resource to assist with recruiting additional lived experience. This remains a concern among Chicago Council on Mental Health Equity members, and members of the Coalition. The IMT recognizes that lived experience can come in many forms, but the City must do a better job seeking feedback and assistance on this from the Chicago Council on Mental Health Equity and Coalition.

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In the sixth monitoring period, the City maintained Preliminary and Secondary compliance with ¶132. To assess Full compliance, the IMT will monitor the City's efforts to finalize the Chicago Council on Mental Health Equity's bylaws and evaluate the continuing robust participation from the Chicago Council on Mental Health Equity members, including people with lived experience. The IMT will also monitor the leadership response to the Chicago Council on Mental Health Equity and on Coalition concerns as addressed in ¶128-29. Last, the IMT will continue to assess the City and the CPD's efforts to proactively engage the members in solution building.

Paragraph 132 Compliance Progress History

FIRST REPORTING PERIOD	SECOND REPORTING PERIOD	THIRD REPORTING PERIOD
SEPTEMBER 1, 2019 – AUGUST 31, 2019	SEPTEMBER 1, 2019 – FEBRUARY 29, 2020	MARCH 1, 2020 – DECEMBER 31, 2020
COMPLIANCE PROGRESS:	COMPLIANCE PROGRESS:	COMPLIANCE PROGRESS:
Not Applicable	Preliminary	Secondary
FOURTH REPORTING PERIOD	**FIFTH REPORTING PERIOD**	**SIXTH REPORTING PERIOD**
JANUARY 1, 2021 – JUNE 30, 2021	JULY 1, 2021 – DECEMBER 31, 2021	JANUARY 1, 2022 – JUNE 30, 2022
COMPLIANCE PROGRESS:	COMPLIANCE PROGRESS:	COMPLIANCE PROGRESS:
Secondary	Secondary	Secondary

Crisis Intervention: ¶133

133. *CPD policy will provide that a crisis response may be necessary even in situations where there has been an apparent violation of law.*

Compliance Progress

(Reporting Period: January 1, 2022, through June 31, 2022)

Preliminary:	***In Compliance*** **(THIRD REPORTING PERIOD)**
Secondary:	***Not in Compliance***
Full:	***Not Yet Assessed***

In the sixth monitoring period, the City and the CPD maintained Preliminary compliance with the requirements of ¶133.

To achieve Preliminary compliance with ¶133, the City and the CPD must implement sufficient policies, procedures, or written guidance through the process described in the Consent Decree (¶¶626–41), which outlines applicable consultation, resolution, workout, and public-comment periods. These paragraphs detail various requirements, including that policies are "plainly written, logically organized, and use clearly defined terms." In addition, the IMT assesses whether the City has qualified personnel fulfilling the responsibilities to achieve the goals of the Consent Decree. The IMT also assesses the City on resource allocation, staffing capacity, and efforts to fill any vacant positions. Moreover, ¶133's requirements must also be adequately memorialized into policy.

Going forward, to achieve Secondary compliance, the CPD will need to develop metrics that, when tracked, will adequately demonstrate the CPD's success under ¶133. Further assessment levels will require an assessment of those developed metrics.

Progress before the Sixth Reporting Period

The CPD memorialized the requirements of ¶133 into Special Order S04-20, *Recognizing and Responding to Individuals in Crisis,* which received a no objection in the third reporting period. The CPD produced a newly developed eLearning and a revised 2021 annual in-service training (De-escalation, Response to Resistance, and Use of Force), both of which were reviewed by the IMT in the third reporting period. While there is room for improvement, a no-objection was issued in the third reporting period. However, neither training has yet to be fully implemented by the CPD.

Progress before the Sixth Reporting Period

The CPD has Special Order S04-20, *Recognizing and Responding to Individuals in Crisis*, which states that a crisis intervention response may be necessary even in situations where there has been apparent violation of law. Additionally, the directive provides tips and techniques for recognizing a person who may be in mental-health crisis and includes requirements for responding to such calls for service.

While the policy contains some concepts related to recognizing mental health conditions and call response, the City and the CPD has not produced the training requirements necessary to achieve Secondary compliance. That is, 95% of members must complete the trainings. For example, non-CIT officers have not yet sufficiently received updated training on responding to calls involving people in mental health crisis. This will be necessary if they are to "provide a crisis response." The CPD has made strides in strengthening the content of crisis response in it revised 2021 annual *Crisis Intervention Team In-Service Training* (De-escalation, Response to Resistance, and Use of Force), but the training has not yet been received by all officers. Further, the CPD has developed a *Crisis Intervention Team eLearning* to address policy changes affecting all officers. This eLearning is a step towards Secondary compliance, but it has not been delivered to all officers.

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In the sixth monitoring period, the City and the CPD maintained Preliminary compliance with ¶133's requirements. To achieve Secondary compliance, the CPD must deliver the necessary crisis response training(s), with 95% completion on both trainings. Going forward, the CPD will need to develop metrics that, when tracked, will adequately demonstrate the CPD's success under ¶133. Further assessment levels will require an assessment of those developed metrics.

Full compliance with the requirements of ¶133 will require reliable data on calls involving people in mental health crisis. This will require consistent completion of the *Crisis Intervention Report* (*see* ¶118) and will require an audit of crisis calls once reliable data is available. We will assess this in future monitoring periods once CPD delivers the training necessary for Secondary compliance.

Paragraph 133 Compliance Progress History

FIRST REPORTING PERIOD	SECOND REPORTING PERIOD	THIRD REPORTING PERIOD
SEPTEMBER 1, 2019 – AUGUST 31, 2019	SEPTEMBER 1, 2019 – FEBRUARY 29, 2020	MARCH 1, 2020 – DECEMBER 31, 2020
COMPLIANCE PROGRESS:	COMPLIANCE PROGRESS:	COMPLIANCE PROGRESS:
Not Applicable	Not Applicable	Preliminary
FOURTH REPORTING PERIOD	**FIFTH REPORTING PERIOD**	**SIXTH REPORTING PERIOD**
JANUARY 1, 2021 – JUNE 30, 2021	JULY 1, 2021 – DECEMBER 31, 2021	JANUARY 1, 2022 – JUNE 30, 2022
COMPLIANCE PROGRESS:	COMPLIANCE PROGRESS:	COMPLIANCE PROGRESS:
Preliminary	Preliminary	Preliminary

Crisis Intervention: ¶134

134. *CPD policy will encourage officers to redirect individuals in crisis to the healthcare system, available community resources, and available alternative response options, where feasible and appropriate.*

Compliance Progress

(Reporting Period: January 1, 2022, through June 31, 2022)

Preliminary:	***In Compliance*** **(THIRD REPORTING PERIOD)**
Secondary:	***Not In Compliance***
Full:	***Not Yet Assessed***

In the sixth monitoring period, the City and the CPD maintained Preliminary compliance with the requirements of ¶134.

To achieve Preliminary compliance with ¶134, the City and the CPD must implement sufficient policies, procedures, or written guidance through the process described in the Consent Decree (¶¶626–41), which outlines applicable consultation, resolution, workout, and public-comment periods. These paragraphs detail various requirements, including that policies are "plainly written, logically organized, and use clearly defined terms." Going forward, to achieve Secondary compliance, the CPD will need to complete 95% training of officers and develop metrics that, when tracked, will adequately demonstrate the CPD's success under ¶134. Further assessment levels will require an assessment of those developed metrics.

Progress before the Sixth Reporting Period

The CPD memorialized the requirements of ¶134 into Special Order S04-20, *Recognizing and Responding to Individuals in Crisis,* which received a no objection in the third reporting period. The CPD produced a newly developed eLearning and a revised 2021 *Crisis Intervention Team In-Service Training* (De-escalation, Response to Resistance, and Use of Force), both of which the IMT reviewed in the third reporting period. While there was room for improvement, a no-objection was issued in the third reporting period. However, neither training has yet to be fully implemented by the CPD.

Progress in the Sixth Reporting Period

The CPD has Special Order S04-20, *Recognizing and Responding to Individuals in Crisis*, which requires officers responding to a call involving an individual in crisis to provide that individual with the document "Mental Health Incident Notice." We have reviewed the Mental Health Incident Notice and the IMT has concerns about

whether it adequately informs community members of the healthcare system, available community resources, and available alternative response options. Rather, NAMI Chicago and Smart 911 are the only resources identified, which is insufficient. The CPD should consider the utility of the Mental Health Incident Notice.

While ¶134's requirements are incorporated into the policy, and the IMT will continue to assess whether the CPD has a responsive data collection tool, the training requirements necessary to achieve Secondary compliance have yet to be delivered. That is, 95% of officers have not yet completed the trainings. For instance, non-CIT officers have not sufficiently received updated training on the mental health system, nor have they received training on "available alternate response options." Such training will be necessary for Secondary compliance with ¶134.

The IMT notes that the City's pilot alternative response program, Crisis Assistance Response Engagement (CARE) was launched. This is an important step, but requires additional policy considerations for the City, the OEMC, the Fire Department, and the CPD, who will all need to demonstrate increased communication. Moreover, the effectiveness of the CPD's *Mental Health Incident Notice* remains uncertain. The CPD will need to assess whether the notice sufficiently addresses ¶134's requirements.

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In the sixth monitoring period, the City and the CPD maintained Preliminary compliance with the requirements of ¶134. To achieve Secondary compliance, the CPD must deliver the necessary crisis response training(s), demonstrating that 95% of officers have received the training. Going forward, the CPD will need to develop metrics that, when tracked, will adequately demonstrate the CPD's success under ¶134. Further assessment levels will require an assessment of those developed metrics. Moreover, the IMT will also consider policy that is developed in relation to the new CARE alternative response program.

Full compliance with the requirements of ¶134 will require reliable data on calls involving people in mental health crisis. This will require responding officers to reliably complete the *Crisis Intervention Report* (*see* ¶118), use the *Mental Health Incident Notice* (or other alternative supporting additional resources), and will require an audit of crisis calls once the City has reliable data. These requirements will be assessed in future monitoring periods once the CPD delivers the training necessary for Secondary compliance.

Paragraph 134 Compliance Progress History

FIRST REPORTING PERIOD	SECOND REPORTING PERIOD	THIRD REPORTING PERIOD
SEPTEMBER 1, 2019 – AUGUST 31, 2019	SEPTEMBER 1, 2019 – FEBRUARY 29, 2020	MARCH 1, 2020 – DECEMBER 31, 2020
COMPLIANCE PROGRESS:	COMPLIANCE PROGRESS:	COMPLIANCE PROGRESS:
Not Applicable	Not Applicable	Preliminary

FOURTH REPORTING PERIOD	FIFTH REPORTING PERIOD	SIXTH REPORTING PERIOD
JANUARY 1, 2021 – JUNE 30, 2021	JULY 1, 2021 – DECEMBER 31, 2021	JANUARY 1, 2022 – JUNE 30, 2022
COMPLIANCE PROGRESS:	COMPLIANCE PROGRESS:	COMPLIANCE PROGRESS:
Preliminary	Preliminary	Preliminary

Crisis Intervention: ¶135

135. *CPD will ensure that the language used in policies, procedures, forms, databases, and trainings to communicate about incidents involving individuals in crisis is appropriate, respectful, and consistent with industry recognized terminology. CPD will seek input from community stakeholders, including the Advisory Committee, for recommendations to identify appropriate and respectful terminology.*

Compliance Progress

(Reporting Period: January 1, 2022, through June 31, 2022)

Preliminary:	***In Compliance*** **(THIRD REPORTING PERIOD)**
Secondary:	***Not In Compliance***
Full:	***Not Yet Assessed***

In the sixth monitoring period, the City and the CPD maintained Preliminary compliance with ¶135.

To achieve Preliminary compliance with ¶135, the City and the CPD must implement sufficient policies, procedures, or written guidance through the process described in the Consent Decree (¶¶626–41), which outlines applicable consultation, resolution, workout, and public-comment periods. These paragraphs detail various requirements, including that policies are "plainly written, logically organized, and use clearly defined terms." Going forward, to achieve Secondary compliance, the IMT will need to verify that at least 95% of officers received the relevant training, and the City and the CPD will need to develop metrics that, when tracked, adequately demonstrate the CPD's success under ¶135. Further assessment levels will require an assessment of those developed metrics.

Progress before the Sixth Reporting Period

In the third reporting period, the CPD developed an eLearning and in-service course for all CPD members on the Crisis Intervention program and responding to individuals in crisis. However, neither training has yet to be fully implemented by the CPD.

Progress in the Sixth Reporting Period

The CPD has Special Order S05-14, *Crisis Intervention Team (CIT) Program*, which states that language used in the policies, procedures, forms, databases, and training materials to communicate about incidents involving individuals in crisis should be appropriate, respectful, and consistent with professional terminology.

In addition, Special Order S04-20, *Recognizing and Responding to Individuals in Crisis*, clearly communicates the CPD's commitment to interacting with individuals in crisis with dignity, respect, and the utmost regard for the preservation of human life and the safety of all persons involved. Under the "Procedures" section of the directive, officers are instructed that they are required to interact with individuals in crisis with dignity and respect. Finally, the CPD policies and trainings have been reviewed by members of the Chicago Council on Mental Health Equity, thereby accomplishing the second part of ¶135. It is apparent from the policies, procedures, forms, databases, and training materials that we have reviewed that the CPD is committed to reinforcing respectful dialogue when discussing people in crisis.

However, the CPD has not yet provided updated training on using appropriate and respectful communication when interacting with people in mental health crisis. Although we believe that the CPD has certainly taken sufficient steps to ensure that respectful language is used in policies, procedures, and databases, updated training will ensure that members use respectful language on forms and when "communicat[ing] about individuals in crisis." Such training will be necessary for Secondary compliance. Moreover, the CPD Event Code presently uses outdated and inappropriate language (*e.g.*, DISTME). The phrase "disturbance mental" is used and will need to be updated. With the onboarding of a new Computer Aided Dispatch (CAD) system in 2023, the CPD should be encouraged to consider alternate event codes for mental health related calls for service.

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In the sixth monitoring period, the City and the CPD maintained Preliminary compliance with ¶135. To achieve Secondary compliance, the CPD must deliver the necessary crisis response training(s) demonstrating 95% of personnel has been trained. Going forward, the CPD will need to develop metrics that, when tracked, will adequately demonstrate the CPD's success under ¶135. Further assessment levels will require an assessment of those developed metrics.

Full compliance with the requirements of ¶135 will require reliable data on calls involving people in mental health crisis. This will require consistent completion of the *Crisis Intervention Report* (*see* ¶118) and will require an audit of crisis calls once reliable data is available. We will assess this in future monitoring periods once the CPD delivers the training necessary for Secondary compliance.

Paragraph 135 Compliance Progress History

FIRST REPORTING PERIOD
SEPTEMBER 1, 2019 – AUGUST 31, 2019
COMPLIANCE PROGRESS:
Not Applicable

SECOND REPORTING PERIOD
SEPTEMBER 1, 2019 – FEBRUARY 29, 2020
COMPLIANCE PROGRESS:
Not Applicable

THIRD REPORTING PERIOD
MARCH 1, 2020 – DECEMBER 31, 2020
COMPLIANCE PROGRESS:
Preliminary

FOURTH REPORTING PERIOD
JANUARY 1, 2021 – JUNE 30, 2021
COMPLIANCE PROGRESS:
Preliminary

FIFTH REPORTING PERIOD
JULY 1, 2021 – DECEMBER 31, 2021
COMPLIANCE PROGRESS:
Preliminary

SIXTH REPORTING PERIOD
JANUARY 1, 2022 – JUNE 30, 2022
COMPLIANCE PROGRESS:
Preliminary

Crisis Intervention: ¶136

136. *CPD will develop and implement policies, procedures, and protocols regarding the collection, maintenance, and use of information related to an individual's medical and mental health to facilitate necessary and appropriate communication while adequately protecting an individual's confidentiality. To develop these policies, procedures, and protocols, CPD will seek input from community stakeholders, including the Advisory Committee.*

Compliance Progress

(Reporting Period: January 1, 2022, through June 31, 2022)

Preliminary:	***In Compliance*** **(THIRD REPORTING PERIOD)**
Secondary:	***Not In Compliance***
Full:	***Not Yet Assessed***

In the sixth monitoring period, the City and the CPD maintained Preliminary compliance with ¶136.

To achieve Preliminary compliance with ¶136, the City and the CPD must implement sufficient policies, procedures, or written guidance through the process described in the Consent Decree (¶¶626–41), which outlines applicable consultation, resolution, workout, and public-comment periods. These paragraphs detail various requirements, including that policies are "plainly written, logically organized, and use clearly defined terms."

Progress before the Sixth Reporting Period

In the fourth reporting period, the IMT reviewed Special Order S04-20, *Recognizing and Responding to Individuals in Crisis*, which provides guidance about verbal, behavioral, and environmental cues that may allow an officer to recognize a person in mental health crisis and guidance for officers to collect and use information during the on-scene encounter. S04-20 also includes the requirement for officers to complete a *Crisis Intervention Report* for all calls involving a mental-health component. The report requires data related to individual cases, but the data will also be used in aggregate to identify overall trends in the CPD's mental health response approach. The earlier version of Special Order S05-14, *Crisis Intervention Team (CIT) Program*, clearly identified the responsible parties for following up on mental and behavioral health-related events and for referring and, when appropriate, connecting individuals in crisis with local service providers. However, during the fifth monitoring period, key requirements of these SOP's were subsumed under a significantly revised S05-14. While initially missing several key requirements, the CPD

has now included all requirements of ¶136 into the revised S05-14. The information collected by the draft *CIT Report* also appears capable of assisting area-level resources in conducting such follow up.

Progress in the Sixth Reporting Period

In the sixth monitoring period, the significantly revised S05-14 incorporated all key requirements of ¶136. The associated SOPs are still under review and have not yet been resubmitted to the IMT.

As indicated previously, the City and the CPD initiated a much more thorough review of the various directives and SOPs by the Chicago Council on Mental Health Equity this reporting period. While concerns were raised in previous sections of this report about the process, which the City is actively working to address, the City and the CPD did a much better job reviewing its policies than in the first monitoring period's original review. The IMT appreciates these efforts. The IMT looks forward to expanding this review to additional "community stakeholders" in subsequent rounds of revisions. This expansion should include more robust public notice, which will help the CPD obtain broader input. During this reporting period, the City and the CPD posted the directive for public comment prior to achieving a no objection from the IMT. This creates process issues that could otherwise be avoided. Moreover, the IMT suggests that the CPD make greater efforts to inform members of the Chicago Council on Mental Health Equity why specific comments were not included in revisions to CPD policy. This explanation not only build community trust, but it also a requirement to future levels of compliance. *See* ¶131.

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In the sixth monitoring period, the City and the CPD maintained Preliminary compliance with ¶136.

Second compliance will hinge on several factors. Demonstration that the comments and feedback of the Chicago Council on Mental Health Equity and relevant community stakeholders, including those open through the public posting are adequately addressed. Because ¶136 requires review and input of "policies, procedures, and protocols", and not just "policies", compliance will also hinge on the finalization of the CIT unit specific SOPs, which the Chicago Council on Mental Health Equity reviewed at the end of the fifth monitoring period. Improvements to the responsiveness to the feedback by the CPD occurred this monitoring period. These Unit Specific SOP's go into further depth on the "procedures and protocols" of the CIT Unit. We strongly recommend that the City and the CPD adequately respond to feedback from both the Chicago Council on Mental Health Equity and "community stakeholders" per ¶131. Secondary compliance will require comprehensive training for officers on policy, procedures, and protocols, including the

mandatory completion of the CIT Report, which are required by ¶136. The City and the CPD have developed an eLearning to achieve this requirement and we expect they will achieve Secondary compliance once 95% of members are trained. Additionally, training for area-level resources on how to conduct such follow-up will also be considered. However, we credit the CPD for taking the above-referenced steps to date.

Paragraph 136 Compliance Progress History

FIRST REPORTING PERIOD	SECOND REPORTING PERIOD	THIRD REPORTING PERIOD
SEPTEMBER 1, 2019 – AUGUST 31, 2019	SEPTEMBER 1, 2019 – FEBRUARY 29, 2020	MARCH 1, 2020 – DECEMBER 31, 2020
COMPLIANCE PROGRESS:	COMPLIANCE PROGRESS:	COMPLIANCE PROGRESS:
Not Applicable	Not Applicable	Preliminary

FOURTH REPORTING PERIOD	FIFTH REPORTING PERIOD	SIXTH REPORTING PERIOD
JANUARY 1, 2021 – JUNE 30, 2021	JULY 1, 2021 – DECEMBER 31, 2021	JANUARY 1, 2022 – JUNE 30, 2022
COMPLIANCE PROGRESS:	COMPLIANCE PROGRESS:	COMPLIANCE PROGRESS:
Preliminary	Preliminary	Preliminary

Crisis Intervention: ¶137

137. *Within 180 days of the Effective Date, CPD will review and revise its crisis intervention-related policies as necessary to comply with the terms of this Agreement. CPD will consider any recommendations or feedback provided by the Advisory Committee when revising its policies.*

Compliance Progress

(Reporting Period: January 1, 2022, through June 31, 2022)

Preliminary:	***Not In Compliance***
Secondary:	***Not In Compliance***
Full:	***Not Yet Assessed***

During the sixth monitoring period, the City and the CPD did not meet any level of compliance with ¶137.

To achieve Preliminary compliance with ¶137, the City and the CPD must implement sufficient policies, procedures, or written guidance through the process described in the Consent Decree (¶¶626–41), which outlines applicable consultation, resolution, workout, and public-comment periods. These paragraphs detail various requirements, including that policies are "plainly written, logically organized, and use clearly defined terms." To achieve Preliminary compliance with ¶137, the City and the CPD must develop and finalize policies that incorporate ¶137's requirements.

Progress before the Sixth Reporting Period

In the fourth reporting period, the City produced draft Crisis Intervention unit specific standard operating procedures. As noted in our assessments of other paragraphs, the CPD has made a good-faith effort to ensure that the Consent Decree's requirements were incorporated into CIT-related policies and that a responsible party is listed for each requirement. In the fifth reporting period, the City opted to subsume key consent decree requirements, which were previously covered under the draft standard operating procedures, into a substantially revised Special Order S05-14, *Crisis Intervention Team (CIT) Program*. The City intended to produce revised standard operating procedures in the sixth reporting period, but did not. The CPD has sought feedback from the Chicago Council on Mental Health Equity into draft policies, and have made efforts to improve this process, which represents an important step forward.

Progress in the Sixth Reporting Period

During the sixth monitoring period, the CPD produced a substantially revised Special Order S05-14, *Crisis Intervention Team (CIT) Program* which incorporated ¶137's requirements. While some CPD directives that fulfill Consent Decree requirements have been published, the CPD intends to enumerate other requirements in "crisis intervention-related" standard operating procedures that the City has yet to produce to the IMT. At the end of this reporting period, the CPD nearly completed the requirement that the Chicago Council on Mental Health Equity review and provide feedback on each of these associated policies. Because ¶137 requires review of "crisis intervention-related policies," the associated unit specific SOPs must receive the Chicago Council on Mental Health Equity's feedback. The CPD did a far more comprehensive job on this policy review requirement than in the second reporting period, and the CPD should be commended for this. The feedback and recommendations provided by the Chicago Council on Mental Health Equity, which were robust, were considered and largely responded to. But the City and the CPD must do a better job explaining why specific recommendations from the Chicago Council on Mental Health Equity were not included. This builds community trust and fulfills a Consent Decree requirement.

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In the sixth monitoring period, the City and the CPD did not meet any level of compliance with ¶137. To achieve Preliminary compliance with ¶137, the CPD must finalize policies that incorporate ¶137's requirements. Consideration should also be given to when and how the CPD posts these SOP's for public comment.

Once the CPD has finalized each relevant crisis intervention-related policy, and the associated standard operating procedures, we anticipate that the CPD will be in Preliminary compliance with the ¶137.

We appreciate the CPD's efforts to accomplish the task of policy review in a comprehensive fashion. For future annual revisions, the IMT recommends a more robust communication plan for soliciting broader community feedback, a concern shared not only by the IMT, but also by the Coalition and members of the Chicago Council on Mental Health Equity.

Paragraph 137 Compliance Progress History

FIRST REPORTING PERIOD
SEPTEMBER 1, 2019 – AUGUST 31, 2019
COMPLIANCE PROGRESS:
Not Applicable

SECOND REPORTING PERIOD
SEPTEMBER 1, 2019 – FEBRUARY 29, 2020
COMPLIANCE PROGRESS:
None

THIRD REPORTING PERIOD
MARCH 1, 2020 – DECEMBER 31, 2020
COMPLIANCE PROGRESS:
None

FOURTH REPORTING PERIOD
JANUARY 1, 2021 – JUNE 30, 2021
COMPLIANCE PROGRESS:
None

FIFTH REPORTING PERIOD
JULY 1, 2021 – DECEMBER 31, 2021
COMPLIANCE PROGRESS:
None

SIXTH REPORTING PERIOD
JANUARY 1, 2022 – JUNE 30, 2022
COMPLIANCE PROGRESS:
None

Crisis Intervention: ¶138

138. *OEMC call-takers will continue to identify calls for service involving an individual known, suspected, or perceived to be in crisis.*

Compliance Progress

(Reporting Period: January 1, 2022, through June 31, 2022)

Preliminary:	***In Compliance*** **(FOURTH REPORTING PERIOD)**
Secondary:	***In Compliance*** **(FIFTH REPORTING PERIOD)**
Full:	***Not Yet Assessed***

During the sixth monitoring period, the City and the OEMC maintained Preliminary and Secondary compliance with the requirements of ¶138.

To achieve Preliminary compliance with ¶138, the City and the CPD must implement sufficient policies, procedures, or written guidance through the process described in the Consent Decree (¶¶626–41), which outlines applicable consultation, resolution, workout, and public-comment periods. These paragraphs detail various requirements, including that policies are "plainly written, logically organized, and use clearly defined terms." To maintain Preliminary compliance with ¶138, the OEMC must demonstrate that it is thoroughly reviewing its policies as described in ¶¶626—41.

The IMT assessed Secondary compliance with ¶138 by reviewing training development, implementation, and evaluation in accordance with ¶286 of the Consent Decree. Paragraph 286 incorporates the following evaluation criteria: training needs assessment, curriculum design, curriculum development, training implementation (training delivery), and training evaluation. Moreover, to maintain Secondary compliance with ¶138, the OEMC must provide the IMT with sufficient documentation showing 95% completion of training.

Progress before the Sixth Reporting Period

In previous reporting periods, the IMT reviewed an updated draft version of the OEMC's *Crisis Intervention Team Program* standard operating procedure, which clearly articulates the call-takers' responsibility to identify calls for service involving an individual known, suspected, or perceived to be in crisis. Call-takers are required to complete a series of "CIT triage questions" that help them determine whether a mental health component is known, suspected, or perceived, which would require a CIT response. The standard operating procedure also instructs call-takers that if there is any doubt about whether a call includes a possible mental health component, the steps listed in the standard operating procedure "can and should apply." This SOP received a no objection in the fourth reporting period.

During the fifth monitoring period, the IMT observed the eight-hour CIT and Mental Health Awareness training that all OEMC telecommunicators receive, which includes a module on mental health response (*see* ¶¶142–46). The IMT noted that the OEMC telecommunicators have received sufficient training on how to identify calls involving an individual known, suspected, or perceived to be in crisis and found that the new standard operating procedure is incorporated into training, meeting the requirements of ¶138.

The training included a review of CIT Policies—covering the OEMC drop down boxes, what automatically triggers a CIT drop-down box to appear (e.g. calls that include suicidal ideation or threat, the new requirement to ask about Weapons, Medications, Violent Tendencies, Triggers, etc.) The IMT has suggested improvements to the development of a drop-down box on the Weapons question, as identifying the type of weapon is crucial information for responding officers. The IMT strongly encourages a drop-down field indicating common types of weapons. For example, a drop-down field could include commons weapons (e.g., gun, knife) along with a narrative field to describe other objects being used as a weapon (e.g., hammer, screwdriver). This data is enormously useful to responding officers. While the training included listening to two audio calls with discussion afterwards, live scenario-based training permitting the practice of these important skills would be a good addition to the training. Overall, the eight-hour training was very well done.

Progress in the Sixth Reporting Period

In the sixth monitoring period, the IMT reviewed the OEMC's policy-review process. The IMT notes that a no objection on this review will not be given until robust engagement of the Chicago Council on Mental Health Equity occurs. During the first policy review process, there was essentially no engagement of the Chicago Council on Mental Health Equity as required under ¶122. Since then, the IMT has been clear with the OEMC that compliance will be delayed until the IMT receives evidence that the Chicago Council on Mental Health Equity is significantly engaged with the OEMC's policy-review process. (*See*, e.g., ¶¶139-40, 151, below.)

In this reporting period, the OEMC quickly reviewed the policies during a quarterly Chicago Council on Mental Health Equity meeting. The OEMC also attached the policies to an email to the Chicago Council on Mental Health Equity, inviting feedback. However, no feedback was received. This lack of feedback strongly suggests inadequate engagement, which — again — is required for the OEMC to maintain compliance. Therefore, the IMT recommends that the OEMC engage the CPD and the City to identify a robust plan to solicit thorough review and comment from the Chicago Council on Mental Health Equity. The OEMC plays a crucial role in the initial identification and appropriate dispatch of calls involving a mental health component, and experts and people with lived experience should be given due process.

In the sixth reporting period, the OEMC also launched its CIT Refresher course. The IMT observed that training on March 9, 2022. The City produced partial attendance records for both the CIT Refresher and the 8-hour CIT and Mental Health Awareness training in the sixth monitoring period. The records show the date personnel was scheduled to attend, but it does not show the actual training completion date. Rather, there is an "attended" column that is blank. There is also no way to measure the percent of OEMC personnel who have completed the training without a system that identifies the total number of eligible personnel that the IMT can cross check with an attendance-completion date, which is missing.

During this reporting period, the OEMC gave a brief presentation to the Chicago Council on Mental Health Equity, providing a high-level overview of the role and function of the OEMC. However, this overview falls short of a meaningful solicitation process for feedback on the OEMC's policies and/or training. For example, slide 10 of the overview stated "next quarter policies will be presented to the Chicago Council on Mental Health Equity for feedback," and then listed two dates of March 2 and 9, 2022 wherein the Chicago Council on Mental Health Equity could attend Refresher Training. This is an insufficient mechanism for soliciting policy review or training attendance. Additionally, the only evidence of training observation that was produced to the IMT was an email from a Chicago Council on Mental Health Equity member who expressed interest in attending the OEMC training *in person*. This email was dated December 16, 2021. There was no evidence that the OEMC responded to this person, or that this person attended the training in person, as requested.

To be clear, the IMT requires *written* Chicago Council on Mental Health Equity feedback on relevant OEMC policies. This feedback should be thorough, and the OEMC should consider consulting with the CPD and Chicago Council on Mental Health Equity subcommittee chairs for suggestions. This feedback did not occur during the first policy review and it was again insufficient this reporting period. If this rigorous feedback is absent again during the next reporting period, then the OEMC will lose Preliminary and Secondary compliance with ¶138.

Moreover, two training attendance records were produced this reporting period. One for the "Mental Health Crisis Awareness -Refresher" and one for the "Mental Health Crisis Awareness Training." The Refresher training is a new training implemented this reporting period. However, the OEMC only produced to the IMT:

1. Training completion dated March 14, 2022 -Mental Health Awareness Training-Refresher, which had 30 participants plus 7 guests with 4 missing signatures and 2 identified as late to the training. This production did not include training evaluations, nor does it support 95% completion. The records show the date personnel was scheduled to attend, but it does not show the actual training completion date. Rather, there is an "attended" column that is blank. There is

also no way to measure the percent who have completed the training without a system that identifies the total number of eligible employees to cross check with a attendance completion date which is missing. To maintain Secondary compliance, the IMT requires evidence of full participation, along with training evaluations.

2. Additionally, records were produced with a training completion date of December 3, 2021. There were 17 participants for this Mental Health Crisis Awareness Training. This production provided training evaluations, which were strong, with the most common theme being improvements focused on better integration with the CPD, bringing the CPD experiences in the field. Again, the records show the date personnel was scheduled to attend, but it does not show the actual training completion date. Rather, there is an "attended" column that is blank. There is also no way to measure the percent who have completed the training without a system that identifies the total number of eligible employees to cross check with a attendance completion date which is missing. To maintain Secondary compliance, the IMT requires evidence of full participation, along with training evaluations.

The OEMC is at risk of losing compliance with ¶138 due to its ongoing lack of full and effective engagement with the Chicago Council on Mental Health Equity on both the initial and second policy review process, along with inadequate production of sufficient training records and evaluations. To avoid losing compliance with ¶138 in the next and future reporting periods, the OEMC must provide the IMT with evidence of full and effective engagement with the Chicago Council on Mental Health Equity on the most recent policy-review process, and with adequate training records, as outlined above.

Further levels of compliance will depend on broader system operation, such as ongoing performance and reliable data as evidenced by the results of OEMC's ongoing audits. The OEMC must produce completed audit sheets, along with the OEMC's trend analysis and what the OEMC is doing to address those trends. It will be insufficient to produce only the audit spreadsheet templates, without accompanying proof of audit interpretation, what the leadership is seeing as a result of the audits, and what is being done to support trends.

The IMT acknowledges that the OEMC has made strides toward establishing the importance of call-takers being able to identify crisis-related calls. However, to maintain Preliminary and Secondary compliance with ¶138, more needs to be accomplished as it relates to requirements of ¶138.

Paragraph 138 Compliance Progress History

FIRST REPORTING PERIOD
SEPTEMBER 1, 2019 – AUGUST 31, 2019
COMPLIANCE PROGRESS:
Not Applicable

SECOND REPORTING PERIOD
SEPTEMBER 1, 2019 – FEBRUARY 29, 2020
COMPLIANCE PROGRESS:
Not Applicable

THIRD REPORTING PERIOD
MARCH 1, 2020 – DECEMBER 31, 2020
COMPLIANCE PROGRESS:
None

FOURTH REPORTING PERIOD
JANUARY 1, 2021 – JUNE 30, 2021
COMPLIANCE PROGRESS:
Preliminary

FIFTH REPORTING PERIOD
JULY 1, 2021 – DECEMBER 31, 2021
COMPLIANCE PROGRESS:
Secondary

SIXTH REPORTING PERIOD
JANUARY 1, 2022 – JUNE 30, 2022
COMPLIANCE PROGRESS:
Secondary

Crisis Intervention: ¶139

139. *OEMC will continue to code all incidents identified as potentially involving an individual in crisis in a manner that allows for subsequent data analysis necessary for the evaluation of CPD and OEMC responses to individuals in crisis and the development of the plans required by this section of the Agreement.*

Compliance Progress

(Reporting Period: January 1, 2022, through June 31, 2022)

Preliminary:	***In Compliance*** **(FOURTH REPORTING PERIOD)**
Secondary:	***In Compliance*** **(FOURTH REPORTING PERIOD)**
Full:	***Not Yet Assessed***

In the sixth monitoring period, the City and the OEMC maintained Preliminary and Secondary compliance with the requirements of ¶139.

To achieve Preliminary compliance with ¶139, the City and the CPD must implement sufficient policies, procedures, or written guidance through the process described in the Consent Decree (¶¶626–41), which outlines applicable consultation, resolution, workout, and public-comment periods. These paragraphs detail various requirements, including that policies are "plainly written, logically organized, and use clearly defined terms." To maintain Preliminary compliance with ¶139, the OEMC and the CPD policies must be sufficiently reviewed by the Chicago Council on Mental Health Equity. Moreover, the OEMC and the CPD must provide the IMT with supporting data analysis regarding incidents involving individuals in crisis so that the IMT can assess whether current policy follows sufficient practice, as required under ¶139.

The IMT assessed Secondary compliance with ¶139 by reviewing training development, implementation, and evaluation in accordance with ¶286 of the Consent Decree, which incorporates the following evaluation criteria: training needs assessment, curriculum design, curriculum development, training implementation (training delivery), and training evaluation. To maintain Secondary compliance with ¶139, the OEMC and the CPD must provide the IMT with sufficient documentation showing 95% completion of training.

Progress before the Sixth Reporting Period

In the fourth reporting period, the IMT reviewed an updated draft version of the OEMC's *Crisis Intervention Team Program* standard operating procedure. The standard operating procedure clearly identifies the way telecommunicators are required to code incidents by utilizing a "Z-code" to denote a mental health component when closing an event in their computer system. The "Z-code" is assigned by

CPD officers who are on scene in response to a call for service that OEMC telecommunicators have coded a "mental health disturbance." The standard operating procedure also explains how to complete a set of "CIT triage questions" that allow for subsequent data analysis.

During the fifth monitoring period, the IMT observed the eight-hour training in Mental Health and CIT Awareness that all OEMC telecommunicators receive, which includes a module on mental health response (*see* ¶¶142–46). The IMT noted that the OEMC telecommunicators have received sufficient training on how to identify calls involving an individual known, suspected, or perceived to be in crisis, and found that the new standard operating procedure is incorporated into training, thereby meeting the requirements of ¶139.

The OEMC telecommunicators had also received sufficient training on how to code incidents involving a person in a mental-health crisis and on how to complete the CIT triage questions.

The City launched portions of the alternative response Crisis Assistance Response Engagement (CARE) pilot program in the fifth reporting period. Additional portions of the CARE pilot program were launched in the sixth reporting period. However, call takers have been confused on how to distinguish between Z-coded events and events falling into the pilot project purview. While this is expected with any new program, the IMT looks forward to progress on coding differentiation in the next reporting period. The IMT did not receive data regarding coding differentiation during this reporting period.

Progress in the Sixth Reporting Period

In the sixth monitoring period, the IMT reviewed the OEMC's policy-review process. The IMT notes that a no objection on this review will not be given until robust engagement of the Chicago Council on Mental Health Equity occurs. During the first policy review process, there was essentially no engagement of the Chicago Council on Mental Health Equity as required under ¶122.

In this reporting period, the OEMC quickly touched on the policies via a briefing at a quarterly Chicago Council on Mental Health Equity meeting. The OEMC also attached the policies to an email to the Chicago Council on Mental Health Equity, inviting feedback. However, no feedback was received. This lack of feedback strongly suggests inadequate engagement, which — again — is required for the OEMC to maintain compliance. Therefore, the IMT recommends that the OEMC engage the CPD and the City to identify a robust plan to solicit thorough review and comment from the Chicago Council on Mental Health Equity. The OEMC plays a crucial role in the initial identification and appropriate dispatch of calls involving

a mental health component, and experts and people with lived experience should be given due process.

Moreover, two training attendance records were produced this reporting period. One for the "Mental Health Crisis Awareness -Refresher" and one for the "Mental Health Crisis Awareness Training." The Refresher training is a new training implemented this reporting period. However, the OEMC only produced to the IMT:

1. Training completion dated March 14, 2022 -Mental Health Awareness Training-Refresher, which had 30 participants plus 7 guests with 4 missing signatures and 2 identified as late to the training. This production did not include training evaluations, nor does it support 95% completion. The records show the date personnel was scheduled to attend, but it does not show the actual training completion date. Rather, there is an "attended" column that is blank. There is also no way to measure the percent who have completed the training without a system that identifies the total number of eligible employees to cross check with a attendance completion date which is missing. To maintain Secondary compliance, the IMT requires evidence of full participation, along with training evaluations.

2. Additionally, records were produced with a training completion date of December 3, 2021. There were 17 participants for this Mental Health Crisis Awareness Training. This production did provide training evaluations which were strong, with the most common theme for improvements focused on better integration with the CPD, bringing CPD experiences in the field. Again, the records show the date personnel was scheduled to attend, but it does not show the actual training completion date. Rather, there is an "attended" column that is blank. There is also no way to measure the percent who have completed the training without a system that identifies the total number of eligible employees to cross check with a attendance completion date which is missing. To maintain Secondary compliance, the IMT requires evidence of full participation, along with training evaluations.

The OEMC is at risk of losing compliance with ¶139 due to its ongoing lack of full and effective engagement with the Chicago Council on Mental Health Equity on both the initial and second policy review process, along with inadequate production of sufficient training records and evaluations. To avoid losing compliance with ¶139 in the next and future reporting periods, the OEMC must provide the IMT with evidence of full and effective engagement with the Chicago Council on Mental Health Equity on the most recent policy-review process, and with adequate training records, as outlined above. The OEMC must sufficiently demonstrate this process to maintain Preliminary and Secondary compliance with ¶139.

Further levels of compliance will depend on broader system operation, such as ongoing performance and reliable data as evidenced by the results of OEMC's ongoing audits. The OEMC must produce completed audit sheets, along with the OEMC's trend analysis and what the OEMC is doing to address those trends. It will be insufficient to produce only the audit spreadsheet template, without accompanying proof of audit interpretation, what the leadership is seeing as a result of the audits, and what is being done to support trends.

The IMT acknowledges that the OEMC has made strides in establishing the importance of coding calls involving persons in mental-health crisis in previous reporting periods. However, as discussed on calls with the between the IMT and the OEMC, the OEMC's robust engagement regarding policy review with the Chicago Council on Mental Health Equity is crucial. Evidence of Chicago Council on Mental Health Equity comments on policies both during Chicago Council on Mental Health Equity meetings and by email, along with OEMC's response to those comments is required. Additionally, the IMT did not receive data regarding coding differentiation during this reporting period, which will be required.

Maintaining compliance also requires the OEMC to provide training records supporting training evaluations, 95% completion of trainings, and data analysis going beyond simply producing a monthly template of the auto-generated reports regularly provided to the IMT. If the OEMC fails to demonstrate the above in the next reporting period, then it is at risk of losing compliance with ¶139.

Paragraph 139 Compliance Progress History

FIRST REPORTING PERIOD	SECOND REPORTING PERIOD	THIRD REPORTING PERIOD
SEPTEMBER 1, 2019 – AUGUST 31, 2019	SEPTEMBER 1, 2019 – FEBRUARY 29, 2020	MARCH 1, 2020 – DECEMBER 31, 2020
COMPLIANCE PROGRESS:	COMPLIANCE PROGRESS:	COMPLIANCE PROGRESS:
Not Applicable	Not Applicable	None
FOURTH REPORTING PERIOD	**FIFTH REPORTING PERIOD**	**SIXTH REPORTING PERIOD**
JANUARY 1, 2021 – JUNE 30, 2021	JULY 1, 2021 – DECEMBER 31, 2021	JANUARY 1, 2022 – JUNE 30, 2022
COMPLIANCE PROGRESS:	COMPLIANCE PROGRESS:	COMPLIANCE PROGRESS:
Secondary	Secondary	None

Crisis Intervention: ¶140

140. *OEMC police communication dispatchers will continue to prioritize Certified CIT Officers for dispatch to incidents that involve an individual known, suspected, or perceived to be in crisis. If a Certified CIT Officer is not available to timely respond, OEMC will continue to dispatch an available officer to avoid compromising response time. OEMC dispatchers will dispatch a Certified CIT Officer, when available, if the responding officer requests assistance from a Certified CIT Officer.*

Compliance Progress

(Reporting Period: January 1, 2022, through June 31, 2022)

Preliminary:	***In Compliance*** **(FOURTH REPORTING PERIOD)**
Secondary:	***In Compliance*** **(FOURTH REPORTING PERIOD)**
Full:	***Not Yet Assessed***

In the sixth monitoring period, the City and the OEMC maintained Preliminary and Secondary compliance with the requirements of ¶140.

To achieve Preliminary compliance with ¶140, the City and the CPD must implement sufficient policies, procedures, or written guidance through the process described in the Consent Decree (¶¶626–41), which outlines applicable consultation, resolution, workout, and public-comment periods. These paragraphs detail various requirements, including that policies are "plainly written, logically organized, and use clearly defined terms." To maintain Preliminary compliance with ¶138, the OEMC must demonstrate that it is thoroughly reviewing its policies as described in ¶¶626—41.

The IMT assessed Secondary compliance with ¶140 by reviewing training development, implementation, and evaluation in accordance with ¶286 of the Consent Decree, which incorporates the following evaluation criteria: training needs assessment, curriculum design, curriculum development, training implementation (training delivery), and training evaluation. Moreover, to maintain Secondary compliance with ¶138, the OEMC must provide the IMT with sufficient documentation showing 95% completion of training.

Progress before the Sixth Reporting Period

In the fourth reporting period, the IMT reviewed an updated draft version of OEMC's Crisis Intervention Team Program, which clearly articulates the requirement for telecommunicators to prioritize Certified CIT officers for dispatch to incidents that involve an individual known, suspected, or perceived to be in crisis. The standard operating procedure also includes the requirement of dispatching a non-

CIT officer if a CIT officer is not immediately available and to dispatch a CIT officer if requested by a non-CIT officer.

The CPD's watch lieutenants and the CPD's Citizen Law Enforcement Analysis and Reporting (CLEAR) database provide the OEMC telecommunicators with information regarding which Certified CIT officers are working on a given shift. (*See* ¶141.) As noted previously, officer feedback suggests there are challenges in the CPD's ability to provide an accurate list of officers on patrol who are designated as CIT certified.

During the fifth monitoring period, the IMT observed the eight-hour training in crisis intervention that all OEMC telecommunicators receive, which includes a module on mental health response (*see* ¶¶142–46). The IMT notes that the OEMC telecommunicators have received sufficient training on how to identify calls involving an individual known, suspected, or perceived to be in crisis. Further, the IMT found that the OEMC's *Crisis Intervention Team Program* SOP is incorporated into training, thereby satisfying ¶140's requirements. The OEMC telecommunicators have also received sufficient training in prioritizing Certified CIT officers for dispatch to such incidents. If a CIT officer is not immediately available, the OEMC data demonstrates that one will be dispatched as an assist when that CIT officer becomes available.

Progress in the Sixth Reporting Period

In the sixth monitoring period, the IMT reviewed the OEMC's policy-review process. The IMT notes that a no objection on this review will not be given until robust engagement of the Chicago Council on Mental Health Equity occurs and evidence of such, including Chicago Council on Mental Health Equity comments, is produced. During the first policy review process, there was essentially no engagement of the Chicago Council on Mental Health Equity as required under ¶122. Since then, the IMT has been clear with the OEMC that compliance will be delayed or removed until the IMT receives evidence that the Chicago Council on Mental Health Equity is significantly engaged with the OEMC's policy-review process.

In this reporting period, the OEMC quickly reviewed the policies during a quarterly Chicago Council on Mental Health Equity meeting. The OEMC also attached the policies to an email to the Chicago Council on Mental Health Equity, inviting feedback. However, no feedback was received. This lack of feedback strongly suggests inadequate engagement, which — again — is required for the OEMC to maintain compliance. Therefore, the IMT recommends that the OEMC engage the CPD and the City to identify a robust plan to solicit thorough review and comment from the Chicago Council on Mental Health Equity. The OEMC plays a crucial role in the ini-

tial identification and appropriate dispatch of calls involving a mental health component, and experts and people with lived experience should be given due process.

Moreover, two training attendance records were produced this reporting period. One for the "Mental Health Crisis Awareness -Refresher" and one for the "Mental Health Crisis Awareness Training." The Refresher training is a new training implemented this reporting period. However, the OEMC only produced to the IMT:

1. Training completion dated March 14, 2022 -Mental Health Awareness Training-Refresher, which had 30 participants plus 7 guests with 4 missing signatures and 2 identified as late to the training. This production did not include training evaluations, nor does it support 95% completion. The records show the date personnel was scheduled to attend, but it does not show the actual training completion date. Rather, there is an "attended" column that is blank. There is also no way to measure the percent who have completed the training without a system that identifies the total number of eligible employees to cross check with a attendance completion date which is missing. To maintain Secondary compliance, the IMT requires evidence of full participation, along with training evaluations.

2. Additionally, records were produced with a training completion date of December 3, 2021. There were 17 participants for this Mental Health Crisis Awareness Training. This production did provide training evaluations which were strong, with the most common theme for improvements focused on better integration with the CPD, bringing CPD experiences in the field. Again, the records show the date personnel was scheduled to attend, but it does not show the actual training completion date. Rather, there is an "attended" column that is blank. There is also no way to measure the percent who have completed the training without a system that identifies the total number of eligible employees to cross check with a attendance completion date which is missing. To maintain Secondary compliance, the IMT requires evidence of full participation, along with training evaluations.

The OEMC is at risk of losing compliance with ¶140 due to its ongoing lack of full and effective engagement with the Chicago Council on Mental Health Equity on both the initial and second policy review process, along with inadequate production of sufficient training records and evaluations. To avoid losing compliance with ¶140 in the next and future reporting periods, the OEMC must provide the IMT with evidence of full and effective engagement with the Chicago Council on Mental Health Equity on the most recent policy-review process, and with adequate training records, as outlined above. Evidence of Chicago Council on Mental Health Equity comments on policies both during Chicago Council on Mental Health Equity

meetings and by email, along with OEMC's response to those comments is required.

To allow the IMT to assess compliance with ¶140, the OEMC must also produce records such as the "CIT Employee Review"; "CIT Reviewed Events," and "CIT Quality Assurance Report. In complete form, not just as templates" The OEMC must sufficiently demonstrate this process to maintain Preliminary and Secondary compliance with ¶140.

Further levels of compliance will depend on broader system operation, such as ongoing performance and reliable data as evidenced by the results of the OEMC's ongoing audits. The OEMC must produce completed audit sheets, along with the OEMC's trend analysis and what the OEMC is doing to address those trends. It will be insufficient to produce only the audit spreadsheet template, without accompanying proof of audit interpretation, what the leadership is seeing as a result of the audits, and what is being done to support trends.

The IMT acknowledges that the OEMC has made strides in establishing the importance of coding calls involving persons in mental-health crisis in previous reporting periods. However, as discussed on calls between the IMT and the OEMC, the OEMC's robust engagement regarding policy review with the Chicago Council on Mental Health Equity is crucial. Maintaining compliance also requires the OEMC to provide training records supporting training evaluation, 95% completion of trainings, and data analysis going beyond simply producing a monthly template of the auto-generated reports regularly provided to the IMT requires. If the OEMC fails to demonstrate the above in the next reporting period, then it is at risk of losing compliance with ¶140.

Paragraph 140 Compliance Progress History

FIRST REPORTING PERIOD	SECOND REPORTING PERIOD	THIRD REPORTING PERIOD
SEPTEMBER 1, 2019 – AUGUST 31, 2019	SEPTEMBER 1, 2019 – FEBRUARY 29, 2020	MARCH 1, 2020 – DECEMBER 31, 2020
COMPLIANCE PROGRESS:	COMPLIANCE PROGRESS:	COMPLIANCE PROGRESS:
Not Applicable	Not Applicable	None
FOURTH REPORTING PERIOD	**FIFTH REPORTING PERIOD**	**SIXTH REPORTING PERIOD**
JANUARY 1, 2021 – JUNE 30, 2021	JULY 1, 2021 – DECEMBER 31, 2021	JANUARY 1, 2022 – JUNE 30, 2022
COMPLIANCE PROGRESS:	COMPLIANCE PROGRESS:	COMPLIANCE PROGRESS:
Secondary	Secondary	Secondary

Crisis Intervention: ¶141

141. *CPD will provide OEMC with an updated list of current and active Certified CIT Officers and their assignment at least every week. At the beginning of each watch, CPD will continue to identify for OEMC the Certified CIT Officers on duty for each watch and in each district so that OEMC dispatchers know which Certified CIT Officers to prioritize for dispatch to incidents involving an individual known, suspected, or perceived to be in crisis.*

Compliance Progress

(Reporting Period: January 1, 2022, through June 31, 2022)

Preliminary:	***In Compliance*** **(THIRD REPORTING PERIOD)**
Secondary:	***Not In Compliance***
Full:	***Not Yet Assessed***

In the sixth monitoring period, the City and the CPD maintained Preliminary compliance with ¶141.

To achieve Preliminary compliance with ¶141, the City and the CPD must implement sufficient policies, procedures, or written guidance through the process described in the Consent Decree (¶¶626–41), which outlines applicable consultation, resolution, workout, and public-comment periods. These paragraphs detail various requirements, including that policies are "plainly written, logically organized, and use clearly defined terms." Going forward, to achieve Secondary compliance, the CPD will need to demonstrate that at least 95% of officers have received the e-learning, as well as develop metrics that, when tracked, adequately demonstrate the CPD's success under ¶141. Further assessment levels will require an assessment of those developed metrics.

Progress before the Sixth Reporting Period

In the third reporting period, the CPD achieved Preliminary compliance by memorializing the requirements of ¶141 into Special Order S05-14, *Crisis Intervention Team (CIT) Program*, which contained the requirements of ¶141 as they relate to the CPD's responsibilities. During the fourth reporting period, the IMT reviewed a process flowchart demonstrating the two separate ways in which the CPD provides the OEMC with updated lists of current and active Certified CIT Officers and their assignments daily. Specifically, data is transmitted by (1) manually inputting training records into the CPD's CLEAR and eLearning systems and (2) asking the CPD watch supervisors to identify the CIT officers from the eLearning application and to send a roster to the OEMC daily for each district and watch.

The OEMC has access to the CPD's data systems, allowing the OEMC to obtain an updated list of all current and active Certified CIT Officers (including their assignments) should they require one. The combination of these systems therefore acts as the CPD's official list.

During the fifth monitoring period, the City and the CPD submitted a substantially revised S05-14, *Crisis Intervention Team (CIT) Program*. While ¶141's requirements had been met in the earlier version of S05-14, thus achieving Preliminary compliance, the revised version of S05-14 has changed the requirement that the CPD provide OEMC with an updated list of current and active Certified CIT Officers and their assignment "at least every week" to "no less than quarterly."

Progress in the Sixth Reporting Period

However, in the sixth monitoring period, the City and the CPD addressed this discrepancy, permitting ongoing preliminary compliance. The CPD has yet to develop a systematic plan to ensure that officers who violate the eligibility criteria or who allow their training to lapse are undesignated in the CLEAR and eLearning systems and are not prioritized for dispatch. For instance, the CPD might create an automatic notification of ineligibility based on the number of days lapsed since their last training. Additionally, for those who exceed the ineligibility thresholds (see ¶93 and ¶104), the CPD should create a policy that requires personnel to cross-check the CIT roster against any sustained finding to determine whether the finding renders the officer ineligible. While S05-14 notes that "each quarter, the Commander of the Strategic Initiatives Division[2] is responsible for inform[ing] OEMC of officers who are out of compliance with the CIT Program eligibility requirements," this does not constitute a systematic plan because it provides no significant guidance on what, precisely, the Commander is supposed to do. In other words, the CPD must adequately define a plan that ensures the requirements to remain a designated CIT officer are in place and a system is established which ensures this is occurring so that "an updated list of current and active Certified CIT Officers and their assignment" can be sent to OEMC.

The IMT observed Basic CIT Training last reporting period, and the officers in that training expressed concern over the accuracy of CPD's data to the OEMC regarding who is CIT certified and on duty. The City reports technology limitations in their training tracking system which may result in inaccuracies in the weekly transmission of certified CIT officers to OEMC. The city has indicated the present capability

[2] According to the CPD's last updated organizational chart in the reporting period (dated 12/16/20), a Commander oversees the Strategic Initiatives Division, not a Deputy Chief as indicated by the policy. The CPD should resolve this inconsistency.

of their tracking system is to be able to track a quarterly report of who has fallen out of compliance. This will be monitored over time.

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In the sixth monitoring period, the City and the CPD maintained Preliminary compliance with ¶141. To achieve Secondary compliance, the CPD must demonstrate that at least 95% of officers have received completion of the eLearning. The City and the CPD must also develop a systematic plan to ensure the reliability that officers who violate the eligibility criteria or who allow their training to lapse are undesignated in the CLEAR and eLearning systems and are not prioritized for dispatch. Persons responsible for this plan will need to be trained on the processes and expectations for doing so. Such training requires a systematic plan. Full compliance will then depend on demonstration of the system's success should a CIT officer become ineligible.

Paragraph 141 Compliance Progress History

FIRST REPORTING PERIOD	SECOND REPORTING PERIOD	THIRD REPORTING PERIOD
SEPTEMBER 1, 2019 – AUGUST 31, 2019	SEPTEMBER 1, 2019 – FEBRUARY 29, 2020	MARCH 1, 2020 – DECEMBER 31, 2020
COMPLIANCE PROGRESS:	COMPLIANCE PROGRESS:	COMPLIANCE PROGRESS:
Not Applicable	Not Applicable	Preliminary

FOURTH REPORTING PERIOD	FIFTH REPORTING PERIOD	SIXTH REPORTING PERIOD
JANUARY 1, 2021 – JUNE 30, 2021	JULY 1, 2021 – DECEMBER 31, 2021	JANUARY 1, 2022 – JUNE 30, 2022
COMPLIANCE PROGRESS:	COMPLIANCE PROGRESS:	COMPLIANCE PROGRESS:
Preliminary	Preliminary	Preliminary

Crisis Intervention: ¶142

142. *Within 90 days of the Effective Date, OEMC will ensure that all current active tele-communicators have received mental health and CIT awareness training ("OEMC Training"). OEMC will provide the OEMC Training to new tele-communicators before tele-communicators complete their training and begin answering calls independently.*

Compliance Progress

(Reporting Period: January 1, 2022, through June 31, 2022)

Preliminary:	***In Compliance*** **(FIRST REPORTING PERIOD)**
Secondary:	***In Compliance*** **(FIRST REPORTING PERIOD)**
Full:	***In Compliance*** **(FOURTH REPORTING PERIOD)**
Sustainment Period Ends	***June 30, 2023***

In the sixth monitoring period, the City and the OEMC maintained Full compliance with ¶142.

To achieve Preliminary compliance with ¶142, the City and the CPD must implement sufficient policies, procedures, or written guidance through the process described in the Consent Decree (¶¶626–41), which outlines applicable consultation, resolution, workout, and public-comment periods. These paragraphs detail various requirements, including that policies are "plainly written, logically organized, and use clearly defined terms."

The IMT assessed Secondary compliance with ¶142 by reviewing training development, implementation, and evaluation in accordance with ¶286 of the Consent Decree, which incorporates the following evaluation criteria: training needs assessment, curriculum design, curriculum development, training implementation (training delivery), and training evaluation.

Full compliance with ¶142 is assessed by confirming that 95% of employees have received the requisite training.

Progress before the Sixth Reporting Period

In the first reporting period, the City and the OEMC achieved Preliminary and Secondary compliance with the requirements of ¶142 by demonstrating that all current active telecommunicators have received mental-health and CIT-awareness training. The OEMC has also memorialized this requirement into CIT and Mental Health Awareness policy, which clearly states the requirement for all telecommunicators to receive the mental health and CIT awareness training.

Progress in the Sixth Reporting Period

The City and the OEMC continue to maintain compliance with the requirements of ¶142 based on their demonstration that all current active telecommunicators have received mental-health and CIT awareness training.

During the sixth reporting period, training attendance records were produced for the "Mental Health and CIT Awareness Training." However, the OEMC only produced to the IMT records with a training completion date of Dec 3, 2021 (which is the fifth reporting period). There were 17 participants for this Mental Health Crisis Awareness Training. These training records included training evaluations, which were strong. The most common theme in these evaluations was a desire for better integration with the CPD, bringing CPD experiences in the field.

Because it is impossible to know if 17 participants are new or returning employees, which maintains a 95% completion, the IMT highly recommends a single spreadsheet indicating the employee name, date of hire, and date of training attendance. This will show a running list of all employees, date of hire and date of attendance. The Mental Health and CIT Awareness Training, the Refresher Training and attendance at the 40 hour training could be on the same spreadsheet and re-produced each monitoring period. The IMT has advised the OEMC that attendance records and evaluations must be produced each reporting period for full compliance to be maintained. These OEMC productions must occur to avoid the OEMC's risk of losing compliance with ¶142.

Paragraph 142 Compliance Progress History

FIRST REPORTING PERIOD	SECOND REPORTING PERIOD	THIRD REPORTING PERIOD
SEPTEMBER 1, 2019 – AUGUST 31, 2019	SEPTEMBER 1, 2019 – FEBRUARY 29, 2020	MARCH 1, 2020 – DECEMBER 31, 2020
COMPLIANCE PROGRESS:	COMPLIANCE PROGRESS:	COMPLIANCE PROGRESS:
Secondary	Secondary	Secondary
FOURTH REPORTING PERIOD	**FIFTH REPORTING PERIOD**	**SIXTH REPORTING PERIOD**
JANUARY 1, 2021 – JUNE 30, 2021	JULY 1, 2021 – DECEMBER 31, 2021	JANUARY 1, 2022 – JUNE 30, 2022
COMPLIANCE PROGRESS:	COMPLIANCE PROGRESS:	COMPLIANCE PROGRESS:
Full	Full	Full

Crisis Intervention: ¶143

> ***143.*** *The OEMC Training will be at least an eight-hour course taught jointly by qualified OEMC staff and a mental health clinician or advocate.*

Compliance Progress

(Reporting Period: January 1, 2022, through June 31, 2022)

Preliminary:	***In Compliance*** **(FOURTH REPORTING PERIOD)**
Secondary:	***In Compliance*** **(FOURTH REPORTING PERIOD)**
Full:	***In Compliance*** **(FIFTH REPORTING PERIOD)**
Sustainment Period Ends	***December 31, 2023***

In the sixth monitoring period, the City and the OEMC maintained Full compliance with ¶143.

To achieve Preliminary compliance with ¶143, the City and the CPD must implement sufficient policies, procedures, or written guidance through the process described in the Consent Decree (¶¶626–41), which outlines applicable consultation, resolution, workout, and public-comment periods. These paragraphs detail various requirements, including that policies are "plainly written, logically organized, and use clearly defined terms."

The IMT assessed Secondary compliance with ¶143 by determining whether the City and the OEMC have qualified personnel fulfilling the responsibilities to achieve the goals of the Consent Decree and the requirements of ¶143.

Full compliance was assessed evaluating records of attendance, and ongoing full compliance will also assess the City's and the OEMC's efforts to engage with the community, including the Chicago Council on Mental Health Equity, regarding requisite policy, training, and operations development and implementation as referenced in the Consent Decree (¶¶10, 12, 49, 52, 115, 129, 511, 531, 633). However, the City and the CPD's engagement with the Chicago Council on Mental Health Equity and with the public is insufficient to date to maintain full compliance. This must change in the next reporting period for full compliance to be maintained.

Progress before the Sixth Reporting Period

During the fifth monitoring period, the IMT observed the revised eight-hour training in crisis intervention that all OEMC telecommunicators receive, which includes a module on mental health response (*see* ¶¶142–46). The IMT notes that the OEMC telecommunicators have received sufficient training on how to identify calls involving an individual known, suspected, or perceived to be in crisis and found

that the new standard operating procedure is incorporated into training, meeting the requirements of ¶143.

The external instructors included representatives from the National Alliance on Mental Illness and from people with lived experience. The training included a review of CIT Policies—covering the OEMC drop down boxes, what automatically triggers a CIT drop down box to appear (e.g. calls that include suicidal ideation or threat); the new requirement to ask about Weapons, Medications, Violent Tendencies, Triggers, *etc*. The IMT has made suggestions about developing a drop-down box on the Weapons question, as identification of the type of weapon is crucial information for responding officers. While the training did include listening to two audio calls with discussion afterwards, live scenario-based training permitting the practice of these important skills would be a good addition to the training.

The OEMC has also incorporated a contingency plan for if there are not enough new telecommunicators hired to warrant their own eight-hour training. In such situations, the OEMC sends the new hires to CPD's 40-hour CIT training. Afterwards, the new hire receives a two-hour training relevant to telecommunicators. When this training is complete, new telecommunicators are eligible to answer calls independently (s*ee* ¶142). However, once the OEMC has enough capacity to conduct the eight-hour training, the new hire will also be required to attend this training. The IMT believes this is a reasonable approach to satisfying the intent of ¶143.

In the fifth monitoring period, the City and the OEMC reached Full compliance with ¶143. The OEMC produced evidence of those individuals who attended the eight-hour training since the last submission.

Progress in the Sixth Reporting Period

In the sixth reporting period, the OEMC's productions again did not ensure the evaluation forms, policies, and trainings all reflected the correct, full title of the various training and policy names. This feedback has been given both orally and in writing in previous reporting periods.

In addition, the OEMC submitted partial training records, which in future reporting periods will not be sufficient.

During this reporting period, training attendance records were produced for the "Mental Health and CIT Awareness Training." However, the OEMC produced to the IMT records with a training completion date of Dec 3, 2021 (which is the fifth reporting period). There were 17 participants for this Mental Health Crisis Awareness Training. This production ***did*** provide training evaluations which were strong, with the most common theme for improvements focused on better integration with the CPD, bringing CPD experiences in the field.

Additionally, another record was submitted that showed scheduled training of March 31, 2021, but the date attended column is left blank.

Future productions of training records should state whether any of the individuals taking the training had previously attended the 40-hour Basic CIT training according to the OEMC plan, while awaiting enough new telecommunicators to conduct the eight hour training. The OEMC should also consider prioritizing call taker attendance at the 40- hour Basic CIT training, which would provide call takers with a better understanding of what is being taught in the CPD training.

Because it is impossible to know if 17 participants are new or returning employees, which maintains a 95% completion, the IMT highly recommends a single spreadsheet indicating the employee name, date of hire, and date of training attendance. This will show a running list of all employees, date of hire, and date of attendance. The *Mental Health and CIT Awareness Training*, the *Refresher Training* and attendance at the 40-hour training could be on the same spreadsheet and re-produced each monitoring period. The IMT has advised the OEMC that complete training records and evaluations must be produced each reporting period for full compliance to be maintained.

Moreover, ongoing compliance will require the Chicago Council on Mental Health Equity's involvement. The only records produced by the OEMC to support the Chicago Council on Mental Health Equity's invitation to the training was a PowerPoint, with two training dates identified, and an email from a Chicago Council on Mental Health Equity member requesting to attend the training in person. There was no evidence of response by the OEMC, nor of the member attending the training in person.

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The IMT will evaluate for a period of two years evidence that training is reliably being provided to all telecommunicators, including new hires, and continues to be provided by qualified personnel with records demonstrating such. Additionally, the IMT will evaluate the City's and the OEMC's efforts to incorporate community and Chicago Council on Mental Health Equity feedback, along with training evaluations and trend analysis into ongoing revisions of the 8-hour training. The IMT indicated a more robust scenario-based exercise process would enhance this training, and we will be looking for this in future revisions. Other designated OEMC paragraphs will address accountability for ensuring the required training is operationally successful, including ¶¶138–140, 147, and 149.

The IMT acknowledges that the OEMC has made strides toward establishing the importance of call-takers being able to identify crisis-related calls. However, more is needed at this point in the Consent Decree Process to maintain full compliance.

Paragraph 143 Compliance Progress History

FIRST REPORTING PERIOD	SECOND REPORTING PERIOD	THIRD REPORTING PERIOD
SEPTEMBER 1, 2019 – AUGUST 31, 2019	SEPTEMBER 1, 2019 – FEBRUARY 29, 2020	MARCH 1, 2020 – DECEMBER 31, 2020
COMPLIANCE PROGRESS:	COMPLIANCE PROGRESS:	COMPLIANCE PROGRESS:
Not Applicable	Not Applicable	Status Update

FOURTH REPORTING PERIOD	FIFTH REPORTING PERIOD	SIXTH REPORTING PERIOD
JANUARY 1, 2021 – JUNE 30, 2021	JULY 1, 2021 – DECEMBER 31, 2021	JANUARY 1, 2022 – JUNE 30, 2022
COMPLIANCE PROGRESS:	COMPLIANCE PROGRESS:	COMPLIANCE PROGRESS:
Secondary	Full	Full

Crisis Intervention: ¶144

144. *The OEMC Training will cover, at a minimum, the following topics: identification of individuals in crisis; telephonic suicide prevention strategies; crisis and stress management, de-escalation, and scenario-based exercises; interactions with individuals with mental illness; information that should be gathered and shared with the responding officer or Certified CIT Officer when the call-taker suspects that the call involves an individual in crisis; the types of calls that may require the dispatching of a Certified CIT Officer or a coordinated crisis response of first responders reflective of established policy for intake and dispatch; and the procedures for dispatching a Certified CIT Officer.*

Compliance Progress

(Reporting Period: January 1, 2022, through June 31, 2022)

Preliminary:	***In Compliance*** **(FOURTH REPORTING PERIOD)**
Secondary:	***In Compliance*** **(FOURTH REPORTING PERIOD)**
Full:	***Not In Compliance***

In the sixth monitoring period, the City and the OEMC maintained Preliminary and Secondary compliance with ¶144.

To achieve Preliminary compliance with ¶144, the City and the CPD must implement sufficient policies, procedures, or written guidance through the process described in the Consent Decree (¶¶626–41), which outlines applicable consultation, resolution, workout, and public-comment periods. These paragraphs detail various requirements, including that policies are "plainly written, logically organized, and use clearly defined terms."

The IMT assessed Secondary compliance with ¶144 by reviewing the City's and the OEMC's level of data collection, tracking, analysis, and management as required under the Consent Decree. The IMT "triangulate[s]" the data by comparing multiple data sources, yielding a more robust understanding of ¶144's requirements.

Progress before the Sixth Reporting Period

During the fourth reporting period, OEMC's *Mental Health Training* directive was finalized, which clearly requires the topics listed in ¶144 to be included in their training. Additionally, members of the IMT observed the OEMC's delivery of the eight-hour training and confirmed that the training contained each of the necessary requirements. The training curriculum was also reviewed by members of the Chicago Council on Mental Health Equity, although more robust efforts on training

review and feedback must occur moving forward. The OEMC staff and outside instructors (including mental health clinicians and advocates) were qualified relative to their presentations, including representatives from NAMI and people with lived experience.

During the fifth monitoring period, the IMT observed the revised eight-hour training in crisis intervention that all OEMC telecommunicators receive, which includes a module on mental health response (*see* ¶¶142–46). The IMT notes that the OEMC telecommunicators have received sufficient training on how to identify calls involving an individual known, suspected, or perceived to be in crisis and found that the new standard operating procedure is incorporated into training, meeting the requirements of ¶144.

Progress in the Sixth Reporting Period

In the sixth monitoring period, the OEMC produced records demonstrating its policy review process to the IMT. The IMT appreciates these records, but notes that the City and the CPD must demonstrate a more robust engagement with the Chicago Council on Mental Health Equity. During the first policy review process, there was essentially no engagement of the Chicago Council on Mental Health Equity as required under ¶¶130—31. Since this first policy review, the IMT has been clear that the absence of significant engagement will delay the achievement of full compliance.

In this reporting period, the OEMC briefly touched on the policies, and attached those policies to an email to the Chicago Council on Mental Health Equity, inviting feedback. However, no feedback was received. This lack of feedback indicates inadequate engagement. The IMT recommends the OEMC engage the CPD and the City to identify a robust plan to solicit thorough review and comment. The OEMC plays a crucial role in the initial identification and appropriate dispatch of calls involving a mental health component, and experts and people with lived experience should be given due process. Evidence of Chicago Council on Mental Health Equity comments on policies both during Chicago Council on Mental Health Equity meetings and by email, along with OEMC's response to those comments is required. Should this process not occur by the end of the next reporting period, the IMT will consider withdrawal of Preliminary compliance with ¶144.

Paragraph 144 requires the OEMC training to include "…the types of calls that may require the dispatching of a Certified CIT Officer *or a coordinated crisis response* of first responders reflective of established policy for intake and dispatch." The City has launched the new Crisis Assistance Response and Engagement (CARE) pilot program, qualifying as a *coordinated crisis response*. We commend the City for this step. With any new program, there will likely be a learning curve. The OEMC plays

a key role in identifying and dispatching a coordinated crisis response. While expected, there is confusion on when and how to dispatch alternative crisis response programs. These processes will need to be incorporated into training. The IMT looks forward to the City's progress as these programs continue to grow.

Full compliance requires the OEMC to produce evidence that all telecommunicators, including any new hires since the last submission, have received the required training, as outlined in the OEMC's procedures, written above, and that supplemental training is developed and delivered regarding when and how to dispatch alternative crisis response programs. Training records produced this reporting period were insufficient, as noted in previous paragraphs. The IMT highly recommends a single spreadsheet indicating the employee name, date of hire, and date of training attendance. This will show a running list of all employees and date of attendance. The *Mental Health and Crisis Intervention Team Awareness Training*, the *Refresher Training* and attendance at the 40-hour training could be on the same spreadsheet and re-produced each monitoring period.

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In the sixth monitoring period, the City and the OEMC maintained Preliminary and Secondary compliance with ¶144. Once Full compliance is achieved, the IMT will evaluate for a period of two years evidence that all topics identified under ¶144 are reliably being provided to all telecommunicators, including new hires. The City's and the OEMC's efforts to incorporate community and Chicago Council on Mental Health Equity feedback, along with training evaluations and trend analysis into ongoing revisions of the 8-hour training, will be assessed as it relates to the topics covered under this training. The IMT indicated a more robust scenario-based exercise process would enhance this training. Other designated OEMC paragraphs will address accountability for ensuring the required training is operationally successful. *See* ¶¶138-40, 147, and 149.

The IMT acknowledges that the OEMC has made strides toward establishing the importance of call-takers being able to identify crisis-related calls. However, more is needed to maintain compliance in the next reporting period.

Paragraph 144 Compliance Progress History

FIRST REPORTING PERIOD	SECOND REPORTING PERIOD	THIRD REPORTING PERIOD
SEPTEMBER 1, 2019 – AUGUST 31, 2019	SEPTEMBER 1, 2019 – FEBRUARY 29, 2020	MARCH 1, 2020 – DECEMBER 31, 2020
COMPLIANCE PROGRESS:	COMPLIANCE PROGRESS:	COMPLIANCE PROGRESS:
Not Applicable	Not Applicable	Status Update
FOURTH REPORTING PERIOD	**FIFTH REPORTING PERIOD**	**SIXTH REPORTING PERIOD**
JANUARY 1, 2021 – JUNE 30, 2021	JULY 1, 2021 – DECEMBER 31, 2021	JANUARY 1, 2022 – JUNE 30, 2022
COMPLIANCE PROGRESS:	COMPLIANCE PROGRESS:	COMPLIANCE PROGRESS:
Secondary	Secondary	Secondary

Crisis Intervention: ¶145

145. *Any training on mental health and CIT awareness that has already been provided to tele-communicators may fulfill the OEMC Training requirement of this Agreement, if the previously provided training satisfies the criteria for the OEMC Training described in this Agreement.*

Compliance Progress

(Reporting Period: January 1, 2022, through June 31, 2022)

Preliminary:	***In Compliance*** **(FOURTH REPORTING PERIOD)**
Secondary:	***In Compliance*** **(FOURTH REPORTING PERIOD)**
Full:	***In Compliance*** **(FOURTH REPORTING PERIOD)**
Sustainment Period Ends	***June 30, 2023***

During the sixth monitoring period, the City and the OEMC maintained Full compliance with ¶145.

To achieve Preliminary compliance with ¶145, the City and the CPD must implement sufficient policies, procedures, or written guidance through the process described in the Consent Decree (¶¶626–41), which outlines applicable consultation, resolution, workout, and public-comment periods. These paragraphs detail various requirements, including that policies are "plainly written, logically organized, and use clearly defined terms."

The IMT assessed Secondary compliance with ¶145 by reviewing the City's and the OEMC's level of data collection, tracking, analysis, and management as required under the Consent Decree. The IMT "triangulate[s]" the data by comparing multiple data sources, yielding a more robust understanding of ¶145's requirements.

In continuing to assess Full compliance, the IMT will monitor ongoing performance, reliable data, and whether the City and the CPD have qualified personnel fulfilling the responsibilities to achieve the goals of the Consent Decree.

Progress before the Sixth Reporting Period

In the fourth reporting period, the City and the OEMC met Full compliance with ¶145 because they are not intending to submit previous training as evidence of compliance with the OEMC's training requirements.

In other words, the requirements of ¶145 are somewhat moot because, rather than relying on previously delivered mental health and CIT awareness training to fulfill the training requirements found in ¶¶142–44, the OEMC has provided the required eight-hour training as a single training block. To maintain compliance with

¶145, the City and the OEMC will have to continue to follow through and provide the requisite training.

Progress before the Sixth Reporting Period

During this monitoring period, the IMT observed the eight-hour training in crisis intervention which includes a module on mental health response (*see* ¶¶142–46). The IMT notes that the OEMC telecommunicators have received sufficient training on how to identify calls involving an individual known, suspected, or perceived to be in crisis and found that their policies are incorporated into training.

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In the fifth monitoring period, City and the OEMC maintained Full compliance with ¶145 because they are not intending to submit previous training as evidence of compliance with the OEMC's training requirements, rather utilize their eight-hour training to fulfill compliance. To maintain compliance with ¶145, the City and the OEMC will continue to provide the requisite training. Going forward, the IMT will continue to assess the OEMC based on its delivery of the eight-hour training as prescribed in ¶142–44. The IMT highly recommends a single spreadsheet indicating the employee name, date of hire, and date of training attendance. This will show a running list of all employees and date of attendance. The Mental Health and CIT Awareness Training, the Refresher Training and attendance at the 40-hour training could be on the same spreadsheet and re-produced each monitoring period.

Paragraph 145 Compliance Progress History

FIRST REPORTING PERIOD	SECOND REPORTING PERIOD	THIRD REPORTING PERIOD
SEPTEMBER 1, 2019 – AUGUST 31, 2019	SEPTEMBER 1, 2019 – FEBRUARY 29, 2020	MARCH 1, 2020 – DECEMBER 31, 2020
COMPLIANCE PROGRESS:	COMPLIANCE PROGRESS:	COMPLIANCE PROGRESS:
Not Applicable	Not Applicable	Status Update
FOURTH REPORTING PERIOD	**FIFTH REPORTING PERIOD**	**SIXTH REPORTING PERIOD**
JANUARY 1, 2021 – JUNE 30, 2021	JULY 1, 2021 – DECEMBER 31, 2021	JANUARY 1, 2022 – JUNE 30, 2022
COMPLIANCE PROGRESS:	COMPLIANCE PROGRESS:	COMPLIANCE PROGRESS:
Full	Full	Full

Crisis Intervention: ¶146

146. *All tele-communicators will receive at least annual refresher training on mental health and CIT awareness that is adequate to refresh the tele-communicators' skills on identifying, dispatching, and appropriately responding to calls for service that involve individuals in crisis.*

Compliance Progress

(Reporting Period: January 1, 2022, through June 31, 2022)

Recurring Schedule: Annual ☑ **Not Yet Applicable**

Preliminary: ***In Compliance*** **(FOURTH REPORTING PERIOD)**
Secondary: ***Not in Compliance***
Full: ***Not Yet Assessed***

In the sixth monitoring period, the City and the OEMC maintained Preliminary compliance with ¶146.

To achieve Preliminary compliance with ¶146, the City and the CPD must implement sufficient policies, procedures, or written guidance through the process described in the Consent Decree (¶¶626–41), which outlines applicable consultation, resolution, workout, and public-comment periods. These paragraphs detail various requirements, including that policies are "plainly written, logically organized, and use clearly defined terms." Going forward, to achieve Secondary compliance with ¶146, the OEMC will need to develop metrics that, when tracked, will adequately demonstrate the OEMC's success under ¶146. Further assessment levels will require an assessment of those developed metrics.

Progress before the Sixth Reporting Period

During the fourth reporting period, the OEMC finalized the *Mental Health Training* directive, which clearly states the requirement for all telecommunicators to receive annual refresher training on mental health and CIT awareness, per ¶146. Moreover, the directive identifies the topics to be included in the refresher training, including skills on identifying, dispatching, and appropriately responding to calls for service that involve individuals in crisis.

Progress in the Sixth Reporting Period

In the sixth monitoring period, the OEMC produced records to the IMT evidencing the OEMC's policy review process. The IMT notes that future levels of compliance will require the City and the CPD to robustly engage with the Chicago Council on

Mental Health Equity. During the first policy review process, there was essentially no engagement with the Chicago Council on Mental Health Equity, as required under ¶130—31. Since the OEMC's first policy review, the IMT has been clear that the absence of significant engagement with the Chicago Council on Mental Health Equity will delay future levels of compliance or remove compliance.

In this reporting period, the OEMC briefly touched on the policies during a presentation to the Chicago Council on Mental Health Equity, attaching those policies to an email to the Chicago Council on Mental Health Equity and inviting their feedback. However, no feedback was received. This lack of feedback indicates inadequate engagement. The IMT recommends that the OEMC engage the CPD and the City to identify a robust plan to solicit thorough review and comment. The OEMC plays a crucial role in the initial identification and appropriate dispatch of calls involving a mental health component, and experts and people with lived experience should be given due process. Evidence of Chicago Council on Mental Health Equity comments on policies both during Chicago Council on Mental Health Equity meetings and by email, along with OEMC's response to those comments is required. Should this robust engagement not occur by the end of the next reporting period, the IMT will consider withdrawing of Preliminary compliance with ¶146.

Moreover, the IMT observed the OEMC's required *Refresher Training* in the sixth reporting period. The IMT notes that the OEMC telecommunicators have received sufficient training on how to identify calls involving an individual known, suspected, or perceived to be in crisis and found that the new standard operating procedure is incorporated into training, meeting the requirements of ¶146.

The City and the OEMC invited members of the Chicago Council on Mental Health Equity to observe the OEMC's 8 hour training during this monitoring period. However, the invitation only identified two dates in March in a PowerPoint presentation given to the Chicago Council on Mental Health Equity. Based on the OEMC productions this reporting period, it appears only one individual requested to observe the training in person, and there was no evidence that the OEMC responded to the request, nor that the person observed the training in person. In the next reporting period, the IMT must see robust involvement with the IMT on both training observation and policy review and comment.

During the sixth reporting period, two training attendance records were produced. One for the "Mental Health Crisis Awareness -Refresher" and one for the "Mental Health Crisis Awareness Training." The Refresher training is a new training implemented this reporting period. However, the OEMC only produced to the IMT: Training completion dated March 14, 2022 -Mental Health Awareness Training-Refresher which had 30 participants plus 7 guests with 4 missing signatures and 2 identified as late to the training. *This production did not include training evaluations, nor does it support 95% completion.* The records show the date personnel

was scheduled to attend, but it does not show the actual training completion date. Rather, there is an "attended" column that is blank. There is also no way to measure the percent who have completed the training without a system that identifies the total number of eligible employees to cross check with a attendance completion date which is missing. *The IMT requires evidence of full participation along with training as part of Secondary Compliance.*

***

In the sixth monitoring period, the City and the OEMC maintained Preliminary compliance with ¶146. The city produced partial training attendance records and evaluations, insufficient to assess compliance. During the sixth reporting period, training attendance records were produced for the *Mental Health Crisis Awareness –Refresher*. However, the OEMC only produced to the IMT training records evidencing 30 participants, plus seven guests with four missing signatures and two members who were late to the training. These training records lacked a column identifying date of attendance, not just date scheduled, and also lacked the necessary training evaluations and evidence that at least 95% of officers had received the training.

To achieve Secondary compliance, the City and OEMC must produce sufficient documentation demonstrating that the Chicago Council on Mental Health Equity and community stakeholder input has been incorporated, as well as evidence that the refresher training has been delivered to at least 95% of all telecommunicators. The IMT highly recommends a single spreadsheet indicating the employee name, date of hire, and date of training attendance. This will show a running list of all employees and date of attendance. The Mental Health and CIT Awareness Training, the Refresher Training and attendance at the 40-hour training could be on the same spreadsheet and re-produced each monitoring period.

Paragraph 146 Compliance Progress History

FIRST REPORTING PERIOD	SECOND REPORTING PERIOD	THIRD REPORTING PERIOD
SEPTEMBER 1, 2019 – AUGUST 31, 2019	SEPTEMBER 1, 2019 – FEBRUARY 29, 2020	MARCH 1, 2020 – DECEMBER 31, 2020
COMPLIANCE PROGRESS:	COMPLIANCE PROGRESS:	COMPLIANCE PROGRESS:
Not Applicable	Not Applicable	Status Update
FOURTH REPORTING PERIOD	**FIFTH REPORTING PERIOD**	**SIXTH REPORTING PERIOD**
JANUARY 1, 2021 – JUNE 30, 2021	JULY 1, 2021 – DECEMBER 31, 2021	JANUARY 1, 2022 – JUNE 30, 2022
COMPLIANCE PROGRESS:	COMPLIANCE PROGRESS:	COMPLIANCE PROGRESS:
Preliminary	Preliminary	Preliminary

Crisis Intervention: ¶147

147. *OEMC will evaluate all mental health and CIT awareness trainings for telecommunicators on at least an annual basis to ensure that the trainings meet OEMC needs, comply with this Agreement, incorporate best practices, and ensure that the training is effective for personnel and for the individuals in crisis served. OEMC will consider recommendations and feedback from the CIT Coordinator and the Advisory Committee when conducting its evaluation.*

Compliance Progress

(Reporting Period: January 1, 2022, through June 31, 2022)

Recurring Schedule: At Least Annually ☑ **Not Yet Applicable**

Preliminary: ***In Compliance*** **(FOURTH REPORTING PERIOD)**
Secondary: ***Not in Compliance***
Full: ***Not Yet Assessed***

In the sixth monitoring period, the City and the OEMC maintained Preliminary compliance with ¶147.

To achieve Preliminary compliance with ¶147, the City and the CPD must implement sufficient policies, procedures, or written guidance through the process described in the Consent Decree (¶¶626–41), which outlines applicable consultation, resolution, workout, and public-comment periods. These paragraphs detail various requirements, including that policies are "plainly written, logically organized, and use clearly defined terms." Going forward, to achieve Secondary compliance with ¶147, the OEMC will need to develop metrics that, when tracked, will adequately demonstrate the OEMC's success under ¶147. Further assessment levels will require an assessment of those developed metrics.

Progress before the Sixth Reporting Period

During the fourth reporting period, the OEMC finalized the *Mental Health Training* directive, which clearly states the requirement for all telecommunicators to receive training on the eight-hour mental health and CIT awareness training and annual refresher training, per ¶146. Moreover, the directive identifies the topics to be included in the eight hour and refresher training, including skills on identifying, dispatching, and appropriately responding to calls for service that involve individuals in crisis.

Progress before the Sixth Reporting Period

In the sixth monitoring period, the OEMC produced records evidencing its policy review process to the IMT. The IMT notes that the City and the CPD must robustly engage with the Chicago Council on Mental Health Equity in order to maintain Preliminary compliance with ¶147. Moreover, ¶147's requirements must be explicitly included in the City and the CPD's engagement with the Chicago Council on Mental Health Equity. During the OEMC's first policy review process, there was essentially no engagement of the Chicago Council on Mental Health Equity, as required under ¶130—31. Since its first policy review process, the IMT has been clear with the OEMC that the absence of significant engagement will delay achievement of the OEMC's future compliance or remove current compliance.

In this reporting period, the OEMC briefly touched on the policies in a PowerPoint presentation to the Chicago Council on Mental Health Equity, attaching those policies to an email to the Chicago Council on Mental Health Equity and inviting their feedback. However, no feedback was received. This lack of feedback indicates inadequate engagement. The IMT recommends that the OEMC engage the CPD and the City to identify a robust plan to solicit thorough review and comment. The OEMC plays a crucial role in the initial identification and appropriate dispatch of calls involving a mental health component, and experts and people with lived experience should be given due process. Should more robust engagement not occur by the end of the next reporting period, the IMT will consider withdrawing Preliminary compliance with ¶147.

Further, ¶147 requires review by and feedback from the CIT Coordinator. To date, there has been no evidence of such feedback. Future levels of compliance will depend on the OEMC producing evidence of the CIT Coordinator's review and feedback consistent with ¶147's requirements.

During this monitoring period, the City and the OEMC invited members of the Chicago Council on Mental Health Equity to observe the OEMC 8-hour training. However, the invitation did not meet the standards of a robust, proactive invitation. Based on the OEMC productions this reporting period, it appears only one individual requested to observe the training in person, and there was no evidence that the OEMC responded to the member's inquiry, or that the member attended the in-person training. The IMT has also not received evidence of the Chicago Council on Mental Health Equity's comments. In the next reporting period, the IMT must see robust involvement with the Chicago Council on Mental Health Equity on both training observation and policy review and comment.

The IMT observed the OEMC's required Refresher Training this reporting period. The IMT notes that the OEMC telecommunicators have received sufficient training on how to identify calls involving an individual known, suspected, or perceived to be in crisis and found that the new standard operating procedure is incorporated

into training, meeting the requirements of ¶147. However, sufficient evaluations of all mental health related training by the OEMC have not been produced. There were only partial training evaluations submitted this reporting period on the 8-hour training, and no records on the refresher training.

Currently, the OEMC conducts performance audits related to crisis intervention calls. This is a valid measurement of behavior and can inform future training needs. However, the OEMC did not produce evidence of such audits, which would include productions of the *CIT Employee Review* and *CIT Reviewed Events*, and *CIT Quality Assurance Report*.

Audit spreadsheets alone will not be sufficient for assessing compliance without robust interpretation, and response to trends.

***

In the sixth monitoring period, the City and the OEMC maintained Preliminary compliance with ¶147. To achieve Secondary compliance, the OEMC must ensure that the person responsible for conducting the evaluations is qualified to make revisions and has insight into current best practices. The OEMC must also require that recommendations from the Chicago Council on Mental Health Equity and the CIT coordinator be incorporated into the trainings, where appropriate. The IMT has yet to receive documentation indicating how Chicago Council on Mental Health Equity feedback was incorporated on the 8-hour training. The IMT looks forward to the same with the Refresher training. Training evaluation trends for both trainings will also be assessed. This reporting period, only partial training evaluation records were produced.

The IMT acknowledges that the OEMC has made important strides in standardizing the audits, and we will continue to work with the OEMC as trends begin to emerge. However, more needs to be done to maintain or achieve future levels of compliance.

Paragraph 147 Compliance Progress History

FIRST REPORTING PERIOD	SECOND REPORTING PERIOD	THIRD REPORTING PERIOD
SEPTEMBER 1, 2019 – AUGUST 31, 2019	SEPTEMBER 1, 2019 – FEBRUARY 29, 2020	MARCH 1, 2020 – DECEMBER 31, 2020
COMPLIANCE PROGRESS:	COMPLIANCE PROGRESS:	COMPLIANCE PROGRESS:
Not Applicable	Not Applicable	None
FOURTH REPORTING PERIOD	**FIFTH REPORTING PERIOD**	**SIXTH REPORTING PERIOD**
JANUARY 1, 2021 – JUNE 30, 2021	JULY 1, 2021 – DECEMBER 31, 2021	JANUARY 1, 2022 – JUNE 30, 2022
COMPLIANCE PROGRESS:	COMPLIANCE PROGRESS:	COMPLIANCE PROGRESS:
Preliminary	Preliminary	Preliminary

Crisis Intervention: ¶148

148. *OEMC will develop and implement its portion of the Crisis Intervention Plan.*

Compliance Progress (Reporting Period: January 1, 2022, through June 31, 2022)

Preliminary:	***In Compliance* (FOURTH REPORTING PERIOD)**
Secondary:	***Not in Compliance***
Full:	***Not Yet Assessed***

In the sixth monitoring period, the City and the OEMC maintained Preliminary compliance with ¶148.

To achieve Preliminary compliance with ¶148, the City and the CPD must implement sufficient policies, procedures, or written guidance through the process described in the Consent Decree (¶¶626–41), which outlines applicable consultation, resolution, workout, and public-comment periods. These paragraphs detail various requirements, including that policies are "plainly written, logically organized, and use clearly defined terms." Going forward, to achieve Secondary compliance, the OEMC will need to develop metrics that, when tracked, will adequately demonstrate the OEMC's success under ¶148. Further assessment levels will require the IMT's evaluation of those developed metrics.

Progress before the Sixth Reporting Period

During the fourth reporting period, the OEMC finalized its policy *Mental Health Training* that includes the requirement to develop and implement its portion of the *Crisis Intervention Plan* on an annual basis.

Progress in the Sixth Reporting Period

During this monitoring period, the City did not produce the next iteration of the *Crisis Intervention Plan*, as required annually by ¶122. Therefore, the OEMC is unable to reach any further compliance level for ¶148.

While the IMT appreciates delaying these reports until they can be supported by a more robust strategy and reliable data, additional the City and the CPD should focus on accomplishing the necessary steps to produce these important reports.

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In the sixth monitoring period, the City and the OEMC maintained Preliminary compliance with ¶148. Subsequent levels of compliance will depend on the OEMC

demonstrating ongoing implementation of the goals as listed in the *Crisis Intervention Plan*.

Paragraph 148 Compliance Progress History

FIRST REPORTING PERIOD	SECOND REPORTING PERIOD	THIRD REPORTING PERIOD
SEPTEMBER 1, 2019 – AUGUST 31, 2019	SEPTEMBER 1, 2019 – FEBRUARY 29, 2020	MARCH 1, 2020 – DECEMBER 31, 2020
COMPLIANCE PROGRESS:	COMPLIANCE PROGRESS:	COMPLIANCE PROGRESS:
Not Applicable	Not Applicable	Status Update

FOURTH REPORTING PERIOD	FIFTH REPORTING PERIOD	SIXTH REPORTING PERIOD
JANUARY 1, 2021 – JUNE 30, 2021	JULY 1, 2021 – DECEMBER 31, 2021	JANUARY 1, 2022 – JUNE 30, 2022
COMPLIANCE PROGRESS:	COMPLIANCE PROGRESS:	COMPLIANCE PROGRESS:
Preliminary	Preliminary	Preliminary

Crisis Intervention: ¶149

149. *OEMC supervisors, on an ongoing basis, will audit and provide feedback to calltakers and dispatchers regarding their ability to identify, dispatch, and respond appropriately to calls for service involving individuals in crisis.*

Compliance Progress

(Reporting Period: January 1, 2022, through June 31, 2022)

Preliminary:	***In Compliance*** **(FOURTH REPORTING PERIOD)**
Secondary:	***Not in Compliance***
Full:	***Not Yet Assessed***

In the sixth monitoring period, the City and the OEMC maintained Preliminary compliance with ¶149.

To achieve Preliminary compliance with ¶149, the City and the CPD must implement sufficient policies, procedures, or written guidance through the process described in the Consent Decree (¶¶626–41), which outlines applicable consultation, resolution, workout, and public-comment periods. These paragraphs detail various requirements, including that policies are "plainly written, logically organized, and use clearly defined terms." Going forward, to achieve Secondary compliance, the OEMC will need to develop metrics that, when tracked, will adequately demonstrate the OEMC's success under ¶149. Further assessment levels will require an assessment of those developed metrics.

Progress before the Sixth Reporting Period

During the fourth monitoring period, the OEMC finalized its *Crisis Intervention Program* policy, which includes the requirement to audit and provide feedback to call takers and dispatchers regarding their ability to identify, dispatch, and respond appropriately to calls for service involving individuals in crisis.

Progress in the Sixth Reporting Period

In the sixth monitoring period, the OEMC produced records evidencing its policy review process to the IMT. The IMT notes that more robust engagement with the Chicago Council on Mental Health Equity is required for future levels of compliance. During the first policy review process, there was essentially no engagement of the Chicago Council on Mental Health Equity as required under ¶130—131. Since the OEMC's first policy review process, the IMT has been clear that future compliance will be delayed without significant engagement with the Chicago Council on Mental Health Equity.

In this reporting period, the OEMC briefly presented its policies to the Chicago Council on Mental Health Equity, attaching those policies to an email to the Chicago Council on Mental Health Equity and inviting their feedback. However, no feedback was received. This lack of feedback indicates inadequate engagement. Evidence of Chicago Council on Mental Health Equity comments on policies both during Chicago Council on Mental Health Equity meetings and by email, along with OEMC's response to those comments is required. The IMT recommends the OEMC engage the CPD and the City to identify a robust plan to solicit thorough review and comment. The OEMC plays a crucial role in the initial identification and appropriate dispatch of calls involving a mental health component, and experts and people with lived experience should be given due process. If the IMT does not receive evidence of more robust engagement the end of the next reporting period, then the IMT will consider withdrawing Preliminary compliance with ¶149.

The IMT notes that the OEMC has taken important steps in standardizing its audit protocols. For example, the OEMC is requiring ten calls involving a mental health component to be audited daily. As part of this audit, the OEMC provided the IMT with a revised version of its SOP, *Mental Health Event Audit*, to which the IMT gave a no objection on June 4, 2021. However, in this reporting period, this *Mental Health Event Audit* was re-produced, but did not include an SOP number and indicated a May 18, 2022 draft date. The IMT is unsure whether this policy was ever implemented.

Based on the IMT's recommendations from the 2021 review, the OEMC made changes to the *Mental Health Even Audit* so it could be used as a training tool. For instance, we recommended the OEMC maintain consistency between the information reflected in the *Mental Health Event Audit* policy and its corresponding spreadsheets. This includes ensuring that all data elements identified in the policy are captured in the respective spreadsheet. Similarly, the IMT recommended that all spreadsheet columns match those identified in the *Mental Health Event Audit* policy. Last, we suggested that the OEMC merge data sets that are repeated across the spreadsheets, as doing so could avoid confusion. These edits were included in the recent production of this SOP this reporting period.

Moreover, the OEMC reviewed on a monthly call with the IMT the excel spreadsheet the OEMC is using to track audit outcomes. While we believe this protocol will provide sufficient guidance to act as a training tool for supervisors, the OEMC did not produce completed audit spreadsheets during the reporting period, so the IMT cannot assess them (e.g., "CIT Employee Review," "CIT Reviewed Events," and "CIT Quality Assurance Report"). These spreadsheets must include the OEMC's analysis, which is necessary to assess the metrics on which Full compliance will be based. The Chicago Council on Mental Health Equity must review and provide input on the revised *Mental Health Event Audit* policy, which the OEMC produced to

the IMT this reporting period. The Chicago Council on Mental Health Equity's review is required for the OEMC to maintain Preliminary compliance with ¶149. Because it is unclear whether this policy was ever finalized and enacted after the IMT no-objection was issued, and this policy guides the implementation of ¶149, finalization and enactment is required to maintain compliance.

Paragraph 149 Compliance Progress History

FIRST REPORTING PERIOD	SECOND REPORTING PERIOD	THIRD REPORTING PERIOD
SEPTEMBER 1, 2019 – AUGUST 31, 2019	SEPTEMBER 1, 2019 – FEBRUARY 29, 2020	MARCH 1, 2020 – DECEMBER 31, 2020
COMPLIANCE PROGRESS:	COMPLIANCE PROGRESS:	COMPLIANCE PROGRESS:
Not Applicable	Not Applicable	Not Applicable
FOURTH REPORTING PERIOD	**FIFTH REPORTING PERIOD**	**SIXTH REPORTING PERIOD**
JANUARY 1, 2021 – JUNE 30, 2021	JULY 1, 2021 – DECEMBER 31, 2021	JANUARY 1, 2022 – JUNE 30, 2022
COMPLIANCE PROGRESS:	COMPLIANCE PROGRESS:	COMPLIANCE PROGRESS:
Preliminary	Preliminary	Preliminary

Crisis Intervention: ¶150

150. *The Parties acknowledge that OEMC currently meets regularly with CPD and the City-wide Mental Health Steering Committee. OEMC will continue to meet regularly with CPD, in addition to appropriate members of the Advisory Committee, including service providers and advocates, to review and assess data and information regarding the identification of, the dispatch of, and response to calls for service involving individuals in crisis by OEMC telecommunicators.*

Compliance Progress

(Reporting Period: January 1, 2022, through June 31, 2022)

Preliminary:	***In Compliance*** **(FOURTH REPORTING PERIOD)**
Secondary:	***Not in Compliance***
Full:	***Not in Compliance***

In the sixth monitoring period, the City and the OEMC maintained Preliminary compliance with ¶150.

To achieve Preliminary compliance with ¶150, the City and the CPD must implement sufficient policies, procedures, or written guidance through the process described in the Consent Decree (¶¶626–41), which outlines applicable consultation, resolution, workout, and public-comment periods. These paragraphs detail various requirements, including that policies are "plainly written, logically organized, and use clearly defined terms." Going forward, to achieve Secondary compliance, the OEMC will need to develop metrics that, when tracked, will adequately demonstrate the OEMC's success under ¶150. Demonstration of robust engagement with the CPD and the Chicago Council on Mental Health Equity will be required. Further assessment levels will require an assessment of those developed metrics.

Progress before the Sixth Reporting Period

During the fifth reporting period, the IMT recommended that the OEMC have a more robust involvement with the Chicago Council on Mental Health Equity. In response, the OEMC assigned a dedicated staff representative to participate in Chicago Council on Mental Health Equity meetings. The IMT also recommended that the OEMC demonstrate regular meetings with the CPD.

Progress before the Sixth Reporting Period

The OEMC's involvement with the Chicago Council on Mental Health Equity can be improved. The IMT appreciates that the OEMC briefly presented to the Chicago

Council on Mental Health Equity, informing them of the OEMC's role. This is an important foundational step. But while the OEMC invited the Chicago Council on Mental Health Equity to review policies and attend training, there was no evidence of either comments on policies or training observation. As indicated in previous paragraphs, compliance assessments require a robust policy and training review process along with evidence of collaboration with the CPD.

The IMT suggests the OEMC consider ways to deepen and broaden the involvement of the Chicago Council on Mental Health Equity. For example, the OEMC may consider meeting with the subcommittee chairs to further discuss the role and function of the OEMC, review data the OEMC is capturing, and discuss the OEMC's priorities. Seeking feedback on additional areas to cover would also be useful and can initiate a deeper discussion on policy review suggestions and training attendance. During this reporting period, the only evidence of the OEMC meeting with the CPD was an email from the OEMC to the CPD requesting to meet. Further, the email indicated there were "no trends" in the data. A lack of any trends, after three years of Consent Decree Data, indicates a broader system issue. There must be improved collaboration and communication between these two entities. There was also no evidence that the CPD responded to the OEMC email, or of any meetings taking place. The IMT highly recommends producing meeting agendas, records of attendees, and meeting minutes.

Both the Chicago Council on Mental Health Equity and the IMT have shared concerns with siloed systems. Increasingly, there is greater reliance on systems working collaboratively to ensure success. The onboarding of the CPD's Alternative Response Pilot (CARE) program is one such example.

The IMT strongly encourages a robust data presentation to the full Chicago Council on Mental Health Equity committee in the next reporting period, along with a significant improvement in the policy revision process and the operational practice of the meetings between the OEMC, CPD, and other stakeholders.

Advance Notice of policy review, along with a thorough review process with a corresponding feedback loop back to the Chicago Council on Mental Health Equity will be considered. Additionally, a public comment period is important for transparency and public trust. Since there were substantially-new policies developed by the OEMC since the Consent Decree, feedback by the CPD, Chicago Council on Mental Health Equity, and the public will be essential, along with audit data.

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In the sixth monitoring period, the City and the OEMC maintained Preliminary compliance with ¶150. Subsequent levels of compliance will depend on the OEMC demonstrating regular meetings are occurring with important outcomes. This would go a long way toward demonstrating greater partnership toward efforts to

increase communication between the OEMC and the CPD systems; having more active engagement with the Chicago Council on Mental Health Equity; observing the annual policy, training, and data review and feedback process with the Chicago Council on Mental Health Equity, as required in ¶150; and providing evidence to the IMT that the meetings contribute to the City's overall crisis response approach. The IMT highly encourages a robust data presentation to the full Chicago Council on Mental Health Equity committee in the next reporting period, along with evidence of regular meetings occurring between the identified entities.

Paragraph 150 Compliance Progress History

FIRST REPORTING PERIOD	SECOND REPORTING PERIOD	THIRD REPORTING PERIOD
SEPTEMBER 1, 2019 – AUGUST 31, 2019	SEPTEMBER 1, 2019 – FEBRUARY 29, 2020	MARCH 1, 2020 – DECEMBER 31, 2020
COMPLIANCE PROGRESS:	COMPLIANCE PROGRESS:	COMPLIANCE PROGRESS:
Not Applicable	Not Applicable	None

FOURTH REPORTING PERIOD	FIFTH REPORTING PERIOD	SIXTH REPORTING PERIOD
JANUARY 1, 2021 – JUNE 30, 2021	JULY 1, 2021 – DECEMBER 31, 2021	JANUARY 1, 2022 – JUNE 30, 2022
COMPLIANCE PROGRESS:	COMPLIANCE PROGRESS:	COMPLIANCE PROGRESS:
Preliminary	Preliminary	Preliminary

Crisis Intervention: ¶151

151. *Within 180 days of the Effective Date, and annually thereafter, OEMC will review and revise its intake and dispatch policies and protocols as necessary to meet the requirements of this Agreement. OEMC will consider any recommendations or feedback provided by the Advisory Committee when revising its policies.*

Compliance Progress

(Reporting Period: January 1, 2022, through June 31, 2022)

Recurring Schedule: Annually ☑ **Not Yet Applicable**

Preliminary: ***In Compliance*** **(FOURTH REPORTING PERIOD)**
Secondary: ***Not in Compliance***
Full: ***Not Yet Assessed***

In the sixth monitoring period, the City and the OEMC maintained Preliminary compliance with ¶151.

To achieve Preliminary compliance with ¶151, the City and the CPD must implement sufficient policies, procedures, or written guidance through the process described in the Consent Decree (¶¶626–41), which outlines applicable consultation, resolution, workout, and public-comment periods. These paragraphs detail various requirements, including that policies are "plainly written, logically organized, and use clearly defined terms."

Progress before the Sixth Reporting Period

During the fourth reporting period, the OEMC finalized its directive, *Mental Health Training*. While this directive memorialized the requirements that the OEMC is to review the training on an annual basis and incorporate recommendations from the Chicago Council on Mental Health Equity, this SOP fell short of fully incorporating ¶151's requirements, which focus on intake and dispatch policies and protocols. The IMT recommended that the OEMC include the exact requirements of ¶151 into the directive.

The OEMC has undertaken its annual requirement to review and revise policy, which is an opportune time to ensure the exact requirements of ¶151 are incorporated. Maintenance of preliminary compliance will hinge on this. Further, the Chicago Council on Mental Health Equity's sufficient engagement in the policy revision process, as indicated in previous paragraph assessments, must occur for the OEMC to maintain compliance with ¶151.

Progress in the Sixth Reporting Period

The OEMC has begun its required annual policy and protocol review process during this reporting period. The exact language of the consent decree must be incorporated into the revised policy, as the SOP used for Preliminary compliance fell short of fully incorporating the requirements of ¶151, which focuses on intake and dispatch policies and protocols. The IMT notes that more robust engagement with the Chicago Council on Mental Health Equity is required. During the first policy review process, there was essentially no engagement of the Chicago Council on Mental Health Equity as required under ¶¶130—31. The IMT has been clear since the first policy review process that without significant engagement, future levels of compliance will be delayed or removed. Evidence of Chicago Council on Mental Health Equity comments on policies both during Chicago Council on Mental Health Equity meetings and by email, along with OEMC's response to those comments is required.

In this reporting period, the OEMC briefly touched on the policies at a briefing at a quarterly Chicago Council on Mental Health Equity meeting, attaching those policies to an email to members. However, no feedback was received. This lack of feedback indicates inadequate engagement The IMT recommends the OEMC engage the CPD and the City to identify a robust plan to solicit thorough review and comment. The OEMC plays a crucial role in the initial identification and appropriate dispatch of calls involving a mental health component, and experts and people with lived experience should be given due process.

During this monitoring period, the City and the OEMC invited members of the Chicago Council on Mental Health Equity to observe the OEMC crisis intervention training. Shortcomings have been noted in previous paragraphs, demonstrated by no Chicago Council on Mental Health Equity observation nor feedback and no response to the council member that requested to observe training in person. It is important for members of the Chicago Council on Mental Health Equity to observe CIT-related trainings, as this helps members of the Chicago Council on Mental Health Equity understand what is being taught, and how policy informs protocol and training as required under ¶151.

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Subsequent levels of compliance for this paragraph will assess advanced notice of the review and revision process, along with consideration of the Chicago Council on Mental Health Equity's concerns during previous CPD and OEMC policy review. A corresponding feedback loop back to the Chicago Council on Mental Health Equity on policy and protocol recommendations will be considered, along with its public comment period. Since there were substantially new policies and protocols developed since the onset of the Consent Decree, the IMT will consider how operational practice under these new policies is proceeding, and what changes may

need to be made during this round of policy revisions based on that. The OEMC to date has had minimal leadership involvement in the Chicago Council on Mental Health Equity. The IMT has recommended to the OEMC that a quarterly Chicago Council on Mental Health Equity meeting be designated for the OEMC to give a full presentation on their policies, protocols, and data collection for crisis response, including the CARE pilot with time for discussion. Consideration should be given to utilizing a quarterly meeting once the OEMC has concluded their Chicago Council on Mental Health Equity policy revision process and is ready to respond to formal comments. The council deserves to understand the call intake process, what questions are asked, how dispatch is determined, and what data is being collected. This foundational information will go a long way toward helping Chicago Council on Mental Health Equity members understand the role and function of the policies and protocols for identifying calls involving a mental health component and dispatch of CIT officers and/or alternate crisis response.

Paragraph 151 Compliance Progress History

FIRST REPORTING PERIOD	SECOND REPORTING PERIOD	THIRD REPORTING PERIOD
SEPTEMBER 1, 2019 – AUGUST 31, 2019	SEPTEMBER 1, 2019 – FEBRUARY 29, 2020	MARCH 1, 2020 – DECEMBER 31, 2020
COMPLIANCE PROGRESS:	COMPLIANCE PROGRESS:	COMPLIANCE PROGRESS:
Not Applicable	None	None

FOURTH REPORTING PERIOD	FIFTH REPORTING PERIOD	SIXTH REPORTING PERIOD
JANUARY 1, 2021 – JUNE 30, 2021	JULY 1, 2021 – DECEMBER 31, 2021	JANUARY 1, 2022 – JUNE 30, 2022
COMPLIANCE PROGRESS:	COMPLIANCE PROGRESS:	COMPLIANCE PROGRESS:
Preliminary	Preliminary	Preliminary

Crisis Intervention: ¶152

152. *OEMC will ensure that the language used in policies, procedures, forms, databases, trainings, and by tele-communicators to communicate about calls involving individuals in crisis is appropriate, respectful, and consistent with industry-recognized terminology. OEMC will seek input from the Advisory Committee for recommendations to identify appropriate and respectful terminology.*

Compliance Progress

(Reporting Period: January 1, 2022, through June 31, 2022)

Preliminary:	***In Compliance*** **(FOURTH REPORTING PERIOD)**
Secondary:	***In Compliance*** **(FOURTH REPORTING PERIOD)**
Full:	***Not Yet Assessed***

In the sixth monitoring period, the City and the OEMC maintained Preliminary and Secondary compliance with ¶152.

To achieve Preliminary compliance with ¶152, the City and the CPD must implement sufficient policies, procedures, or written guidance through the process described in the Consent Decree (¶¶626–41), which outlines applicable consultation, resolution, workout, and public-comment periods. These paragraphs detail various requirements, including that policies are "plainly written, logically organized, and use clearly defined terms."

The IMT assessed Secondary compliance with ¶152 by reviewing training development, implementation, and evaluation in accordance with ¶286 of the Consent Decree, which incorporates the following evaluation criteria: training needs assessment, curriculum design, curriculum development, training implementation (training delivery), and training evaluation.

Progress before the Sixth Reporting Period

During the fourth reporting period, the OEMC finalized its directive, *Mental Health Training*, which clearly states the requirements of ¶152. The OEMC has made a concerted effort to ensure that language used in the policies, procedures, forms, databases, trainings, and by telecommunicators to communicate about calls involving individuals in crisis is appropriate, respectful, and consistent with industry-recognized terminology. Additionally, we have observed members of the OEMC using respectful language and this has been reinforced in trainings we have observed. Therefore, the OEMC has met Preliminary and Secondary compliance with this paragraph.

Progress in the Sixth Reporting Period

During this monitoring period, the IMT observed members of the OEMC, during their refresher training, using respectful language involving individuals in crisis.

Currently, the event code used by the OEMC, but originating through the CPD does not reflect best practices (e.g., DISTME). The phrase "disturbance mental" is utilized and will need to be updated. This will need to be addressed for future compliance. With the onboarding of a new Computer Aided Dispatch (CAD) system in 2023, the OEMC and the CPD will be encouraged to consider alternate event code(s) for mental health related calls for service. The OEMC and the CPD should consider what event code change they would recommend utilizing best practice language.

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In the sixth monitoring period, the City and the OEMC maintained both Preliminary and Secondary compliance with ¶152. For Full compliance, the IMT anticipates that results from the OEMC's audits will help to ensure that industry-recognized language is used and updated when appropriate.

Paragraph 152 Compliance Progress History

FIRST REPORTING PERIOD SEPTEMBER 1, 2019 – AUGUST 31, 2019 COMPLIANCE PROGRESS: Not Applicable	SECOND REPORTING PERIOD SEPTEMBER 1, 2019 – FEBRUARY 29, 2020 COMPLIANCE PROGRESS: Not Applicable	THIRD REPORTING PERIOD MARCH 1, 2020 – DECEMBER 31, 2020 COMPLIANCE PROGRESS: Status Update
FOURTH REPORTING PERIOD JANUARY 1, 2021 – JUNE 30, 2021 COMPLIANCE PROGRESS: Secondary	FIFTH REPORTING PERIOD JULY 1, 2021 – DECEMBER 31, 2021 COMPLIANCE PROGRESS: Secondary	SIXTH REPORTING PERIOD JANUARY 1, 2022 – JUNE 30, 2022 COMPLIANCE PROGRESS: Secondary

Appendix 4
Use of Force
Compliance Assessments, by Paragraph

Appendix 4
Use of Force
Compliance Assessments, by Paragraph

¶153 ¶154 ¶155 ¶156 ¶157 ¶158 ¶159 ¶160 ¶161 ¶162 ¶163 ¶164 ¶165 ¶166 ¶167 ¶168 ¶169 ¶170 ¶171 ¶172 ¶173 ¶174 ¶175 ¶176

¶177 ¶178 ¶179 ¶180 ¶181 ¶182 ¶183 ¶184 ¶185 ¶186 ¶187 ¶188 ¶189 ¶190 ¶191 ¶192 ¶193 ¶194 ¶195 ¶196 ¶197 ¶198 ¶199 ¶200

¶201 ¶202 ¶203 ¶204 ¶205 ¶206 ¶207 ¶208 ¶209 ¶210 ¶211 ¶212 ¶213 ¶214 ¶215 ¶216 ¶217 ¶218 ¶219 ¶220 ¶221 ¶222 ¶223 ¶224

¶225 ¶226 ¶227 ¶228 ¶229 ¶230 ¶231 ¶232 ¶233 ¶234 ¶235 ¶236 ¶237 ¶238 ¶239 ¶240 ¶241 ¶242 ¶243 ¶244 ¶245 ¶246 ¶247 ¶248

Use of Force: ¶153

153. CPD's use of force policies, as well as its training, supervision, and accountability systems, must ensure that: CPD officers use force in accordance with federal law, state law, and the requirements of this Agreement; CPD officers apply de-escalation techniques to prevent or reduce the need for force whenever safe and feasible; when using force, CPD officers only use force that is objectively reasonable, necessary, and proportional under the totality of the circumstances; and any use of unreasonable or unnecessary force is promptly identified and responded to appropriately.

Compliance Progress

(Reporting Period: January 1, 2022, through June 31, 2022)

Preliminary:	***In Compliance*** **(FOURTH REPORTING PERIOD)**
Secondary:	***Under Assessment***
Full:	***Not Yet Assessed***

In the sixth reporting period, the City and the CPD maintained Preliminary compliance with ¶153.

To assess Preliminary compliance with ¶153, the IMT reviewed the CPD's Use of Force policies to ensure they are in accordance with law and the Consent Decree and appropriately address use of de-escalation. The IMT also assessed the CPD's efforts to actively engage the community and obtain feedback on its Use of Force policies.

To assess Secondary compliance with ¶153, the IMT is reviewing the CPD's use of force training materials and records for completion of training as it relates to the requirements of the Consent Decree.

To assess Full compliance with ¶153, the IMT will assess the implementation and supervision of Use of Force policies by department personnel, to include supervisors, and accountability measures. For this assessment, the IMT is reviewing supervision at a district level, by the Tactical Review and Evaluation Division (TRED),[1] CPD command staff, and COPA to determine if supervision and accountability systems are effective.

In the last reporting period, the IMT continued to assess Secondary compliance with ¶153 by reviewing TRED's quarterly reports, CPD's Use of Force Dashboard, and COPA's allegations and findings on excessive force. We also monitored the CPD's progress with the TRED dashboard for supervisors and its efforts to launch

[1] The Tactical Review and Evaluation Division (TRED) was formerly called the Force Review Division (FRD).

the dashboard (e.g., train supervisors on its utility and provide guidance or policies on expectations for its use).

This reporting period, the IMT continued to assess Secondary compliance, and reviewed and observed the CPD's 2021 in-service training and Supervisory Refresher Training related to use of force, paying particular attention to accountability and supervision. These trainings' curricula demonstrate a continual focus on de-escalation. We await attendance records for the Supervisory Refresher Training, but the CPD provided records to show that as of February 18, 2022, more than 95% of officers received the two-day *2021 De-Escalation, Response to Resistance, and Use of Force* in-service training, with 96.71% of participants completing the *Communications* eight-hour course and 96.86% completing the *Procedures* eight-hour course.[2] Additionally, TRED's continued attention to de-escalation in its reviews has played an important role. Proper articulation of de-escalation/force mitigation is one of the biggest review points identified by TRED. TRED has provided this feedback to CPD's Training Division last year, which resulted in additional focus on the quality of TRRs in the 2021 in-service training. While the CPD cannot point to specific improvements tied to the impact of training, TRED noted they have seen a steady decrease debriefing points on this matter this reporting period.

In this reporting period the CPD also launched its Use of Force Supervisor's Dashboard and completed development of its De-escalation Dashboard (see ¶157 for more on the de-escalation dashboard). These new dashboards provide an important tool for accountability and supervision of use of force incidents. Previously the IMT has stressed the importance of front-line supervisors playing a greater role in addressing deficiencies when reviewing TRRs, and this dashboard provides them with a useful tool to do so.

The Supervisor's dashboard went live on March 11, 2022. The CPD posted a message to its internal Administrative Message Center (AMC) that day, notifying department members and supervisors of the dashboard, which included a user guide. In the weeks following the dashboard's launch, the CPD observed limited views of the dashboard by Department members (from Sergeants to Deputy Chiefs). Thus, on March 21, 2022, the CPD sent a second AMC message and a separate request via email to Command Staff members to elicit additional feedback on the dashboard's use and functionality. The department saw two-fold increase in dashboards following that message. TRED also noted it includes a reminder of the dashboard in its emails on debriefings to supervisors to encourage them to use the Supervisor's dashboard.

Additionally, during this reporting period, the CPD shared that it intends to integrate the Supervisor's dashboard into its CompStat meetings, where supervisors

[2] Because of the COVID-19 extension, the CPD had until March 5, 2022, to complete the delivery of its 2021 in-service training.

will be required to review and report on data and resulting actions at the district-level. The CPD noted that it intends for the dashboard to be used at a multi-faceted level to promote accountability of use of force incidents – at the district/supervisor level and TRED/department level. The minutes from the CompStat meetings will then be shared with TRED, which will be incorporated in TRED reporting. The IMT looks forward to seeing these plans come into fruition and hopes that appropriate time is allotted in CompStat for these reviews and there is a sufficient feedback loop for information reported back to TRED and the IMT.

However, more remains to be done to ensure both dashboards are being used daily and appropriately, to include the CPD providing training at all supervisory levels on the use and expectations of supervisory use for the dashboards. The CPD noted it plans to incorporate the dashboard into its in-service training. The IMT believe it is critically important that front-line supervisors receive clear expectations for the dashboard.

In conclusion, the CPD remains in Preliminary compliance for ¶153. Moving forward, the IMT will monitor's CPD effort to train all supervisors on the dashboards for Secondary compliance.

Paragraph 153 Compliance Progress History

FIRST REPORTING PERIOD	SECOND REPORTING PERIOD	THIRD REPORTING PERIOD
SEPTEMBER 1, 2019 – AUGUST 31, 2019	SEPTEMBER 1, 2019 – FEBRUARY 29, 2020	MARCH 1, 2020 – DECEMBER 31, 2020
COMPLIANCE PROGRESS:	COMPLIANCE PROGRESS:	COMPLIANCE PROGRESS:
Not Applicable	Not Applicable	Under Assessment

FOURTH REPORTING PERIOD	FIFTH REPORTING PERIOD	SIXTH REPORTING PERIOD
JANUARY 1, 2021 – JUNE 30, 2021	JULY 1, 2021 – DECEMBER 31, 2021	JANUARY 1, 2022 – JUNE 30, 2022
COMPLIANCE PROGRESS:	COMPLIANCE PROGRESS:	COMPLIANCE PROGRESS:
Preliminary	Preliminary	Preliminary

Use of Force: ¶154

154. *CPD adopted revised use of force policies on October 16, 2017 ("October 2017 Policies"). The October 2017 Policies incorporated multiple best practices that were not reflected in CPD's prior use of force policies. Building on these improvements, CPD will maintain the best practices reflected in the October 2017 Policies and make additional improvements to its policies consistent with the terms of this Agreement.*

Compliance Progress (Reporting Period: January 1, 2022, through June 31, 2022)

Preliminary:	***In Compliance*** **(FOURTH REPORTING PERIOD)**
Secondary:	***In Compliance*** **(FOURTH REPORTING PERIOD)**
Full:	***Not in Compliance***

In the sixth reporting period, the City and the CPD maintained Preliminary and Secondary compliance with ¶154.

To assess Preliminary compliance with ¶154, the IMT reviewed the CPD's Use of Force policies and *Foot Pursuits* policy to ensure they reflect best practices and delineate who is responsible for identifying best practices, and for maintaining Advanced Law Enforcement Accreditation from the Commission on Accreditation for Law Enforcement Agencies (CALEA) standards. Foot pursuits account for a significant portion of use of force incidents and, thus, relates to ¶154. The IMT also reviewed information from the CPD on policies it reviewed from other jurisdictions and assessed the CPD's efforts to actively engage the community and obtain feedback on its Use of Force policies and Foot Pursuit policy.

To assess Secondary compliance with ¶154, the IMT reviewed the CPD's Use of Force and Foot Pursuit training materials and records for updates related to improvements to maintain best practices and completion of training as it relates to the requirements of the Consent Decree.

To assess Full compliance with ¶154, the IMT is assessing ongoing efforts by the CPD to identify best practices (including person responsible and internal processes to adhere to best practices, and to make necessary updates per CALEA certification requirements).

The CPD achieved both Preliminary and Second compliance in the fourth reporting period. For Preliminary compliance, the CPD had issued its most recent Use of Force policies on December 31, 2020, which became effective April 15, 2021. In addition, the CPD had attained and maintained CALEA accreditation, indicating compliance with national policy standards, including for use of force. The CPD also issued a temporary foot pursuit policy on May 26, 2021. To evaluate Secondary

compliance, the IMT reviewed records indicating that 96% of CPD officers had completed the 2020 Use of Force training.

In the last reporting period, the CPD made notable progress with community input on policies relevant to ¶154, particularly for foot pursuits, First Amendment Rights, and use of force. Negotiations remained in progress with the Coalition for some use-of-force policies at the end of the last reporting period; the CPD had not issued final foot-pursuit and First Amendment Rights policies.

During this reporting period, the CPD continued to seek community input on these policies through a number of methods (e.g., deliberative dialogues, online feedback, webinars, and direct engagement). With exception of the Foot Pursuit policy (which is planned to be effective August 29, 2022, see ¶172 for more on this policy), these revised policies have yet to be finalized as of the close of the sixth reporting period.

For Full compliance, the IMT continues to monitor TRED findings of patterns and trends for the Department's application of best practices and identification of areas for additional improvement. The IMT also notes that the CPD's finalization and implementation of G01-03-01, *Community Engagement in Policy Development*, is also important to Full compliance with ¶154.

Moving forward, we will regularly review Preliminary compliance and discuss the Use of Force policies with the CPD to ensure the CPD maintains best practices and makes additional policy improvements consistent with the Consent Decree, including required community engagement. We will also continue to review Secondary compliance yearly, requiring the CPD to meet the aforementioned criteria for ¶154.

Paragraph 154 Compliance Progress History

FIRST REPORTING PERIOD	SECOND REPORTING PERIOD	THIRD REPORTING PERIOD
SEPTEMBER 1, 2019 – AUGUST 31, 2019	SEPTEMBER 1, 2019 – FEBRUARY 29, 2020	MARCH 1, 2020 – DECEMBER 31, 2020
COMPLIANCE PROGRESS:	COMPLIANCE PROGRESS:	COMPLIANCE PROGRESS:
Not Applicable	Not Applicable	Under Assessment
FOURTH REPORTING PERIOD	**FIFTH REPORTING PERIOD**	**SIXTH REPORTING PERIOD**
JANUARY 1, 2021 – JUNE 30, 2021	JULY 1, 2021 – DECEMBER 31, 2021	JANUARY 1, 2022 – JUNE 30, 2022
COMPLIANCE PROGRESS:	COMPLIANCE PROGRESS:	COMPLIANCE PROGRESS:
Secondary	Secondary	Secondary

Use of Force: ¶155

155. *CPD officers have the authority to use force, but that authority is limited by the law and Department policy. The provisions of this Agreement seek to facilitate compliance with the law and Department policy regarding the use of force to reduce the circumstances in which using force is necessary, and to ensure accountability when CPD officers use force that is not objectively reasonable, necessary, and proportional under the totality of the circumstances.*

Compliance Progress (Reporting Period: January 1, 2022, through June 30, 2022)

Preliminary:	***Under Assessment***
Secondary:	***Not in Compliance***
Full:	***Not in Compliance***

In the sixth reporting period, the City and the CPD remained under assessment for Preliminary Compliance with ¶155.

To assess Preliminary compliance with ¶155, the IMT reviewed the CPD's Use of Force policies and department protocols to ensure policies and systems meet the requirements of this paragraph.

The IMT began assessing compliance for ¶155 during this reporting period. The requirements of this paragraph are within CPD's current Use of Force policies. While the latest drafts of the revised policies have yet to be issued, the CPD has engaged community members and the Coalition (*see* ¶669) in various formats for input on these policies.

In reviewing TRED quarter and annual reports, and CPD's Use of Force dashboard, the CPD has had significant drop in submitted TRRs in recent years (see Appendix Figure 1).[3] TRRs decreased by 22 percent from 2020 to 2021. The CPD's focus on de-escalation in TRED reviews and debriefings, and in CPD training, may play a role in decreases.

[3] The IMT's review of TRR data reported by CPD revealed minor data discrepancies between CPD's Public Use of Force Dashboard and TRED reports. For the purposes of IMR-6, we are reporting data from the dashboard. The IMT plans to further examine and discuss these discrepancies with the CPD in the next reporting period.

Use of Force Appendix Figure 1: TRRs reported by the CPD[4]

	Reported TRRs
2019	4,989
2020	4,259
2021	3,316

In conclusion, the City and the CPD remain under assessment for Preliminary compliance with ¶155. For Preliminary compliance, the IMT will continue to monitor progress with finalization of the CPD Use of Force policies.

Paragraph 155 Compliance Progress History

FIRST REPORTING PERIOD
SEPTEMBER 1, 2019 – AUGUST 31, 2019
COMPLIANCE PROGRESS:
Not Applicable

SECOND REPORTING PERIOD
SEPTEMBER 1, 2019 – FEBRUARY 29, 2020
COMPLIANCE PROGRESS:
Not Applicable

THIRD REPORTING PERIOD
MARCH 1, 2020 – DECEMBER 31, 2020
COMPLIANCE PROGRESS:
Not Applicable

FOURTH REPORTING PERIOD
JANUARY 1, 2021 – JUNE 30, 2021
COMPLIANCE PROGRESS:
Not Applicable

FIFTH REPORTING PERIOD
JULY 1, 2021 – DECEMBER 31, 2021
COMPLIANCE PROGRESS:
Not Applicable

SIXTH REPORTING PERIOD
JANUARY 1, 2022 – JUNE 30, 2022
COMPLIANCE PROGRESS:
Under Assessment

[4] Use of Force Dashboard (2015-Present), CHICAGO POLICE DEPARTMENT, https://home.chicagopolice.org/statistics-data/data-dashboards/use-of-force-dashboard/.

Use of Force: ¶156

156. *CPD's use of force policies and training, supervision, and accountability systems will be designed, implemented, and maintained so that CPD members: a. act at all times in a manner consistent with the sanctity of human life; b. act at all times with a high degree of ethics, professionalism, and respect for the public; c. use de-escalation techniques to prevent or reduce the need for force whenever safe and feasible; d. use sound tactics to eliminate the need to use force or reduce the amount of force that is needed; e. only use force that is objectively reasonable, necessary, and proportional under the totality of the circumstances; f. only use force for a lawful purpose and not to punish or retaliate; g. continually assess the situation and modify the use of force as circumstances change and in ways that are consistent with officer safety, including stopping the use of force when it is no longer necessary; h. truthfully and completely report all reportable instances of force used; i. promptly report any use of force that is excessive or otherwise in violation of policy; j. are held accountable, consistent with complaint and disciplinary policies, for use of force that is not objectively reasonable, necessary, and proportional under the totality of the circumstances, or that otherwise violates law or policy; and k. act in a manner that promotes trust between CPD and the communities it serves.*

Compliance Progress

(Reporting Period: January 1, 2022, through June 31, 2022)

Preliminary:	***Under Assessment***
Secondary:	***Not in Compliance***
Full:	***Not Yet Assessed***

In the sixth reporting period, the City and the CPD remained under assessment for Preliminary Compliance with ¶156.

To assess Preliminary compliance with ¶156, the IMT reviewed the CPD's Use of Force policies to ensure policies and systems meet the requirements of this paragraph. Paragraph 156 addresses many sections of the Consent Decree, including short- and long-term efforts. The IMT also assessed the CPD's efforts to actively engage the community and obtain feedback on its Use of Force policies and Foot Pursuit policy.

In the last reporting period, the CPD remained under assessment with ¶156. While the City and the CPD had made significant compliance efforts with Use of Force policies and training since the start of the Consent Decree, related policies—including those related to training, supervision, and accountability systems—remained works in progress. In particular the CPD remained in dialogue with the UOF

working group and Coalition to finalize the updated Use of Force policies, in particular policies regarding Tasers, OC Spray, foot pursuits, and First Amendment Rights. The IMT believed the CPD's engagement in the prior reporting period was thoughtful and resulted in the CPD adjusting these policies, in some cases beyond what the Consent Decree requires. The CPD, however, needed to make additional progress related to ¶156(j). With exception of the Foot Pursuit policy (which went into effect after the close of the reporting period on August 29, 2022, see ¶172 for more on this policy), these revised policies have yet to be finalized as of the close of the sixth reporting period.

Related to Secondary compliance and training for ¶156, TRED quarterly reports in the prior reporting period for early 2021 showed a significant number of debriefing points for de-escalation, highlighting the continued need for and emphasis on de-escalation in-service training.

The CPD has made significant strides on its policies and trainings related to ¶156. However, we urge the CPD to pay additional attention to its Use of Force supervision and accountability requirements and systems, as noted in the last reporting period. These are critical to Secondary compliance with this paragraph. The CPD's Supervisory Dashboard, launched during this reporting period, provides the system for supervision and accountability if initiated properly. The CPD has expressed that the dashboard will provide front-line supervisors with important data concerning use of force for their subordinates, and that they are responsible for initiating and identifying training opportunities. However, front-line supervisors have done so rarely. While the CPD advised that it plans to include training on how to effectively use the Supervisor's dashboard in its in-service training, it has yet to provide the IMT with details on what the training will address, to include expectations and responsibilities for supervisors using the dashboard.

In conclusion, the City and the CPD remain under assessment for Preliminary compliance with ¶156. The IMT will continue to monitor progress with finalization of the CPD Use of Force policies and attention to Use of Force supervision and accountability requirements and systems.

Paragraph 153 Compliance Progress History

FIRST REPORTING PERIOD	SECOND REPORTING PERIOD	THIRD REPORTING PERIOD
SEPTEMBER 1, 2019 – AUGUST 31, 2019	SEPTEMBER 1, 2019 – FEBRUARY 29, 2020	MARCH 1, 2020 – DECEMBER 31, 2020
COMPLIANCE PROGRESS:	COMPLIANCE PROGRESS:	COMPLIANCE PROGRESS:
Not Applicable	Not Applicable	Under Assessment
FOURTH REPORTING PERIOD	**FIFTH REPORTING PERIOD**	**SIXTH REPORTING PERIOD**
JANUARY 1, 2021 – JUNE 30, 2021	JULY 1, 2021 – DECEMBER 31, 2021	JANUARY 1, 2022 – JUNE 30, 2022
COMPLIANCE PROGRESS:	COMPLIANCE PROGRESS:	COMPLIANCE PROGRESS:
Under Assessment	Under Assessment	Under Assessment

Use of Force: ¶157

157. *CPD will collect and analyze information on the use of force by CPD members, including whether and to what extent CPD members use de-escalation techniques in connection with use of force incidents. CPD will use this information to assess whether its policies, training, tactics, and practices meet the goals of this Agreement, reflect best practices, and prevent or reduce the need to use force.*

Compliance Progress

(Reporting Period: January 1, 2022, through June 31, 2022)

Preliminary:	***In Compliance*** **(FOURTH REPORTING PERIOD)**
Secondary:	***Not in Compliance***
Full:	***Not in Compliance***

In the sixth reporting period, the City and the CPD maintained Preliminary compliance with ¶157.

To assess Preliminary compliance with ¶157, the IMT reviewed the CPD's Use of Force policies and revisions to the TRR, TRR-R, and TRR-I forms to see if they are designed to capture de-escalation and other data in an extractable format.

To assess Secondary compliance with ¶157, the IMT is reviewing the CPD's Use of Force training materials and records, focusing on training specific to de-escalation and force-mitigation techniques, and related to reporting use of these techniques in TRRs.

The CPD achieved Preliminary compliance in the fourth reporting period, following the IMT's review of data collected by the CPD, and specifically, TRED. The CPD had created a Use of Force Dashboard that allows for public accessibility of information contained in TRRs. TRED updated the TRR and the TRR-R to allow for tracking and identifying officers' use of de-escalation tactics, as well as produced guides that provide guidance for officers about how to document de-escalation appropriately. In the prior reporting periods, TRED showed a continued focus on de-escalation reporting. However, according to TRED reports, this was one of the top TRR reporting issues. Thus, the IMT expressed that the CPD must continue to focus on front-line supervisors taking the lead on enforcing de-escalation actions and reporting, in order to meet Secondary compliance.[5]

[5] In their comments on an earlier draft of this report, the City and the CPD state that "dashboards and TRED reviews are operational measures." With respect to the requirements of this paragraph, however, dashboards and TRED reviews form the infrastructure needed for front-line supervisors to "analyze the use of force by CPD members" and make use of that information to provide their reports with timely guidance regarding de-escalation techniques and reporting the use of those techniques in TRRs.

In this reporting period, the CPD continued to engage in a number of initiatives regarding de-escalation and use of force, to include its De-Escalation dashboard and TRED reviews.

On May 31, 2022, the IMT participated in a virtual site visit to preview the CPD's De-Escalation dashboard. The dashboard shows both 'Person's Actions' as well as 'Force Mitigation Efforts' as they pertain to de-escalation activities. On June 23, 2022, the CPD shared the dashboard with the IMT and OAG. The dashboard is current published internally, and the CPD intends to make it available to the public in the future. The IMT appreciates the CPD's efforts to develop this dashboard and awaits further training on the dashboard for CPD members.

In addition, TRED continues to review TRRs, with a focus on de-escalation. In TRED's *2021 Year-End Report*, in 2021 TRED recommendations included 464 debriefing points for not articulating de-escalation, as well as other de-escalation/force mitigation debriefings related to communication (10), position/distancing (7), and time (1). While there was a 3.2% decrease in this debriefing point from 2020 to 2021, this remained the most frequent debriefing point in 2021.[6]

In 2022, CPD's Audit Division plans to conduct a review of TRED's debriefing procedures. The IMT awaits the audit's findings, specifically related to debriefings on issues such as de-escalation. The IMT also looks forward to more information regarding CPD's de-escalation certification roll-out plan, which the Department noted to the IMT in this reporting period would be forthcoming.

In sum, the City and the CPD continue to make notable progress towards Secondary compliance by continuing to emphasize de-escalation. As noted, de-escalation needs to be a priority identified at district and unit level by front-line supervisors. The De-escalation dashboard, Supervisory dashboard, and audit findings will hopefully provide further tools to enhance those efforts. The CPD must focus on training at the district level on the new dashboards, including instruction for how to use them and guidance on expectations of their use. Moving forward, the IMT looks to assess Secondary and Full compliance with ¶157.

Paragraph 157 Compliance Progress History

FIRST REPORTING PERIOD	SECOND REPORTING PERIOD	THIRD REPORTING PERIOD
SEPTEMBER 1, 2019 – AUGUST 31, 2019	SEPTEMBER 1, 2019 – FEBRUARY 29, 2020	MARCH 1, 2020 – DECEMBER 31, 2020
COMPLIANCE PROGRESS:	COMPLIANCE PROGRESS:	COMPLIANCE PROGRESS:
Not Applicable	Not Applicable	Not Applicable
FOURTH REPORTING PERIOD	**FIFTH REPORTING PERIOD**	**SIXTH REPORTING PERIOD**
JANUARY 1, 2021 – JUNE 30, 2021	JULY 1, 2021 – DECEMBER 31, 2021	JANUARY 1, 2022 – JUNE 30, 2022
COMPLIANCE PROGRESS:	COMPLIANCE PROGRESS:	COMPLIANCE PROGRESS:
Preliminary	Preliminary	Preliminary

[6] TRED's *2021 Year-End Report*, CHICAGO POLICE DEPARTMENT (APRIL 29, 2022), https://home.chicagopolice.org/wp-content/uploads/2021-YEAR-END-REPORT.pdf.

Use of Force: ¶158

158. *CPD's use of force policies must comply with applicable law and this Agreement, reflect the objectives described above, and promote trust between CPD and the communities that it serves.*

Compliance Progress (Reporting Period: January 1, 2022, through June 31, 2022)

Preliminary:	***In Compliance*** **(FOURTH REPORTING PERIOD)**
Secondary:	***Under Assessment***
Full:	***Not Yet Assessed***

In the sixth reporting period, the City and the CPD maintained Preliminary compliance and is under assessment for Secondary compliance with ¶158.

To assess Preliminary compliance with ¶158, the IMT reviewed the CPD's Use of Force policies, related to community engagement, and plans and efforts by the CPD to address suggestions from the community.

To assess Secondary compliance with ¶158, the IMT is reviewing the CPD's Use of Force training materials and records, focusing on whether training complies with applicable law and the Consent Decree, promotes use of force behavior that promotes trust with the community, and how training reflects input/changes from community feedback.

The CPD achieved Preliminary compliance with ¶158 in the fourth reporting period following revisions to the Use of Force policing as a result of feedback and recommendations from the IMT and the OAG. The CPD has also sought community input in the Use of Force policies, Foot Pursuit policy, and First Amendment Rights policy in the prior reporting periods.

In particular, during the fifth and throughout this reporting period, the CPD engaged in numerous dialogues with the Coalition on these policies, as well as solicited input from community members through webinars, deliberative dialogues, and online. To continuously monitor Preliminary compliance, the IMT observed these engagements and reviewed reactions by the community. During this reporting period, the CPD was responsive to some community concerns regarding these policies (e.g., the use of the term "high crime area" in the Foot Pursuit policy). Parts of the Use of Force policy suite (Tasers and OC Spray) have yet to be finalized and issued, and the Foot Pursuit policies is to become effective in the next reporting period on August 29, 2022.

Building trust with the community is incremental and the IMT believes the CPD must have a plan and process regarding community engagement in its use of force policies that meets both the needs of the CPD and the community. The CPD has

begun to make strides in establishing such processes to continue to promote community trust. In this reporting period, the IMT also reviewed draft General Order G01-03-01, *Community Engagement in Policy Development*, and began supporting the CPD in developing a community engagement plan in response to its request for technical assistance. The IMT awaits community input on and finalization of this policy.

Further, there have been a number of recent changes to Illinois criminal law. The IMT reviewed these changes and CPD's policies, and most have already been incorporated (e.g., regarding chokeholds, duty to intervene, or penalties for knowing failures to record body-worn camera footage). However, some laws are not fully covered in the current policy, in particular provisions regarding rendering of aid are not reflected in the Baton and Taser policies.

In the prior reporting period and this reporting period, the IMT also assessed Secondary compliance with ¶158 by reviewing the CPD's *2021 De-Escalation, Response to Resistance, and Use of Force* in-service training. The CPD provided records to show that as of February 18, 2022, more than 95% of officers received the two-day *2021 De-Escalation, Response to Resistance, and Use of Force* in-service training, with 96.71% of participants completing the *Communications* eight-hour course and 96.86% completing the *Procedures* eight-hour course.[7] However, as we indicated in the prior reporting period, the requirements of ¶158 are not limited to the CPD's annual Use of Force in-service training. Moreover, at the end of the reporting period, the CPD was still developing revisions to key policies, including those related to Tasers, Batons, and OC Spray.

Moving forward, the IMT will continue to monitor the CPD's efforts to build trust with the community it serves through its community engagement plan and community engagement policy, particularly regarding its Use of Force policies. Additionally, in the next reporting period, the IMT will continue to review Secondary and Full compliance with ¶158 to include reviewing examples of the new policy in practice.

Paragraph 158 Compliance Progress History

FIRST REPORTING PERIOD	SECOND REPORTING PERIOD	THIRD REPORTING PERIOD
SEPTEMBER 1, 2019 – AUGUST 31, 2019	SEPTEMBER 1, 2019 – FEBRUARY 29, 2020	MARCH 1, 2020 – DECEMBER 31, 2020
COMPLIANCE PROGRESS:	COMPLIANCE PROGRESS:	COMPLIANCE PROGRESS:
Not Applicable	Not Applicable	Under Assessment
FOURTH REPORTING PERIOD	**FIFTH REPORTING PERIOD**	**SIXTH REPORTING PERIOD**
JANUARY 1, 2021 – JUNE 30, 2021	JULY 1, 2021 – DECEMBER 31, 2021	JANUARY 1, 2022 – JUNE 30, 2022
COMPLIANCE PROGRESS:	COMPLIANCE PROGRESS:	COMPLIANCE PROGRESS:
Preliminary	Preliminary	Preliminary

[7] Because of the COVID-19 extension, the CPD had until March 5, 2022, to complete the delivery of its 2021 in-service training.

Use of Force: ¶159

159. *CPD will conduct an annual review of its use of force policies consistent with accreditation requirements of the Commission on Accreditation for Law Enforcement Agencies ("CALEA"). In addition, every two years, CPD will conduct a comprehensive review of its use of force policies to assess whether CPD's use of force policies meet the requirements of this Agreement, incorporate best practices, address observed trends and practices, as necessary, and reflect developments in applicable law.*

Compliance Progress

(Reporting Period: January 1, 2022, through June 31, 2022)

Recurring Schedule:	Annual	✓	**Not Yet Applicable**
Recurring Schedule:	Every Two Years	✓	**Not Yet Applicable**

Preliminary:	***In Compliance*** **(FOURTH REPORTING PERIOD)**
Secondary:	***Under Assessment***
Full:	***Not in Compliance***

In the sixth reporting period, the City and the CPD maintained Preliminary compliance and is under assessment for Secondary compliance with ¶159.

To assess Preliminary compliance with ¶159, the IMT reviewed the CPD's policies and standard operating procedures (SOPs) related to completion of CALEA accreditation. We also reviewed the data sources/elements that are to be assessed during the comprehensive Use of Force policy review.

To assess Secondary compliance with ¶159, the IMT is reviewing the CALEA and CPD reports and training sources to assess whether training requirements are detailed, with attention to de-escalation efforts and the CPD's training adjustments based on findings of use of force patterns and reviews. We are also reviewing drafts of the CPD's annual Use of Force report, and will also review the forthcoming comprehensive review upon its completion by the CPD.

In the fourth reporting period, the CPD achieved Preliminary compliance with ¶159 through its annual review for maintaining its Advanced Law Enforcement Accreditation through the CALEA. During the fourth reporting period, the IMT and OAG discussed and reviewed CPD's plans for its annual Use of Force report, which is intended to fulfill the bi-annual comprehensive review and CALEA compliance requirements of ¶159 moving forward.

In the last and this reporting period, the IMT continued assessing Secondary compliance to determine whether training requirements related to ¶159 are detailed, with attention to de-escalation and adjustments in training based on the findings

of CPD's biannual comprehensive review of its Use of Force policies. The CPD has yet to complete a comprehensive review of its use of force policies to assess whether they meet the requirements of the Consent Decree, incorporate best practices, address observed trends and practices, as necessary, and reflect developments in applicable law. The IMT continues to await the CPD's completion of this review, which is necessary for Secondary compliance.

Further, as described in ¶158, the State of Illinois recently made changes to its laws, which per ¶159 must be reflected in CPD's use of force policies. Most changes, except for provisions regarding rendering aid, are appropriately addressed in CPD policy.

Finally, per ¶159, the CPD needs to clearly demonstrate its compliance with CALEA standards annually, which it has yet to do for 2022.

In conclusion, the City and CPD maintained Preliminary compliance with ¶159 this reporting period and are under assessment for Secondary compliance as it is developing its first annual comprehensive Use of Force review and demonstrates CALEA compliance for 2022.

Paragraph 159 Compliance Progress History

FIRST REPORTING PERIOD	SECOND REPORTING PERIOD	THIRD REPORTING PERIOD
SEPTEMBER 1, 2019 – AUGUST 31, 2019	SEPTEMBER 1, 2019 – FEBRUARY 29, 2020	MARCH 1, 2020 – DECEMBER 31, 2020
COMPLIANCE PROGRESS:	COMPLIANCE PROGRESS:	COMPLIANCE PROGRESS:
Not Applicable	Not Applicable	Under Assessment

FOURTH REPORTING PERIOD	FIFTH REPORTING PERIOD	SIXTH REPORTING PERIOD
JANUARY 1, 2021 – JUNE 30, 2021	JULY 1, 2021 – DECEMBER 31, 2021	JANUARY 1, 2022 – JUNE 30, 2022
COMPLIANCE PROGRESS:	COMPLIANCE PROGRESS:	COMPLIANCE PROGRESS:
Preliminary	Preliminary	Preliminary

Use of Force: ¶160

160. *CPD will establish and maintain clear channels through which community members can provide input regarding CPD's use of force policies and propose revisions or additions to those policies. CPD will regularly review the input received, including during the biennial review process.*

Compliance Progress (Reporting Period: January 1, 2022, through June 31, 2022)

Preliminary:	***Under Assessment***
Secondary:	***Not in Compliance***
Full:	***Not in Compliance***

In the sixth reporting period, the City and the CPD made progress toward Preliminary compliance but remain under assessment for the requirements of ¶160.

To evaluate Preliminary compliance, we are reviewing the CPD's community engagement efforts related to its Use of Force policies, including its new foot pursuit policy. In assessing community engagement, we examine (1) outreach; (2) meetings and interactions and problem-solving and decision making; (3) follow-up and sustainability of partnerships, trust, community policing, and problem-solving activities; and (4) general police-community interactions regardless of context.

Since the Consent Decree took effect, the CPD has been in continuous discussion with the IMT, the OAG, and the community about its Use of Force policies. As we detailed in our prior three reports, the CPD began consulting with the Use of Force Working Group in June 2020 and while the IMT thought the CPD's community engagement efforts with the Use of Force Working Group in 2020 were inadequate, the processes and engagement improved in the past two reporting periods. There were to be some substantive changes as a result of discussions between the CPD and Working Group, but those changes were not all reflected in policy and training at the close of the last reporting period. At the end of the fourth reporting period and into the prior reporting period, the CPD also sought community feedback on its draft Foot Pursuit policy through a variety of formats (e.g., public comment via the CPD website, webinars, and deliberative dialogues). The IMT also observed discussions with the Coalition concerning the First Amendment Rights policy. Relatedly, the IMT offered extensive feedback to the CPD with its plans to pilot a community contact survey (My90).

Additionally, during the prior reporting period, on December 31, 2021, the IMT and OAG received General Order G01-03-01, *Community Engagement in Policy Development*, for review. This draft policy establishes a process for how and when the CPD engages the community in policy development and further provides a

point system for the level of engagement. The IMT provided feedback on this policy on February 3, 2022, and the OAG provided feedback on March 9, 2022. The IMT highlighted the need to offer community members early involvement in policy development and recommended including guidance on outreach strategies and participant selection processes to improve engagement with groups that have the most interactions with the police. Specifically related to ¶160, the IMT suggested including more detail regarding engagement types required by this paragraph (clear community input channels) and others. The CPD provided the IMT and OAG with an updated version of this policy at the close of the reporting period on June 30, 2022. The CPD's revised policy is thoughtful and recognizes not only the need to engage the community up front in policy development, but to include consistent follow-up on the community's suggestions. It also recognizes that there is not one single way to approach engagement; it is a multi-prong approach. The policy offers 10 different engagement methods, such as advisory committees, anonymous surveys, focus groups, public comment, working groups, and more.

In conclusion, the City and CPD remain under Preliminary assessment with ¶160. The IMT appreciates the CPD's continued engagement and commitment to working with the community on its Use of Force policies and its policy on community engagement in policy development. However, the IMT awaits community feedback on G01-03-01 to determine whether the City and the CPD have achieved Preliminary compliance.

Paragraph 160 Compliance Progress History

FIRST REPORTING PERIOD	SECOND REPORTING PERIOD	THIRD REPORTING PERIOD
SEPTEMBER 1, 2019 – AUGUST 31, 2019	SEPTEMBER 1, 2019 – FEBRUARY 29, 2020	MARCH 1, 2020 – DECEMBER 31, 2020
COMPLIANCE PROGRESS:	COMPLIANCE PROGRESS:	COMPLIANCE PROGRESS:
None	None	None
FOURTH REPORTING PERIOD	**FIFTH REPORTING PERIOD**	**SIXTH REPORTING PERIOD**
JANUARY 1, 2021 – JUNE 30, 2021	JULY 1, 2021 – DECEMBER 31, 2021	JANUARY 1, 2022 – JUNE 30, 2022
COMPLIANCE PROGRESS:	COMPLIANCE PROGRESS:	COMPLIANCE PROGRESS:
None	Under Assessment	Under Assessment

Use of Force: ¶161

161. *CPD recently adopted de-escalation as a core principle. CPD officers must use de-escalation techniques to prevent or reduce the need for force whenever safe and feasible. CPD officers are required to de-escalate potential and ongoing use of force incidents whenever safe and feasible through the use of techniques that may include, but are not limited to, the following: a. using time as a tactic by slowing down the pace of an incident; b. employing tactical positioning and re-positioning to isolate and contain a subject, to create distance between an officer and a potential threat, or to utilize barriers or cover; c. continual communication, including exercising persuasion and advice, and providing a warning prior to the use of force; d. requesting assistance from other officers, mental health personnel, or specialized units, as necessary and appropriate; and e. where appropriate, use trauma-informed communication techniques, including acknowledging confusion or mistrust, or using a respectful tone.*

Compliance Progress

(Reporting Period: January 1, 2022, through June 31, 2022)

Preliminary:	***In Compliance*** **(FOURTH REPORTING PERIOD)**
Secondary:	***In Compliance*** **(NEW)**
Full:	***Not Yet Assessed***

In the sixth reporting period, the City and the CPD maintained Preliminary compliance with ¶161.

To assess Preliminary compliance with ¶161, the IMT reviewed the CPD's Use of Force policies and TRR forms to ensure they address de-escalation requirements and reporting. The IMT also assessed the CPD's efforts to actively engage the community and obtain feedback on its Use of Force policies.

To assess Secondary compliance with ¶161, the IMT reviewed the CPD's training materials and records, specific to de-escalation/force mitigation techniques, related to reporting use of these techniques in TRRS, and revisions/updates in policy.

To assess Full compliance with ¶161, the IMT will review TRED reports, TRRs, video footage, and CPD dashboards, as well as conducting interviews with CPD personnel, to determine whether the CPD has sufficiently implemented its policy and training related to de-escalation. The IMT is examining data and information on trends and patterns in de-escalation, and subsequent corrective actions taken by the CPD.

In the fourth reporting period, the IMT continued to review the CPD's Use of Force policies and community engagement efforts related to ¶161's requirements. The CPD engaged with the Use of Force Working Group on de-escalation, which resulted in policy changes. The CPD also revised its TRR and TRR-Review (TRR-R) forms to gather more information on de-escalation. Through these efforts the CPD reached Preliminary compliance with ¶161.

For Secondary compliance, in prior reporting periods we reviewed and determined that the 2020 annual Use of Force in-service training, and *2021 De-Escalation, Response to Resistance, and Use of Force* in-service training, include information on force mitigation principles and de-escalation principles, with an emphasis on documenting these actions in the TRR forms. The CPD provided records to show that as of February 18, 2022, more than 95% of officers received the two-day *2021 De-Escalation, Response to Resistance, and Use of Force* in-service training, with 96.71% of participants completing the *Communications* eight-hour course and 96.86% completing the *Procedures* eight-hour course.[8]

Additionally for Secondary compliance, during this reporting period, the IMT assessed whether appropriate processes are in place for the CPD to provide feedback to Department members on de-escalation behavior. TRED has continued to focus on de-escalation and has been responsive to the IMT's feedback regarding continuous feedback. TRED is revising the TRR, TRR-I, TRR-R forms to ensure they capture all necessary debriefing points and has created a process to document the actions taken by local districts/units on de-debriefings. Additionally, the CPD has created the Supervisor's Use of Force and De-escalation dashboards (see ¶153 for more on these dashboards) to allow districts to identify patterns and trends in de-escalation at a local level. While the CPD has not yet provided the revised forms for our review, and we have indicated that training is needed on the Supervisor's dashboard, the CPD has achieved Secondary compliance with ¶161.

For Full compliance with ¶161, the IMT has regularly monitored de-escalation in action, examining how updated policies and training in this paragraph are impacting the actions of Department members. Specifically, we have reviewed reports produced by TRED in 2020 and 2021. TRED continues to place emphasis on members fully articulating de-escalation tactics in the narrative of the TRR. According to TRED's *2021 Year-End Report*, not articulating de-escalation tactics resulted in 464 debriefing points. This accounted for the most frequently addressed debriefing point (26.7%). There was a slight decrease in in this debriefing point from 2020 to 2021 (3.2%).[9] While debriefings following TRED review are important, the IMT

[8] Because of the COVID-19 extension, the CPD had until March 5, 2022, to complete the delivery of its 2021 in-service training.

[9] TRED's *2021 Year-End Report*, CHICAGO POLICE DEPARTMENT (APRIL 29, 2022), https://home.chicagopolice.org/wp-content/uploads/2021-YEAR-END-REPORT.pdf.

believes that debriefings are most effective when conducted shortly after the incident and by district/unit supervisors. The IMT has concerns about the effectiveness of debriefings conducted by supervisors who failed to identify the training need in the first place. For continual and comprehensive assessment of Full compliance, the IMT awaits the results of the CPD Audit Division's review of TRED's debriefing procedures, as well as further training on and use of the Supervisor's and De-escalation dashboards.

In conclusion, the CPD and the City achieved Preliminary and Secondary compliance with ¶161. Looking forward, the IMT will continue to assess Full compliance, which will depend on completion of supervisory training, and an examination of whether the processes currently in place have the desired impact and if the CPD has made it clear to their supervisors the expectations for de-escalation behaviors of their staff. The utilization of the Supervisory and De-escalation dashboards by front-line supervisors is critical.

Paragraph 161 Compliance Progress History

FIRST REPORTING PERIOD	SECOND REPORTING PERIOD	THIRD REPORTING PERIOD
SEPTEMBER 1, 2019 – AUGUST 31, 2019	SEPTEMBER 1, 2019 – FEBRUARY 29, 2020	MARCH 1, 2020 – DECEMBER 31, 2020
COMPLIANCE PROGRESS:	COMPLIANCE PROGRESS:	COMPLIANCE PROGRESS:
None	None	Under Assessment
FOURTH REPORTING PERIOD	**FIFTH REPORTING PERIOD**	**SIXTH REPORTING PERIOD**
JANUARY 1, 2021 – JUNE 30, 2021	JULY 1, 2021 – DECEMBER 31, 2021	JANUARY 1, 2022 – JUNE 30, 2022
COMPLIANCE PROGRESS:	COMPLIANCE PROGRESS:	COMPLIANCE PROGRESS:
Preliminary	Preliminary	Secondary

Use of Force: ¶162

162. *Consistent with CPD's commitment to preventing and reducing the need for force, CPD officers will allow individuals to voluntarily comply with lawful orders whenever safe and feasible (e.g., allowing individuals the opportunity to submit to arrest before force is used).*

Compliance Progress

(Reporting Period: January 1, 2022, through June 31, 2022)

Preliminary:	***In Compliance*** **(FOURTH REPORTING PERIOD)**
Secondary:	***Under Assessment***
Full:	***Not Yet Assessed***

In the sixth reporting period, the City and the CPD maintained Preliminary compliance with ¶162.

To assess Preliminary compliance with ¶162, the IMT reviewed the CPD's Use of Force policies and community engagement efforts related to Consent Decree requirements.

To assess Secondary compliance with ¶162, the IMT is reviewing training sources and records to determine whether the CPD has sufficiently trained on its Use of Force and First Amendment Rights policies, to include prior and current training related to handling protests and civil unrest.

In prior monitoring reports, the IMT reviewed CPD Use of Force policies which describe the requirements of ¶162, including requiring de-escalation when safe and feasible. We also noted concerns about CPD actions during the protests of 2020 related to officers allowing individuals to voluntarily comply with lawful orders. The CPD addressed related reporting requirements in its updated Department Notice D20-08, *Reporting the Response to Crowds, Protests, and Civil Disturbances* (effective November 20, 2020) and requisite forms. The CPD achieved Preliminary compliance due to these policies in the fourth reporting period. During 2021, the CPD worked with the IMT, OAG, Coalition, and the Court to draft and revise General Order G02-02, *First Amendment Rights*. The CPD also sought public comment on the policy from April 28, 2022, to May 13, 2022. The CPD finalized internally G02-02 on June 30, 2022, incorporating input from public comments, but has put publishing of the policy on hold for training. Additionally, the CPD developed forms to document force and all efforts to have protestors voluntarily comply with directives to ensure proper documentation of the same.

For Secondary compliance, the CPD provided training related to the daily application of ¶162 in its *2021 De-Escalation, Response to Resistance, and Use of Force* in-service training. The CPD provided records to show that as of February 18, 2022,

more than 95% of officers received the two-day *2021 De-Escalation, Response to Resistance, and Use of Force* in-service training, with 96.71% of participants completing the *Communications* eight-hour course and 96.86% completing the *Procedures* eight-hour course.[10]

Specific to application of ¶162 to response to protest, the CPD has previously delivered protest training to specialized units as they are most likely to be deployed first to respond to protests. However as noted in the last reporting period, given the problems the CPD encountered in 2020, the IMT continues to believe additional training on the updated policy and corresponding forms is necessary for all officers regarding protests. In the CPD 2021 Training plan, they describe the First Amendment eLearning which will address this need.

The IMT has been monitoring how updated policies and training related to this paragraph are impacting the actions of CPD officers, in an effort to assess Full compliance with ¶162. There has been a steady reduction in TRRs over the last three years, which may be attributable to a number of factors (see Figure 1 in ¶155). The CPD's emphasis on de-escalation could be a cause, but the CPD has not conducted any evaluation, produced any evidence, or analyzed any data to explain the reduction.

In conclusion, the City and the CPD maintained Preliminary compliance and are under assessment for Secondary compliance with ¶162. Moving forward, the IMT will continue to assess the CPD's progress with publication and department-wide training on its First Amendment Policy for protests and reporting, which will be necessary for Secondary compliance.

Paragraph 162 Compliance Progress History

FIRST REPORTING PERIOD SEPTEMBER 1, 2019 – AUGUST 31, 2019 COMPLIANCE PROGRESS: Not Applicable	SECOND REPORTING PERIOD SEPTEMBER 1, 2019 – FEBRUARY 29, 2020 COMPLIANCE PROGRESS: None	THIRD REPORTING PERIOD MARCH 1, 2020 – DECEMBER 31, 2020 COMPLIANCE PROGRESS: Under Assessment
FOURTH REPORTING PERIOD JANUARY 1, 2021 – JUNE 30, 2021 COMPLIANCE PROGRESS: Preliminary	FIFTH REPORTING PERIOD JULY 1, 2021 – DECEMBER 31, 2021 COMPLIANCE PROGRESS: Preliminary	SIXTH REPORTING PERIOD JANUARY 1, 2022 – JUNE 30, 2022 COMPLIANCE PROGRESS: Preliminary

[10] Because of the COVID-19 extension, the CPD had until March 5, 2022, to complete the delivery of its 2021 in-service training.

Use of Force: ¶163

163. *CPD officers may only use force for a lawful purpose. CPD officers are prohibited from using force as punishment or retaliation, such as using force to punish or retaliate against a person for fleeing, resisting arrest, insulting an officer, or engaging in protected First Amendment activity (e.g., lawful demonstrations, protected speech, observing or filming police activity, or criticizing an officer or the officer's conduct).*

Compliance Progress

(Reporting Period: January 1, 2022, through June 31, 2022)

Preliminary:	***Under Assessment***
Secondary:	***Not in Compliance***
Full:	***Not in Compliance***

In the sixth reporting period, the City and the CPD made progress toward, but remain under assessment for, Preliminary compliance with ¶163.

To assess Preliminary compliance with ¶163, the IMT is reviewing the CPD policies and procedures related to handling demonstrations. Related policies include the CPD's Use of Force policies, First Amendment policy, and *Foot Pursuits* policy. The IMT is also assessing the CPD's efforts to actively engage the community and obtain feedback on these policies.

In prior reporting periods, the IMT determined that G03-02, *De-escalation, Response to Resistance, and Use of Force*, issued on December 31, 2020, addresses ¶163 in Section III.B.5, which prohibits using force as punishment, retaliation, or in response to the lawful exercise of First Amendment rights. The CPD also issued forms and directives to assist in the proper documentation of various aspects of the Consent Decree, including the Use of Force section.

The IMT also discussed criticism of the CPD using force for retaliation and, more specifically, in response to the lawful exercise of First Amendment rights during protests in 2020. We noted the shortcomings in prior CPD policies related to retaliation during protests, which the CPD has addressed in its Use of Force policies, effective April 15, 2021, and Department Notice D20-08, *Reporting the Response to Crowds, Protests, and Civil Disturbances*, effective November 2, 2020. During 2021, the CPD worked with the IMT, OAG, Coalition, and the Court to draft and revise General Order G02-02, *First Amendment Rights*. The CPD also sought public comment on the policy from April 28, 2022, to May 13, 2022. The CPD finalized internally G02-02 on June 30, 2022, incorporating input from public comments, but has put publishing of the policy on hold for training.

On May 26, 2021, the CPD issued a temporary policy G03-07, *Foot Pursuits*, which became effective June 11, 2021. In the prior reporting period, the CPD engaged in dialogue with the IMT, OAG, Court, community, and other stakeholders to revise the foot pursuit policy. On June 30, 2022, the CPD advised all Department members that its revised Foot Pursuit policy would become effective on August 29, 2022 and replace the interim policy. See ¶172 for more detail on the development of the foot pursuit policy.

For Secondary compliance, the IMT reviewed the 2021 in-service training, which instructs on the prohibition against retaliation, and the 2022 In-service Supervisory Training curriculum, which provides good instruction on how supervisors should address retaliation. The CPD provided records to show that as of February 18, 2022, more than 95% of officers received the two-day *2021 De-Escalation, Response to Resistance, and Use of Force* in-service training, with 96.71% of participants completing the *Communications* eight-hour course and 96.86% completing the *Procedures* eight-hour course.[11]

Additionally, CPD reported in its Annual Training Report for 2021 that 3,728 members received an 8-hour Crowd Control and Behavior Refresher/Field Force Operations course. This refresher course is described as follows:

> 4 hours of classroom instruction and 4 hours of practical exercises to prepare Department members for Mobile Field Force Deployment. The classroom portion includes a review of protections afforded under the U.S. Constitution during a civil action/disorder, use of force considerations, individual roles within protest groups and demonstrator tactics, and lessons learned from past civil actions/disorders. The practical crowd-control exercises include commands and signals associated with crowd control formations, movements within a formation, different types of formations, and donning/doffing of a respirator and emergency masking techniques.

It is important that the CPD issue the First Amendment Rights and Foot Pursuits policies to ensure proper training on policy changes as soon as possible. In particular, the Foot Pursuits policy will require a significant training commitment, which the CPD described in this reporting period will last well into the seventh reporting period.

In conclusion, the City and the CPD remain under assessment for Preliminary compliance with ¶163. Moving forward, we will continue to assess the CPD's progress with compliance, awaiting the foot pursuit and First Amendment rights policies to

[11] Because of the COVID-19 extension, the CPD had until March 5, 2022, to complete the delivery of its 2021 in-service training.

become effective and whether adequate training is provided relating to the prohibition of force as punishment, retaliation, or in response to the lawful exercise of First Amendment rights, with special attention to responses to protests. Further, moving forward for Full compliance, the IMT will review data and information related to disciplinary outcomes as they relate to the 2020 protests or foot pursuits (e.g., did COPA issue a summary report or has COPA issued recommendations for foot-pursuits cases).

Paragraph 163 Compliance Progress History

FIRST REPORTING PERIOD	SECOND REPORTING PERIOD	THIRD REPORTING PERIOD
SEPTEMBER 1, 2019 – AUGUST 31, 2019	SEPTEMBER 1, 2019 – FEBRUARY 29, 2020	MARCH 1, 2020 – DECEMBER 31, 2020
COMPLIANCE PROGRESS:	COMPLIANCE PROGRESS:	COMPLIANCE PROGRESS:
Not Applicable	None	Under Assessment
FOURTH REPORTING PERIOD	**FIFTH REPORTING PERIOD**	**SIXTH REPORTING PERIOD**
JANUARY 1, 2021 – JUNE 30, 2021	JULY 1, 2021 – DECEMBER 31, 2021	JANUARY 1, 2022 – JUNE 30, 2022
COMPLIANCE PROGRESS:	COMPLIANCE PROGRESS:	COMPLIANCE PROGRESS:
Under Assessment	Under Assessment	Under Assessment

Use of Force: ¶164

164. *CPD officers must only use force when it is objectively reasonable, necessary, and proportional under the totality of the circumstances.*

Compliance Progress

(Reporting Period: January 1, 2022, through June 31, 2022)

Preliminary:	***In Compliance*** **(FOURTH REPORTING PERIOD)**
Secondary:	***In Compliance*** **(FOURTH REPORTING PERIOD)**
Full:	***Not in Compliance***

In the fifth reporting period, the City and the CPD remained in Preliminary and Secondary compliance with ¶164.

To assess Preliminary compliance with ¶164, the IMT reviewed the CPD's Use of Force policies and community engagement efforts related to Consent Decree requirements. To assess Secondary compliance with ¶164, the IMT reviewed the CPD's in-service *2021* and *2022 De-Escalation, Response to Resistance, and Use of Force* in-service training materials and records to determine whether the CPD has sufficiently trained its officers on its use-of-force policies.

To assess Full compliance, the IMT is reviewing CPD reports, the CPD's use of force dashboard, COPA findings, and legal settlements and judgements, as well as conducting interviews with CPD officers to determine whether the CPD has sufficiently implemented its policy and training related to ¶164.

In prior reporting periods, the CPD achieved Preliminary compliance with ¶164, following the CPD's continued discussions with the Use of Force Working Group and issuance of revised Use of Force policies on December 31, 2020, which went into effect on April 15, 2021. Additionally, the 2020 in-service training covered the conditions when force may be utilized, and as a result, the CPD reached Secondary compliance. The IMT noted at the close of the prior two reporting periods that to maintain Preliminary compliance, the City and the CPD must continue to review and revise its Use of Force policies, including establishing and maintaining clear channels for community input. To maintain Secondary compliance, the City and the CPD must, as appropriate, develop, revise, and provide corresponding training.

During this reporting period, the IMT continued to monitor Preliminary and Secondary compliance with ¶164.

To assess Full compliance, the IMT is reviewing whether the CPD has sufficiently implemented its policy and training related to ¶164. During this reporting period, the IMT review data from TRED indicating that the number of TRRs continues to

decrease yearly, with a significant decline by 22% from 2020 (4,262) to 2021 (3,324).[12]

The IMT also continues to review the CPD's Use of Force Dashboard, paying attention to incidents where force was used and found not to be in compliance with CPD policy, and COPA's data regarding complaints of excessive force.

In conclusion, the City and the CPD remain in Preliminary and Secondary compliance with ¶164. Moving forward, to maintain Preliminary compliance, the City and the CPD must continue to review and revise its Use of Force policies, including establishing and maintaining clear channels for community input. To maintain Secondary compliance, the City and the CPD must, as appropriate, develop, revise, and provide corresponding training. For Full compliance, the IMT will continue to review the CPD's and COPA's data regarding use of force, including how the two datasets compare.

Paragraph 164 Compliance Progress History

FIRST REPORTING PERIOD	SECOND REPORTING PERIOD	THIRD REPORTING PERIOD
SEPTEMBER 1, 2019 – AUGUST 31, 2019	SEPTEMBER 1, 2019 – FEBRUARY 29, 2020	MARCH 1, 2020 – DECEMBER 31, 2020
COMPLIANCE PROGRESS: None	COMPLIANCE PROGRESS: Preliminary	COMPLIANCE PROGRESS: Under Assessment
FOURTH REPORTING PERIOD	**FIFTH REPORTING PERIOD**	**SIXTH REPORTING PERIOD**
JANUARY 1, 2021 – JUNE 30, 2021	JULY 1, 2021 – DECEMBER 31, 2021	JANUARY 1, 2022 – JUNE 30, 2022
COMPLIANCE PROGRESS: Secondary	COMPLIANCE PROGRESS: Secondary	COMPLIANCE PROGRESS: Secondary

[12] TRED's *2021 Year-End Report*, CHICAGO POLICE DEPARTMENT (APRIL 29, 2022), https://home.chicagopolice.org/wp-content/uploads/2021-YEAR-END-REPORT.pdf.

Use of Force: ¶165

165. *CPD officers are prohibited from using deadly force except in circumstances where there is an imminent threat of death or great bodily harm to an officer or another person. CPD officers are not permitted to use deadly force against a person who is a threat only to himself or herself or to property. CPD officers may only use deadly force as a last resort.*

Compliance Progress

(Reporting Period: January 1, 2022, through June 31, 2022)

Preliminary:	***In Compliance*** **(FOURTH REPORTING PERIOD)**
Secondary:	***In Compliance*** **(FOURTH REPORTING PERIOD)**
Full:	***Not in Compliance***

In the fifth reporting period, the City and the CPD remained in Preliminary and Secondary compliance with ¶165.

To assess Preliminary compliance with ¶165, the IMT reviewed the CPD's Use of Force policies and community engagement efforts related to Consent Decree requirements. To assess Secondary compliance with ¶165, the IMT reviewed the CPD's in-service *2021* and *2022 De-Escalation, Response to Resistance, and Use of Force* in-service training materials and records to determine whether the CPD has sufficiently trained on its use-of-force policies, specific to use of deadly force.

To assess Full compliance, the IMT is reviewing CPD reports, TRRs, video footage, the CPD's use of force dashboard, and COPA findings, Chicago Police Board findings, as well as conducting interviews with CPD officers and City personnel, to determine whether the CPD has sufficiently implemented its policy and training related to ¶165. This includes reviewing the number of deadly force incidents, process for submitting cases to COPA for determination of appropriateness, and COPA's findings.

In the fourth reporting period, the IMT found the CPD in Preliminary compliance with ¶165, following the CPD's continued discussions with the Use of Force Working Group and issuance of revised Use of Force policies on December 31, 2020, which went into effect on April 15, 2021. Additionally, the 2020 in-service training covered the conditions of deadly force, and as a result of required completion rates, the CPD reached Secondary compliance. The IMT noted at the close of the prior two reporting periods that to maintain Preliminary compliance, the City and the CPD must continue to review and revise its Use of Force policies, including establishing and maintaining clear channels for community input. To maintain Secondary compliance, the City and the CPD must, as appropriate, develop, revise, and provide corresponding training.

During this reporting period, the IMT continued to review data and reports on deadly force incidents. In this reporting period (January–June 2022), officers discharged their weapons 15 times, according to the CPD's Use of Force Dashboard. This is a decrease compared to the same period of time in 2021 with 25 discharges.

The IMT is also reviewing data from TRED on deadly force. In its quarterly reports, TRED identifies how many Level 3 incidents occurred. From April 22, 2021, to December 31, 2021, there were 45 Level 3 incidents, all of which were firearm discharges.

COPA and the Chicago Police Board have issued a number of decisions regarding the use of deadly force and firearm discharges. The IMT seeks access to documents from all involved agencies to evaluate the investigation and conclusions/recommendations of each incident.

In conclusion, the CPD remains in Preliminary and Secondary compliance with ¶165. The IMT continues to have reservations about the nature and thoroughness of deadly force investigations (*see* ¶492) and looks forward to working with all the Parties to ensure that investigations are conducted in a timely and thorough manner. The IMT looks forward to determining the thoroughness and nature of recommendations relevant to ¶165.

Paragraph 165 Compliance Progress History

FIRST REPORTING PERIOD	SECOND REPORTING PERIOD	THIRD REPORTING PERIOD
SEPTEMBER 1, 2019 – AUGUST 31, 2019	SEPTEMBER 1, 2019 – FEBRUARY 29, 2020	MARCH 1, 2020 – DECEMBER 31, 2020
COMPLIANCE PROGRESS:	COMPLIANCE PROGRESS:	COMPLIANCE PROGRESS:
Not Applicable	None	Under Assessment
FOURTH REPORTING PERIOD	**FIFTH REPORTING PERIOD**	**SIXTH REPORTING PERIOD**
JANUARY 1, 2021 – JUNE 30, 2021	JULY 1, 2021 – DECEMBER 31, 2021	JANUARY 1, 2022 – JUNE 30, 2022
COMPLIANCE PROGRESS:	COMPLIANCE PROGRESS:	COMPLIANCE PROGRESS:
Secondary	Secondary	Secondary

Use of Force: ¶166

166. *CPD officers are prohibited from using deadly force against fleeing subjects who do not pose an imminent threat of death or great bodily harm to an officer or another person.*

Compliance Progress

(Reporting Period: January 1, 2022, through June 31, 2022)

Preliminary:	***In Compliance*** **(NEW)**
Secondary:	***Not in Compliance***
Full:	***Not Yet Assessed***

In the sixth reporting period, the CPD achieved Preliminary compliance with ¶166.

To assess Preliminary compliance with ¶166, the IMT reviewed the CPD's Use of Force policies and foot pursuit policy, and community engagement efforts related to Consent Decree requirements in this paragraph. Paragraph 166 deals with use of deadly force, but the fleeing suspect aspect of this paragraph has been a primary focus. Thus, the IMT believes that G03-02 *De-escalation, Response to Resistance and Use of Force,* Section III.D.3 - Force used as punishment or retaliation (e.g., force used to punish or retaliate for fleeing, resisting arrest, or insulting a Department member) must be read in conjunction with the Foot Pursuit policy.

To assess Secondary compliance with ¶166, the IMT is reviewing the CPD's training materials and records to determine whether the CPD has sufficiently trained its officers on its use of force and foot pursuit policies.

In the prior reporting periods, the CPD engaged the Use of Force Working Group is discussions regarding non-lethal force on fleeing subjects and foot pursuits. The CPD moved language regarding these prohibitions into General Order G03-02, *De-escalation, Response to Resistance, and Use of Force*, which now indicates deadly force will not be used against a fleeing person unless the person poses an imminent threat (Section IV.D.1.a). The CPD issued revised Use of Force policies on December 31, 2020, which went into effect on April 15, 2021.

Further, during the fourth monitoring period, as required by ¶172, on March 5, 2021, the IMT recommended that the CPD adopt a foot pursuit policy based on our assessment of CPD data and information. On May 26, 2021, the CPD issued a temporary policy G03-07, *Foot Pursuits*, which became effective June 11, 2021. In the prior reporting period, the CPD engaged in dialogue with the IMT, OAG, Court, community, and other stakeholders to revise the foot pursuit policy. On June 30, 2022, the CPD advised all Department members that its revised Foot Pursuit policy would become effective on August 29, 2022 and replace the interim policy. See ¶172 for more detail on the development of the foot pursuit policy. As a result of the policy becoming effective in the next reporting period, the IMT finds the City

and the CPD in Preliminary compliance with ¶166. Should the policy not become effective in the next reporting period, the City and the CPD may not maintain Preliminary compliance.

The IMT has reviewed data to understand and analyze the nature of the foot pursuit issue. Unfortunately, CPD data for foot pursuits has not been reliable (see ¶168 for more detail). As a result, the CPD pulled down its Foot Pursuits dashboard during the prior reporting period. TRED has continued to report data on foot pursuits that end in some degree of force, which provides some information (see Appendix Figure 2).

Use of Force Appendix Figure 2: Foot Pursuit Incidents Involving a Use of Force

	TRED Quarter 1 Report (Jan. 1, 2021 – Mar. 31, 2021)	**TRED Quarter 2 Report** (April 1, 2021 – Jun. 30, 2021)	**TRED Quarter 3 Report** (July 1, 2021 – Sep. 30, 2021)	**TRED Quarter 4 Report** (Oct. 1, 2021 – Dec. 30, 2021)
Number of Foot Pursuits with a TRR	198	100	131	121
Firearm Pointing during a Foot Pursuit	181	200	231	204
Weapon Recovery from a Foot Pursuit	83	125	124	105
Suspect Injury during a Foot Pursuit	139 no injury 59 minor	64 no injury 36 minor/alleged	85 no injury 32 minor 1 major	74 no injury 26 minor 17 alleged 4 unknown 0 major

The OIG's dashboard identifies 536 TRRs (28% of TRRs), covering 341 incidents from January 1, 2022 to July 12, 2022 where the subject was fleeing. For 2021, the OIG identifies 1,462 TRRs (28% of TRRs), covering 974 incidents, where the subject was fleeing.

The IMT continues to monitor the outcomes of firearm discharges referred to COPA and subsequent outcomes. See ¶184 for more detail.

In conclusion, the City and CPD achieved Preliminary compliance with ¶166 in this reporting period. In the next reporting period, the IMT will continue to assess Preliminary compliance ensuring the revised *Foot Pursuits* policy does indeed go in effect. We will also assess Secondary compliance by reviewing CPD's progress in

delivering the required annual in-service training and training on the foot pursuit policy.

Paragraph 166 Compliance Progress History

FIRST REPORTING PERIOD SEPTEMBER 1, 2019 – AUGUST 31, 2019	SECOND REPORTING PERIOD SEPTEMBER 1, 2019 – FEBRUARY 29, 2020	THIRD REPORTING PERIOD MARCH 1, 2020 – DECEMBER 31, 2020
COMPLIANCE PROGRESS: Not Applicable	COMPLIANCE PROGRESS: None	COMPLIANCE PROGRESS: Under Assessment
FOURTH REPORTING PERIOD JANUARY 1, 2021 – JUNE 30, 2021	**FIFTH REPORTING PERIOD** JULY 1, 2021 – DECEMBER 31, 2021	**SIXTH REPORTING PERIOD** JANUARY 1, 2022 – JUNE 30, 2022
COMPLIANCE PROGRESS: Under Assessment	COMPLIANCE PROGRESS: Under Assessment	COMPLIANCE PROGRESS: Preliminary

Use of Force: ¶167

167. *CPD officers will operate their vehicles in a manner that is consistent with CPD policy and training and with the foremost regard for the safety of all persons involved. CPD will periodically include instruction regarding sound vehicle maneuvers in its in-service training regarding use of force. As appropriate, CPD will provide supplemental training guidance regarding dangerous vehicle maneuvers that should be avoided.*

Compliance Progress (Reporting Period: January 1, 2022, through June 31, 2022)

Preliminary:	***In Compliance*** **(SECOND REPORTING PERIOD)**
Secondary:	***Under Assessment***
Full:	***Not Yet Assessed***

The CPD maintained Preliminary compliance with ¶167 in the sixth reporting period but did not reach Secondary compliance.

To assess Preliminary compliance with ¶167, the IMT reviewed the CPD's Use of Force policies and vehicle pursuit policy to ensure they address requirements specific to this paragraph.

To assess Secondary compliance with ¶167, the IMT is reviewing the CPD's process and policies to identify drivers in need of remedial training and whether such training has occurred, as well as training that was provided to all officers.

In the fourth reporting period, the IMT observed CPD's Monthly Traffic Review Board. The board addressed the issues required by the Consent Decree, including reviewing the length of pursuit, speed of pursuit, road conditions, reason for pursuit, and whether a supervisor becomes involved in the incident. For each review, the Board determined whether the officer was in compliance with policy. During this meeting, a number of officers were referred for remedial training, and reprimands were issued particularly for supervisors who failed to engage within three minutes. The IMT noted that the CPD has appropriate policies, practices, and processes for holding officers accountable for violations of policy for vehicular operations. Thus, the CPD maintained Preliminary compliance with ¶167.

To achieve Secondary compliance, the CPD must periodically include traffic safety in its training and demonstrate how officers are identified and receive remedial training when not following policy.[13] In the prior reporting periods, the IMT re-

[13] In their comments on our assessment of this paragraph, the City and the CPD state, "Any information from the Traffic Review Board or accident data is necessary for full or operational compliance." Because the Traffic Review Board is the mechanism by which the CPD identifies

viewed CPD's 2021 in-service training curriculum which includes instruction (module 4) on how to conduct a motor vehicle stop and a portion on vehicular eluding and pursuit. In this reporting period, the IMT reviewed CPD's 2022 in-service training plan, which includes *In-Service Peak Performance Driving training* which "provides a review of basic driving skills and traffic pursuit policy and reinforces skills related to proper emergency driving techniques." That is an 8-hour training that is mandatory for Department members that have been identified as needing additional training. The CPD's 2022 Training Report indicates a projected 2,700 Department members will be trained in this course in 2022. Additionally on May 19, 2022, the CPD submitted to the IMT course materials for its *Emergency Vehicle Operations Course In-Service 4-hour training*. The IMT reviewed the course and had minimal comments, finding it appropriate to the requirements of the consent decree. The CPD plans to begin offering this training in the seventh reporting period.

The IMT has also been reviewing activities, data, and actions of the Traffic Review Board to address these problems with motor vehicle pursuits. On December 31, 2021, the IMT submitted a written request for monthly Traffic Review Boards reports to include number of officers sent to remedial training, to conduct a deeper review of the nature of the board's findings, recommendations for training, and any corrective action that emanates from the Board.

In conclusion, the City and the CPD remain under Assessment for Secondary compliance with ¶167. Moving forward, the IMT will continue to assess Secondary compliance pending receipt of data on the number of accidents, Traffic Review Board reports with data on the number of officers assigned to remedial training, and requisite attendance at the Emergency Vehicle Operations in-service four-hour course.

Paragraph 167 Compliance Progress History

FIRST REPORTING PERIOD SEPTEMBER 1, 2019 – AUGUST 31, 2019	SECOND REPORTING PERIOD SEPTEMBER 1, 2019 – FEBRUARY 29, 2020	THIRD REPORTING PERIOD MARCH 1, 2020 – DECEMBER 31, 2020
COMPLIANCE PROGRESS: Not Applicable	COMPLIANCE PROGRESS: Preliminary	COMPLIANCE PROGRESS: Preliminary
FOURTH REPORTING PERIOD JANUARY 1, 2021 – JUNE 30, 2021	**FIFTH REPORTING PERIOD** JULY 1, 2021 – DECEMBER 31, 2021	**SIXTH REPORTING PERIOD** JANUARY 1, 2022 – JUNE 30, 2022
COMPLIANCE PROGRESS: Preliminary	COMPLIANCE PROGRESS: Preliminary	COMPLIANCE PROGRESS: Preliminary

officers in need of "supplemental training guidance," however, we require this information to evaluate Secondary compliance.

Use of Force: ¶168

168. *Starting no later than January 1, 2019, CPD will track and analyze the frequency with which CPD officers engage in foot pursuits of persons attempting to evade arrest or detention by fleeing on foot, regardless of whether the foot pursuit is associated with a reportable use of force incident. CPD will track foot pursuits associated with reportable use of force incidents through TRRs or any similar form of documentation CPD may implement.*

Compliance Progress

(Reporting Period: January 1, 2022, through June 31, 2022)

Preliminary:	***Under Assessment***
Secondary:	***Not in Compliance***
Full:	***Not Yet Assessed***

In this reporting period, the City and the CPD made progress toward but did not achieve Preliminary Compliance with ¶168.

To assess Preliminary compliance with ¶168, the IMT is assessing policies and practices to enable the CPD to capture and analyze appropriate data related to foot pursuits, as required by this paragraph.

In the prior two reporting periods, the City and the CPD did not maintain Preliminary or Secondary compliance due to the failure to properly capture and analyze foot pursuit data. In prior reporting periods, the City and the CPD had achieved Preliminary and Secondary compliance for this paragraph's requirements based on the fact that the OEMC has processes in place that capture foot pursuits; that the CPD's TRED reviews all TRRs that are foot pursuit-related and result in the use of force; and that the TRED's tracking and analysis of pursuits was sound. However, in the fourth reporting period, the IMT was alerted to the fact that there were serious issues of data quality regarding foot pursuits. Specifically, the way in which foot pursuit data were captured may be incorrect. This raised several concerns for the IMT.

In this reporting period, the CPD made important strides to fix the foot pursuit data issues. First, it has worked extensively to develop and update its *Foot Pursuits* policy. On May 26, 2021, the CPD issued a temporary policy G03-07, *Foot Pursuits*, which became effective June 11, 2021. In the prior reporting period, the CPD engaged in dialogue with the IMT, OAG, Court, community, and other stakeholders to revise the foot pursuit policy. On June 30, 2022, the CPD advised all Department members that its revised *Foot Pursuits* policy would become effective on August 29, 2022 and replace the interim policy. The policy mandates the collection of all foot pursuit data by officers initiating the pursuit and assisting in the pursuit. (*See* ¶172 for more on the development of this policy.)

Additionally, on February 24, 2022, the CPD presented its foot pursuit data plan to the IMT and CPD. The plan outlines the Department's approach to collect and analyze data related to foot pursuits, in accordance with G03-07. The plan aims to ensure the Department can use quantitative data to answer five key questions:

1. Do foot pursuits happen for justifiable reasons?

2. Are foot pursuits terminated, when necessary, based on the nature of the situation?

3. Are CPD members appropriately reporting and documenting foot pursuits?

4. Are supervisors taking corrective or disciplinary actions when needed?

5. How frequently are foot pursuits associated with other incident types?

To answer these questions, the CPD is working to implement a variety of data collection mechanisms, to include the creation of a new foot pursuit event log to document when any individual officer engages in a foot pursuit (and the officer's actions related to the pursuit). Additionally, the CPD identified the enhancement of the digital TRR form as a short-term priority. G03-07 requires all officers who engage in a foot pursuit, whether they initiated or joined it, to fill out the foot-pursuit data-collection form. The CPD plans to improve the form to require entry of an event number that is automatically validated to improve data entry quality and aid in connecting a foot pursuit number to any TRR forms that were associated with the same incident. The CPD notes that this should reduce the double-counting issues between OEMC foot pursuit event codes and foot pursuits reported on TRRs moving forward. The CPD's second short-term priority is to implement a TRED review of foot pursuits. TRED will oversee the foot pursuit data, and in the long term, the CPD's implementation of a new records management system (RMS) will streamline this work.

In conclusion, the City and the CPD remain under Preliminary Assessment for ¶168. The actual collection of data required by this paragraph will not take place until August 2022. Moving forward, the IMT will continue to reevaluate the paragraph in light of expected finalization of the policy and the proposed data improvements explained above.

Paragraph 168 Compliance Progress History

FIRST REPORTING PERIOD SEPTEMBER 1, 2019 – AUGUST 31, 2019	SECOND REPORTING PERIOD SEPTEMBER 1, 2019 – FEBRUARY 29, 2020	THIRD REPORTING PERIOD MARCH 1, 2020 – DECEMBER 31, 2020
COMPLIANCE PROGRESS: Preliminary	COMPLIANCE PROGRESS: Preliminary	COMPLIANCE PROGRESS: Secondary
FOURTH REPORTING PERIOD JANUARY 1, 2021 – JUNE 30, 2021	**FIFTH REPORTING PERIOD** JULY 1, 2021 – DECEMBER 31, 2021	**SIXTH REPORTING PERIOD** JANUARY 1, 2022 – JUNE 30, 2022
COMPLIANCE PROGRESS: None	COMPLIANCE PROGRESS: None	COMPLIANCE PROGRESS: Under Assessment

Use of Force: ¶169

169. *For foot pursuits associated with reportable use of force incidents, by January 1, 2020, CPD will review all associated foot pursuits at the headquarters level to identify any tactical, equipment, or training concerns.*

Compliance Progress

(Reporting Period: January 1, 2022, through June 31, 2022)

Preliminary:	***In Compliance*** **(THIRD REPORTING PERIOD)**
Secondary:	***In Compliance*** **(THIRD REPORTING PERIOD)**
Full:	***Not in Compliance***

In the sixth reporting period, the City and the CPD maintained Preliminary and Secondary compliance with ¶169.

To assess Preliminary compliance with ¶169, the IMT reviewed the CPD's Use of Force policies and TRED SOP, to ensure they address the requirements for a headquarter-level entity to review foot pursuits with associated reported use of force incidents. The IMT also assessed the CPD's efforts to actively engage the community and obtain feedback on its Use of Force policies.

To assess Secondary compliance with ¶169, the IMT reviewed training sources and records related to reviews of foot pursuits, including reviewing the nature of debriefings and supplemental training following the identification of patterns and trends. Specifically, the IMT reviewed the TRED's processes regarding debriefings, which are similar to brief remedial training sessions.

To assess Full compliance, the IMT will consider whether the CPD has sufficiently implemented its foot pursuit review policy, protocols, and training and if the TRED and the CPD are appropriately recommending and acting on tactical, equipment, and training concerns.

During the fourth reporting period, per ¶172, on March 5, 2021, the IMT recommended that the CPD adopt a foot pursuit policy. The CPD was required to adopt a foot pursuit policy by September 3, 2021. On May 26, 2021, the CPD issued a temporary policy G03-07, *Foot Pursuits*, which became effective June 11, 2021. Following revisions to the policy, on June 30, 2022, the CPD advised all Department members that its revised Foot Pursuit policy would become effective on August 29, 2022 and replace the interim policy. The new policy will significantly increase the review of foot pursuits, as *all* foot pursuits, not just force-related ones, will now be reviewed by TRED.

In the last reporting periods, the IMT continued to assess Full compliance with ¶169 by monitoring efforts by the TRED to review foot pursuits. The data issues

encountered in ¶168 do not impact this paragraph, as the data TRED pulls and analyzes comes from TRRs.

The IMT continues to review the annual and quarterly reports developed by the TRED, paying specific attention to debriefing points emanating from reviews of pursuits with TRRs. TRED continues to issue debriefing points on issues, such as partner separation, communication, and weapons handling (see Figure 3). In 2021, there were 516 foot pursuits[14] that resulted in a TRR. Of those pursuits, TRED made no recommendations in 473 (91.7%) incidents. A majority of TRED's training recommendations involved partner separation (20) and communications (18). Compared with firearm pointing incidents, TRED has made far fewer recommendations for foot pursuits involving a use of force.[15]

Use of Force Appendix Figure 3: Foot Pursuit Data in 2020 vs. 2020

	2020	2021
Foot Pursuits with a TRR	425	516[2]
Pursuits with no debriefing point	394	473
Debriefing for partner separation	7	20
Debriefing for radio communication	9	18
Debriefing for other	2	5

TRED has done an admirable job of notifying the Training Oversight Committee of concerns. When the CPD's *Foot Pursuits* policy becomes effective in August 2022, TRED will be responsible for reviewing supervisor reviews of foot pursuits. The IMT encourages TRED to make explicit what will be reviewed and its expectations of the reviewing Lieutenant.

In conclusion, the City and the CPD maintained Preliminary and Secondary compliance with ¶169. Moving forward, once the new *Foot Pursuits* policy becomes effective, TRED's role in foot pursuit reviews will significantly increase. In turn, this will require more training on several fronts, for TRED personnel, supervisors, and officers to understand responsibilities for the reporting and reviewing of foot pursuits. For the next reporting period, the IMT expects to review such additional training for the CPD to maintain Secondary compliance.

[14] In 2021, TRED began distinguishing foot pursuits to include incidents with foot pursuits and combined foot and vehicle pursuits.

[15] TRED's *2021 Year-End Report*, CHICAGO POLICE DEPARTMENT (APRIL 29, 2022), https://home.chicagopolice.org/wp-content/uploads/2021-YEAR-END-REPORT.pdf.

Paragraph 169 Compliance Progress History

FIRST REPORTING PERIOD	SECOND REPORTING PERIOD	THIRD REPORTING PERIOD
SEPTEMBER 1, 2019 – AUGUST 31, 2019	SEPTEMBER 1, 2019 – FEBRUARY 29, 2020	MARCH 1, 2020 – DECEMBER 31, 2020
COMPLIANCE PROGRESS:	COMPLIANCE PROGRESS:	COMPLIANCE PROGRESS:
Not Applicable	None	Secondary

FOURTH REPORTING PERIOD	FIFTH REPORTING PERIOD	SIXTH REPORTING PERIOD
JANUARY 1, 2021 – JUNE 30, 2021	JULY 1, 2021 – DECEMBER 31, 2021	JANUARY 1, 2022 – JUNE 30, 2022
COMPLIANCE PROGRESS:	COMPLIANCE PROGRESS:	COMPLIANCE PROGRESS:
Secondary	Secondary	Secondary

Use of Force: ¶170

170. *CPD recently issued a foot pursuit training bulletin. By July 1, 2019, CPD will develop and issue a supplemental foot pursuit training bulletin that reflects best practices from foot pursuit policies in other jurisdictions. The supplemental training bulletin will be subject to review and approval by the Monitor and OAG. The supplemental training bulletin will: a. identify risks and tactical factors officers should consider prior to initiating and during the course of a foot pursuit; b. provide guidance to officers regarding radio communications during a foot pursuit; c. instruct officers to avoid, to the extent practical, separating from other officers in the course of a foot pursuit; d. provide guidance on circumstances when alternatives to a foot pursuit may be appropriate; and e. inform officers that they must follow supervisors' instructions in the course of a foot pursuit, including instructions to alter tactics or discontinue the pursuit.*

Compliance Progress

(Reporting Period: January 1, 2022, through June 31, 2022)

Preliminary:	***In Compliance*** **(FOURTH REPORTING PERIOD)**
Secondary:	***In Compliance*** **(FOURTH REPORTING PERIOD)**
Full:	***In Compliance*** **(FOURTH REPORTING PERIOD)**
Sustainment Period Ends	***June 30, 2023***

In the sixth reporting period, the City and the CPD maintained Preliminary, Secondary, and Full compliance with ¶170.

To assess Preliminary compliance with ¶170, the IMT determined whether the CPD developed and issued a foot pursuit bulletin.

To assess Secondary compliance with ¶170, the IMT and OAG reviewed the training bulletin and underlying sources to determine whether it reflects best practices from foot pursuit policies in other jurisdictions and compiles with the requirements in this paragraph of the Consent Decree.

To assess Full compliance with ¶170, the IMT reviewed training sources and records to assess comprehension of the foot pursuit actions by officers and supervisors (including separation from and responsibility to one's partner). We also reviewed TRED reports, TRRs, video footage, and COPA cases involving foot pursuits to assess the extent to which officers follow the training bulletin, such as officer separation or firearm retention issues, and the extent that district supervisors address noncompliance with the foot pursuit training bulletin.

In the fourth reporting period, the City, the CPD, the OAG, and the IMT had many discussions regarding the on-going compliance efforts regarding CPD foot pursuits. The 2019 Training Bulletin was not sufficient for these ongoing efforts—particularly as the City and the CPD continued to develop the Foot Pursuit policy and corresponding training, which will differ from the Training Bulletin. As a result, this paragraph was considered a one-time requirement—although ¶170 will continue to inform how the CPD should instruct officers regarding foot pursuits.

In conclusion, the City and the CPD achieved Full compliance with ¶170 in the fourth reporting period and maintained it through this sixth reporting period. The IMT will continue to measure the CPD's ongoing policy, training, and implementation efforts under other paragraphs.

Paragraph 170 Compliance Progress History

FIRST REPORTING PERIOD	SECOND REPORTING PERIOD	THIRD REPORTING PERIOD
SEPTEMBER 1, 2019 – AUGUST 31, 2019	SEPTEMBER 1, 2019 – FEBRUARY 29, 2020	MARCH 1, 2020 – DECEMBER 31, 2020
COMPLIANCE PROGRESS:	COMPLIANCE PROGRESS:	COMPLIANCE PROGRESS:
None	Secondary	Secondary
FOURTH REPORTING PERIOD	**FIFTH REPORTING PERIOD**	**SIXTH REPORTING PERIOD**
JANUARY 1, 2021 – JUNE 30, 2021	JULY 1, 2021 – DECEMBER 31, 2021	JANUARY 1, 2022 – JUNE 30, 2022
COMPLIANCE PROGRESS:	COMPLIANCE PROGRESS:	COMPLIANCE PROGRESS:
Full	Full	Full

Use of Force: ¶171

171. *CPD will provide scenario-based training regarding foot pursuits and the supplemental foot pursuit training bulletin during the first annual use of force training required by this Agreement.*

Compliance Progress

(Reporting Period: January 1, 2022, through June 31, 2022)

Preliminary: ***In Compliance*** **(NEW)**
Secondary: ***Under Assessment***
Full: ***Under Assessment***

In the sixth reporting period, the City and the CPD achieved Preliminary compliance with ¶171.

To assess Preliminary compliance with ¶171, the IMT reviewed the CPD's annual Use of Force training to determine whether it has incorporated scenario-based training regarding foot pursuits and assessed whether the CPD looked at examples of how other jurisdictions may have done so. Additionally, to evaluate Preliminary compliance, the CPD's annual *De-Escalation, Response to Resistance, and Use of Force* in-service training needs to re-enforce new requirements or restrictions for foot pursuits through scenario-based training.

In the fourth reporting period, the CPD issued a temporary emergency policy (citing ¶631), G03-07, *Foot Pursuits*. In the fifth and sixth reporting period, the CPD engaged in numerous discussions with the IMT, the OAG, community members, the Coalition, and the Court regarding the foot pursuit policy. On June 30, 2022, the CPD advised all Department members that its revised *Foot Pursuits* policy would become effective on August 29, 2022. Section XVIII (Additional Responsibilities) of this policy addresses the requirements of ¶171, stating "the Training Division will provide Department members with training including scenario based on the policy." As a result, the City and CPD have met Preliminary compliance with ¶171. Should the policy not become effective in the next reporting period, the IMT may remove compliance.

To assess Secondary compliance, the IMT reviewed the *2021 De-Escalation, Response to Resistance, and Use of Force* in-service training and the training proposed for 2022. The current training has one scenario that includes a foot pursuit. The CPD's Education and Training Division has a timeline for the delivery of scenario-based foot pursuit training. The CPD has expressed concerns in the past that scenario-based training on foot pursuits may result in injuries to officers and that the current facilities are not conducive to live scenario-based training.

In conclusion, the City and the CPD achieved Preliminary compliance with ¶171 in this reporting period. In the next reporting period, the IMT will monitor Preliminary compliance to ensure the *Foot Pursuits* policy becomes effective as planned and assess Secondary compliance as the CPD begins to train its officers on the new policy.

Paragraph 171 Compliance Progress History

FIRST REPORTING PERIOD	SECOND REPORTING PERIOD	THIRD REPORTING PERIOD
SEPTEMBER 1, 2019 – AUGUST 31, 2019	SEPTEMBER 1, 2019 – FEBRUARY 29, 2020	MARCH 1, 2020 – DECEMBER 31, 2020
COMPLIANCE PROGRESS:	COMPLIANCE PROGRESS:	COMPLIANCE PROGRESS:
Not Applicable	Not Applicable	Preliminary
FOURTH REPORTING PERIOD	**FIFTH REPORTING PERIOD**	**SIXTH REPORTING PERIOD**
JANUARY 1, 2021 – JUNE 30, 2021	JULY 1, 2021 – DECEMBER 31, 2021	JANUARY 1, 2022 – JUNE 30, 2022
COMPLIANCE PROGRESS:	COMPLIANCE PROGRESS:	COMPLIANCE PROGRESS:
Under Assessment	Under Assessment	Preliminary

Use of Force: ¶172

172. *By no later than January 1, 2021, the Monitor will complete an assessment of CPD data and information to determine whether CPD should adopt a foot pursuit policy. If the Monitor recommends that CPD should adopt a foot pursuit policy, CPD will adopt a foot pursuit policy no later than July 1, 2021. Any foot pursuit policy adopted by CPD will be subject to review and approval by the Monitor and OAG.*

Compliance Progress (Reporting Period: January 1, 2022, through June 31, 2022)

Preliminary:	***In Compliance*** **(NEW)**
Secondary:	***Under Assessment***
Full:	***Not in Compliance***

In the sixth reporting period, the City and the CPD achieved Preliminary compliance with ¶172.

To assess Preliminary compliance with ¶172, the IMT reviewed the CPD's *Foot Pursuits* policy and its efforts to garner appropriate community input on the policy. The IMT is also assessing how the CPD and OEMC establish appropriate foot pursuit data reporting systems.

In the fourth reporting period, on March 5, 2021, the IMT recommended that the CPD adopt a foot pursuit policy based on our assessment of CPD data and information. Because of our recommendation, the CPD was required to adopt a foot pursuit policy by September 3, 2021, and "[a]ny foot pursuit policy adopted by CPD will be subject to review and approval by the Monitor and OAG."

On June 11, 2021, the CPD issued a temporary policy, though the IMT and OAG had previously noted multiple concerns to the City and CPD regarding the temporary, draft policy. The draft did not provide clear expectations for CPD officers or supervisors, allow the CPD to enforce such expectations, or provide the public with notice on the CPD's expected practices and procedures. Furthermore, the City and the CPD did not receive community input on the policy, which is necessary to receive compliance under the Consent Decree. *See* ¶160.

Since then, the CPD has worked with the IMT and the OAG to revise its interim policy and engaged the department and the community for input on this policy. On June 2, 2021, the CPD conducted a public webinar on its new temporary foot pursuit policy. In addition, in June 2021, CPD conducted "deliberative dialogues" with community organizations on the policy. On December 23, 2021, the CPD, the OAG, and the IMT reached an agreement on a permanent policy, General Order G03-07, *Foot Pursuits*.

In this reporting period, the CPD continued efforts to refine and finalize the policy. On February 10, 2022, the CPD posted the draft policy for a 15-day public comment period. Following continued dialogue with the community, Coalition, and Court, the OAG provided a no objection letter on May 16, 2022, and the IMT provided a no objection letter on May 20, 2022, to the revised G03-07, *Foot Pursuits* policy, G03-07-01, *Foot Pursuits Review* policy, and accompanying forms. To support our review of the CPD's draft policies, the IMT reviewed best practices and policies from other departments across the nation and foot pursuit related data in TRED reports (e.g., number of injuries, weapons recovered, weapons pointed, and arrests). The IMT also reviewed comments from community members and CPD personnel provided via the public-comment website portal, e-mail, webinars, and deliberative dialogues. We also participated in numerous discussions with the CPD, the OAG, the Coalition, and the Court regarding foot pursuit best practices from various jurisdictions, including some jurisdictions under consent decrees.

The IMT's no objection notice to the policy was, in part, a recognition of the CPD's need to complete a policy and training as soon as possible. However, the IMT continues to have concerns about the accuracy and reliability of foot-pursuit data (*see* ¶168).

The CPD has a timeline to rollout the new policy, including an effective date of August 29, 2022, which it announced via AMC message to Department members on June 30, 2022. The message also included details regarding required eLearning that all sworn Department members were enrolled into (2022 Foot Pursuit Policy Program), which the IMT reviewed, commented on, and for which we ultimately issued a no-objection notice. The CPD also shared plans with the IMT for additional training for officers and supervisors. In discussion with the IMT, the CPD acknowledged the need for a speedy rollout of policy, but also stressed the need for appropriate training on policy. As a result of the policy becoming effective in the next reporting period, the City and the CPD have achieved Preliminary compliance with ¶166. Should the policy not become effective in the next reporting period, the City and the CPD may lose compliance.

In conclusion, the City and the CPD achieved Preliminary compliance with ¶172 this reporting period. Moving forward, the IMT will continue to monitor Preliminary compliance, and look for the *Foot Pursuits* policy to go in effect as planned in August 2022. To achieve Secondary compliance, the CPD must demonstrate its ability to produce reliable foot pursuit data.

Paragraph 172 Compliance Progress History

FIRST REPORTING PERIOD	SECOND REPORTING PERIOD	THIRD REPORTING PERIOD
SEPTEMBER 1, 2019 – AUGUST 31, 2019	SEPTEMBER 1, 2019 – FEBRUARY 29, 2020	MARCH 1, 2020 – DECEMBER 31, 2020
COMPLIANCE PROGRESS:	COMPLIANCE PROGRESS:	COMPLIANCE PROGRESS:
Not Applicable	Not Applicable	Not Applicable
FOURTH REPORTING PERIOD	**FIFTH REPORTING PERIOD**	**SIXTH REPORTING PERIOD**
JANUARY 1, 2021 – JUNE 30, 2021	JULY 1, 2021 – DECEMBER 31, 2021	JANUARY 1, 2022 – JUNE 30, 2022
COMPLIANCE PROGRESS:	COMPLIANCE PROGRESS:	COMPLIANCE PROGRESS:
Under Assessment	Under Assessment	Preliminary

Use of Force: ¶173

173. *Following a use of force, once the scene is safe and as soon as practicable, CPD officers must immediately request appropriate medical aid for injured persons or persons who claim they are injured.*

Compliance Progress

(Reporting Period: January 1, 2022, through June 31, 2022)

Preliminary:	***In Compliance*** **(SECOND REPORTING PERIOD)**
Secondary:	***In Compliance*** **(FOURTH REPORTING PERIOD)**
Full:	***Under Assessment***

In the sixth reporting period, the City and the CPD maintained Preliminary and Secondary compliance with ¶173.

To assess Preliminary compliance with ¶173, the IMT reviewed the CPD's Use of Force policies to ensure they address requirements specified in this paragraph regarding requesting medical aid following a use of force. The IMT also assessed the CPD's efforts to actively engage the community and obtain feedback on its Use of Force policies. To assess Secondary compliance with ¶173, the IMT reviewed the CPD's Use of Force and LEMART training sources and records to determine whether the CPD has sufficiently trained on its latest policies.

In the fourth reporting period, the CPD achieved Secondary compliance through completion of the 2020 Use of Force in-service training for more than 95% of CPD officers. This training addresses requirements of ¶173 related to requesting medical aid for injured persons following a Use of Force incident.

In the prior period, the IMT began assessing Full compliance with ¶173 by reviewing TRR forms, TRED reports, COPA reports and videos, and recent changes to Illinois law. The CPD's TRR form directs officers to indicate provision of medical aid. The CPD's TRR-I form requires the Watch Operations Lieutenant to examine people for injuries. The number of occasions in which injuries are detected by the Lieutenant and not by the officers may offer some indication of compliance with ¶173. To further improve reporting and review of ¶173, in the future, the CPD will be revising its TRR-R form to add a debriefing point box entitled "Officer did not request medical aid in a timely way."

As with the last reporting period, the IMT's review of TRED reports for this reporting period (2021 annual report and 2021 quarter 3 and 4 reports) did not reveal that TRED has identified (via debriefing points) an issue with officers failing to request medical aid for individuals who have been subjected to force. In our review of COPA reports and videos, officers consistently request and provide medical assistance in a timely manner.

In conclusion, the City and the CPD remain in Preliminary and Secondary compliance with ¶173. The IMT looks to assess this paragraph for Full compliance in future reporting periods, and has requested information from BIA, COPA, and the City's Law Department that will aid in our review. Moving forward, the IMT will review additional sources of data, including anticipated data on requests for medical aid in the CPD's Use of Force Dashboard. The IMT also seeks to identify cases in which the Watch Operations Lieutenant has identified injuries via the TRR-I, to include how many of these cases had injuries and what transpired with officers at the scene.

Paragraph 173 Compliance Progress History

FIRST REPORTING PERIOD	SECOND REPORTING PERIOD	THIRD REPORTING PERIOD
SEPTEMBER 1, 2019 – AUGUST 31, 2019	SEPTEMBER 1, 2019 – FEBRUARY 29, 2020	MARCH 1, 2020 – DECEMBER 31, 2020
COMPLIANCE PROGRESS:	COMPLIANCE PROGRESS:	COMPLIANCE PROGRESS:
Not Applicable	Preliminary	Preliminary
FOURTH REPORTING PERIOD	**FIFTH REPORTING PERIOD**	**SIXTH REPORTING PERIOD**
JANUARY 1, 2021 – JUNE 30, 2021	JULY 1, 2021 – DECEMBER 31, 2021	JANUARY 1, 2022 – JUNE 30, 2022
COMPLIANCE PROGRESS:	COMPLIANCE PROGRESS:	COMPLIANCE PROGRESS:
Secondary	Secondary	Secondary

Use of Force: ¶174

174. *Before January 1, 2021, CPD will ensure that all CPD officers receive Law Enforcement Medical and Rescue Training ("LEMART"). The LEMART training provided to CPD officers will incorporate scenario-based elements. Before January 1, 2021, CPD will equip all CPD officers engaged in patrol activities who have completed LEMART training with an individual first aid kit ("IFAK") (as defined in current CPD policy, U06-02-23).*

Compliance Progress

(Reporting Period: January 1, 2022, through June 31, 2022)

Preliminary:	***In Compliance*** **(FOURTH REPORTING PERIOD)**
Secondary:	***Under Assessment***
Full:	***Not in Compliance***

In the fifth reporting period, the City and the CPD maintained Preliminary compliance with ¶174.

Since the CPD had already begun its significant training on LEMART, the IMT assessed this paragraph to be in Preliminary compliance by adjusting our methodologies in the fourth monitoring period – essentially considering training as evidence of Preliminary compliance and policy as evidence of Secondary compliance.

In the fourth reporting period, the City and the CPD reached Preliminary compliance with ¶174. In the last reporting period, to assess training, the IMT reviewed LEMART course materials, observed a live training session, and reviewed training attendance and equipment records to determine whether the CPD has sufficiently provided LEMART training and the number and percentage of officers who have under-gone training and received individual first aid kits (IFAKs). The training appropriately covered the requirements of ¶174 regarding instruction to officers on requesting medical aid and using IFAKs. During the training, all officers electronically verified their attendance and confirmed they received their IFAKs at the end of the course.

During this reporting period, on May 26, 2022, the CPD provided the IMT with documentation of 2021 LEMART training and IFAK distribution. Between September 2019 and April 2022, 2,341 officers received LEMART training, and of those officers 2,339 were issued IFAKs. The IMT observed the LEMART and in-service training that addressed rendering aid and included scenario-based exercises.

In conclusion, the City and the CPD remained under assessment for Secondary compliance with ¶174. The IMT awaits the complete training and equipment numbers to assess Secondary compliance in the next reporting period.

Paragraph 174 Compliance Progress History

FIRST REPORTING PERIOD SEPTEMBER 1, 2019 – AUGUST 31, 2019	SECOND REPORTING PERIOD SEPTEMBER 1, 2019 – FEBRUARY 29, 2020	THIRD REPORTING PERIOD MARCH 1, 2020 – DECEMBER 31, 2020
COMPLIANCE PROGRESS: Not Applicable	COMPLIANCE PROGRESS: Not Applicable	COMPLIANCE PROGRESS: Not Applicable
FOURTH REPORTING PERIOD JANUARY 1, 2021 – JUNE 30, 2021	**FIFTH REPORTING PERIOD** JULY 1, 2021 – DECEMBER 31, 2021	**SIXTH REPORTING PERIOD** JANUARY 1, 2022 – JUNE 30, 2022
COMPLIANCE PROGRESS: Preliminary	COMPLIANCE PROGRESS: Preliminary	COMPLIANCE PROGRESS: Preliminary

Use of Force: ¶175

175. *Starting January 1, 2021, in use of force incidents involving CPD officers, CPD will require CPD officers to provide life-saving aid consistent with their LEMART training to injured persons as soon as it is safe and feasible to do so until medical professionals arrive on scene. CPD will replenish IFAKs, and the contents thereof, used by CPD officers as necessary to ensure officers have the equipment necessary to render aid consistent with their LEMART training. Subsequent to January 1, 2021, CPD will ensure that any officer regularly engaged in patrol activities who has no prior LEMART training receives LEMART training within one year of beginning his or her regular patrol activities.*

Compliance Progress

(Reporting Period: January 1, 2022, through June 31, 2022)

Recurring Schedule: Ongoing ☐ **Met** ☑ **Missed**

Preliminary: ***In Compliance*** **(FOURTH REPORTING PERIOD)**
Secondary: ***In Compliance*** **(FOURTH REPORTING PERIOD)**
Full: ***Under Assessment***

In the sixth reporting period, the City and the CPD maintained Preliminary and Secondary compliance with ¶175.

To assess Preliminary compliance with ¶175, the IMT reviewed CPD's policy requiring officers to provide life-saving aid consistent with LEMART training, regarding replenishing IFAKs, and ensuring that any officer regularly engaged in patrol activities receive LEMART training within one year of beginning patrol activities.

To assess Secondary compliance with ¶175, the IMT reviewed LEMART course materials, and reviewed training attendance and equipment records to determine whether officers are appropriately trained on the requirements of ¶175.

To assess Full compliance with ¶175, the IMT will determine whether the CPD has sufficiently implemented its policy and training, specifically regarding the provision of life saving aid during incidents and if there is a process for distributing and replenishing IFAKs.

In the fourth reporting period, the CPD achieved Preliminary compliance, through General Order G03-02, *De-Escalation, Response to Resistance, and Use of Force* and G03-06, *Firearm Discharge and Officer-Involved Death Incident Response and Investigation*. Following the IMT's review of LEMART course materials, live training, and training attendance and equipment records, the CPD also achieved Secondary compliance in the fourth reporting period.

However, the requirements regarding replenishing IFAKs and receiving LEMART training within one year of beginning patrol duties were not documented in CPD policy.

In the last reporting period, the CPD had yet to complete LEMART training. Due to the COVID-19 pandemic the CPD received an extension to complete this training by March 2022.

As described in ¶174, during this reporting period, on May 26, 2022, the CPD provided the IMT with documentation of 2021 LEMART training and IFAK distribution. Between September 2019 to April 2022, 2,341 officers received LEMART training, and of those officers 2,339 were issued IFAK kits. To achieve Full compliance, the CPD needs to demonstrate that all CPD officers have received LEMART training and received IFAKs, as well as provide documentation demonstrating processes replenishing IFAKs.

The IMT has also been reviewing TRED annual and quarterly reports, in which the provision of life saving aid during use of force incidents was not identified as an issue (or debriefing point) in the prior two years. However, the IMT had recommended the CPD add a debriefing point on the TRR-R form specific to rendering aid. During this reporting period, the CPD shared with the IMT that it will be revising its TRR-R form to add a debriefing point box entitled "Officer did not request medical aid in a timely way."

The IMT also continues to conduct a random sampling review of COPA videos on use of force incidents and has confirmed that officers are rendering aid and using their IFAK kits.

Finally, the IMT reviewed Illinois legislation which now reflects consent decree requirements for ¶175, thus, CPD policy is consistent with state laws.

In conclusion, the City and the CPD remain in Preliminary and Secondary compliance with ¶175. Moving forward, the IMT will continue to assess Full compliance, to include reviewing use of force incidents to evaluate the degree of operational compliance. The IMT also needs data from the CPD on the distribution of IFAKs to all Department members.

Paragraph 175 Compliance Progress History

FIRST REPORTING PERIOD	SECOND REPORTING PERIOD	THIRD REPORTING PERIOD
SEPTEMBER 1, 2019 – AUGUST 31, 2019	SEPTEMBER 1, 2019 – FEBRUARY 29, 2020	MARCH 1, 2020 – DECEMBER 31, 2020
COMPLIANCE PROGRESS:	COMPLIANCE PROGRESS:	COMPLIANCE PROGRESS:
Not Applicable	Not Applicable	Not Applicable
FOURTH REPORTING PERIOD	**FIFTH REPORTING PERIOD**	**SIXTH REPORTING PERIOD**
JANUARY 1, 2021 – JUNE 30, 2021	JULY 1, 2021 – DECEMBER 31, 2021	JANUARY 1, 2022 – JUNE 30, 2022
COMPLIANCE PROGRESS:	COMPLIANCE PROGRESS:	COMPLIANCE PROGRESS:
Secondary	Secondary	Secondary

Use of Force: ¶176

176. *CPD officers must recognize and act upon the duty to intervene on the subject's behalf when another officer is using excessive force.*

Compliance Progress

(Reporting Period: January 1, 2022, through June 31, 2022)

Preliminary:	***In Compliance*** **(SECOND REPORTING PERIOD)**
Secondary:	***In Compliance*** **(FOURTH REPORTING PERIOD)**
Full:	***Under Assessment***

In the sixth reporting period, the City and the CPD maintained Preliminary and Secondary compliance with ¶176.

To assess Preliminary compliance with ¶176, the IMT reviewed the CPD's Use of Force policies to ensure they address requirements specified in this paragraph regarding the duty to intervene. The IMT also assessed the CPD's efforts to actively engage the community and obtain feedback on its Use of Force policies.

To assess Secondary compliance with ¶176, the IMT reviewed the CPD's Use of Force training sources and records to determine whether the CPD has sufficiently trained on its latest policies.

To assess Full compliance with ¶176, the IMT is reviewing various community and data sources to determine whether the CPD has sufficiently implemented its policy and training. This includes reviewing the number of incidents where force was used against a person who was handcuffed or otherwise restrained; and whether the CPD has a process that differentiates force against a person who is handcuffed or otherwise restrained and identifies and forwards those cases to COPA. We will review a random sampling of such incidents, including review of reviewing supervisors' and TRED's findings on each case as to whether it was in compliance with policy.

In the second reporting period, the CPD achieved Preliminary compliance with ¶176. The CPD engaged the Use of Force Working Group on the requirements of this paragraph, which resulted in a change in G03-02, *De-Escalation, Response to Resistance, and Use of Force*.

In the fourth reporting period, the CPD achieved Secondary compliance with ¶176. The IMT reviewed the development, implementation, and evaluation of the 2020 Use of Force in-service training specific to the duty to intervene, and determined this requirement is covered within training. As of March 4, 2021, 96% of CPD officers had completed the 2020 Use of Force in-service training.

In this reporting period, the IMT continued to monitor ongoing Preliminary and Secondary compliance with ¶176.

Related to Preliminary compliance, for the updated use of force policy suite, the IMT observed negotiations between the CPD and the Coalition (*see* ¶669), which resulted in additional language being added in the current draft policies necessitating "duty to physically intervene."

Related to Secondary compliance, the IMT observed the 2021 in-service training this period, which addresses the duty to intervene. Additionally, the IMT reviewed training materials provided by the CPD on January 26, 2022, for the Active Bystander for Law Enforcement (ABLE) Training, developed by Georgetown University Law Center. ABLE training is a one-day class that introduces and facilitates buy-in for active bystandership in law enforcement and discusses several tactics to intervene effectively (specifically, a commitment to intervening when there is a violation of policy/law, including excessive use of force). The CPD provided revised ABLE training materials to the IMT and OAG on June 2, 2022. The IMT provided a no-objection notice June 17, 2022 (the OAG previously provided a no-objection on March 18, 2022).

To assess Full compliance with ¶176, the IMT continued to review TRED reports for excessive force incidents. Generally, there is no mention from TRED's 2021 annual report regarding failure to intervene. Specifically, the IMT looked at debriefing points reported by TRED for officers in a use-of-force incident, none of which identify failure to intervene. The IMT is aware of only one case forwarded to COPA related to failure to intervene. TRED reviewed the body-worn camera footage of officers who were present during the use of force incident and not engaged. There was no TRR submitted in this incident and this incident was made known as the result of TRED review. Further, IMT continues to stress that data maintained by the CPD, COPA, or others are not kept in a format that allows for the IMT to effectively assess Full compliance. For example, COPA does not have a category that identifies this violation, which makes it very difficult to identify cases brought against officers who failed to intervene, and thus monitor Full compliance.

Finally, the IMT reviewed Illinois legislation which now reflects consent decree requirements for ¶176, thus, CPD policy is consistent with state laws.

In conclusion, the City and the CPD remain in Preliminary and Secondary compliance with ¶176. The CPD training in this area is admirable, but the IMT has not received the data or information to determine Full compliance.

Paragraph 176 Compliance Progress History

FIRST REPORTING PERIOD SEPTEMBER 1, 2019 – AUGUST 31, 2019	SECOND REPORTING PERIOD SEPTEMBER 1, 2019 – FEBRUARY 29, 2020	THIRD REPORTING PERIOD MARCH 1, 2020 – DECEMBER 31, 2020
COMPLIANCE PROGRESS: Not Applicable	COMPLIANCE PROGRESS: Preliminary	COMPLIANCE PROGRESS: Preliminary
FOURTH REPORTING PERIOD JANUARY 1, 2021 – JUNE 30, 2021	**FIFTH REPORTING PERIOD** JULY 1, 2021 – DECEMBER 31, 2021	**SIXTH REPORTING PERIOD** JANUARY 1, 2022 – JUNE 30, 2022
COMPLIANCE PROGRESS: Secondary	COMPLIANCE PROGRESS: Secondary	COMPLIANCE PROGRESS: Secondary

Use of Force: ¶177

177. *Consistent with CPD policy that force must be objectively reasonable, necessary, and proportional, CPD officers must generally not use force against a person who is handcuffed or otherwise restrained absent circumstances such as when the person's actions must be immediately stopped to prevent injury or escape or when compelled by other law enforcement objectives.*

Compliance Progress

(Reporting Period: January 1, 2022, through June 31, 2022)

Preliminary:	***In Compliance*** **(FOURTH REPORTING PERIOD)**
Secondary:	***In Compliance*** **(NEW)**
Full:	***Under Assessment***

In the sixth reporting period, the City and the CPD maintained Preliminary compliance and met Secondary compliance with ¶177.

To assess Preliminary compliance with ¶177, the IMT reviewed the CPD's Use of Force policies to ensure they address requirements specified in this paragraph regarding use of force against a person who is handcuffed or otherwise restrained. The IMT also assessed the CPD's efforts to actively engage the community and obtain feedback on its Use of Force policies.

To assess Secondary compliance with ¶177, the IMT reviewed the CPD's Use of Force training sources and records to determine whether the CPD has sufficiently trained on its latest policies.

To assess Full compliance with ¶177, the IMT is reviewing various community and data sources to determine whether the CPD has sufficiently implemented its policy and training. This includes reviewing the number of incidents in which force was used against a person who was handcuffed or otherwise restrained; whether the CPD has a process that differentiates force against a person who was handcuffed or otherwise restrained and identifies and forwards those cases to COPA; as well as reviewing a random sampling of such incidents, including review of reviewing supervisors' and TRED's findings on each case as to whether it was in compliance with policy.

The CPD achieved Preliminary compliance with ¶177 in the fourth reporting period. The IMT found that the CPD received the requisite community input for G03-02-01, *Response to Resistance and Force Options*, and finalized the policy. Based on feedback from the community, the CPD's December 31, 2020, revised G03-02-01 policy clarified the "necessary" aspect of use of force by clarifying the "minimum amount force."

In the fifth and sixth reporting periods, the IMT assessed Secondary compliance with ¶177, focusing on whether the CPD has trained on policy revisions in its annual *2021 De-Escalation, Response to Resistance, and Use of Force* in-service training. This training includes instruction on interacting with difficult prisoners and proper procedures, including handcuffing. The CPD provided records to show that as of February 18, 2022, more than 95% of officers received the two-day *2021 De-Escalation, Response to Resistance, and Use of Force* in-service training, with 96.71% of participants completing the *Communications* eight-hour course and 96.86% completing the *Procedures* eight-hour course.[16] The IMT also observed the 2022 in-service training on April 22, 2022, which addresses ¶177. Thus, the City and the CPD achieved Secondary compliance with ¶177.

For Full compliance, in the fifth reporting period IMT began reviewing incidents where force was used against a person who was handcuffed or otherwise restrained. Use of force against a person who is handcuffed or otherwise restrained is a Level 2 force and as such must be responded to by a supervisor and reviewed by TRED.

At the request of the IMT, TRED supplied data to the IMT on February 3, 2022, for use of force incidents against restrained individuals since March 1, 2019. TRED reported 706 TRRs covering 506 incidents from March 1, 2019 to December 31, 2021, in which the involved officer indicated that force was used "against the subject while handcuffed or otherwise in physical restraints."

Additionally, according to TRED's 2021 annual report, 361 TRRs in 2021 involved an officer's use of force against handcuffed/restrained individuals (15.3% of TRRs generated). One-hundred eighty of those incidents (50%) resulted in training recommendations, which included 277 debriefing points ranging from de-escalation force mitigation not articulated (occurring most often at 80 debriefings) to seven instances for TRR-Entry Handcuffed Subject. All 361 instances were reviewed by an investigating supervisor to determine compliance with Department policy. For 16 instances, the investigating supervisor determined that the involved officer's action was not in compliance with Department policy and obtained a complaint log. For 3 of those 16 cases, the complaint log resulted due to a lack of body-worn camera video.

In conclusion, the City and the CPD remained in Preliminary compliance with ¶177 and have achieved Secondary compliance. Moving forward, the IMT will continue to assess Full compliance for whether the CPD has sufficiently implemented its policy and training related to ¶177.

[16] Because of the COVID-19 extension, the CPD had until March 5, 2022, to complete the delivery of its 2021 in-service training.

Paragraph 177 Compliance Progress History

FIRST REPORTING PERIOD SEPTEMBER 1, 2019 – AUGUST 31, 2019	SECOND REPORTING PERIOD SEPTEMBER 1, 2019 – FEBRUARY 29, 2020	THIRD REPORTING PERIOD MARCH 1, 2020 – DECEMBER 31, 2020
COMPLIANCE PROGRESS: Not Applicable	COMPLIANCE PROGRESS: None	COMPLIANCE PROGRESS: Under Assessment
FOURTH REPORTING PERIOD JANUARY 1, 2021 – JUNE 30, 2021	**FIFTH REPORTING PERIOD** JULY 1, 2021 – DECEMBER 31, 2021	**SIXTH REPORTING PERIOD** JANUARY 1, 2022 – JUNE 30, 2022
COMPLIANCE PROGRESS: Preliminary	COMPLIANCE PROGRESS: Preliminary	COMPLIANCE PROGRESS: Secondary

Use of Force: ¶178

178. *CPD officers are prohibited from using carotid artery restraints or chokeholds (or other maneuvers for applying direct pressure on a windpipe or airway, i.e., the front of the neck, with the intention of reducing the intake of air) unless deadly force is authorized. CPD officers must not use chokeholds or other maneuvers for intentionally putting pressure on a person's airway or carotid artery restraints as take-down techniques.*

Compliance Progress

(Reporting Period: January 1, 2022, through June 31, 2022)

Preliminary:	***In Compliance*** **(FOURTH REPORTING PERIOD)**
Secondary:	***In Compliance*** **(NEW)**
Full:	***Under Assessment***

In the sixth reporting period, the City and the CPD maintained Preliminary compliance and met Secondary compliance with ¶178.

To assess Preliminary compliance with ¶178, the IMT reviewed the CPD's Use of Force policies to ensure they address requirements specified in this paragraph regarding use of carotid artery restraints or chokeholds. The IMT also assessed the CPD's efforts to actively engage the community and obtain feedback on its Use of Force policies.

To assess Secondary compliance with ¶178, the IMT reviewed the CPD's Use of Force training sources and records to determine whether the CPD has sufficiently trained on its latest policies.

To assess Full compliance with ¶178, the IMT is reviewing various community and data sources to determine whether the CPD has sufficiently implemented its policy and training. This includes the TRED's review of such incidents in quarterly and annual reports (all deadly force incidents, shootings, head strikes, and chokeholds).

In the fourth period, the CPD achieved Preliminary compliance with ¶178. The CPD and the Use of Force Working Group engaged in extensive discussions over the prohibition of carotid artery restraints or chokeholds. The Working Group recommended and strongly advocated for their strict prohibition. While the CPD did not accept the Working Group's recommendation, it revised G03-02, *De-Escalation, Response to Resistance, and Use of Force*, effective April 15, 2021, with stronger language about carotid artery restraints or chokeholds not being allowable unless it is an act of last resort when necessary to protect against an imminent threat to life and includes further examples of prohibited actions in the neck area.

In the fifth and sixth monitoring periods, the IMT assessed Secondary compliance with ¶178 by observing the CPD's Use of Force in-service training. During the training, the instructor addressed ¶178 and made clear the prohibitions of carotid artery restraints or chokeholds. Further, in the course of discussion with the CPD, the IMT understands that chokeholds are not taught at the Academy as an authorized use of force. The CPD provided records to show that as of February 18, 2022, more than 95% of officers received the two-day *2021 De-Escalation, Response to Resistance, and Use of Force* in-service training, with 96.71% of participants completing the *Communications* eight-hour course and 96.86% completing the *Procedures* eight-hour course.[17] The IMT also observed the 2022 in-service training on April 22, 2022, which addresses ¶178. Thus, the City and CPD achieved Secondary compliance with ¶178.

During the last reporting period, the IMT also began assessing Full compliance with ¶178 by reviewing TRED quarterly reports. Chokeholds are considered a Level 3 use of force requiring the response of a Street Deputy. Since April 1, 2021, the CPD established a process for capturing all Level 3 use of force incidents, including carotid artery restraints. From April 22, 2021, through December 31, 2021, TRED's 2021 Annual report provides that there were no incidents reported to OEMC that required a Street Deputy to respond for a chokehold.

In conclusion, the City and the CPD achieved Secondary compliance with ¶178 this reporting period. The IMT will continue to monitor these incidents for Full compliance moving forward and looks to determine if other entities (e.g., BIA, COPA, or the City's Law Department) have received complaints.

Paragraph 178 Compliance Progress History

FIRST REPORTING PERIOD	SECOND REPORTING PERIOD	THIRD REPORTING PERIOD
SEPTEMBER 1, 2019 – AUGUST 31, 2019	SEPTEMBER 1, 2019 – FEBRUARY 29, 2020	MARCH 1, 2020 – DECEMBER 31, 2020
COMPLIANCE PROGRESS:	COMPLIANCE PROGRESS:	COMPLIANCE PROGRESS:
Not Applicable	None	Under Assessment
FOURTH REPORTING PERIOD	**FIFTH REPORTING PERIOD**	**SIXTH REPORTING PERIOD**
JANUARY 1, 2021 – JUNE 30, 2021	JULY 1, 2021 – DECEMBER 31, 2021	JANUARY 1, 2022 – JUNE 30, 2022
COMPLIANCE PROGRESS:	COMPLIANCE PROGRESS:	COMPLIANCE PROGRESS:
Preliminary	Preliminary	Secondary

[17] Because of the COVID-19 extension, the CPD had until March 5, 2022, to complete the delivery of its 2021 in-service training.

Use of Force: ¶179

179. *CPD's use of force policies must guide officers on all force techniques, technologies, and weapons that CPD officers are authorized to use. CPD's use of force policies must clearly define and describe each force option and the circumstances under which use of such force is appropriate to address potential types of resistance.*

Compliance Progress

(Reporting Period: January 1, 2022, through June 31, 2022)

Preliminary:	***In Compliance*** **(FIFTH REPORTING PERIOD)**
Secondary:	***In Compliance*** **(NEW)**
Full:	***Not in Compliance***

In the sixth reporting period, the City and the CPD maintained Preliminary compliance and achieved Secondary compliance with ¶179.

To evaluate Preliminary compliance, the IMT reviewed the CPD's Use of Force policies and community engagement efforts related to ¶179's requirements for guidance to officers on all force techniques, technologies, and weapons that officers are authorized to use.

In 2020 and through the prior reporting period, the CPD continued to engage the community on its Use of Force policies. The Use of Force Working Group raised concerns with the use and prohibitions of Tasers and OC Spray, which they continued to discuss in the sixth reporting period with the Coalition.

All of the CPD's Use of Force policies are effective and meet the requirements of ¶179. However, General Order G03-02-04, *Taser Use Incidents*, and General Order G03-02-05, *Oleoresin Capsicum (OC) Devices and Other Chemical Agent Use Incidents* remained in unresolved dialogue with the Coalition through this reporting period. The IMT and the OAG participated in these dialogues, where much of the discussion centered on First Amendment rights. For example, there are outstanding policy issues regarding the use of OC Spray (*e.g.*, regarding the use of OC Spray on passive resisters in protests and passive resisters in vehicles). Further, the IMT notes that the current iterations of these policies still fail to incorporate the requirements of ¶¶205 and 216, requiring officers to provide medical aid. While these policies have yet to be finalized, the CPD has noted that the revised policy will reflect additional criteria not required by ¶179, but rather address input from the community.

For Secondary compliance, in prior reporting periods we reviewed the 2020 annual Use of Force in-service training, and the *2021 De-Escalation, Response to Resistance, and Use of Force* in-service training. The CPD provided records to show that as of February 18, 2022, more than 95% of officers received the two-day *2021*

De-Escalation, Response to Resistance, and Use of Force in-service training, with 96.71% of participants completing the *Communications* eight-hour course and 96.86% completing the *Procedures* eight-hour course.[18]

In conclusion, the City and the CPD achieved Secondary compliance with ¶179 this reporting period. The CPD is engaged on the requirements of this paragraph with the community and needs to complete these efforts in the next reporting period to maintain Secondary compliance. Moving forward, the IMT will continue to assess CPD's community engagement efforts related to the force options requirements of ¶179.

Paragraph 179 Compliance Progress History

FIRST REPORTING PERIOD	SECOND REPORTING PERIOD	THIRD REPORTING PERIOD
SEPTEMBER 1, 2019 – AUGUST 31, 2019	SEPTEMBER 1, 2019 – FEBRUARY 29, 2020	MARCH 1, 2020 – DECEMBER 31, 2020
COMPLIANCE PROGRESS:	COMPLIANCE PROGRESS:	COMPLIANCE PROGRESS:
Not Applicable	Not Applicable	Under Assessment
FOURTH REPORTING PERIOD	**FIFTH REPORTING PERIOD**	**SIXTH REPORTING PERIOD**
JANUARY 1, 2021 – JUNE 30, 2021	JULY 1, 2021 – DECEMBER 31, 2021	JANUARY 1, 2022 – JUNE 30, 2022
COMPLIANCE PROGRESS:	COMPLIANCE PROGRESS:	COMPLIANCE PROGRESS:
Under Assessment	Preliminary	Secondary

[18] Because of the COVID-19 extension, the CPD had until March 5, 2022, to complete the delivery of its 2021 in-service training.

Use of Force: ¶180

180. *CPD will maintain policies for each of the following weapons, using the following guidelines.*

Compliance Progress (Reporting Period: January 1, 2022, through June 30, 2022)

Preliminary: ***In Compliance*** **(NEW)**
Secondary: ***In Compliance*** **(NEW)**
Full: ***Not in Compliance***

In the sixth reporting period, the City and the CPD achieved Preliminary and Secondary compliance with ¶180. (The weapons listed in the Consent Decree following ¶180 include subheadings as follows: "a. firearms," "b. Electronic Control Weapons ('Tasers')," "c. Oleoresin Capsicum Devices ('OC Devices')," and "d. Impact Weapons.")

To assess Preliminary compliance with ¶180, the IMT reviewed the CPD's policies to ensure they address requirements specified in this paragraph for maintaining weapons-specific policies. The IMT also assessed the CPD's efforts to actively engage the community and obtain feedback on its Use of Force policies.

The CPD has met the requirements of ¶180 for almost all of the weapons policies. It remains in discussion with Coalition on General Order G03-02-04, *Taser Use Incidents,* and General Order G03-02-05, *Oleoresin Capsicum (OC) Devices and Other Chemical Agent Use Incidents.* The CPD must still insert language regarding "must render lifesaving aid to injured persons consistent with training" into the Baton and Taser policies. This language is currently present in parent policy G03-02, *De-escalation, Response to Resistance, and Use of Force*, but not in those weapons-specific policies. Changes to these policies based on community input are currently in draft form and go beyond the specific requirements of the weapons paragraphs. The IMT believes the CPD has engaged the community in good faith and thus achieves Preliminary compliance with ¶180.

For Secondary compliance, in prior reporting periods we reviewed the 2020 annual Use of Force in-service training, and the *2021 De-Escalation, Response to Resistance, and Use of Force* in-service training. The CPD provided records to reflect that as of February 18, 2022, more than 95% of officers received the two-day *2021 De-Escalation, Response to Resistance, and Use of Force* in-service training, with 96.71% of participants completing the *Communications* eight-hour course and 96.86% completing the *Procedures* eight-hour course.[19]

[19] Because of the COVID-19 extension, the CPD had until March 5, 2022, to complete the delivery of its 2021 in-service training.

In conclusion, the City and the CPD achieved Preliminary and Secondary compliance with ¶180 in this reporting period. Moving forward, the IMT will continue to monitor both Preliminary and Secondary compliance, the maintenance of which will require the CPD to issue the updated use-of-force policy suite.

Paragraph 180 Compliance Progress History

FIRST REPORTING PERIOD SEPTEMBER 1, 2019 – AUGUST 31, 2019	SECOND REPORTING PERIOD SEPTEMBER 1, 2019 – FEBRUARY 29, 2020	THIRD REPORTING PERIOD MARCH 1, 2020 – DECEMBER 31, 2020
COMPLIANCE PROGRESS: Not Applicable	COMPLIANCE PROGRESS: Not Applicable	COMPLIANCE PROGRESS: Not Applicable
FOURTH REPORTING PERIOD JANUARY 1, 2021 – JUNE 30, 2021	**FIFTH REPORTING PERIOD** JULY 1, 2021 – DECEMBER 31, 2021	**SIXTH REPORTING PERIOD** JANUARY 1, 2022 – JUNE 30, 2022
COMPLIANCE PROGRESS: Not Applicable	COMPLIANCE PROGRESS: Not Applicable	COMPLIANCE PROGRESS: Secondary

Use of Force: ¶181

181. *CPD will continue to require that only officers who are currently certified may be issued, carry, and use firearms.*

Compliance Progress

(Reporting Period: January 1, 2022, through June 31, 2022)

Preliminary:	***In Compliance*** **(SECOND REPORTING PERIOD)**
Secondary:	***In Compliance*** **(THIRD REPORTING PERIOD)**
Full:	***Under Assessment***

In the sixth reporting period, the City and the CPD maintained Preliminary and Secondary compliance with ¶181.

To assess Preliminary compliance with ¶181, the IMT reviewed the CPD's policies to ensure they address requirements specified in this paragraph regarding issuance, carry, and use of firearms. The IMT also assessed the CPD's efforts to actively engage the community and obtain feedback on its Use of Force policies.

To assess Secondary compliance with ¶181, the IMT reviewed the CPD's training sources and records to determine whether the CPD has sufficiently trained officers on firearm use. We also reviewed records showing the percentage of officers who qualified at the range and possessed the requisite FOID card.

To assess Full compliance with ¶181, the IMT will review various community and data sources to determine whether the CPD has sufficiently implemented its policy and training and ensures that officers are certified to issue, carry, and use firearms (including active FOID cards and CPD qualifications).

Beginning in the fourth reporting period, to assess Full compliance, the IMT attempted to audit firearms certification records for all officers and review the results of those records. In the last reporting period, the IMT reviewed the CPD's *2020 Annual Training Report*, which indicated 11,921 officers (97%) took an eLearning course prior to firearms qualification.

In order for the IMT to properly assess Full compliance, we seek data or records indicating that only officers who are qualified and possess necessary licenses carry a firearm, as well as data on officers who failed to certify and do not carry firearms (e.g., it is unclear to the IMT how the CPD tracks and addresses issuance of firearms for injured or sick officers). The CPD informed the IMT in this reporting period that it intends to address these data points in TRED's first quarter 2022 report.

Furthermore, a recent COPA officer-involved shooting investigation resulted in a 30-day recommended suspension for an expired FOID card. As such, the IMT recommends the CPD create a process that ensures officers have necessary licenses.

In conclusion, the City and the CPD maintained Preliminary and Secondary compliance with ¶181. Moving forward, the IMT looks forward to assessing Full compliance upon receipt of firearm qualification and certification records for all officers.

Paragraph 181 Compliance Progress History

FIRST REPORTING PERIOD SEPTEMBER 1, 2019 – AUGUST 31, 2019 COMPLIANCE PROGRESS: Not Applicable	SECOND REPORTING PERIOD SEPTEMBER 1, 2019 – FEBRUARY 29, 2020 COMPLIANCE PROGRESS: Preliminary	THIRD REPORTING PERIOD MARCH 1, 2020 – DECEMBER 31, 2020 COMPLIANCE PROGRESS: Secondary
FOURTH REPORTING PERIOD JANUARY 1, 2021 – JUNE 30, 2021 COMPLIANCE PROGRESS: Secondary	FIFTH REPORTING PERIOD JULY 1, 2021 – DECEMBER 31, 2021 COMPLIANCE PROGRESS: Secondary	SIXTH REPORTING PERIOD JANUARY 1, 2022 – JUNE 30, 2022 COMPLIANCE PROGRESS: Secondary

Use of Force: ¶182

182. *CPD will require officers to consider their surroundings before discharging their firearms and take reasonable precautions to ensure that people other than the target will not be struck.*

Compliance Progress

(Reporting Period: January 1, 2022, through June 31, 2022)

Preliminary:	***In Compliance*** **(FOURTH REPORTING PERIOD)**
Secondary:	***In Compliance*** **(FIFTH REPORTING PERIOD)**
Full:	***Under Assessment***

In the sixth reporting period, the City and the CPD maintained Preliminary and Secondary compliance with ¶182.

To assess Preliminary compliance with ¶182, the IMT reviewed the CPD's Use of Force policies to ensure they address requirements specified in this paragraph regarding officer precautions before discharging a firearm. The IMT also assessed the CPD's efforts to actively engage the community and obtain feedback on its Use of Force policies.

To assess Secondary compliance with ¶182, the IMT reviewed the CPD's training sources and records to determine whether the CPD has sufficiently trained officers on firearm use. We also reviewed records showing the percentage of officers who qualified at the range and possessed the requisite FOID card.

To assess Full compliance with ¶182, the IMT is reviewing various community and data sources to determine whether the CPD has sufficiently implemented its policy and training. This includes a review of data on firearm discharges, nature of the incident, and whether this paragraph's requirements were an issue.

In the fourth reporting period, the CPD achieved Preliminary compliance with ¶182, following receiving requisite community input on General Order G03-02-03, *Firearm Discharge Incidents – Authorized Use and Post-Discharge Administrative Procedures*. Additionally, the CPD demonstrated it has a process in place to capture data related to the conditions under which an officer discharges his/her firearm via the TRR-I form, which is completed by the Street Deputy.

In the fifth reporting period, the CPD achieved Secondary compliance with ¶182, following IMT review of training on de-escalation. Specifically, de-escalation training applied to all uses of force and firearms, including the responsibility to issue a warning if safe and feasible.

The IMT began assessing Full compliance in the last reporting period by reviewing TRED quarterly reports and COPA's dashboard for firearm discharges and continued that review during the sixth reporting period.

As described in the last period, beginning April 2021 TRED began capturing and reporting data on all Level 3 incidents, and Street Deputies assessed whether the discharge involved the possibility of nearby people being at risk. TRED reported in its *2021 Annual Report* that between April 22, 2021, and December 31, 2021, there were 45 firearm discharges, in none of which did the Street Deputy find that an officer discharged into a crowd. There was one incident on November 2, 2021, where a Street Deputy declared "unknown" regarding nearby people.

The IMT also examined COPA's summary finding for all discharges but was unable to distinguish whether the potential sustained violation was attributable to a particular section of G03-02-03.

In conclusion, the City and the CPD maintained Preliminary and Secondary compliance with ¶182. Moving forward, to assess Full compliance the IMT continues to require access to investigative data from all concerned entities (COPA, Police Board, IRT, and FRB) for discharge cases to make an informed determination.

Paragraph 182 Compliance Progress History

FIRST REPORTING PERIOD	SECOND REPORTING PERIOD	THIRD REPORTING PERIOD
SEPTEMBER 1, 2019 – AUGUST 31, 2019	SEPTEMBER 1, 2019 – FEBRUARY 29, 2020	MARCH 1, 2020 – DECEMBER 31, 2020
COMPLIANCE PROGRESS:	COMPLIANCE PROGRESS:	COMPLIANCE PROGRESS:
Not Applicable	None	Under Assessment
FOURTH REPORTING PERIOD	**FIFTH REPORTING PERIOD**	**SIXTH REPORTING PERIOD**
JANUARY 1, 2021 – JUNE 30, 2021	JULY 1, 2021 – DECEMBER 31, 2021	JANUARY 1, 2022 – JUNE 30, 2022
COMPLIANCE PROGRESS:	COMPLIANCE PROGRESS:	COMPLIANCE PROGRESS:
Preliminary	Secondary	Secondary

Use of Force: ¶183

183. *CPD will require officers to issue a verbal warning prior to the use of any reportable force, including the use of firearms, when it is safe and feasible to do so.*

Compliance Progress

(Reporting Period: January 1, 2022, through June 31, 2022)

Preliminary:	***In Compliance*** **(FOURTH REPORTING PERIOD)**
Secondary:	***In Compliance*** **(FOURTH REPORTING PERIOD)**
Full:	***Under Assessment***

In the sixth reporting period, the City and the CPD maintained Preliminary and Secondary compliance with ¶183.

To assess Preliminary compliance with ¶183, the IMT reviewed the CPD's Use of Force policies to ensure they address requirements specified in this paragraph regarding verbal warning prior to use of any reportable force. The IMT also assessed the CPD's efforts to actively engage the community and obtain feedback on its Use of Force policies.

To assess Secondary compliance with ¶183, the IMT reviewed the CPD's training sources and records to determine whether the CPD has sufficiently trained officers, specifically with an emphasis on the importance of verbal warnings if safe and feasible.

To assess Full compliance with ¶183, the IMT is reviewing various community and data sources to determine whether the CPD has sufficiently implemented its policy and training, to include reviewing CPD data and findings on how many times verbal warnings were given.

In the fourth reporting period, the CPD achieved Preliminary compliance due to its continued community engagement regarding the Use of Force policies. While specific recommendations from the community relevant to this paragraph were not incorporated into the April 15, 2021 policies, the CPD actively discussed with the Working Group their feedback and concerns and made a number of other related policy changes as a result.

The CPD also achieved Secondary compliance in the fourth reporting period. More than 95% of CPD officers had completed the 2020 Use of Force in-service training, which appropriately addressed ¶183's requirements related to issuing verbal warnings. The CPD maintained Secondary compliance in the last reporting period due to ongoing *2021 De-Escalation, Response to Resistance, and Use of Force* in-service training that included instruction on ¶183.

Related to Full compliance, the CPD has focused on de-escalation and TRED has issued many debriefing points on this matter. Specifically, TRED reports have identified debriefing points regarding when officers have failed to issue a verbal warning.

To assist in the review of compliance with ¶183, the IMT recommends that TRED revise the TRR-R form to include failure to give warning prior using force as a debriefing point. It could be argued that the debriefing point *De-escalation-Communication* covers this, but the IMT believes reported data need to be more specific. Additionally, CPD officers do not submit a narrative description in the TRRs for firearm discharges and given the lack of documentation available from the CPD on these cases, the IMT is currently unable determine whether a warning was issued, short of reviewing COPA reports.

In conclusion, the City and the CPD maintained Preliminary and Secondary compliance with ¶183. Moving forward, the IMT believes that updating the TRR-R with a debriefing point for warnings would help provide necessary data to assess Full compliance. Additionally, the IMT will explore whether warnings before uses of firearms are routinely addressed in COPA investigations and if such information is accessible.

Paragraph 183 Compliance Progress History

FIRST REPORTING PERIOD SEPTEMBER 1, 2019 – AUGUST 31, 2019 COMPLIANCE PROGRESS: Not Applicable	SECOND REPORTING PERIOD SEPTEMBER 1, 2019 – FEBRUARY 29, 2020 COMPLIANCE PROGRESS: None	THIRD REPORTING PERIOD MARCH 1, 2020 – DECEMBER 31, 2020 COMPLIANCE PROGRESS: Under Assessment
FOURTH REPORTING PERIOD JANUARY 1, 2021 – JUNE 30, 2021 COMPLIANCE PROGRESS: Secondary	FIFTH REPORTING PERIOD JULY 1, 2021 – DECEMBER 31, 2021 COMPLIANCE PROGRESS: Secondary	SIXTH REPORTING PERIOD JANUARY 1, 2022 – JUNE 30, 2022 COMPLIANCE PROGRESS: Secondary

Use of Force: ¶184

184. *When CPD officers discharge firearms, they must continually assess the circumstances that necessitated the discharge and modify their use of force accordingly, including ceasing to use their firearm when the circumstances no longer require it (e.g., when a subject is no longer a threat).*

Compliance Progress

(Reporting Period: January 1, 2022, through June 31, 2022)

Preliminary:	***In Compliance*** **(FOURTH REPORTING PERIOD)**
Secondary:	***In Compliance*** **(FOURTH REPORTING PERIOD)**
Full:	***Under Assessment***

In the sixth reporting period, the City and the CPD maintained Preliminary and Secondary compliance with ¶184.

To assess Preliminary compliance with ¶184, the IMT reviewed the CPD's Use of Force policies to ensure they address requirements specified in this paragraph regarding discharge of a firearm. The IMT also assessed the CPD's efforts to actively engage the community and obtain feedback on its Use of Force policies.

To assess Secondary compliance with ¶184, the IMT reviewed the CPD's training sources and records to determine whether the CPD has sufficiently trained officers, specifically with an emphasis on the importance of constant assessment when using deadly force with a firearm.

To assess Full compliance with ¶184, the IMT is reviewing various community and data sources to determine whether the CPD has sufficiently implemented its policy and training. This includes reviewing data on firearm discharges, nature of the incident and whether this section was an issue (e.g., any instance where an officer may have discharged more than 3 rounds in one incident), and disciplinary actions to reinforce the policy.

In the fourth reporting period, the CPD achieved Preliminary compliance following receiving requisite community input for its Use of Force policies. Section II.E-F of G03-02-01, *Response to Resistance and Force Options*, details policy requirements for members to continually assess situations and modify force. The CPD also achieved Secondary compliance in the fourth reporting period. More than 95% of CPD officers had completed the 2020 Use of Force in-service training, which appropriately addressed ¶184 requirements related to continually assessing the circumstances that necessitate the discharge of a firearm. In the fifth and sixth reporting periods, the CPD maintained Secondary compliance due to delivery of the *2021 De-Escalation, Response to Resistance, and Use of Force* in-service training that includes instruction on ¶184. The CPD provided records to show that as of

February 18, 2022, more than 95% of officers received the two-day *2021 De-Escalation, Response to Resistance, and Use of Force* in-service training, with 96.71% of participants completing the *Communications* eight-hour course and 96.86% completing the *Procedures* eight-hour course.[20] The IMT also observed the 2022 in-service training on April 22, 2022, which addresses ¶184. Furthermore, the CPD reported in its *2021 Annual Training Report* that it delivered a Firearms Qualification Program training via eLearning, for which as of June 2, 2022, 100% of CPD officers completed (11,472).

To begin assessing Full compliance, in the last reporting period the IMT reviewed the CPD's Use of Force Dashboard, TRED quarterly reports, COPA's dashboard and reports, and media reports (for general accounts of officer discharges), and efforts of the Force Review Board, which we continued to review in this reporting period.

Beginning April 2021, the TRED began capturing and reporting data on all Level 3 reportable uses of force. Street Deputies assess whether force should have been modified. From April 22, 2021, to December 31, 2021, TRED reported that CPD Street Deputies responded to all Level 3 incidents and found no instances where officers could have modified their actions or ceased firing.

In conclusion, the City and the CPD maintained Preliminary and Secondary compliance with ¶184. Moving forward, the IMT will require access to more documentation from the CPD and COPA to make an informed decision regarding firearm discharges.

Paragraph 184 Compliance Progress History

FIRST REPORTING PERIOD	SECOND REPORTING PERIOD	THIRD REPORTING PERIOD
SEPTEMBER 1, 2019 – AUGUST 31, 2019	SEPTEMBER 1, 2019 – FEBRUARY 29, 2020	MARCH 1, 2020 – DECEMBER 31, 2020
COMPLIANCE PROGRESS:	COMPLIANCE PROGRESS:	COMPLIANCE PROGRESS:
Not Applicable	None	Under Assessment
FOURTH REPORTING PERIOD	**FIFTH REPORTING PERIOD**	**SIXTH REPORTING PERIOD**
JANUARY 1, 2021 – JUNE 30, 2021	JULY 1, 2021 – DECEMBER 31, 2021	JANUARY 1, 2022 – JUNE 30, 2022
COMPLIANCE PROGRESS:	COMPLIANCE PROGRESS:	COMPLIANCE PROGRESS:
Secondary	Secondary	Secondary

[20] Because of the COVID-19 extension, the CPD had until March 5, 2022, to complete the delivery of its 2021 in-service training.

Use of Force: ¶185

185. *CPD will continue to prohibit officers from firing warning shots.*

Compliance Progress (Reporting Period: January 1, 2022, through June 31, 2022)

Preliminary:	***In Compliance*** **(SECOND REPORTING PERIOD)**
Secondary:	***In Compliance*** **(FOURTH REPORTING PERIOD)**
Full:	***Under Assessment***

In the sixth reporting period, the City and the CPD maintained Preliminary and Secondary compliance with ¶185.

To assess Preliminary compliance with ¶185, the IMT reviewed the CPD's Use of Force policies to ensure they address requirements specified in this paragraph regarding prohibiting officers from firing warning shots. The IMT also assessed the CPD's efforts to actively engage the community and obtain feedback on its Use of Force policies.

To assess Secondary compliance with ¶185, the IMT reviewed the CPD's training sources and records to determine whether the CPD has sufficiently trained officers, specifically with an emphasis that firing warning shots is prohibited.

To assess Full compliance with ¶185, the IMT is reviewing various community and data sources to determine whether the CPD has sufficiently implemented its policy and training. This includes reviewing CPD data on how many times officers fired warning shots.

The CPD achieved Preliminary compliance with this paragraph in the second reporting period with its Use of Force policies. In the fourth reporting period, the CPD achieved Secondary compliance. We reviewed the development, implementation, and evaluation of the 2020 Use of Force in-service training, eLearning materials, and recruit force options training specific to firearms and deadly force. These trainings cover instruction on the requirements of ¶185. As of March 4, 2021, 96% of CPD officers completed the 2020 Use of Force in-service training. Finally, during the fourth reporting period, because of feedback from the IMT to develop a process to track data related to Level 3 reportable use of force incidents, the CPD also established a process to track and examine the nature of firearm discharge incidents and determine the nature of the event via the TRR-I form.

In the last reporting period, the IMT began assessing Full compliance by examining data from the CPD's Use of Force Dashboard, video and reports from COPA's website, and TRED quarterly reports, which we continued to do this reporting period.

Beginning April 2021, the TRED began reporting data on all Level 3 reportable uses of force. In 2021, the TRED reported 45 Level 3 incidents. The responding Street Deputies determined no firearm discharges to be warning shots.

During this reporting period, IMT also reviewed a random number of firearm discharges from the COPA website and saw no indication from COPA's investigations of warning shots.

Additionally, during the May 19, 2022 monthly use-of-force meeting, the CPD, IMT, and OAG discussed the data the CPD plans to include in its *2021 Annual Use of Force Report*, to include information regarding the Force Review Board. The CPD shared the report will include general summaries of Board decisions as it relates to training and tactics. The IMT reiterated its desire to observe Force Review Board meetings to help with its assessment of ¶185 and other paragraphs of the Consent Decree, and the matter is currently under discussion among the Parties. Additionally, the CPD noted it is unable to produce material, documents, or minutes from the Force Review Board meetings. We hope to resolve this issue regarding IMT access in the seventh reporting period. *See* ¶¶681–89.

In conclusion, the City and the CPD maintained Secondary compliance with ¶185. Moving forward, the IMT looks to review as much investigatory information as possible to assess Full compliance, to include written information from the Incident Response Team and the Force Review Board. The IMT requires access to more documentation from the CPD and COPA to make an informed determination regarding whether officers fire warning shots. Specifically, the IMT believes its ability to attend the Force Review Board meetings and have access to documents is critical to properly assess Full compliance.

Paragraph 185 Compliance Progress History

FIRST REPORTING PERIOD	SECOND REPORTING PERIOD	THIRD REPORTING PERIOD
SEPTEMBER 1, 2019 – AUGUST 31, 2019	SEPTEMBER 1, 2019 – FEBRUARY 29, 2020	MARCH 1, 2020 – DECEMBER 31, 2020
COMPLIANCE PROGRESS:	COMPLIANCE PROGRESS:	COMPLIANCE PROGRESS:
Not Applicable	Preliminary	Preliminary
FOURTH REPORTING PERIOD	**FIFTH REPORTING PERIOD**	**SIXTH REPORTING PERIOD**
JANUARY 1, 2021 – JUNE 30, 2021	JULY 1, 2021 – DECEMBER 31, 2021	JANUARY 1, 2022 – JUNE 30, 2022
COMPLIANCE PROGRESS:	COMPLIANCE PROGRESS:	COMPLIANCE PROGRESS:
Secondary	Secondary	Secondary

Use of Force: ¶186

186. *CPD officers must not fire at moving vehicles when the vehicle is the only force used against the officer or another person, except in extreme circumstances when it is a last resort to preserve human life or prevent great bodily harm to a person, such as when a vehicle is intentionally being used to attack a person or group of people. CPD will continue to instruct officers to avoid positioning themselves or remaining in the path of a moving vehicle, and will provide officers with adequate training to ensure compliance with this instruction.*

Compliance Progress

(Reporting Period: January 1, 2022, through June 31, 2022)

Preliminary:	***In Compliance*** **(FOURTH REPORTING PERIOD)**
Secondary:	***In Compliance*** **(FOURTH REPORTING PERIOD)**
Full:	***Under Assessment***

In the sixth reporting period, the City and the CPD maintained Preliminary and Secondary compliance with ¶186.

To assess Preliminary compliance with ¶186, the IMT reviewed the CPD's Use of Force policies to ensure they address requirements specified in this paragraph. The IMT also assessed the CPD's efforts to actively engage the community and obtain feedback on its Use of Force policies.

To assess Secondary compliance with ¶186, the IMT reviewed the CPD's training sources and records to determine whether the CPD has sufficiently trained officers, specifically with an emphasis use of force and moving vehicles.

To assess Full compliance with ¶186, the IMT is reviewing various community and data sources to determine whether the CPD has sufficiently implemented its policy and training. This includes reviewing CPD data regarding how many times officers fired at moving vehicles.

In the fourth reporting period, the CPD achieved Preliminary compliance following review of the CPD's Use of Force policies by the IMT, OAG, and community. Section II.D.6 of G03-02-03, *Firearm Discharge Incidents – Authorized Use and Post-Discharge Administrative Procedures*, prohibits firing at or into a moving vehicle.

The CPD also achieved Secondary compliance in the fourth reporting period. The IMT reviewed the development, implementation, and evaluation of the 2020 Use of Force in-service training and recruit force options training specific to firearms and deadly force. Both trainings cover instruction on the requirements of ¶186 and more than 95% of CPD officers had completed the in-service training.

In the last period, the IMT began assessing Full compliance by reviewing TRED quarterly reports to determine whether officers were sufficiently trained on prohibitions from firing at a moving vehicle, which we continued to assess in this reporting period. TRED reported that, between April 22, 2021, and December 31, 2021, Street Deputies determined there were two incidents involving three officers firing at moving vehicles. Street Deputies also identified two other incidents involving two officers where it was "unknown" whether an officer fired at a moving vehicle. These cases (documents/investigation) by COPA were not available to the IMT due to a court order.

Furthermore, the IMT is aware of the City's Police Board ruling overturning the termination of an officer in October 2018 for firing at and from a motor vehicle.[21] COPA and the CPD Superintendent supported the termination. Also, a recent Police Board ruling in 2022 involved an off-duty sergeant who fired at her motor vehicle as it was being stolen.[22] COPA recommended termination, while the CPD Superintendent recommended a 180-day suspension. The Police Board sided with COPA and recommended termination, leading to disciplinary hearings.

In conclusion, the City and the CPD maintained Preliminary and Secondary compliance with ¶186. Moving forward, the IMT requests thorough information on all incidents involving officers shooting at moving vehicles to determine the outcomes and rationale for decisions made by both CPD and COPA, to include documentation of the Superintendent's position.

Paragraph 186 Compliance Progress History

FIRST REPORTING PERIOD SEPTEMBER 1, 2019 – AUGUST 31, 2019 COMPLIANCE PROGRESS: Not Applicable	SECOND REPORTING PERIOD SEPTEMBER 1, 2019 – FEBRUARY 29, 2020 COMPLIANCE PROGRESS: None	THIRD REPORTING PERIOD MARCH 1, 2020 – DECEMBER 31, 2020 COMPLIANCE PROGRESS: Under Assessment
FOURTH REPORTING PERIOD JANUARY 1, 2021 – JUNE 30, 2021 COMPLIANCE PROGRESS: Secondary	FIFTH REPORTING PERIOD JULY 1, 2021 – DECEMBER 31, 2021 COMPLIANCE PROGRESS: Secondary	SIXTH REPORTING PERIOD JANUARY 1, 2022 – JUNE 30, 2022 COMPLIANCE PROGRESS: Secondary

[21] *See, Police Discipline*, CHICAGO POLICE BOARD, https://www.chcago.gov/city/en/depts/cpb/provdrs/police_discipline.html.

[22] *See* Chip Mitchell, *A Chicago panel is letting a cop keep his job after a 'clearly unreasonable and unnecessary' shooting*, WBEZ CHICAGO (January 21, 2022), https://www.wbez.org/stories/chicago-cop-to-keep-his-job-after-clearly-unreasonable-and-unnecessary-shooting/5c5b4dd8-c23d-4d89-a130-abbad061079d.

Use of Force: ¶187

187. *CPD will prohibit officers from firing from a moving vehicle unless such force is necessary to protect against an imminent threat to life or to prevent great bodily harm to the officer or another person.*

Compliance Progress

(Reporting Period: January 1, 2022, through June 31, 2022)

Preliminary:	***In Compliance*** **(FOURTH REPORTING PERIOD)**
Secondary:	***In Compliance*** **(FOURTH REPORTING PERIOD)**
Full:	***Under Assessment***

In the sixth reporting period, the City and the CPD maintained Preliminary and Secondary compliance with ¶187 and made progress toward Full compliance.

The City and the CPD reached Preliminary and Secondary compliance with ¶187 in the fourth reporting period. To assess Preliminary compliance, the IMT reviewed the CPD's policies to determine whether they sufficiently address ¶187's requirements—specifically, Section II.D.7 of G03-02-03, *Firearm Discharge Incidents – Authorized Use and Post-Discharge Administrative Procedures*. In addition, the CPD demonstrated its commitment to actively engage the Working Group and community in dialogue regarding the Use of Force policies and their recommendations.

To assess Secondary compliance, the IMT reviewed data to determine whether the CPD had provided sufficient training to its officers on the requirements of ¶187 via the 2021 Use of Force in-service training, and by putting into place a process to track firearm discharges via a supplement to the TRR-I form. We also reviewed the number of officers who have completed Use of Force in-service training.

To assess Full Compliance, the IMT will continue to evaluate whether the CPD has sufficiently implemented its policy and training, including by reviewing data on firearm discharges. Sources of that data may include, but are not limited to, completed TRRs, TRED reports, Use of Force data dashboards, COPA investigatory reports, supervisory audits, video footage, and interviews with CPD officers.

In the fourth and fifth reporting periods, the IMT reviewed data regarding firearm discharge cases from both the CPD and COPA.

Data from the TRR-I supplement, which the CPD implemented on April 1, 2021, was first reflected in TRED's Quarterly Reports for Q2 and Q3 2021.[23] According to

[23] *See Chicago Police Department Force Review Division 2021 Q2 Report*, CHICAGO POLICE DEPARTMENT (OCTOBER 13, 2021), https://home.chicagopolice.org/wp-content/uploads/Force-Review-

the TRED reports, among the firearm discharge incidents examined by the Force Review Board during Q2 and Q3 of 2021, Street Deputies reported no instances of officers firing shots from a moving motor vehicle.

The IMT was unable to determine the exact nature of the violations that COPA sustained for its shooting cases because COPA publicly reports only the "primary category" of concluded investigations on its dashboard.[24]

During the sixth reporting period, the IMT reviewed data regarding firearm discharge cases from the CPD and other sources, including the Police Board.

TRED's *2021 Year-End Report* contains a chart listing all Level 3 incidents reviewed by the Force Review Board that occurred between April 22 and December 31, 2021. The chart indicates that for one incident occurring November 2, 2021, TRR No. 2021-03135, it was unknown whether a firearm was discharged "at or into a moving motor vehicle" or "from a moving motor vehicle." The narrative of TRED's *2021 Year-End Report* states that in 2021, "There were two reported instances of a discharge at or into a moving motor vehicle."[25] In the first instance, "it was reported that the vehicle was used as a weapon. Further investigation revealed that this incident did not involve a firearm discharge *solely* in defense or protection of property."[26] In the second instance, "an offender was believed to firing [sic] at the members while inside the vehicle."[27]

As we wrote in our assessment of ¶186 in *Independent Monitoring Report 5*, the City's Policy Board held an evidentiary hearing in November 2021 for a patrol officer charged with violating the CPD's prohibition against shooting at a moving vehicle during an incident on October 4, 2018.[28] The officer was inside a police SUV when the officer fired four times at the other vehicle. On January 20, 2022, the City's Police Board found the officer guilty and ordered that he be suspended for two years.[29] The officer had previously been stripped of police powers in October

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Division-2021-Q2-Report.pdf; *Chicago Police Department Force Review Division 2021 Q3 Report*, CHICAGO POLICE DEPARTMENT (DECEMBER 13, 2021), https://home.chicagopolice.org/wp-content/uploads/Q3-2021-13-Dec-21.pdf.

[24] *See Concluded Investigations*, CIVILIAN OFFICE OF POLICE ACCOUNTABILITY, https://www.chicagocopa.org/data-cases/data-dashboard/closed-investigations/.

[25] TRED's *2021 Year-End Report*, CHICAGO POLICE DEPARTMENT (APRIL 29, 2022), https://home.chicagopolice.org/wp-content/uploads/2021-YEAR-END-REPORT.pdf, p. 66.

[26] *Id.*

[27] *Id.*

[28] *See, Police Discipline*, CHICAGO POLICE BOARD, https://www.chicago.gov/city/en/depts/cpb/provdrs/police_discipline.html.

[29] *See* Chip Mitchell, *A Chicago panel is letting a cop keep his job after a 'clearly unreasonable and unnecessary' shooting*, WBEZ CHICAGO (January 21, 2022), https://www.wbez.org/stories/chicago-cop-to-keep-his-job-after-clearly-unreasonable-and-unnecessary-shooting/5c5b4dd8-c23d-4d89-a130-abbad061079d.

2018 and placed in a no-pay status in February 2021. COPA and the Police Superintendent had recommended in 2020 that the officer be fired. In addition to the suspension, the Police Board ordered the officer to complete full re-training on the use of deadly force, including scenario-based elements and interactive exercises. The IMT considers the City, the CPD, and the City's other entities' responses to individual incidents—including disciplinary actions—as part of the broader picture in evaluating whether the CPD has sufficiently implemented its policy and training.

To support ongoing Secondary compliance during the sixth reporting period, the CPD provided records to show that more than 95% of officers received the two-day *2021 De-Escalation, Response to Resistance, and Use of Force* in-service training, with 96.71% of participants completing the *Communications* eight-hour course and 96.86% completing the *Procedures* eight-hour course.[30]

The City and the CPD maintained Preliminary and Secondary compliance with ¶187 in the sixth reporting period. The supplemental TRR-I data continues to represent an important step toward Full compliance, but additional data—including data from COPA on cases involving firearms discharges and motor vehicles—is needed. We look forward to examining more data and information regarding firearm discharges in the next reporting period, including additional TRED quarterly reports.

Paragraph 187 Compliance Progress History

FIRST REPORTING PERIOD	SECOND REPORTING PERIOD	THIRD REPORTING PERIOD
SEPTEMBER 1, 2019 – AUGUST 31, 2019	SEPTEMBER 1, 2019 – FEBRUARY 29, 2020	MARCH 1, 2020 – DECEMBER 31, 2020
COMPLIANCE PROGRESS:	COMPLIANCE PROGRESS:	COMPLIANCE PROGRESS:
Not Applicable	None	Under Assessment
FOURTH REPORTING PERIOD	**FIFTH REPORTING PERIOD**	**SIXTH REPORTING PERIOD**
JANUARY 1, 2021 – JUNE 30, 2021	JULY 1, 2021 – DECEMBER 31, 2021	JANUARY 1, 2022 – JUNE 30, 2022
COMPLIANCE PROGRESS:	COMPLIANCE PROGRESS:	COMPLIANCE PROGRESS:
Secondary	Secondary	Secondary

[30] Because of the COVID-19 extension, the CPD had until March 5, 2022, to complete the delivery of its 2021 in-service training.

Use of Force: ¶188

> ***188.*** *By January 1, 2019, CPD will develop a training bulletin that provides guidance on weapons discipline, including circumstances in which officers should and should not point a firearm at a person. CPD will incorporate training regarding pointing of a firearm in the annual use of force training required by this Agreement in 2019.*

Compliance Progress (Reporting Period: January 1, 2022, through June 31, 2022)

Preliminary:	***In Compliance*** **(SECOND REPORTING PERIOD)**
Secondary:	***In Compliance*** **(SECOND REPORTING PERIOD)**
Full:	***In Compliance*** **(NEW)**
Sustainment Period Ends	***June 30, 2024***

In the sixth reporting period, the City and the CPD maintained Preliminary and Secondary compliance and achieved Full compliance with ¶188.

To assess Preliminary Compliance with ¶188, the IMT determined whether the CPD developed and issued the requisite training bulletin. To assess Secondary Compliance, the IMT determined whether the training bulletin complied with ¶188's requirements and whether the IMT and the OAG approved the bulletin.

To assess Full Compliance, the IMT reviewed the CPD's training attendance records and data, as well as progress made by the CPD to educate and operationalize the Weapons Discipline Training Bulletin (such as whether the annual Use of Force training sufficiently addresses TRED's recommendations regarding pointing incidents).

In prior reporting periods, we indicated that to attain Full compliance, the CPD would need to demonstrate an ability to sufficiently analyze all pointing incidents, including those not documented in ISRs or arrest reports. While we still believe that the CPD's firearm pointing training should be data-driven, we revised our methodology for Full compliance with this paragraph to reflect the Parties' agreement that the CPD's analysis of pointing incidents is covered by ¶¶189 and 190.

The City and the CPD reached Preliminary and Secondary compliance in the second reporting period and have since maintained that status based on the CPD's subsequent Use of Force in-service training.

The CPD has also demonstrated ongoing training on firearm pointing and weapon discipline, which is necessary to maintain Full compliance. During the sixth reporting period, the CPD provided records to show that more than 95% of officers received the two-day *2021 De-Escalation, Response to Resistance, and Use of Force* in-service training, with 96.71% of participants completing the *Communications*

eight-hour course and 96.86% completing the *Procedures* eight-hour course.[31] The IMT reviewed and provided a no-objection notice for training materials for the CPD's *2022 De-Escalation, Response to Resistance, and Use of Force* in-service training. We also observed a session of the CPD's *2022 De-Escalation, Response to Resistance, and Use of Force* in-service training, as well as a session of the CPD's *Supervisor's in-service training*.

The City and the CPD achieved Full compliance with ¶188 in the sixth reporting period. The IMT looks forward to continuing to monitor the CPD's ongoing training on firearm pointing and weapon discipline.

Paragraph 188 Compliance Progress History

FIRST REPORTING PERIOD SEPTEMBER 1, 2019 – AUGUST 31, 2019 COMPLIANCE PROGRESS: None	SECOND REPORTING PERIOD SEPTEMBER 1, 2019 – FEBRUARY 29, 2020 COMPLIANCE PROGRESS: Secondary	THIRD REPORTING PERIOD MARCH 1, 2020 – DECEMBER 31, 2020 COMPLIANCE PROGRESS: Secondary
FOURTH REPORTING PERIOD JANUARY 1, 2021 – JUNE 30, 2021 COMPLIANCE PROGRESS: Secondary	FIFTH REPORTING PERIOD JULY 1, 2021 – DECEMBER 31, 2021 COMPLIANCE PROGRESS: Secondary	SIXTH REPORTING PERIOD JANUARY 1, 2022 – JUNE 30, 2022 COMPLIANCE PROGRESS: Full

[31] Because of the COVID-19 extension, the CPD had until March 5, 2022, to complete the delivery of its 2021 in-service training.

Use of Force: ¶189

189. *CPD will clarify in policy that when a CPD officer points a firearm at a person to detain the person, an investigatory stop or an arrest has occurred, which must be documented. CPD will also clarify in policy that officers will only point a firearm at a person when objectively reasonable under the totality of the circumstances.*

Compliance Progress

(Reporting Period: January 1, 2022, through June 31, 2022)

Preliminary:	***In Compliance*** **(FIRST REPORTING PERIOD)**
Secondary:	***In Compliance*** **(FOURTH REPORTING PERIOD)**
Full:	***Not in Compliance***

In the fifth reporting period, the City and the CPD maintained Preliminary and Secondary compliance with ¶189.

To assess Preliminary Compliance, the IMT reviewed the CPD's relevant policies, including the CPD's Use of Force policies to ensure they address the requirements specified in ¶189. We also evaluated the CPD's efforts to obtain and address community engagement and input on the policy that addresses ¶189's requirements.

To assess Secondary Compliance, we reviewed data and documentation to determine whether the CPD has sufficiently trained on its Use of Force policies. We also reviewed the number of officers who have completed Use of Force in-service training.

To assess Full Compliance, the IMT evaluates whether officers understand the firearm-pointing policy, particularly with respect to the requirements of ¶189. Along with other sources of information, the IMT reviews TRED reports for its findings on patterns and trends, recommendations for follow-up training, and referrals to COPA.

The City and the CPD have maintained Preliminary compliance with ¶189 since reaching it in the first reporting period. The current version of the CPD's Department Notice D19-01, *Firearm Pointing Incidents*, has been in effect since November 1, 2019.

In the fourth reporting period, the City and the CPD achieved Secondary compliance because a sufficient number of CPD personnel received appropriate training as part of the 2020 Use of Force in-service training. In the fifth reporting period, TRED began reviewing all firearm pointing incident reports (FPIRs), including FPIRs that did not have an investigatory stop report (ISR) or arrest report associated with the incident, which had been a longstanding IMT recommendation. We appreciate TRED including these incidents in their review processes.

During the sixth reporting period, the IMT reviewed TRED's quarterly and year-end reports.

TRED's *2021 Year-End Report* indicates that officers reported 3,005 individual firearm pointing incidents (FPIs) in 2021.[32] TRED reviewed 2,751 of those.[33] Because one incident may involve multiple beats reporting an FPI, these reports corresponded to 2,562 incidents. The number of FPIs and incidents each declined by 1% in comparison to 2020, when officers reported 3,038 FPIs and there were 2,595 incidents.

TRED made no recommendations for training in connection with 1881 (68%) of the 3,005 reports and made a recommendation for training in connection with 865 (31%).[34] Another five reports were referred to COPA. TRED also made three referrals to the district or unit of occurrence for corrective and/or disciplinary action because an officer "was observed in a related TRR or FPIR pointing their firearm at a person and there was no notification to OEMC of a FPI by that member."

TRED's *2021 Year-End Report* indicates that most FPIRs began as a traffic stop (27.3%), a reported person with a gun (17.4%), or a street stop (7.5%). The report also notes that the percentage of all traffic stops that result in an FPI is small (0.2%). Other top initial event types include shots fired (6.4%) and foot pursuit (4.9%).

The top two units involved in FPIs in 2021 were the Community Safety Team, which operates citywide and reported 341 FPIs (or 10.4%) followed by District 15, which reported 236 FPIs (or 7.9%).

The IMT continues to appreciate the CPD's efforts to begin reviewing all firearm pointing incidents, including those not associated with an arrest or ISR. Because of how frequently they occur (508, or 17% of the total number of FPIRs in 2021), this review is critical to the credibility of the CPD's analysis of firearm pointing overall. TRED referred 31 firearm pointing incidents that were not associated with an arrest or ISR (6%) to the Fourth Amendment Stop Unit for a final determination as to whether "there was a reporting deficiency."[35]

The CPD's Audit Division has indicated that it plans to initiate a review of TRED's debriefing procedures during 2022; we await the Audit Division's findings.

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[32] TRED's *2021 Year-End Report*, CHICAGO POLICE DEPARTMENT (APRIL 29, 2022), https://home.chicagopolice.org/wp-content/uploads/2021-YEAR-END-REPORT.pdf, p. 70.

[33] *Id.* at p. 85. Elsewhere, the report states that TRED reviewed 2,748 FPI reports, *id.* at p. 70.

[34] *Id.* at p. 85.

[35] *Id.* at p. 80.

Regarding ongoing training on firearm pointing, the CPD provided records to demonstrate that more than 95% of officers received the two-day *2021 De-Escalation, Response to Resistance, and Use of Force* in-service training, with 96.71% of participants completing the *Communications* eight-hour course and 96.86% completing the *Procedures* eight-hour course.[36] The IMT reviewed and provided a no-objection notice for training materials for the CPD's *2022 De-Escalation, Response to Resistance, and Use of Force* in-service training. We also observed a session of the CPD's *2022 De-Escalation, Response to Resistance, and Use of Force* in-service training, as well as a session of the CPD's *Supervisor's in-service training*.

The CPD demonstrated its TRR Supervisory Dashboard for the IMT during the sixth reporting period. According to TRED's *2021 Year-End Report*, "The information included in this dashboard should allow for Department supervisors to correct the action of individual members and also recommend specific training for their districts/units based on documented need."[37] To that end, the IMT hopes that the dashboard will be expanded in the future to include firearm pointing incidents. TRED's *2021 Year-End Report* contains extensive FPI data—detailed by beat and unit, weapons recovered, nature of the initial incident, foot pursuits, and FPIs reported in error, for example—that could be useful to supervisors in real time.

The City and the CPD maintained Preliminary and Secondary compliance with ¶189 in the sixth reporting period and have continued to make progress toward Full compliance. TRED has done an excellent job of identifying patterns and trends at the citywide and local level. The IMT looks forward to continuing to monitor TRED's review of firearm pointing incidents that are not associated with arrest reports or ISRs, as well as TRED's continued identification of patterns and trends associated with those and all firearm pointing incidents. In particular, we appreciate TRED's identification of other reports in which pointing incidents have been documented when there is no associated ISR or arrest report, such as the Traffic Stop Statistical Study Card (blue card) or the General Offense Case Report, and we look forward to learning more about the additional steps that the CPD will take to ensure that firearm pointing incidents are properly documented. We also look forward to learning more about how the Supervisory Dashboard is used and to the results of the Audit Division's review of TRED's debriefing procedures.

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[36] Because of the COVID-19 extension, the CPD had until March 5, 2022, to complete the delivery of its 2021 in-service training.

[37] TRED's *2021 Year-End Report*, CHICAGO POLICE DEPARTMENT (APRIL 29, 2022), https://home.chicagopolice.org/wp-content/uploads/2021-YEAR-END-REPORT.pdf, p. 95.

Paragraph 189 Compliance Progress History

FIRST REPORTING PERIOD SEPTEMBER 1, 2019 – AUGUST 31, 2019	SECOND REPORTING PERIOD SEPTEMBER 1, 2019 – FEBRUARY 29, 2020	THIRD REPORTING PERIOD MARCH 1, 2020 – DECEMBER 31, 2020
COMPLIANCE PROGRESS: Preliminary	COMPLIANCE PROGRESS: Preliminary	COMPLIANCE PROGRESS: Preliminary
FOURTH REPORTING PERIOD JANUARY 1, 2021 – JUNE 30, 2021	**FIFTH REPORTING PERIOD** JULY 1, 2021 – DECEMBER 31, 2021	**SIXTH REPORTING PERIOD** JANUARY 1, 2022 – JUNE 30, 2022
COMPLIANCE PROGRESS: Secondary	COMPLIANCE PROGRESS: Secondary	COMPLIANCE PROGRESS: Secondary

Use of Force: ¶190

190. *Beginning July 1, 2019, CPD officers will, at a minimum, promptly after the incident is concluded, notify OEMC of investigatory stop or arrest occurrences in which a CPD officer points a firearm at a person in the course of effecting the seizure. The notification will identify which CPD beat(s) pointed a firearm at a person in the course of effecting the seizure. The City will ensure that OEMC data recording each such notification is electronically linked with CPD reports and body-worn camera recordings associated with the incident, and all are retained and readily accessible to the supervisor of each CPD beat(s) identified in the notification.*

Compliance Progress

(Reporting Period: January 1, 2022, through June 31, 2022)

Preliminary:	***In Compliance*** **(SECOND REPORTING PERIOD)**
Secondary:	***In Compliance*** **(FOURTH REPORTING PERIOD)**
Full:	***Not in Compliance***

In the sixth reporting period, the City and the CPD maintained Preliminary and Secondary compliance with ¶190.

To assess Preliminary Compliance, the IMT reviewed the CPD's *Use of Force* policies and the OEMC's policies to ensure they address the requirements of ¶190. We also evaluated the CPD's efforts to obtain and address community engagement and input on the policy that addresses ¶190's requirements.

To assess Secondary Compliance, we determined whether the CPD and the OEMC have sufficiently trained on their relevant policies. We also reviewed the number of officers who have completed *Use of Force* in-service training.

To assess Full Compliance, the IMT will evaluate whether the CPD and the OEMC have sufficiently implemented their policies and training and to ensure that OEMC records for firearm pointing notifications are properly linked to Police Computer Aided Dispatch (PCAD) reports and body-worn camera videos. One way to assess whether the notifications are occurring would be to sample incidents that are likely to involve a firearm pointing but for which no pointing was reported (such as reports of a person with a firearm or shots fired that result in an arrest); similarly, body-worn camera videos will be reviewed to determine whether required notifications occur, and video is properly linked. Other sources of information would include TRED's various reported findings with respect to firearm pointing incidents (including policy violations, proportion of cases with associated body worn camera video, and the proportion of cases for which documentation is lacking (such as an arrest report or ISR). The IMT may also consider records from BIA, COPA, and the

City's Law Department concerning firearm pointing incidents that are not reported to the OEMC.

In the fifth reporting period, TRED began reviewing all FPIRs, including FPIRs that did not have an ISR or arrest report associated with the incident, which had been a longstanding IMT recommendation.

During the sixth reporting period, the IMT reviewed TRED's quarterly and year-end reports.

TRED's *2021 Year-End Report* indicates that officers reported 3,005 individual firearm pointing incidents (FPIs) in 2021.[38] TRED reviewed 2,751 of those.[39] Because one incident may involve multiple beats reporting an FPI, these reports corresponded to 2,562 incidents. The number of FPIs and incidents each declined by 1% in comparison to 2020, when officers reported 3,038 FPIs and there were 2,595 incidents.

TRED made a recommendation for training in connection with 865 of the 3,005 reports (31%) and made no recommendations for training in connection with 1881 (68%).[40] Another five reports were referred to COPA. TRED also made three referrals to the district or unit of occurrence for corrective and/or disciplinary action because an officer "was observed in a related TRR or FPIR pointing their firearm at a person and there was no notification to OEMC of a FPI by that member."

Paragraph 190 requires the City to ensure that OEMC data is linked with CPD reports and body-worn camera recordings, "and all are retained and readily accessible to the supervisor of each CPD beat(s) identified in the notification."

As measured by the availability of body-worn camera video for TRED's review, body-worn camera use appears to have improved overall in 2021 as compared to 2020. In 2021, body-worn camera video was available for 97% of reviews compared to 90% in 2020.[41]

However, as in prior reporting periods, the majority of TRED's training recommendations in the sixth reporting period for firearm pointing addressed body-worn camera issues. There were 695 debriefings for late body-worn camera activations in 2021, which accounts for 27% of all firearm pointing incidents TRED reviewed but 80% of those reports for which TRED made a recommendation. The IMT observed refresher training for supervisors during the sixth reporting period that emphasized the need for front-line supervisors to identify, address, and document

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38 TRED's *2021 Year-End Report*, CHICAGO POLICE DEPARTMENT (APRIL 29, 2022), https://home.chicagopolice.org/wp-content/uploads/2021-YEAR-END-REPORT.pdf, p. 70.

39 *Id.* at p. 85. Elsewhere, the report states that TRED reviewed 2,748 FPI reports, *id.* at 70.

40 *Id.* at p. 85.

41 *Id.* at p. 87.

body-worn camera issues, but TRED's data suggest that more can and should be done.

The IMT continues to appreciate the CPD's efforts to begin reviewing all firearm pointing incidents, including those not associated with an arrest or ISR. Because of how frequently they occur (508, or 17% of the total number of FPIRs in 2021), this review is critical to the credibility of the CPD's analysis of firearm pointing overall. TRED referred 31 firearm pointing incidents that were not associated with an arrest or ISR (6%) to the Fourth Amendment Stop Unit for a final determination as to whether "there was a reporting deficiency."[42]

With respect to ongoing training on firearm pointing, the CPD provided records to show that more than 95% of officers received the two-day *2021 De-Escalation, Response to Resistance, and Use of Force* in-service training, with 96.71% of participants completing the *Communications* eight-hour course and 96.86% completing the *Procedures* eight-hour course.[43] The IMT reviewed and provided a no-objection notice for training materials for the CPD's *2022 De-Escalation, Response to Resistance, and Use of Force* in-service training. We also observed a session of the CPD's *2022 De-Escalation, Response to Resistance, and Use of Force* in-service training, as well as a session of the CPD's *Supervisor's in-service training*.

The CPD demonstrated its TRR Supervisory Dashboard for the IMT during the sixth reporting period. According to TRED's *2021 Year-End Report*, "The information included in this dashboard should allow for Department supervisors to correct the action of individual members and also recommend specific training for their districts/units based on documented need."[44] To that end, the IMT hopes that the dashboard will be expanded in the future to include firearm pointing incidents. TRED's *2021 Year-End Report* contains extensive FPI data—about beat and unit, weapons recovered, the nature of the initial incident, foot pursuits, and FPIs reported in error, for example—that could be useful to supervisors in real time.

The City and the CPD maintained Preliminary compliance with ¶190 since reaching it in the second reporting period. In the fourth reporting period, the City and the CPD achieved Secondary compliance because a sufficient number of CPD personnel received appropriate training as part of the 2020 *Use of Force* in-service training. We have previously noted that the CPD's ability to achieve Full compliance will depend on its ability to account for all firearm pointing incidents and achieve greater compliance with body-worn camera use.

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42 *Id.* at p. 80.

43 Because of the COVID-19 extension, the CPD had until March 5, 2022, to complete the delivery of its 2021 in-service training.

44 TRED's *2021 Year-End Report*, CHICAGO POLICE DEPARTMENT (APRIL 29, 2022), https://home.chicagopolice.org/wp-content/uploads/2021-YEAR-END-REPORT.pdf, p. 95.

The IMT looks forward to continuing to monitor TRED's review of firearm pointing incidents that are not associated with arrest reports or ISRs, as well as TRED's continued identification of patterns and trends associated with those and all firearm pointing incidents. In particular, we appreciate TRED's identification of other reports in which pointing incidents have been documented when there is no associated ISR or arrest report, such as the Traffic Stop Statistical Study Card (blue card) or the General Offense Case Report, and we look forward to learning more about the additional steps that the CPD will take to ensure that firearm pointing incidents are properly documented. We also look forward to learning more about how the Supervisory Dashboard is used, and whether it can be expanded to include FPI data. Going forward, the City and the CPD should continue to encourage and support front-line supervisors' efforts to identify, address, and document late activation of body-worn cameras.

Paragraph 190 Compliance Progress History

FIRST REPORTING PERIOD SEPTEMBER 1, 2019 – AUGUST 31, 2019 COMPLIANCE PROGRESS: None	SECOND REPORTING PERIOD SEPTEMBER 1, 2019 – FEBRUARY 29, 2020 COMPLIANCE PROGRESS: Preliminary	THIRD REPORTING PERIOD MARCH 1, 2020 – DECEMBER 31, 2020 COMPLIANCE PROGRESS: Preliminary
FOURTH REPORTING PERIOD JANUARY 1, 2021 – JUNE 30, 2021 COMPLIANCE PROGRESS: Secondary	FIFTH REPORTING PERIOD JULY 1, 2021 – DECEMBER 31, 2021 COMPLIANCE PROGRESS: Secondary	SIXTH REPORTING PERIOD JANUARY 1, 2022 – JUNE 30, 2022 COMPLIANCE PROGRESS: Secondary

Use of Force: ¶191

191. *OEMC will notify an immediate supervisor of the identified beat(s) each time the pointing of a firearm is reported. Notified CPD supervisors will ensure that the investigatory stop or arrest documentation and the OEMC recordation of the pointing of a firearm are promptly reviewed in accordance with CPD policy. CPD supervisors will effectively supervise the CPD members under their command consistent with their obligations set forth in the Supervision section of this Agreement.*

Compliance Progress

(Reporting Period: January 1, 2022, through June 31, 2022)

Preliminary:	***In Compliance*** **(SECOND REPORTING PERIOD)**
Secondary:	***Under Assessment***
Full:	***Not Yet Assessed***

In the sixth reporting period, the City and the CPD maintained Preliminary compliance and made progress toward Secondary compliance with ¶191.

To assess Preliminary Compliance, the IMT reviewed the CPD's *Use of Force* policies and the OEMC's relevant policies to ensure they address the requirements specified in ¶191. We also evaluate the CPD's efforts to obtain and address community engagement and input on the policy that addresses ¶191's requirements.

To assess Secondary Compliance, we reviewed data and documentation to determine whether the CPD has trained a sufficient number of officers and whether officers understand the firearm pointing policies and procedures. We also reviewed supervisor-specific training.

To assess Full Compliance, the IMT will evaluate whether the OEMC is making the required notifications and whether the CPD has sufficiently implemented its policy and training. Along with other sources of information, we will review TRED data on supervisor advisements and recommendations, which provide insight into whether supervisors are identifying deficiencies and training opportunities. We will also review a sample of firearm pointing incidents to assess whether supervisors respond appropriately.

The City and the CPD have maintained Preliminary compliance with ¶191 since reaching it in the second reporting period. In the fourth reporting period, the City and the CPD also made progress toward Secondary compliance with ¶191 via its 2020 Use of Force in-service training. We noted, however, that training specific to supervisors was still needed because TRED had reported that supervisors were proactively taking action in only 5 percent of pointing incidents warranting action.

The IMT also communicated to the CPD that further training on body-worn camera use was necessary for compliance with ¶191.

Additionally, in the fourth reporting period, we stated that the CPD should consider a process in which supervisors identify and record any issues with firearm pointing incidents shortly after review because the onus of enforcing the CPD's directives cannot and should not fall only on TRED.

We noted that during the fifth reporting period, TRED started to report how often supervisors indicated that they recognized a training opportunity and took corrective action at the time an incident occurs. In Q2, this reportedly occurred in only eight instances (or 4.8% of the time). In Q3, there were only four reported instances where supervisors recognized a training opportunity and addressed the issue (or 2% of the time). By way of comparison, TRED made 186 recommendations regarding FPIRs in Q2 and 281 in Q3.

In both the fourth and fifth reporting periods, we noted that we looked forward to the CPD's anticipated development of a supervisory dashboard.

As in prior reporting periods, the majority of TRED's training recommendations in the sixth reporting period for firearm pointing incidents were for body-worn camera issues. There were 695 debriefings for late body-worn camera activations in 2021, which accounts for 27% of all firearm pointing incidents TRED reviewed but 80% of those reports for which TRED made a recommendation.

In addition, TRED's *2021 Q4 Report* reported that there were zero instances of supervisors indicating that they recognized a training opportunity and took corrective action at the time an incident occurred (compared to eight and four in Q2 and Q3, respectively). In contrast, TRED made 225 recommendations regarding FPIRs in Q4.[45]

The IMT observed refresher training for supervisors during the sixth reporting period that emphasized the need for front-line supervisors to identify, address, and document body-worn camera issues, but TRED's statistics suggest that more can and should be done.

The IMT continues to appreciate the CPD's efforts to begin reviewing all firearm pointing incidents, including those not associated with an arrest or ISR. Because of how frequently they occur (508, or 17% of the total number of FPIRs in 2021), this review is critical to the credibility of the CPD's analysis of firearm pointing overall.

[45] TRED's *2021 Q4 Report*, CHICAGO POLICE DEPARTMENT (APRIL 29, 2022), https://home.chicagopolice.org/wp-content/uploads/Q4-2021-FRD-Report.pdf, p. 21.

TRED referred 31 firearm pointing incidents that were not associated with an arrest or ISR (6%) to the Fourth Amendment Stop Unit for a final determination as to whether "there was a reporting deficiency."[46]

With respect to ongoing training on firearm pointing, the CPD provided records to show that more than 95% of officers received the two-day *2021 De-Escalation, Response to Resistance, and Use of Force* in-service training, with 96.71% of participants completing the *Communications* eight-hour course and 96.86% completing the *Procedures* eight-hour course.[47] The IMT reviewed and provided a no-objection notice for training materials for the CPD's *2022 De-Escalation, Response to Resistance, and Use of Force* in-service training. We also observed a session of the CPD's *2022 De-Escalation, Response to Resistance, and Use of Force* in-service training, as well as a session of the CPD's *Supervisor's in-service training*.

The CPD demonstrated its TRR Supervisory Dashboard for the IMT during the sixth reporting period. According to TRED's *2021 Year-End Report*, "The information included in this dashboard should allow for Department supervisors to correct the action of individual members and also recommend specific training for their districts/units based on documented need."[48] To that end, the IMT hopes that the dashboard will be expanded in the future to include firearm pointing incidents. TRED's *2021 Year-End Report* contains extensive FPI data—about beat and unit, weapons recovered, the nature of the initial incident, foot pursuits, and FPIs reported in error, for example—that could be useful to supervisors in real time.

The City and the CPD maintained Preliminary compliance with ¶191 in the sixth reporting period and continued to make progress toward Secondary compliance. We look forward to verifying that a sufficient number of supervisors complete the *Supervisor's in-service training*. Based on the data from TRED's reports, however, further training is likely necessary to encourage front-line supervisors to take on a greater responsibility for identifying issues and training opportunities, and taking corrective action, at the time that a firearm pointing incident occurs. In particular, the IMT looks forward to learning more about the training and instructions the CPD will provide in connection with the Supervisory Dashboard and how the dashboard is used.

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46 TRED's *2021 Year-End Report*, CHICAGO POLICE DEPARTMENT (APRIL 29, 2022), https://home.chicagopolice.org/wp-content/uploads/2021-YEAR-END-REPORT.pdf, p. 80.

47 Because of the COVID-19 extension, the CPD had until March 5, 2022, to complete the delivery of its 2021 in-service training.

48 TRED's *2021 Year-End Report*, CHICAGO POLICE DEPARTMENT (APRIL 29, 2022), https://home.chicagopolice.org/wp-content/uploads/2021-YEAR-END-REPORT.pdf, p. 95.

Paragraph 191 Compliance Progress History

FIRST REPORTING PERIOD SEPTEMBER 1, 2019 – AUGUST 31, 2019	SECOND REPORTING PERIOD SEPTEMBER 1, 2019 – FEBRUARY 29, 2020	THIRD REPORTING PERIOD MARCH 1, 2020 – DECEMBER 31, 2020
COMPLIANCE PROGRESS: None	COMPLIANCE PROGRESS: Preliminary	COMPLIANCE PROGRESS: Preliminary
FOURTH REPORTING PERIOD JANUARY 1, 2021 – JUNE 30, 2021	**FIFTH REPORTING PERIOD** JULY 1, 2021 – DECEMBER 31, 2021	**SIXTH REPORTING PERIOD** JANUARY 1, 2022 – JUNE 30, 2022
COMPLIANCE PROGRESS: Preliminary	COMPLIANCE PROGRESS: Preliminary	COMPLIANCE PROGRESS: Preliminary

Use of Force: ¶192

192. *A designated unit at the CPD headquarters level will routinely review and audit documentation and information collected from all investigatory stop and arrest occurrences in which a CPD officer pointed a firearm at a person in the course of effecting a seizure. The review and audit will be completed within 30 days of each such occurrence. This review and audit will: a. identify whether the pointing of the firearm at a person allegedly violated CPD policy; b. identify any patterns in such occurrences and, to the extent necessary, ensure that any concerns are addressed; and c. identify any tactical, equipment, training, or policy concerns and, to the extent necessary, ensure that the concerns are addressed. The designated unit at the CPD headquarters level will, where applicable, make appropriate referrals for misconduct investigations or other corrective actions for alleged violations of CPD policy. At the completion of each review and audit, the designated unit at the CPD headquarters level will issue a written notification of its findings and, if applicable, any other appropriate actions taken or required to an immediate supervisor as described above.*

Compliance Progress

(Reporting Period: January 1, 2022, through June 31, 2022)

Recurring Schedule: Ongoing ☐ **Met** ☑ **Missed**

Preliminary: ***In Compliance*** **(SECOND REPORTING PERIOD)**
Secondary: ***In Compliance*** **(FOURTH REPORTING PERIOD)**
Full: ***Not in Compliance***

In the sixth reporting period, the City and the CPD maintained Preliminary and Secondary compliance with ¶192 and made progress toward Full compliance. Due to deployments, staff attrition, and insufficient resources, however, TRED was unable to meet the 30-day review deadline during the sixth reporting period.

To assess Preliminary Compliance, the IMT reviewed the CPD's *Use of Force* policies to ensure they address the requirements specified in ¶192.

To assess Secondary Compliance, we reviewed the CPD's training regarding its firearm pointing incident policy and procedures for TRED, and determined whether a sufficient number of officers have completed the training.

To assess Full Compliance, the IMT evaluated training, community, and data sources, including footage from body-worn cameras, firearm-pointing data, and TRED review schedules and TRED review completion records to determine

whether the CPD has sufficiently implemented its policy and training. We also examined whether concerns are adequately identified (both detected and evaluated), and whether the processes in place "ensure that concerns are addressed" at both the organizational and individual level.

The City and the CPD have maintained Preliminary compliance with ¶192 since reaching it in the second reporting period. In the fourth reporting period, the City and the CPD achieved Secondary compliance with ¶192 via the CPD's 2020 Use of Force in-service training and training that it delivered to TRED staff. We noted that the CPD also made progress toward Full compliance in the fourth and fifth reporting periods. In the fifth reporting period, however, we cautioned that TRED requires additional personnel in order to meet its 30-day deadline for firearm pointing incident reviews.

In the sixth reporting period, the IMT reviewed TRED's 2021 Q4 and Year-End Reports.[49] The IMT also attended a virtual site visit and monthly meetings with TRED's leadership. The reports and visit reveal that TRED made the following progress in the required areas for ¶192:

1. *Complete the review and audit within 30 days of each occurrence.* Despite TRED's best efforts, it is no longer able to meet the 30-day deadline for all firearm pointing incident reviews because of deployments, staff attrition, and insufficient resources.

2. *Identify whether the pointing of the firearm at a person allegedly violated policy*. TRED reported just five referrals to COPA in all of 2021. The most common recommendations for TRED Firearm Pointing Reviews continue to be related to body-worn camera use.

3. *Identify any patterns and ensure such concerns are addressed*. The IMT continues to appreciate the CPD's efforts to begin reviewing all firearm pointing incidents, including those not associated with an arrest or ISR. Because of how frequently they occur (508, or 17% of the total number of FPIRs in 2021), this review is critical to the credibility of the CPD's analysis of firearm pointing overall. TRED referred 31 firearm pointing incidents that were not associated with an arrest or ISR (6%) to the Fourth Amendment Stop Unit for a final determination as to whether "there was a reporting deficiency."[50]

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[49] *See* TRED's *2021 Q4 Report*, CHICAGO POLICE DEPARTMENT (APRIL 29, 2022), https://home.chicagopolice.org/wp-content/uploads/Q4-2021-FRD-Report.pdf; TRED's *2021 Year-End Report*, CHICAGO POLICE DEPARTMENT (APRIL 29, 2022), https://home.chicagopolice.org/wp-content/uploads/2021-YEAR-END-REPORT.pdf.

[50] TRED's *2021 Year-End Report*, CHICAGO POLICE DEPARTMENT (APRIL 29, 2022), https://home.chicagopolice.org/wp-content/uploads/2021-YEAR-END-REPORT.pdf, p. 80.

4. *Identify tactical, equipment, training, or policy concerns and to the extent necessary ensure that the concerns are addressed*. As in prior reporting periods, the majority of TRED's training recommendations in the sixth reporting period for firearm pointing incidents were for body-worn camera issues. There were 695 debriefings for late body-worn camera activations in 2021, which accounts for 27% of all firearm pointing incidents TRED reviewed but 80% of those reports for which TRED made a recommendation. In its *2021 Q4 Report*, TRED stated that it requested and was granted access to re-enroll officers in a *Body Worn Camera E-Learning* module, which it intended to begin implementing during the second quarter of 2022. We look forward to learning more about this promising development.

In addition, TRED's *2021 Q4 Report* reported that there were zero instances of supervisors indicating that they recognized a training opportunity and took corrective action at the time an incident occurred (compared to eight and four in Q2 and Q3, respectively). In contrast, TRED made 225 recommendations regarding FPIRs in Q4.[51] The IMT observed refresher training for supervisors during the sixth reporting period that emphasized the need for front-line supervisors to identify, address, and document body-worn camera issues, but TRED's statistics suggest that more can and should be done.

The CPD demonstrated its TRR Supervisory Dashboard for the IMT during the sixth reporting period. According to TRED's *2021 Year-End Report*, "The information included in this dashboard should allow for Department supervisors to correct the action of individual members and also recommend specific training for their districts/units based on documented need."[52] To that end, the IMT hopes that the dashboard will be expanded in the future to include firearm pointing incidents. TRED's *2021 Year-End Report* contains extensive FPI data—about beat and unit, weapons recovered, the nature of the initial incident, foot pursuits, and FPIs reported in error, for example—that could be useful to supervisors in real time.

The City and the CPD maintained Secondary compliance with ¶192 in the sixth reporting period and continued to make progress toward Full compliance.

We appreciate TRED's continued work addressing most of the requirements of ¶192, but it requires additional personnel in order to meet its 30-day deadline for firearm pointing incident reviews. We urge the City and the CPD to sufficiently staff TRED and to stop deploying its personnel.

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[51] TRED's *2021 Q4 Report*, CHICAGO POLICE DEPARTMENT (APRIL 29, 2022), https://home.chicagopolice.org/wp-content/uploads/Q4-2021-FRD-Report.pdf, p. 21.

[52] TRED's *2021 Year-End Report*, CHICAGO POLICE DEPARTMENT (APRIL 29, 2022), https://home.chicagopolice.org/wp-content/uploads/2021-YEAR-END-REPORT.pdf, p. 95.

We will continue to monitor TRED's review of firearm pointing incidents that are not associated with arrest reports or ISRs, as well as TRED's continued identification of patterns and trends associated with those and all firearm pointing incidents.

In addition, as TRED's data continues to show, front-line supervisors are not yet identifying or addressing deficiencies in pointing incidents at an effective rate. We will verify that a sufficient number of supervisors complete the *Supervisor's in-service training*. Based on the data from TRED's reports, however, further training is likely necessary to encourage front-line supervisors to take on a greater responsibility for identifying issues and training opportunities, and taking corrective action, at the time that a firearm pointing incident occurs. The IMT stresses that front line supervisors are crucial to this reform process. They must hold officers accountable and provide proper supervision, guidance, and correction consistently. In particular, the IMT looks to learn more about the training and instructions the CPD will provide in connection with the Supervisory Dashboard and how the dashboard is used.

Paragraph 192 Compliance Progress History

FIRST REPORTING PERIOD	SECOND REPORTING PERIOD	THIRD REPORTING PERIOD
SEPTEMBER 1, 2019 – AUGUST 31, 2019	SEPTEMBER 1, 2019 – FEBRUARY 29, 2020	MARCH 1, 2020 – DECEMBER 31, 2020
COMPLIANCE PROGRESS:	COMPLIANCE PROGRESS:	COMPLIANCE PROGRESS:
None	Preliminary	Preliminary
FOURTH REPORTING PERIOD	**FIFTH REPORTING PERIOD**	**SIXTH REPORTING PERIOD**
JANUARY 1, 2021 – JUNE 30, 2021	JULY 1, 2021 – DECEMBER 31, 2021	JANUARY 1, 2022 – JUNE 30, 2022
COMPLIANCE PROGRESS:	COMPLIANCE PROGRESS:	COMPLIANCE PROGRESS:
Secondary	Secondary	Secondary

Use of Force: ¶193

193. *CPD will ensure that the designated unit at the CPD headquarters level responsible for performing the duties required by this Part has sufficient resources to perform them, including staff with sufficient experience, rank, knowledge, and expertise.*

Compliance Progress

(Reporting Period: January 1, 2022, through June 31, 2022)

Preliminary:	***In Compliance*** **(SECOND REPORTING PERIOD)**
Secondary:	***Not in Compliance*** **(NEW: LOST COMPLIANCE)**
Full:	***Not in Compliance***

In the sixth reporting period, the City and the CPD maintained Preliminary compliance with ¶193 but did not maintain Secondary compliance.

To assess Preliminary Compliance, the IMT reviewed the CPD's Use of Force policies to ensure they address the requirements specified in ¶193.

To assess Secondary compliance, we reviewed the CPD's training regarding its firearm pointing incident policy and procedures for TRED, and determined whether a sufficient number of officers have completed the training.

To assess Full compliance, the IMT evaluated whether the CPD has sufficiently implemented its policy and training, including a review of TRED quarterly reports and data on TRED staffing levels and expertise to assess the capacities and capabilities of the TRED. The IMT also monitors TRED training and whether the TRED's firearm pointing review unit has sufficient personnel to address their workload and consistently meet the 30-day review deadline. The IMT also reviewed a sample of pointing incidents to determine whether policy has been complied with and accurately categorized.

The City and the CPD have maintained Preliminary compliance with ¶193 since reaching it in the second reporting period. The City and the CPD reached Secondary compliance in the third reporting period and maintained it through the fifth reporting period.

In the fourth reporting period, TRED continued to demonstrate its commitment to ensuring its staff have sufficient knowledge and expertise through continued in-service training. With respect to Full compliance, we noted during our site visit in the fourth reporting period that TRED was understaffed by at least 13 officers.

In the fifth reporting period, the CPD indicated its intent to expand the responsibilities of TRED to include search warrants and committed to allowing the IMT to review the changes and criteria for staffing the unit in light of the added responsibilities. We noted then that TRED was understaffed even for its current scope of

responsibilities and had been missing its 30-day firearm pointing incident review deadline and accumulating a backlog for its review of TRRs.

During the sixth reporting period, TRED staff continued to receive approximately 40 hours of training to perform their responsibilities over and above the 40 hours of annual in-service training that all officers receive.

The IMT continues to appreciate TRED's efforts to begin reviewing all firearm pointing incidents, including those not associated with an arrest or ISR. Because of how frequently they occur (508, or 17% of the total number of FPIRs in 2021), this review is critical to the credibility of the CPD's analysis of firearm pointing overall. TRED continues to provide the CPD with an extremely valuable service, and given sufficient resources, could do even more. For example, it may have been helpful for a TRED supervisor to appear as an expert alongside the instructor for two of the *Supervisor in-service training* modules, or even to teach the modules.

Soon, TRED will be responsible for reviewing all foot pursuits and for reviewing search warrants. However, even as the CPD continues to increase TRED's responsibilities, the CPD is failing to provide TRED with sufficient officers and supervisors to shoulder its existing workload. The CPD's continued practice of deploying TRED staff compounds this problem.

During a meeting with TRED's leadership on May 17, 2022, we learned that TRED was operating with one lieutenant, six sergeants, and 36 officers. At that time, TRED was budgeted for 48 officers. More than a year after selecting five officers for assignment to TRED, TRED was still waiting for CPD leadership to permit the assignment of the officers. There was no indication that those five officers—or any other additional staff—would be joining TRED in the near future.

As we noted in the fifth reporting period, TRED was using voluntary overtime to avoid a significant backlog. By May 17, 2022, however, TRED explained that its backlog was increasing at an accelerating pace. CPD's practice of deploying TRED personnel would continue to disrupt TRED's operations, in part because overworked staff would be less likely to take on voluntary overtime. By the end of the reporting period, TRED was no longer meeting its 30-day deadline for firearm pointing incident reviews. And we fear that its backlog will continue to grow.

In addition to the strain that deployments place on TRED's ability to meet its workload, deploying members of TRED to meet patrol needs risks undercutting TRED's credibility if it must review its own personnel's uses of force. We have repeatedly raised this serious concern with CPD leadership.

Because of the severity of TRED's lack of resources—and in spite of TRED's best efforts—we find that although TRED continues to train its staff, TRED no longer has

enough trained staff to perform its duties. Therefore, the City and the CPD did not maintain Secondary compliance in the sixth reporting period.

In conclusion, because the CPD has not sufficiently staffed TRED—even according to its budgeted positions—and the CPD continues to deploy TRED personnel, the City and the CPD are failing to provide TRED with sufficient resources to fulfill all of TRED's duties under the Consent Decree. On top of that, TRED is in the process of taking on additional responsibilities for the CPD. The professionalism and expertise of TRED personnel, along with the extensive training that they receive, simply cannot make up for the fact that TRED requires additional personnel in order to meet its 30-day deadline for firearm pointing incident reviews and to take on its new duties.

Paragraph 193 Compliance Progress History

FIRST REPORTING PERIOD	SECOND REPORTING PERIOD	THIRD REPORTING PERIOD
SEPTEMBER 1, 2019 – AUGUST 31, 2019	SEPTEMBER 1, 2019 – FEBRUARY 29, 2020	MARCH 1, 2020 – DECEMBER 31, 2020
COMPLIANCE PROGRESS: None	COMPLIANCE PROGRESS: Preliminary	COMPLIANCE PROGRESS: Secondary
FOURTH REPORTING PERIOD	**FIFTH REPORTING PERIOD**	**SIXTH REPORTING PERIOD**
JANUARY 1, 2021 – JUNE 30, 2021	JULY 1, 2021 – DECEMBER 31, 2021	JANUARY 1, 2022 – JUNE 30, 2022
COMPLIANCE PROGRESS: Secondary	COMPLIANCE PROGRESS: Secondary	COMPLIANCE PROGRESS: Preliminary

Use of Force: ¶194

194. *CPD officers will not be required to notify OEMC of the pointing of a firearm at a person when the CPD officer is a SWAT Team Officer responding to a designated SWAT incident, as defined in CPD Special Order S05-05, or an officer assigned to a federal task force during the execution of federal task force duties.*

Compliance Progress

(Reporting Period: January 1, 2022, through June 31, 2022)

Preliminary:	***In Compliance*** **(THIRD REPORTING PERIOD)**
Secondary:	***In Compliance*** **(FOURTH REPORTING PERIOD)**
Full:	***Under Assessment***

In the sixth reporting period, the City and the CPD maintained Preliminary and Secondary compliance with ¶194.

To assess Preliminary compliance, the IMT reviewed the CPD's *Use of Force* policies to ensure they address the requirements specified in ¶194.

To assess Secondary compliance, we reviewed the CPD's training regarding its firearm pointing incident policy and procedures for TRED, and determined whether a sufficient number of officers have completed the training.

To assess Full compliance, the IMT evaluated whether the CPD has sufficiently implemented its policy and training, including whether notifications that are not required are tracked and if ¶194's exemptions to the general firearm pointing reporting requirements result in complaints or other issues. As we continue to assess Full compliance, sources of information may include OEMC data, TRED reports, and news reports.

The City and the CPD have maintained Preliminary compliance with ¶194 since reaching it in the third reporting period. In the fourth reporting period, the City and the CPD achieved Secondary compliance with ¶194 via the CPD's 2020 *Use of Force* in-service training.

In the fifth reporting period, the CPD's TRED provided a letter to the IMT dated December 16, 2021, that stated that TRED "found no Firearm Pointing Incidents that were erroneously reported by Department Members assigned to SWAT team member assigned to a SWAT incident as defined in Department Special Order: S05-05-Special Weapons and Tactics (SWAT) Incidents." TRED did not separately address whether any such exempted notifications were made by an officer assigned to a federal task force during the execution of federal task force duties.

The CPD indicated that beginning in 2022, TRED would begin documenting whether any exempted firearm pointing notifications occur in its quarterly reports.

In our fifth semi-annual report, the IMT recommended that the CPD consider whether to continue to exempt SWAT from its general firearm pointing reporting requirements.

During the sixth reporting period, a SWAT officer who was not equipped with a body-worn camera reportedly shot and killed a man on April 3, 2022.[53] During a meeting on April 11, 2022, the CPD outlined the steps it was taking to ensure that SWAT officers are equipped with body-worn cameras but indicated that the SWAT officers would continue to be required to wear them only during the execution of search warrants pending revisions to SWAT's standard operating procedure (SOP). As we await an update on the resolution of this issue, we remind the City and the CPD of the utility of body-worn camera footage in permitting the comprehensive review and evaluation of law enforcement activities, including firearm pointing incidents and use of force incidents.

TRED's *2021 Year-End Report* indicates that there was one instance in 2021 in which a SWAT team member reported an FPI during a SWAT incident despite the exception to the notification requirement.[54] The report also indicates that there were no instances of a member assigned to a federal task force reporting an FPI.

The City and the CPD maintained Preliminary and Secondary compliance with ¶194 in the sixth reporting period.

The IMT will continue to review information in TRED's reports about whether exempted notifications are occurring in future reporting periods. In addition, the IMT will explore further whether the exemptions will remain viable in light of the expansion of TRED's role to cover review of search warrants.

Paragraph 194 Compliance Progress History

FIRST REPORTING PERIOD	SECOND REPORTING PERIOD	THIRD REPORTING PERIOD
SEPTEMBER 1, 2019 – AUGUST 31, 2019	SEPTEMBER 1, 2019 – FEBRUARY 29, 2020	MARCH 1, 2020 – DECEMBER 31, 2020
COMPLIANCE PROGRESS:	COMPLIANCE PROGRESS:	COMPLIANCE PROGRESS:
Not Applicable	Not Applicable	Preliminary
FOURTH REPORTING PERIOD	**FIFTH REPORTING PERIOD**	**SIXTH REPORTING PERIOD**
JANUARY 1, 2021 – JUNE 30, 2021	JULY 1, 2021 – DECEMBER 31, 2021	JANUARY 1, 2022 – JUNE 30, 2022
COMPLIANCE PROGRESS:	COMPLIANCE PROGRESS:	COMPLIANCE PROGRESS:
Secondary	Secondary	Secondary

[53] https://news.wttw.com/2022/04/04/chicago-officer-who-shot-killed-man-sunday-was-not-equipped-body-worn-camera.

[54] TRED's *2021 Year-End Report*, CHICAGO POLICE DEPARTMENT (APRIL 29, 2022), https://home.chicagopolice.org/wp-content/uploads/2021-YEAR-END-REPORT.pdf, p. 78.

Use of Force: ¶195

195. *CPD officers will not be required to notify OEMC of any unholstering or display of a firearm or having a firearm in a "low ready" position during the course of an investigation, unless the firearm is pointed at a person.*

Compliance Progress

(Reporting Period: January 1, 2022, through June 31, 2022)

Preliminary:	***In Compliance*** **(THIRD REPORTING PERIOD)**
Secondary:	***In Compliance*** **(FOURTH REPORTING PERIOD)**
Full:	***In Compliance*** **(NEW)**
Sustainment Period Ends	***June 30, 2024***

In the sixth reporting period, the City and the CPD maintained Preliminary and Secondary compliance and achieved Full compliance with ¶195.

To assess Preliminary compliance, the IMT reviewed the CPD's *Use of Force* policies—particularly Department Order D19-01, *Firearm Pointing Incidents*, effective November 1, 2019—to ensure they address the requirements specified in ¶195.

To assess Secondary compliance, we reviewed the CPD's training regarding its firearm pointing incident policy and procedures for TRED, and determined whether a sufficient number of officers have completed the training.

To assess Full compliance, the IMT evaluated whether the CPD has sufficiently implemented its policy and training, including whether notifications that are not required are tracked and if ¶195's exemptions to the general firearm pointing reporting requirements result in complaints or other issues.

The City and the CPD have maintained Preliminary compliance with ¶195 since reaching it in the third reporting period. In the fourth reporting period, the City and the CPD achieved Secondary compliance with ¶195 via the CPD's 2020 Use of Force in-service training.

In the fifth reporting period, the CPD indicated that beginning in 2022, TRED would begin documenting in its quarterly reports whether any "erroneous" firearm pointing notifications occur.

During the sixth reporting period, the IMT reviewed TRED's quarterly and annual reports. TRED's *2021 Year-End Report* indicates that officers reported 3,005 individual firearm pointing incidents (FPIs) in 2021.[55] TRED reviewed 2,751 of those.[56]

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[55] TRED's *2021 Year-End Report*, CHICAGO POLICE DEPARTMENT (APRIL 29, 2022), https://home.chicagopolice.org/wp-content/uploads/2021-YEAR-END-REPORT.pdf, p. 70.

[56] *Id.* at p. 85. Elsewhere, the report states that TRED reviewed 2,748 FPI reports, *id.* at 70.

TRED made no recommendations for training in connection with 1881 (68%) of those reports and made a recommendation for training in connection with 865 (31%).[57] Another five reports were referred to COPA. TRED also made three referrals to the district or unit of occurrence for corrective and/or disciplinary action because an officer "was observed in a related TRR or FPIR pointing their firearm at a person and there was no notification to OEMC of a FPI by that member."[58]

In comparison, in 2021, there were five instances where an officer reported a firearm pointing incident when TRED only observed the firearm in a low-ready position.[59] In addition, there were three instances where an officer reported an FPI after pointing a Taser at a person.

We appreciate that TRED now publicly reports the number of "erroneous" firearm pointing incident reports. The infrequency with which such reports occur—coupled with TRED's ability to address such incidents—demonstrates that officers and supervisors are well aware that CPD's firearm pointing policy does not require a notification to OEMC of a mere "unholstering or display of a firearm or having a firearm in a 'low ready' position," ¶195. Therefore, the City and the CPD met Full compliance with ¶195 in the sixth reporting period.

With respect to ongoing training on firearm pointing reporting, the CPD provided records to show that more than 95% of officers received the two-day *2021 De-Escalation, Response to Resistance, and Use of Force* in-service training, with 96.71% of participants completing the *Communications* eight-hour course and 96.86% completing the *Procedures* eight-hour course.[60] In addition, the IMT reviewed and provided a no-objection notice for training materials for the CPD's *2022 De-Escalation, Response to Resistance, and Use of Force* in-service training, and observed a session of that training.

The City and the CPD achieved Full compliance with ¶195 in the sixth reporting period.

The IMT will continue to review information in TRED's quarterly and annual reports about whether notifications are occurring that are not required by ¶195.

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57 *Id.* at p. 85.

58 *Id.* at p. 70.

59 *Id.* at p. 78.

60 Because of the COVID-19 extension, the CPD had until March 5, 2022, to complete the delivery of its 2021 in-service training.

Paragraph 195 Compliance Progress History

FIRST REPORTING PERIOD	SECOND REPORTING PERIOD	THIRD REPORTING PERIOD
SEPTEMBER 1, 2019 – AUGUST 31, 2019	SEPTEMBER 1, 2019 – FEBRUARY 29, 2020	MARCH 1, 2020 – DECEMBER 31, 2020
COMPLIANCE PROGRESS:	COMPLIANCE PROGRESS:	COMPLIANCE PROGRESS:
Not Applicable	Not Applicable	Preliminary

FOURTH REPORTING PERIOD	FIFTH REPORTING PERIOD	SIXTH REPORTING PERIOD
JANUARY 1, 2021 – JUNE 30, 2021	JULY 1, 2021 – DECEMBER 31, 2021	JANUARY 1, 2022 – JUNE 30, 2022
COMPLIANCE PROGRESS:	COMPLIANCE PROGRESS:	COMPLIANCE PROGRESS:
Secondary	Secondary	Full

Use of Force: ¶196

196. *The City will ensure that all documentation and recordation of investigatory stop or arrest occurrences in which a CPD member points a firearm at a person, including OEMC data, is maintained in a manner that allows the Monitor, CPD, and OAG to review and analyze such occurrences. Beginning January 1, 2020, the Monitor will analyze these occurrences on an annual basis to assess whether changes to CPD policy, training, practice, or supervision are necessary, and to recommend any changes to the process of documenting, reviewing, and analyzing these occurrences. CPD will either adopt the Monitor's recommendations or respond in writing within 30 days. Any dispute regarding the whether the Monitor's recommendations should be implemented will be resolved by the Court.*

Compliance Progress

(Reporting Period: January 1, 2022, through June 31, 2022)

Recurring Schedule: Ongoing ☐ **Met** ☑ **Missed**

Preliminary: ***In Compliance*** **(SECOND REPORTING PERIOD)**
Secondary: ***In Compliance*** **(THIRD REPORTING PERIOD)**
Full: ***Not in Compliance***

In the sixth reporting period, the City and the CPD maintained Preliminary and Secondary compliance with ¶196.

Paragraph 196—along with a few other paragraphs in the Consent Decree—is written to highlight the IMT's actions or reviews but ultimately relates to City responsibilities.

To assess Preliminary Compliance, the IMT reviewed the CPD's *Use of Force* policies—particularly Department Order D19-01, *Firearm Pointing Incidents*, effective November 1, 2019—to ensure they address the requirements specified in ¶196.

To assess Secondary Compliance, we reviewed the CPD's training regarding its firearm pointing incident policy and procedures for TRED, and determined whether a sufficient number of officers have completed the training.

To assess Full Compliance, the IMT evaluated whether the CPD has sufficiently implemented its policy and training, including following practices for maintaining and reviewing documentation, recordation, and data regarding firearm pointing incidents. We also evaluated whether the CPD produces data that allows the IMT to identify patterns and trends at the district, shift, and beat level in a timely fashion

for all current pointing incidents (including those not associated with an ISR or arrest report) and how the CPD responds to recommendations regarding trends and patterns.

The City and the CPD have maintained Preliminary and Secondary compliance with ¶196 since reaching those levels in the second and third reporting periods, respectively.

In the fourth reporting period, the IMT noted our longstanding recommendation for the CPD to review all firearm pointing incidents, including those that did not have an associated ISR or arrest report. We also discussed our recommended revisions to the dashboards to include detailed data at the beat level, allowing for identification of geographic areas with high levels of firearm pointing incidents. We explained that capturing and analyzing data at the beat level will enable the CPD to identify patterns and trends that may be rectified through, for example, training or increased supervisor engagement. We also noted that the CPD was planning to conduct an audit to assess the effectiveness of debriefings.

During the fifth reporting period, TRED began reviewing all FPIRs, including FPIRs that did not have an ISR or arrest report associated with the incident, which had been a longstanding IMT recommendation. We appreciate the effort. We noted, however, that TRED required additional personnel in order to meet its 30-day deadline for firearm pointing incident reviews.

We also noted that we looked forward to reviewing the CPD's ongoing efforts to address our recommendations, including the CPD's plan to introduce a Supervisory Dashboard to enable and encourage field supervisors to take on a greater responsibility for identifying issues and training opportunities, and taking corrective action, at the time that a firearm pointing incident occurs.

During the sixth reporting period, the IMT reviewed TRED's quarterly and year-end reports. TRED's *2021 Year-End Report* indicates that TRED made a recommendation for training in connection with 865 of the 3,005 firearm pointing incident reports made in 2021 (31%) and made no recommendations for training in connection with 1881 (68%).[61]

As in prior reporting periods, the majority of TRED's training recommendations in the sixth reporting period for firearm pointing incidents were for body-worn camera issues. There were 695 debriefings for late body-worn camera activations in 2021, which accounts for 27% of all firearm pointing incidents TRED reviewed but 80% of those reports for which TRED made a recommendation. In its *2021 Q4 Report*, TRED stated that it requested and was granted access to re-enroll officers in

[61] TRED's *2021 Year-End Report*, CHICAGO POLICE DEPARTMENT (APRIL 29, 2022), https://home.chicagopolice.org/wp-content/uploads/2021-YEAR-END-REPORT.pdf, p. 85.

a *Body Worn Camera E-Learning* module, which it intended to begin implementing during the second quarter of 2022. We look forward to learning more about this promising development. The IMT also observed refresher training for supervisors during the sixth reporting period that emphasized the need for front-line supervisors to identify, address, and document body-worn camera issues, but TRED's statistics suggest that more can and should be done.

The IMT continues to appreciate the CPD's efforts to begin reviewing all firearm pointing incidents, including those not associated with an arrest or ISR. Because of how frequently they occur (508, or 17% of the total number of FPIRs in 2021), this review is critical to the credibility of the CPD's analysis of firearm pointing overall. TRED referred 31 firearm pointing incidents that were not associated with an arrest or ISR (6%) to the Fourth Amendment Stop Unit for a final determination as to whether "there was a reporting deficiency."[62]

The CPD demonstrated its TRR Supervisory Dashboard for the IMT during the sixth reporting period. According to TRED's *2021 Year-End Report*, "The information included in this dashboard should allow for Department supervisors to correct the action of individual members and also recommend specific training for their districts/units based on documented need."[63] To that end, the IMT hopes that the dashboard will be expanded in the future to include firearm pointing incidents. TRED's *2021 Year-End Report* contains extensive FPI data—about beat and unit, weapons recovered, the nature of the initial incident, foot pursuits, and FPIs reported in error, for example—that could be useful to supervisors in real time.

TRED's *2021 Q4 Report* reported that there were zero instances of supervisors indicating that they recognized a training opportunity and took corrective action at the time an incident occurred (compared to eight and four in Q2 and Q3, respectively). In contrast, TRED made 225 recommendations regarding FPIRs in Q4.[64] The IMT discussed front-line supervisors' accountability with the CPD during numerous meetings and site visits and will continue to do so going forward.

The City and the CPD maintained Preliminary and Secondary compliance with ¶196 in the sixth reporting period. The IMT will continue to monitor TRED's review of firearm pointing incidents that are not associated with arrest reports or ISRs, as well as TRED's continued identification of patterns and trends associated with those and all firearm pointing incidents. We also look forward to learning more

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62 *Id.* at p. 80.

63 TRED's *2021 Year-End Report*, CHICAGO POLICE DEPARTMENT (APRIL 29, 2022), https://home.chicagopolice.org/wp-content/uploads/2021-YEAR-END-REPORT.pdf, p. 95.

64 TRED's *2021 Q4 Report*, CHICAGO POLICE DEPARTMENT (APRIL 29, 2022), https://home.chicagopolice.org/wp-content/uploads/Q4-2021-FRD-Report.pdf, p. 21.

about how the Supervisory Dashboard is used, and whether it can be expanded to include FPI data.

Going forward, the City and the CPD should continue to encourage and support front-line supervisors' efforts to identify, address, and document issues with FPIs. We look forward to verifying that a sufficient number of supervisors complete the *Supervisor's in-service training*. Based on the data from TRED's reports, however, further training is likely necessary to encourage front-line supervisors to take on a greater responsibility for identifying issues and training opportunities, and taking corrective action, at the time that a firearm pointing incident occurs.

Finally, the CPD's Audit Division has indicated that it plans to initiate a review of TRED's debriefing procedures during 2022; we await further updates as well as the Audit Division's findings.

Paragraph 196 Compliance Progress History

FIRST REPORTING PERIOD SEPTEMBER 1, 2019 – AUGUST 31, 2019 COMPLIANCE PROGRESS: Not Applicable	SECOND REPORTING PERIOD SEPTEMBER 1, 2019 – FEBRUARY 29, 2020 COMPLIANCE PROGRESS: Preliminary	THIRD REPORTING PERIOD MARCH 1, 2020 – DECEMBER 31, 2020 COMPLIANCE PROGRESS: Secondary
FOURTH REPORTING PERIOD JANUARY 1, 2021 – JUNE 30, 2021 COMPLIANCE PROGRESS: Secondary	FIFTH REPORTING PERIOD JULY 1, 2021 – DECEMBER 31, 2021 COMPLIANCE PROGRESS: Secondary	SIXTH REPORTING PERIOD JANUARY 1, 2022 – JUNE 30, 2022 COMPLIANCE PROGRESS: Secondary

Use of Force: ¶197

197. *CPD will continue to require that only officers who are currently certified may be issued, carry, and use Tasers.*

Compliance Progress (Reporting Period: January 1, 2022, through June 31, 2022)

Preliminary:	***In Compliance*** **(THIRD REPORTING PERIOD)**
Secondary:	***In Compliance*** **(FOURTH REPORTING PERIOD)**
Full:	***Under Assessment***

In the sixth reporting period, the City and the CPD maintained Preliminary and Secondary compliance with and remained under assessment for Full compliance with ¶197.

To assess Preliminary compliance with ¶197, the IMT reviewed the CPD's policies that reflect the requirements of the Consent Decree, including *Uniform and Property* U04-02-02, *Control Devices and Instruments*, General Order G03-02-04, *Taser Use Incidents*, and Special Order S11-03-01, *Annual Prescribed Weapon Qualification Program and Taser Recertification*.

During the sixth reporting period, the CPD continued to meet with the Coalition to revise G03-02-04, its *Taser Use Incidents* policy. On the final day of the reporting period, the CPD provided the IMT with a revised version of G03-02-04 reflecting revisions that the CPD made as a result of its discussions with the Coalition.

The CPD also provided records to show that more than 95% of officers received the two-day *2021 De-Escalation, Response to Resistance, and Use of Force* in-service training, with 96.71% of participants completing the *Communications* eight-hour course and 96.86% completing the *Procedures* eight-hour course.[65] In addition, the IMT reviewed and provided a no-objection notice for training materials for the CPD's *2022 De-Escalation, Response to Resistance, and Use of Force* in-service training, and observed a session of that training.

As in the previous reporting period, the IMT continues to seek a data source with which to clearly assess the CPD's Full compliance. The data base should include all officers who are certified Taser users, the date of their certification, length of their certification, and requirements of their certification, searchable by reporting period. We also plan to review TRED records and TRRs regarding Taser use to cross check against the list of certified officers. We look forward to the CPD's continued progress on the requirements of ¶197.

[65] Because of the COVID-19 extension, the CPD had until March 5, 2022, to complete the delivery of its 2021 in-service training.

Paragraph 197 Compliance Progress History

FIRST REPORTING PERIOD	SECOND REPORTING PERIOD	THIRD REPORTING PERIOD
SEPTEMBER 1, 2019 – AUGUST 31, 2019	SEPTEMBER 1, 2019 – FEBRUARY 29, 2020	MARCH 1, 2020 – DECEMBER 31, 2020
COMPLIANCE PROGRESS:	COMPLIANCE PROGRESS:	COMPLIANCE PROGRESS:
Not Applicable	None	Preliminary

FOURTH REPORTING PERIOD	FIFTH REPORTING PERIOD	SIXTH REPORTING PERIOD
JANUARY 1, 2021 – JUNE 30, 2021	JULY 1, 2021 – DECEMBER 31, 2021	JANUARY 1, 2022 – JUNE 30, 2022
COMPLIANCE PROGRESS:	COMPLIANCE PROGRESS:	COMPLIANCE PROGRESS:
Secondary	Secondary	Secondary

Use of Force: ¶198

198. *CPD will instruct officers that Tasers can cause serious injury or death and, as a result, officers should use Tasers only after balancing relevant factors including the threat presented by the subject, the risk of injury if a Taser is used, and the seriousness of the suspected offense. Consistent with this standard, CPD officers should not use Tasers against persons who are reasonably perceived to be non-violent, unarmed, and suspected of low-level offenses, such as property-related misdemeanors, quality of life offenses, moving or traffic violations, or municipal code violations.*

Compliance Progress

(Reporting Period: January 1, 2022, through June 31, 2022)

Preliminary:	***In Compliance*** **(NEW)**
Secondary:	***In Compliance*** **(NEW)**
Full:	***Not Yet Assessed***

In the sixth reporting period, the City and the CPD achieved Preliminary and Secondary compliance with ¶198.

To evaluate Preliminary compliance with ¶198, we continued to focus our review on whether the City and the CPD received the requisite community input for General Order G03-02-04, *Taser Use Incidents*. Throughout this reporting period, the CPD engaged in discussions with the Coalition (*see* ¶669). On the final day of the reporting period, the CPD provided the IMT with a revised version of G03-02-04 reflecting revisions that the CPD made as a result of its discussions with the Coalition. The IMT and the OAG will have the opportunity to comment on the revised version during the seventh reporting period.

The version of G03-02-04, *Taser Use Incidents*, that is currently in effect was issued December 31, 2020, with an effective date of April 15, 2021. That version contains the necessary language for Preliminary compliance with ¶198, and in the intervening time, the CPD has continued discussions with the Coalition to revise the policy in ways that go beyond ¶198's requirements, thereby enabling them to achieve Preliminary compliance. In order to maintain Preliminary compliance in the seventh reporting period, we expect the CPD to issue and make effective the changes agreed upon with the Coalition to G03-02-04.

With regard to Secondary compliance, the CPD provided records indicating that more than 95% of officers received the two-day *2021 De-Escalation, Response to Resistance, and Use of Force* in-service training, with 96.71% of participants com-

pleting the *Communications* eight-hour course and 96.86% completing the *Procedures* eight-hour course.[66] In addition, the IMT reviewed and provided a no-objection notice for training materials for the CPD's *2022 De-Escalation, Response to Resistance, and Use of Force* in-service training, and observed a session of that training.

Because the currently effective version of G03-02-04 contains the necessary language for Preliminary compliance with ¶198, the CPD's training on that version of the policy likewise suffices for Secondary compliance. But to maintain Secondary compliance going forward, the CPD needs to provide training on the revisions it agreed to with the Coalition that go beyond ¶198's requirements.

As we noted in the previous reporting period, according to the CPD's Use of Force Dashboard, Taser usage has seen a significant reduction in recent years.

Use of Force Appendix Figure 4.
Data from CPD's Use of Force Dashboard re: Taser Use[67]

YEAR	REPORTED TASER INCIDENTS
2016	474
2017	383
2018	207
2019	202
2020	149
2021	112

The IMT will continue to monitor data regarding Taser use in the next reporting period.

Paragraph 198 Compliance Progress History

FIRST REPORTING PERIOD	SECOND REPORTING PERIOD	THIRD REPORTING PERIOD
SEPTEMBER 1, 2019 – AUGUST 31, 2019	SEPTEMBER 1, 2019 – FEBRUARY 29, 2020	MARCH 1, 2020 – DECEMBER 31, 2020
COMPLIANCE PROGRESS:	COMPLIANCE PROGRESS:	COMPLIANCE PROGRESS:
Not Applicable	None	Under Assessment
FOURTH REPORTING PERIOD	**FIFTH REPORTING PERIOD**	**SIXTH REPORTING PERIOD**
JANUARY 1, 2021 – JUNE 30, 2021	JULY 1, 2021 – DECEMBER 31, 2021	JANUARY 1, 2022 – JUNE 30, 2022
COMPLIANCE PROGRESS:	COMPLIANCE PROGRESS:	COMPLIANCE PROGRESS:
Under Assessment	Under Assessment	Secondary

66 Because of the COVID-19 extension, the CPD had until March 5, 2022, to complete the delivery of its 2021 in-service training.

67 The IMT's review of TRR data reported by CPD revealed minor data discrepancies between CPD's Public Use of Force Dashboard and TRED reports. For the purposes of IMR-6, we are reporting data from the dashboard. The IMT plans to further examine and discuss these discrepancies with the CPD in the next reporting period.

Use of Force: ¶199

199. *CPD will clarify in policy that flight alone, without any other basis for reasonable articulable suspicion or probable cause, does not justify use of a Taser against a subject.*

Compliance Progress (Reporting Period: January 1, 2022, through June 31, 2022)

Preliminary:	***In Compliance*** **(NEW)**
Secondary:	***In Compliance*** **(NEW)**
Full:	***Not Yet Assessed***

In the sixth reporting period, the City and the CPD achieved Preliminary and Secondary compliance with ¶199.

To evaluate Preliminary compliance with ¶199, we continued to focus our review on whether the City and the CPD received the requisite community input for General Order G03-02-04, *Taser Use Incidents*. Throughout this reporting period, the CPD engaged in discussions with the Coalition (*see* ¶669). On the final day of the reporting period, the CPD provided the IMT with a revised version of G03-02-04 reflecting revisions that the CPD made as a result of its discussions with the Coalition. The IMT and the OAG will have the opportunity to comment on the revised version during the seventh reporting period.

The version of G03-02-04, *Taser Use Incidents*, that is currently in effect was issued December 31, 2020, with an effective date of April 15, 2021. That version contains the necessary language for Preliminary compliance with ¶199, and in the intervening time, the CPD has continued discussions with the Coalition to revise the policy in ways that go beyond ¶199's requirements. In order to maintain Preliminary compliance in the seventh reporting period, we expect the CPD to issue and make effective the changes agreed upon with the Coalition to G03-02-04.

With regard to Secondary compliance, the CPD provided records to indicate that more than 95% of officers received the two-day *2021 De-Escalation, Response to Resistance, and Use of Force* in-service training, with 96.71% of participants completing the *Communications* eight-hour course and 96.86% completing the *Procedures* eight-hour course.[68] In addition, the IMT reviewed and provided a no-objection notice for training materials for the CPD's *2022 De-Escalation, Response to Resistance, and Use of Force* in-service training, and observed a session of that training.

Because the currently effective version of G03-02-04 contains the necessary language for Preliminary compliance with ¶199, the CPD's training on that version of

[68] Because of the COVID-19 extension, the CPD had until March 5, 2022, to complete the delivery of its 2021 in-service training.

the policy likewise suffices for Secondary compliance. But to maintain Secondary compliance going forward, the CPD will need to provide training on the revisions it agreed to with the Coalition that go beyond ¶199's requirements.

Paragraph 199 Compliance Progress History

FIRST REPORTING PERIOD SEPTEMBER 1, 2019 – AUGUST 31, 2019	SECOND REPORTING PERIOD SEPTEMBER 1, 2019 – FEBRUARY 29, 2020	THIRD REPORTING PERIOD MARCH 1, 2020 – DECEMBER 31, 2020
COMPLIANCE PROGRESS: Not Applicable	COMPLIANCE PROGRESS: None	COMPLIANCE PROGRESS: Under Assessment
FOURTH REPORTING PERIOD JANUARY 1, 2021 – JUNE 30, 2021	**FIFTH REPORTING PERIOD** JULY 1, 2021 – DECEMBER 31, 2021	**SIXTH REPORTING PERIOD** JANUARY 1, 2022 – JUNE 30, 2022
COMPLIANCE PROGRESS: Under Assessment	COMPLIANCE PROGRESS: Under Assessment	COMPLIANCE PROGRESS: Secondary

Use of Force: ¶200

> ***200.*** *When safe and feasible to do so, CPD officers must give verbal commands and warnings prior to, during, and after deployment of a Taser. When safe and feasible to do so, CPD officers will allow a subject a reasonable amount of time to comply with a warning prior to using or continuing to use a Taser, unless doing so would compromise the safety of an officer or another person.*

Compliance Progress

(Reporting Period: January 1, 2022, through June 31, 2022)

Preliminary:	***In Compliance*** **(FOURTH REPORTING PERIOD)**
Secondary:	***Under Assessment***
Full:	***Under Assessment***

In the sixth reporting period, the City and the CPD maintained Preliminary compliance with ¶200 and remained under assessment for Secondary and Full compliance.

To evaluate Preliminary compliance with ¶200—which the City and the CPD reached in the fourth reporting period—we reviewed General Order G03-02-04, *Taser Use Incidents*. The version of G03-02-04, *Taser Use Incidents*, that is currently in effect was issued December 31, 2020, with an effective date of April 15, 2021. That version contains the necessary language for Preliminary compliance with ¶200.

With regard to Secondary compliance, the CPD provided records to indicate that more than 95% of officers received the two-day *2021 De-Escalation, Response to Resistance, and Use of Force* in-service training, with 96.71% of participants completing the *Communications* eight-hour course and 96.86% completing the *Procedures* eight-hour course.[69] In addition, the IMT reviewed and provided a no-objection notice for training materials for the CPD's *2022 De-Escalation, Response to Resistance, and Use of Force* in-service training, and observed a session of that training.

We also reviewed TRED's quarterly and year-end reports and the CPD's Use of Force Dashboard and note (*see* data table in ¶198) that Taser use incidents have declined over the last six years, with 116 Taser discharges in 2021. In its *2021 Year-End Report*, TRED indicated that there was one debriefing for an officer failing to give a warning prior to Taser use.[70]

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[69] Because of the COVID-19 extension, the CPD had until March 5, 2022, to complete the delivery of its 2021 in-service training.

[70] TRED's *2021 Year-End Report*, CHICAGO POLICE DEPARTMENT (APRIL 29, 2022), https://home.chicagopolice.org/wp-content/uploads/2021-YEAR-END-REPORT.pdf, p. 60.

At the end of the fifth reporting period, we recommended to the CPD that TRED add a debriefing point to the TRR-R to track whether a verbal warning was issued prior to the use of any reportable force (as required by ¶183). We consider this an important step toward Secondary compliance.

The CPD remains under assessment for Secondary and Full compliance pending a revision to the TRR-R that will allow the CPD to better assess compliance with the requirements of ¶200.

Paragraph 200 Compliance Progress History

FIRST REPORTING PERIOD SEPTEMBER 1, 2019 – AUGUST 31, 2019 COMPLIANCE PROGRESS: Not Applicable	SECOND REPORTING PERIOD SEPTEMBER 1, 2019 – FEBRUARY 29, 2020 COMPLIANCE PROGRESS: None	THIRD REPORTING PERIOD MARCH 1, 2020 – DECEMBER 31, 2020 COMPLIANCE PROGRESS: Under Assessment
FOURTH REPORTING PERIOD JANUARY 1, 2021 – JUNE 30, 2021 COMPLIANCE PROGRESS: Preliminary	FIFTH REPORTING PERIOD JULY 1, 2021 – DECEMBER 31, 2021 COMPLIANCE PROGRESS: Preliminary	SIXTH REPORTING PERIOD JANUARY 1, 2022 – JUNE 30, 2022 COMPLIANCE PROGRESS: Preliminary

Use of Force: ¶201

201. *CPD will strongly discourage the use of Tasers in schools and on students. CPD will require officers to consider the totality of the circumstances, including a subject's apparent age, size, and the threat presented, in assessing the reasonableness and necessity of using a Taser in a school.*

Compliance Progress

(Reporting Period: January 1, 2022, through June 31, 2022)

Preliminary:	***In Compliance*** **(NEW)**
Secondary:	***In Compliance*** **(NEW)**
Full:	***Not Yet Assessed***

In the sixth reporting period, the City and the CPD re-attained Preliminary compliance and achieved Secondary compliance with ¶201.

To evaluate Preliminary compliance with ¶201, we considered the CPD's changes to "strongly discourage" the use of Tasers in schools and on students in a revised version of S04-01-02, *School Resource Officer*, that was issued and made effective on June 30, 2022 (the last day of the reporting period). We recommended that the CPD revise S04-01-02 in IMR-4 and determined that the City and the CPD failed to maintain Preliminary compliance in the fifth reporting period pending that revision.

We also continued to focus our review on whether the City and the CPD received the requisite community input for General Order G03-02-04, *Taser Use Incidents*. Throughout this reporting period, the CPD engaged in discussions with the Coalition (*see* ¶669). On the final day of the reporting period, the CPD provided the IMT with a revised version of G03-02-04 reflecting revisions that the CPD made as a result of its discussions with the Coalition. The IMT and the OAG will have the opportunity to comment on the revised version during the seventh reporting period.

The version of G03-02-04, *Taser Use Incidents*, that is currently in effect was issued December 31, 2020, with an effective date of April 15, 2021. That version contains the necessary language for Preliminary compliance with ¶201, and in the intervening time, the CPD has continued discussions with the Coalition to revise the policy in ways that go beyond ¶201's requirements. In order to maintain Preliminary compliance in the seventh reporting period, we expect the CPD to issue and make effective the changes agreed upon with the Coalition to G03-02-04.

With regard to Secondary compliance, the CPD provided records to indicate that more than 95% of officers received the two-day *2021 De-Escalation, Response to Resistance, and Use of Force* in-service training, with 96.71% of participants com-

pleting the *Communications* eight-hour course and 96.86% completing the *Procedures* eight-hour course.[71] In addition, the IMT reviewed and provided a no-objection notice for training materials for the CPD's *2022 De-Escalation, Response to Resistance, and Use of Force* in-service training, and observed a session of that training.

Because the currently effective version of G03-02-04 contains the necessary language for Preliminary compliance with ¶201, the CPD's training on that version of the policy likewise suffices for Secondary compliance. But to maintain Secondary compliance going forward, the CPD will need to provide training on the revisions it agreed to with the Coalition that go beyond ¶201's requirements.

Looking forward, we recommend that TRED begin reporting on Taser use in schools and on students in its regular reports.

Paragraph 201 Compliance Progress History

FIRST REPORTING PERIOD	SECOND REPORTING PERIOD	THIRD REPORTING PERIOD
SEPTEMBER 1, 2019 – AUGUST 31, 2019	SEPTEMBER 1, 2019 – FEBRUARY 29, 2020	MARCH 1, 2020 – DECEMBER 31, 2020
COMPLIANCE PROGRESS:	COMPLIANCE PROGRESS:	COMPLIANCE PROGRESS:
Not Applicable	Not Applicable	Under Assessment
FOURTH REPORTING PERIOD	**FIFTH REPORTING PERIOD**	**SIXTH REPORTING PERIOD**
JANUARY 1, 2021 – JUNE 30, 2021	JULY 1, 2021 – DECEMBER 31, 2021	JANUARY 1, 2022 – JUNE 30, 2022
COMPLIANCE PROGRESS:	COMPLIANCE PROGRESS:	COMPLIANCE PROGRESS:
Preliminary	Under Assessment	Secondary

[71] Because of the COVID-19 extension, the CPD had until March 5, 2022, to complete the delivery of its 2021 in-service training.

Use of Force: ¶202

202. *CPD officers will treat each application or standard cycle (five seconds) of a Taser as a separate use of force that officers must separately justify as objectively reasonable, necessary, and proportional. CPD will continue to require officers to, when possible, use only one five-second energy cycle and reassess the situation before any additional cycles are given or cartridges are discharged. In determining whether any additional application is necessary, CPD officers will consider whether the individual has the ability and has been given a reasonable opportunity to comply prior to applying another cycle.*

Compliance Progress

(Reporting Period: January 1, 2022, through June 31, 2022)

Preliminary:	***In Compliance*** **(FOURTH REPORTING PERIOD)**
Secondary:	***In Compliance*** **(FIFTH REPORTING PERIOD)**
Full:	***Under Assessment***

In the sixth reporting period, the CPD maintained Preliminary and Secondary compliance with and remained under assessment for the requirements of ¶202.

To evaluate Preliminary compliance with ¶202, we reviewed on General Order G03-02-04, *Taser Use Incidents*, which became effective on April 15, 2021.

Section II.F of G03-02-04 clearly states that officers must "Justify Separate Uses of Force. An initial Taser application and each subsequent application of Taser energy (either re-energizing a discharged cartridge with the ARC switch or discharging a second cartridge) must be individually justified and documented on the Tactical Response Report (TRR) as a separate use of force."

The Parties and the Coalition (*see* ¶669) continued to meet and discuss Taser issues throughout this reporting period; we appreciate these community engagement efforts.

In IMR-4, we noted that for Secondary compliance, the CPD would need to demonstrate its ability to identify TRRs with multiple applications. During the fifth reporting period, TRED's reports indicated a vehicle to assess multiple cycle events.

During the sixth reporting period, the IMT reviewed TRED's quarterly and year-end reports. We also reviewed CPD's Use of Force Dashboard and note (*see* data table in ¶198) that Taser use incidents have declined over the last six years, with 116

Taser discharges in 2021. TRED's *2021 Year-End Report* indicates that of the 116 TRRs, 66 (56.9%) indicated that multiple energy cycles were discharged.[72]

In 2021, TRED made a training recommendation for 71 (61.2%) of the 116 TRRs involving Taser discharge. "Taser – Other" was the reason for 24 of the recommendations, and TRED indicated that eleven of those debriefings "were for the involved member incorrectly documenting the number of energy cycles."[73] TRED's 2021 Q3 report indicated 22 incidents of Taser discharges, 15 of which were a single energy cycle and 7 of which were multiple cycles. Of the 22 incidents, 7 resulted in an enrollment in the Taser Refresher Training course offered by CPD's Training and Support Group. In contrast, in all 22 instances, the district-level Investigating Supervisor found the officer complied with policy.

In two instances in 2021, the officer did not switch to another force option after the initial three energy cycles were ineffective, and in two more instances, TRED observed the involved member use more than three energy cycles of the Taser device. The investigating supervisor for both of the latter instances found the use of force to be within Department policy. In one instance, the officer did not fully articulate each energy cycle.

With regard to training, the CPD provided records to show that more than 95% of officers received the two-day *2021 De-Escalation, Response to Resistance, and Use of Force* in-service training, with 96.71% of participants completing the *Communications* eight-hour course and 96.86% completing the *Procedures* eight-hour course.[74] In addition, the IMT reviewed and provided a no-objection notice for training materials for the CPD's *2022 De-Escalation, Response to Resistance, and Use of Force* in-service training, and observed a session of that training.

To maintain Secondary compliance, the CPD must maintain its levels of appropriate training regarding Taser use. For Full compliance, the IMT will review and analyze a sampling of incidents of multiple Taser applications; we look forward to the CPD's continued progress on this paragraph.

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72 TRED's *2021 Year-End Report*, CHICAGO POLICE DEPARTMENT (APRIL 29, 2022), https://home.chicagopolice.org/wp-content/uploads/2021-YEAR-END-REPORT.pdf, p. 60.

73 *Id.*

74 Because of the COVID-19 extension, the CPD had until March 5, 2022, to complete the delivery of its 2021 in-service training.

Paragraph 202 Compliance Progress History

FIRST REPORTING PERIOD SEPTEMBER 1, 2019 – AUGUST 31, 2019	SECOND REPORTING PERIOD SEPTEMBER 1, 2019 – FEBRUARY 29, 2020	THIRD REPORTING PERIOD MARCH 1, 2020 – DECEMBER 31, 2020
COMPLIANCE PROGRESS: Not Applicable	COMPLIANCE PROGRESS: None	COMPLIANCE PROGRESS: Under Assessment
FOURTH REPORTING PERIOD JANUARY 1, 2021 – JUNE 30, 2021	**FIFTH REPORTING PERIOD** JULY 1, 2021 – DECEMBER 31, 2021	**SIXTH REPORTING PERIOD** JANUARY 1, 2022 – JUNE 30, 2022
COMPLIANCE PROGRESS: Preliminary	COMPLIANCE PROGRESS: Secondary	COMPLIANCE PROGRESS: Secondary

Use of Force: ¶203

203. *CPD will require that if the subject has been exposed to three, five-second energy cycles (or has been exposed to a cumulative 15 total seconds of energy) and the officer has not gained control, officers switch to other force options unless the officer can reasonably justify that continued Taser use was necessary to ensure the safety of the officer or another person, recognizing that prolonged Taser exposure may increase the risk of death or serious injury.*

Compliance Progress

(Reporting Period: January 1, 2022, through June 31, 2022)

Preliminary:	***In Compliance*** **(FOURTH REPORTING PERIOD)**
Secondary:	***In Compliance*** **(FIFTH REPORTING PERIOD)**
Full:	***Under Assessment***

In the sixth reporting period, the CPD maintained Preliminary and Secondary compliance with and remained under assessment for the requirements of ¶203.

To evaluate Preliminary compliance with ¶203, we reviewed on General Order G03-02-04, *Taser Use Incidents*, which became effective on April 15, 2021.

CPD's policy G03-02-04*, Taser Use Incidents*, which became effective on April 15, 2021, includes the requirements of ¶203. Specifically, Section III.B.7. of G03-02-04 clearly states that "if the subject has been exposed to three, five-second energy cycles (or has been exposed to a cumulative 15 total seconds of energy) and the member has not gained control of the subject, switch to other force options unless the member can reasonably justify that continued Taser use was necessary to ensure the safety of the member or another person," echoing the language and requirements of ¶203. The policy also includes a "NOTE," which states "Prolonged Taser exposure under certain circumstances may increase the risk of serious injury or death."

The Parties and the Coalition (*see* ¶669) continued to meet and discuss Taser issues throughout this reporting period; we appreciate these community engagement efforts.

With regard to Secondary compliance, the CPD provided records to show that more than 95% of officers received the two-day *2021 De-Escalation, Response to Resistance, and Use of Force* in-service training, with 96.71% of participants completing the *Communications* eight-hour course and 96.86% completing the *Procedures* eight-hour course.[75] In addition, the IMT reviewed and provided a no-objection notice for training materials for the CPD's *2022 De-Escalation, Response to*

[75] Because of the COVID-19 extension, the CPD had until March 5, 2022, to complete the delivery of its 2021 in-service training.

Resistance, and Use of Force in-service training, and observed a session of that training.

During the fifth reporting period, TRED's reports indicated a vehicle to assess multiple cycle events.

During the sixth reporting period, the IMT reviewed TRED's quarterly and year-end reports. We also reviewed CPD's Use of Force Dashboard and note (*see* data table in ¶198) that Taser use incidents have declined over the last six years, with 116 Taser discharges in 2021. TRED's *2021 Year-End Report* indicates that of the 116 TRRs, 66 (56.9%) indicated that multiple energy cycles were discharged.[76]

In 2021, TRED made a training recommendation for 71 (61.2%) of the 116 TRRs involving Taser discharge. "Taser – Other" was the reason for 24 of the recommendations, and TRED indicated that eleven of those debriefings "were for the involved member incorrectly documenting the number of energy cycles."[77]

In two instances in 2021, the officer did not switch to another force option after the initial three energy cycles were ineffective, and in two more instances, TRED observed the involved officers use more than three energy cycles of the Taser device. The investigating supervisor for both of the latter instances found the use of force to be within Department policy. In one instance, the officer did not fully articulate each energy cycle.

For Full compliance, the IMT will review and analyze a sampling of incidents of multiple Taser applications; we look forward to the CPD's continued progress on this paragraph.

Paragraph 203 Compliance Progress History

FIRST REPORTING PERIOD	SECOND REPORTING PERIOD	THIRD REPORTING PERIOD
SEPTEMBER 1, 2019 – AUGUST 31, 2019	SEPTEMBER 1, 2019 – FEBRUARY 29, 2020	MARCH 1, 2020 – DECEMBER 31, 2020
COMPLIANCE PROGRESS:	COMPLIANCE PROGRESS:	COMPLIANCE PROGRESS:
Not Applicable	None	Under Assessment
FOURTH REPORTING PERIOD	**FIFTH REPORTING PERIOD**	**SIXTH REPORTING PERIOD**
JANUARY 1, 2021 – JUNE 30, 2021	JULY 1, 2021 – DECEMBER 31, 2021	JANUARY 1, 2022 – JUNE 30, 2022
COMPLIANCE PROGRESS:	COMPLIANCE PROGRESS:	COMPLIANCE PROGRESS:
Preliminary	Secondary	Secondary

[76] TRED's *2021 Year-End Report*, CHICAGO POLICE DEPARTMENT (APRIL 29, 2022), https://home.chicagopolice.org/wp-content/uploads/2021-YEAR-END-REPORT.pdf, p. 60.

[77] *Id.*

Use of Force: ¶204

204. *CPD officers must: a. determine the necessity, objective reasonableness, and proportionality of Taser use based on the totality of the circumstances, including the subject's apparent age, size, physical and mental condition, disability, and impairment; b. not use Tasers in drive-stun mode unless the subject is an assailant and other force options are not readily available or would otherwise be ineffective; c. when practicable, avoid the use of Tasers when it is reasonably evident that a deployment may cause serious physical injury, including if the subject is elevated above the ground, if the subject is operating or riding any mode of transportation, or if the subject may be less able to catch or protect themselves in a fall; d. not use Tasers in any environment that contains potentially flammable, volatile, or explosive material; e. not use Tasers on a subject who is at a greater risk of serious injury or death from Taser use, including, but not limited to, children, pregnant individuals, and the elderly, unless the subject is an assailant and other force options are not readily available or would otherwise be ineffective; f. target the Taser in probe mode at the lower center mass and avoid the head, neck, and genitalia; g. not activate more than one Taser at a time against a subject, unless an officer already attempted to use a Taser against the subject but the probes did not make contact with the subject; and h. keep Tasers in a weak-side holster.*

Compliance Progress

(Reporting Period: January 1, 2022, through June 31, 2022)

Preliminary:	***In Compliance*** **(NEW)**
Secondary:	***In Compliance*** **(NEW)**
Full:	***Not Yet Assessed***

In the sixth reporting period, the City and the CPD achieved Preliminary and Secondary compliance with ¶204.

To evaluate Preliminary compliance with ¶204, we continued to focus our review on whether the City and the CPD received the requisite community input for General Order G03-02-04, *Taser Use Incidents*. Throughout this reporting period, the CPD engaged in discussions with the Coalition (*see* ¶669). On the final day of the reporting period, the CPD provided the IMT with a revised version of G03-02-04 reflecting revisions that the CPD made as a result of its discussions with the Coalition. The IMT and the OAG will have the opportunity to comment on the revised version during the seventh reporting period.

The version of G03-02-04, *Taser Use Incidents*, that is currently in effect was issued December 31, 2020, with an effective date of April 15, 2021. That version contains

the necessary language for Preliminary compliance with ¶204, and in the intervening time, the CPD has continued discussions with the Coalition to revise the policy in ways that go beyond ¶204's requirements. In order to maintain Preliminary compliance in the seventh reporting period, we expect the CPD to issue and make effective the changes agreed upon with the Coalition to G03-02-04.

With regard to Secondary compliance, the CPD provided records to demonstrate that more than 95% of officers received the two-day *2021 De-Escalation, Response to Resistance, and Use of Force* in-service training, with 96.71% of participants completing the *Communications* eight-hour course and 96.86% completing the *Procedures* eight-hour course.[78] In addition, the IMT reviewed and provided a no-objection notice for training materials for the CPD's *2022 De-Escalation, Response to Resistance, and Use of Force* in-service training, and observed a session of that training.

Because the currently effective version of G03-02-04 contains the necessary language for Preliminary compliance with ¶204, the CPD's training on that version of the policy likewise suffices for Secondary compliance. But to maintain Secondary compliance going forward, the CPD will need to provide training on the revisions it agreed to with the Coalition that go beyond ¶204's requirements.

Paragraph 204 Compliance Progress History

FIRST REPORTING PERIOD	SECOND REPORTING PERIOD	THIRD REPORTING PERIOD
SEPTEMBER 1, 2019 – AUGUST 31, 2019	SEPTEMBER 1, 2019 – FEBRUARY 29, 2020	MARCH 1, 2020 – DECEMBER 31, 2020
COMPLIANCE PROGRESS:	COMPLIANCE PROGRESS:	COMPLIANCE PROGRESS:
Not Applicable	None	Under Assessment
FOURTH REPORTING PERIOD	**FIFTH REPORTING PERIOD**	**SIXTH REPORTING PERIOD**
JANUARY 1, 2021 – JUNE 30, 2021	JULY 1, 2021 – DECEMBER 31, 2021	JANUARY 1, 2022 – JUNE 30, 2022
COMPLIANCE PROGRESS:	COMPLIANCE PROGRESS:	COMPLIANCE PROGRESS:
Under Assessment	Under Assessment	Secondary

[78] Because of the COVID-19 extension, the CPD had until March 5, 2022, to complete the delivery of its 2021 in-service training.

Use of Force: ¶205

> ***205.*** *CPD officers must request medical aid for a person subjected to a Taser application. CPD officers must place any person subjected to a Taser application in a position that does not impair respiration, as soon as it is safe and feasible to do so. CPD officers must render life-saving aid to injured persons consistent with their training until medical professionals arrive on scene. Only trained medical personnel may remove Taser probes from a subject.*

Compliance Progress

(Reporting Period: January 1, 2022, through June 31, 2022)

Preliminary:	***In Compliance*** **(NEW)**
Secondary:	***In Compliance*** **(NEW)**
Full:	***Not Yet Assessed***

In the sixth reporting period, the City and the CPD achieved Preliminary and Secondary compliance with ¶205.

To evaluate Preliminary compliance with ¶205, we continued to focus our review on whether the City and the CPD received the requisite community input for General Order G03-02-04, *Taser Use Incidents*. Throughout this reporting period, the CPD engaged in discussions with the Coalition (*see* ¶669). On the final day of the reporting period, the CPD provided the IMT with a revised version of G03-02-04 reflecting revisions that the CPD made as a result of its discussions with the Coalition. The IMT and the OAG will have the opportunity to comment on the revised version during the seventh reporting period.

We note that Section V.B of the current version of the CPD's primary use of force policy, G03-02, *De-Escalation, Response to Resistance, and Use of Force*, states that Department members *will* render life-saving medical aid:

> *[A]s soon as it is safe and feasible to do so, members will provide life saving aid consistent with their Department training, including the Law Enforcement Medical and Rescue Training (LEMART) training, to injured persons until medical professionals arrive on the scene.*

However, as we noted in our past two reports, this required language was not present in G03-02-04, *Taser Use Incidents*. The revised version of G03-02-04 that we received during the sixth reporting period does include this language, enabling the City and the CPD to achieve Preliminary compliance. To maintain Preliminary compliance in the seventh reporting period, we expect the CPD to issue and make effective that change to G03-02-04.

With regard to Secondary compliance, the CPD provided records to demonstrate that more than 95% of officers received the two-day *2021 De-Escalation, Response to Resistance, and Use of Force* in-service training, with 96.71% of participants completing the *Communications* eight-hour course and 96.86% completing the *Procedures* eight-hour course.[79] In addition, the IMT reviewed and provided a no-objection notice for training materials for the CPD's *2022 De-Escalation, Response to Resistance, and Use of Force* in-service training, and observed a session of that training.

Because the currently effective version of G03-02 contains the necessary language for Preliminary compliance with ¶205, the CPD's training on that version of the policy likewise suffices for Secondary compliance. But to maintain Secondary compliance going forward, the CPD will need to train on the revision to G03-02-04 that reflects ¶205's requirements.

Paragraph 205 Compliance Progress History

FIRST REPORTING PERIOD SEPTEMBER 1, 2019 – AUGUST 31, 2019	SECOND REPORTING PERIOD SEPTEMBER 1, 2019 – FEBRUARY 29, 2020	THIRD REPORTING PERIOD MARCH 1, 2020 – DECEMBER 31, 2020
COMPLIANCE PROGRESS: Not Applicable	COMPLIANCE PROGRESS: None	COMPLIANCE PROGRESS: Under Assessment
FOURTH REPORTING PERIOD JANUARY 1, 2021 – JUNE 30, 2021	**FIFTH REPORTING PERIOD** JULY 1, 2021 – DECEMBER 31, 2021	**SIXTH REPORTING PERIOD** JANUARY 1, 2022 – JUNE 30, 2022
COMPLIANCE PROGRESS: None	COMPLIANCE PROGRESS: None	COMPLIANCE PROGRESS: Secondary

[79] Because of the COVID-19 extension, the CPD had until March 5, 2022, to complete the delivery of its 2021 in-service training.

Use of Force: ¶206

> ***206.*** *CPD will conduct Taser inspections on a periodic basis to perform information downloads, ensure Tasers are operable, and perform necessary maintenance or repairs.*

Compliance Progress

(Reporting Period: January 1, 2022, through June 31, 2022)

Preliminary:	***In Compliance*** **(THIRD REPORTING PERIOD)**
Secondary:	***Under Assessment***
Full:	***Not Yet Assessed***

In the sixth reporting period, the City and the CPD maintained Preliminary compliance and was under assessment for Secondary compliance with the requirements of ¶206.

To assess Preliminary compliance, the IMT reviewed the CPD's relevant policy and notes that Uniform and Property U04-02-02, *Control Devices and Instruments* (effective February 29, 2020) clearly states:

> *District commanders/unit commanding officers will ensure that Taser inspections are conducted on a quarterly basis. During inspections, district commanders/unit commanding officers will ensure: a. a Taser discharge data report is downloaded for each Taser assigned to the unit. b. a Taser Data Reconciliation Report (CPD-21.969) is completed. c. Tasers assigned to the unit are operational and any Tasers requiring maintenance or repairs are hand-carried during 2nd watch by a sworn member to the Taser Repair Center,*

It also contains a "NOTE," which states, "If necessary, Taser inspections can be conducted more often."

During the fourth reporting period, the IMT reviewed training materials relating to the above provision in U04-02-02, but the CPD did not provide corresponding attendance records. Similarly, the CPD provided a copy of the Taser Data Reconciliation Report form (CPD-21.969), but we have not received data about or gleaned from those reports.

The IMT continues to seek further information about the CPD's Taser inspections, related training, and documentation. We look forward to assessing the CPD's continued progress with ¶206 in the next reporting period.

Paragraph 206 Compliance Progress History

FIRST REPORTING PERIOD	SECOND REPORTING PERIOD	THIRD REPORTING PERIOD
SEPTEMBER 1, 2019 – AUGUST 31, 2019	SEPTEMBER 1, 2019 – FEBRUARY 29, 2020	MARCH 1, 2020 – DECEMBER 31, 2020
COMPLIANCE PROGRESS:	COMPLIANCE PROGRESS:	COMPLIANCE PROGRESS:
Not Applicable	None	Preliminary
FOURTH REPORTING PERIOD	**FIFTH REPORTING PERIOD**	**SIXTH REPORTING PERIOD**
JANUARY 1, 2021 – JUNE 30, 2021	JULY 1, 2021 – DECEMBER 31, 2021	JANUARY 1, 2022 – JUNE 30, 2022
COMPLIANCE PROGRESS:	COMPLIANCE PROGRESS:	COMPLIANCE PROGRESS:
Preliminary	Preliminary	Preliminary

Use of Force: ¶207

207. *CPD officers may use OC devices only when such force is objectively reasonable, necessary, and proportional under the totality of the circumstances, and consistent with the objectives above.*

Compliance Progress

(Reporting Period: January 1, 2022, through June 31, 2022)

Preliminary: ***In Compliance*** **(FOURTH REPORTING PERIOD)**
Secondary: ***Not in Compliance***
Full: ***Not Yet Assessed***

In the sixth reporting period, the City and the CPD maintained Preliminary compliance but did not achieve Secondary compliance with ¶207.

To evaluate Preliminary compliance with ¶207, we reviewed G03-02-05, *Oleoresin Capsicum (OC) Devices and Other Chemical Agent Use Incidents*, which became effective on April 15, 2021; the policy addresses all the requirements of ¶207.

Throughout this reporting period, the CPD engaged in discussions with the Coalition (*see* ¶669). On the final day of the reporting period, the CPD provided the IMT with a revised version of G03-02-04 reflecting revisions that the CPD made as a result of its discussions with the Coalition. The IMT and the OAG will have the opportunity to comment on the revised version during the seventh reporting period.

The CPD also continued discussions with the Coalition about General Order G02-02, *First Amendment Rights*, which affects OC spray usage. The CPD sought public comment on the policy from April 28, 2022, to May 13, 2022. The CPD has delayed issuing the policy, however, until preparations to train on it are complete.

During the sixth reporting period, the IMT reviewed records demonstrating that more than 95% of CPD officers received the two-day *2021 De-Escalation, Response to Resistance, and Use of Force* in-service training, with 96.71% of participants completing the *Communications* eight-hour course and 96.86% completing the *Procedures* eight-hour course.[80] In addition, the IMT reviewed and provided a no-objection notice for training materials for the CPD's *2022 De-Escalation, Response to Resistance, and Use of Force* in-service training, and observed a session of that training.

During the sixth reporting period, the IMT reviewed TRED's quarterly and year-end reports. We also reviewed CPD's Use of Force Dashboard and note that OC spray use incidents declined in 2021. TRED's *2021 Year-End Report* indicates that only 15

[80] Because of the COVID-19 extension, the CPD had until March 5, 2022, to complete the delivery of its 2021 in-service training.

TRRs involved an OC discharge, or 0.4% of all TRRs.[81] TRED reports that it did not make any training recommendations based on an officer's discharge of OC in all of 2021.

Use of Force Appendix Figure 5.
Data from CPD's Use of Force Dashboard re: OC Spray Use[82]

YEAR	REPORTED OC SPRAY INCIDENTS
2017	36
2018	18
2019	38
2020	45
2021	15

The IMT will continue to monitor data regarding OC Spray use in the next reporting period.

In order to maintain Preliminary compliance with ¶207 in the seventh reporting period, we expect the CPD to issue and make effective the changes agreed upon with the Coalition to G03-02-05 and G02-02.

Paragraph 207 Compliance Progress History

FIRST REPORTING PERIOD
SEPTEMBER 1, 2019 – AUGUST 31, 2019
COMPLIANCE PROGRESS:
Not Applicable

SECOND REPORTING PERIOD
SEPTEMBER 1, 2019 – FEBRUARY 29, 2020
COMPLIANCE PROGRESS:
None

THIRD REPORTING PERIOD
MARCH 1, 2020 – DECEMBER 31, 2020
COMPLIANCE PROGRESS:
Preliminary

FOURTH REPORTING PERIOD
JANUARY 1, 2021 – JUNE 30, 2021
COMPLIANCE PROGRESS:
Preliminary

FIFTH REPORTING PERIOD
JULY 1, 2021 – DECEMBER 31, 2021
COMPLIANCE PROGRESS:
Preliminary

SIXTH REPORTING PERIOD
JANUARY 1, 2022 – JUNE 30, 2022
COMPLIANCE PROGRESS:
Preliminary

[81] TRED's *2021 Year-End Report*, CHICAGO POLICE DEPARTMENT (APRIL 29, 2022), https://home.chicagopolice.org/wp-content/uploads/2021-YEAR-END-REPORT.pdf, p. 58.

[82] The IMT's review of TRR data reported by CPD revealed minor data discrepancies between CPD's Public Use of Force Dashboard and TRED reports. For the purposes of IMR-6, we are reporting data from the dashboard. The IMT plans to further examine and discuss these discrepancies with the CPD in the next reporting period.

Use of Force: ¶208

208. *CPD officers may only use OC devices for crowd dispersal when such force is necessary, objectively reasonable, and proportional to the threat presented to public safety. CPD will continue to require that the Superintendent or his or her designee provides authorization before OC devices are used for noncompliant groups, crowds, or an individual taking part in a group or crowd.*

Compliance Progress (Reporting Period: January 1, 2022, through June 31, 2022)

Preliminary:	***Under Assessment***
Secondary:	***Not in Compliance***
Full:	***Not in Compliance***

In the fifth reporting period, the City and the CPD made progress toward, but remain under assessment for, Preliminary compliance with ¶208.

To evaluate Preliminary compliance with ¶208, we focused our review on G03-02-05, *Oleoresin Capsicum (OC) Devices and Other Chemical Agent Use Incidents* and G02-02, *First Amendment Rights.* The IMT also spent hours listening to conversations among the Parties and the Coalition regarding OC spray.

On April 15, 2021, the CPD's revised G03-02-05, *Oleoresin Capsicum (OC) Devices and Other Chemical Agent Use Incidents*, became effective. Sections II.C.3 and 4 state:

> *3. A Personal OC device is an authorized force option against passive resisters only under the following conditions: a. Occupants of a motor vehicle who are passively resisting arrest only after obtaining authorization from an on-scene supervisor the rank of sergeant or above. b. Noncompliant groups, crowds, or an individual taking part in a group or crowd and only after obtaining authorization from the Superintendent or his or her designee.*
>
> *4. Special weapons that dispense the Capsaicin II powder agent or larger volumes of chemical agents are authorized force options against active and passive resistors that are part of a noncompliant groups, crowds, or an individual taking part in a group or crowd only under the following conditions: a. when the chemical agent is used only for area saturation, and b. only after obtaining authorization from the Superintendent or his or her designee.*

On April 13, 2021, the CPD issued an updated version of G02-02, *First Amendment Rights*, but it did not mention the use of OC spray in that context.

During the sixth reporting period, the CPD continued discussions with the Coalition about G02-02, *First Amendment Rights*, which affects OC spray usage. The CPD sought public comment on the policy from April 28, 2022, to May 13, 2022. The CPD has delayed issuing the policy, however, until preparations to provide officers with training on it are complete.

As we explained in the previous reporting period, the CPD must issue and make effective the revised *First Amendment Rights* policy in order to reach Preliminary compliance with ¶208.

Paragraph 208 Compliance Progress History

FIRST REPORTING PERIOD	SECOND REPORTING PERIOD	THIRD REPORTING PERIOD
SEPTEMBER 1, 2019 – AUGUST 31, 2019	SEPTEMBER 1, 2019 – FEBRUARY 29, 2020	MARCH 1, 2020 – DECEMBER 31, 2020
COMPLIANCE PROGRESS:	COMPLIANCE PROGRESS:	COMPLIANCE PROGRESS:
Not Applicable	None	Under Assessment
FOURTH REPORTING PERIOD	**FIFTH REPORTING PERIOD**	**SIXTH REPORTING PERIOD**
JANUARY 1, 2021 – JUNE 30, 2021	JULY 1, 2021 – DECEMBER 31, 2021	JANUARY 1, 2022 – JUNE 30, 2022
COMPLIANCE PROGRESS:	COMPLIANCE PROGRESS:	COMPLIANCE PROGRESS:
Under Assessment	Under Assessment	Under Assessment

Use of Force: ¶209

209. *When safe and feasible to do so, CPD officers must issue verbal commands and warnings to the subject prior to, during, and after the discharge of an OC device. When safe and feasible to do so, CPD will require officers to allow a subject a reasonable amount of time to comply with a warning prior to using or continuing to use an OC device, unless doing so would compromise the safety of an officer or another person.*

Compliance Progress

(Reporting Period: January 1, 2022, through June 31, 2022)

Preliminary:	***In Compliance*** **(FOURTH REPORTING PERIOD)**
Secondary:	***Not in Compliance***
Full:	***Not Yet Assessed***

In the sixth reporting period, the CPD maintained Preliminary compliance but did not achieve Secondary compliance with ¶209.

To assess Preliminary compliance, the IMT reviewed G03-02-05, *Oleoresin Capsicum (OC) Devices and Other Chemical Agent Use Incidents*, which became effective on April 15, 2021. Section III.A. 1 and 2 articulate the requirements of ¶209:

> *III. CONDITIONS ON THE USE OF PERSONAL OC DEVICES OR OTHER CHEMICAL AGENTS*
>
> *A. Authorized Manner of Use. When it is safe and feasible to do so, a member who is discharging a Personal OC device or other chemical agent will:*
>
> *1. give verbal commands and warnings prior to, during, and after discharge, including informing other Department members on the scene of the discharge.*
>
> *2. allow a subject a reasonable amount of time to comply with a warning prior to using or continuing to use a Personal OC device or other chemical agent, unless doing so would compromise the safety of a Department member or another person.*

During the sixth reporting period, the CPD continued discussions with the Coalition about G02-02, *First Amendment Rights*, which affects OC spray usage. The CPD sought public comment on the policy from April 28, 2022, to May 13, 2022. The CPD has delayed issuing the policy, however, until preparations to provide training to its officers on it are complete.

The IMT also reviewed TRED's quarterly and year-end reports, and the data presented therein. And as we note in ¶207 above, CPD data indicate that OC spray usage is trending downward. TRED's *2021 Year-End Report* indicates that only 15 TRRs involved an OC discharge, or 0.4% of all TRRs.[83] In 2021, TRED conducted debriefings with officers for "failure to warn," but not related to OC spray. In fact, TRED reports that it did not make any training recommendations based on an officer's discharge of OC in all of 2021.

During the sixth reporting period, the CPD provided records to show that more than 95% of officers received the two-day *2021 De-Escalation, Response to Resistance, and Use of Force* in-service training, with 96.71% of participants completing the *Communications* eight-hour course and 96.86% completing the *Procedures* eight-hour course.[84] In addition, the IMT reviewed and provided a no-objection notice for training materials for the CPD's *2022 De-Escalation, Response to Resistance, and Use of Force* in-service training, and observed a session of that training.

As we have explained in prior reporting periods, however, we continue to stress the need for training for all officers on OC spray in the context of protests, unrest, and crowd control.[85] Secondary compliance will depend on the provision of such training.

In order to maintain Preliminary compliance with ¶209 in the seventh reporting period, we expect the CPD to issue and make effective the changes agreed upon with the Coalition to G03-02-05 and G02-02. We look forward to continued progress on ¶209 in the next reporting period.

Paragraph 209 Compliance Progress History

FIRST REPORTING PERIOD	SECOND REPORTING PERIOD	THIRD REPORTING PERIOD
SEPTEMBER 1, 2019 – AUGUST 31, 2019	SEPTEMBER 1, 2019 – FEBRUARY 29, 2020	MARCH 1, 2020 – DECEMBER 31, 2020
COMPLIANCE PROGRESS:	COMPLIANCE PROGRESS:	COMPLIANCE PROGRESS:
Not Applicable	None	Under Assessment
FOURTH REPORTING PERIOD	**FIFTH REPORTING PERIOD**	**SIXTH REPORTING PERIOD**
JANUARY 1, 2021 – JUNE 30, 2021	JULY 1, 2021 – DECEMBER 31, 2021	JANUARY 1, 2022 – JUNE 30, 2022
COMPLIANCE PROGRESS:	COMPLIANCE PROGRESS:	COMPLIANCE PROGRESS:
Preliminary	Preliminary	Preliminary

[83] TRED's *2021 Year-End Report*, CHICAGO POLICE DEPARTMENT (APRIL 29, 2022), https://home.chicagopolice.org/wp-content/uploads/2021-YEAR-END-REPORT.pdf, p. 58.

[84] Because of the COVID-19 extension, the CPD had until March 5, 2022, to complete the delivery of its 2021 in-service training.

[85] The requirements of ¶209 are not limited to the CPD's annual Use of Force in-service training.

Use of Force: ¶210

210. *Each individual application of an OC device (e.g., each spray of an officer's personal OC device) by a CPD officer must be objectively reasonable, necessary, and proportional under the totality of the circumstances, and consistent with the objectives above.*

Compliance Progress

(Reporting Period: January 1, 2022, through June 31, 2022)

Preliminary:	***In Compliance*** **(FOURTH REPORTING PERIOD)**
Secondary:	***Under Assessment***
Full:	***Not Yet Assessed***

In the sixth reporting period, the CPD maintained Preliminary compliance and remained under assessment for Secondary compliance with ¶210.

To assess compliance, the IMT reviewed relevant CPD policy, TRED's quarterly and year-end reports, the CPD's Use of Force Dashboard, and relevant CPD training.

We note that CPD's policy G03-02-05, *Oleoresin Capsicum (OC) Devices and Other Chemical Agent Use Incidents*, which became effective on April 15, 2021, includes the requirements of this paragraph in II.C: "When Use is Authorized. Department members' use of Personal OC devices or other chemical agents must be objectively reasonable, necessary, and proportional to the threat, actions, and level of resistance offered by a subject, under the totality of the circumstances" and II.E.: "Justify Separate Uses of Force. An initial application of a Personal OC device or other chemical agent and each subsequent application must be individually justified and documented on the Tactical Response Report (TRR) as a separate use of force."

During the sixth reporting period, the CPD continued discussions with the Coalition about G02-02, *First Amendment Rights*, which affects OC spray usage. The CPD sought public comment on the policy from April 28, 2022, to May 13, 2022. The CPD has delayed issuing the policy, however, until preparations to provide training to its officers on it are complete.

The IMT also reviewed TRED's quarterly and year-end reports, and the data presented therein. And as we note in ¶207 above, CPD data indicate that OC spray usage is trending downward. TRED's *2021 Year-End Report* indicates that only 15 TRRs involved an OC discharge, or 0.4% of all TRRs.[86] TRED reports that it did not make any training recommendations based on an officer's discharge of OC in all of 2021.

[86] TRED's *2021 Year-End Report*, CHICAGO POLICE DEPARTMENT (APRIL 29, 2022), https://home.chicagopolice.org/wp-content/uploads/2021-YEAR-END-REPORT.pdf, p. 58.

The IMT recognizes that the CPD's current TRR can capture the number of times OC spray may have been discharged, similar to how it captures multiple applications of Tasers. In the fifth and sixth reporting periods, the IMT requested to review TRRs that reflect multiple applications and looks forward to reviewing such records. TRED's *2021 Year-End Report* does not indicate whether any of the 15 TRRs involved multiple applications of OC spray.

During the sixth reporting period, the IMT reviewed records to demonstrate that more than 95% of officers received the two-day *2021 De-Escalation, Response to Resistance, and Use of Force* in-service training, with 96.71% of participants completing the *Communications* eight-hour course and 96.86% completing the *Procedures* eight-hour course.[87] In addition, the IMT reviewed and provided a no-objection notice for training materials for the CPD's *2022 De-Escalation, Response to Resistance, and Use of Force* in-service training, and observed a session of that training.

As we have explained in prior reporting periods, however, we continue to stress the need for training for all officers on OC spray in the context of protests, unrest, and crowd control.[88] Secondary compliance will depend on the provision of such training.

Paragraph 210 Compliance Progress History

FIRST REPORTING PERIOD SEPTEMBER 1, 2019 – AUGUST 31, 2019 COMPLIANCE PROGRESS: Not Applicable	SECOND REPORTING PERIOD SEPTEMBER 1, 2019 – FEBRUARY 29, 2020 COMPLIANCE PROGRESS: None	THIRD REPORTING PERIOD MARCH 1, 2020 – DECEMBER 31, 2020 COMPLIANCE PROGRESS: Under Assessment
FOURTH REPORTING PERIOD JANUARY 1, 2021 – JUNE 30, 2021 COMPLIANCE PROGRESS: Preliminary	FIFTH REPORTING PERIOD JULY 1, 2021 – DECEMBER 31, 2021 COMPLIANCE PROGRESS: Preliminary	SIXTH REPORTING PERIOD JANUARY 1, 2022 – JUNE 30, 2022 COMPLIANCE PROGRESS: Preliminary

[87] Because of the COVID-19 extension, the CPD had until March 5, 2022, to complete the delivery of its 2021 in-service training.

[88] The requirements of ¶209 are not limited to the CPD's annual Use of Force in-service training.

Use of Force: ¶211

211. *CPD officers must assist subjects exposed to application of an OC device with decontamination and flushing when it is safe and feasible to do so. CPD officers must request the appropriate medical aid for a subject after the discharge of an OC device if the subject appears to be in any physical distress, or complains of injury or aggravation of a pre-existing medical condition (e.g., asthma, emphysema, bronchitis, or a heart ailment).*

Compliance Progress

(Reporting Period: January 1, 2022, through June 31, 2022)

Preliminary:	***In Compliance*** **(FOURTH REPORTING PERIOD)**
Secondary:	***In Compliance*** **(NEW)**
Full:	***Not Yet Assessed***

In the sixth reporting period, the CPD maintained Preliminary Compliance and achieved Secondary compliance with ¶211.

To assess Preliminary and Secondary compliance, the IMT reviewed relevant CPD policy, TRED's quarterly and year-end reports, the CPD's Use of Force Dashboard, and the CPD's training.

We note that CPD's policy G03-02-05, *Oleoresin Capsicum (OC) Devices and Other Chemical Agent Use Incidents*, which became effective on April 15, 2021, states the requirements of this paragraph in IV.B.2., which states that an officer discharging OC spray will "request the appropriate medical aid, including contacting emergency medical services (EMS) from the Chicago Fire Department, if the subject appears to be in any physical distress or complains of injury or aggravation of a known pre-existing medical condition (*e.g.*, asthma, emphysema, bronchitis, or a heart ailment)."

During the sixth reporting period, the IMT reviewed records demonstrating that more than 95% of officers received the two-day *2021 De-Escalation, Response to Resistance, and Use of Force* in-service training, with 96.71% of participants completing the *Communications* eight-hour course and 96.86% completing the *Procedures* eight-hour course.[89] As a result, the City and the CPD achieved Secondary compliance with ¶211. In addition, the IMT reviewed and provided a no-objection notice for training materials for the CPD's *2022 De-Escalation, Response to Resistance, and Use of Force* in-service training, and observed a session of that training.

[89] Because of the COVID-19 extension, the CPD had until March 5, 2022, to complete the delivery of its 2021 in-service training.

The IMT also reviewed TRED's quarterly and year-end reports, and the data presented therein. And as we note in ¶207 above, CPD data indicate that OC spray usage is trending downward. TRED's *2021 Year-End Report* indicates that only 15 TRRs involved an OC discharge, or 0.4% of all TRRs.[90]

TRED reports that it did not make any training recommendations based on an officer's discharge of OC in all of 2021. TRED also reports the following about aid rendered after deploying OC spray in 2021:

- In two instances, the person who was sprayed was not immediately apprehended, so no medical aid was provided;
- In one instance, the person who was sprayed refused medical aid;
- In one instance, the officer rendered medical aid and additional aid was provided by the Chicago Fire Department's (CFD) Emergency Medical Service (EMS);
- In every other instance, CFD EMS rendered aid to the person and/or the person was taken to a hospital for decontamination.

We look forward to assessing continued progress on ¶211 in future reporting periods.

Paragraph 211 Compliance Progress History

FIRST REPORTING PERIOD SEPTEMBER 1, 2019 – AUGUST 31, 2019 COMPLIANCE PROGRESS: Not Applicable	SECOND REPORTING PERIOD SEPTEMBER 1, 2019 – FEBRUARY 29, 2020 COMPLIANCE PROGRESS: None	THIRD REPORTING PERIOD MARCH 1, 2020 – DECEMBER 31, 2020 COMPLIANCE PROGRESS: Under Assessment
FOURTH REPORTING PERIOD JANUARY 1, 2021 – JUNE 30, 2021 COMPLIANCE PROGRESS: Preliminary	FIFTH REPORTING PERIOD JULY 1, 2021 – DECEMBER 31, 2021 COMPLIANCE PROGRESS: Preliminary	SIXTH REPORTING PERIOD JANUARY 1, 2022 – JUNE 30, 2022 COMPLIANCE PROGRESS: Secondary

[90] TRED's *2021 Year-End Report*, CHICAGO POLICE DEPARTMENT (APRIL 29, 2022), https://home.chicagopolice.org/wp-content/uploads/2021-YEAR-END-REPORT.pdf, p. 58.

Use of Force: ¶212

212. *CPD officers may only use department-issued or approved OC devices.*

Compliance Progress

(Reporting Period: January 1, 2022, through June 31, 2022)

Preliminary:	***In Compliance*** **(SECOND REPORTING PERIOD)**
Secondary:	***In Compliance*** **(NEW)**
Full:	***Not Yet Assessed***

In the sixth reporting period, the City and the CPD maintained Preliminary compliance and achieved Secondary compliance with ¶212.

CPD policy U04-02-02 *Control Devices and Instruments* states: "Department members are not approved to carry or use any type of personal OC device different from that which is prescribed" in Section IV.C.

To assess Secondary compliance, we reviewed the following training materials provided to us by the CPD during the sixth reporting period:

- *November 2020 Training Bulletin on Personal Oleoresin Capsicum (OC) Devices*
- *Recruit Training on Control Tactics: Chemical Weapons Exposure (Oleoresin Capsicum)*
- *Recruit Force Options Suite Training*
- *Recruit Inspection Report*

Going forward, the IMT aims to review the CPD's measures to ensure officers are carrying authorized OC devices (*e.g.*, training records and periodic inspections at roll call). We did not have access to such records during the sixth reporting period to conduct this assessment and look forward to receiving them in the next reporting period.

Paragraph 212 Compliance Progress History

FIRST REPORTING PERIOD	SECOND REPORTING PERIOD	THIRD REPORTING PERIOD
SEPTEMBER 1, 2019 – AUGUST 31, 2019	SEPTEMBER 1, 2019 – FEBRUARY 29, 2020	MARCH 1, 2020 – DECEMBER 31, 2020
COMPLIANCE PROGRESS:	COMPLIANCE PROGRESS:	COMPLIANCE PROGRESS:
Not Applicable	Preliminary	Preliminary
FOURTH REPORTING PERIOD	**FIFTH REPORTING PERIOD**	**SIXTH REPORTING PERIOD**
JANUARY 1, 2021 – JUNE 30, 2021	JULY 1, 2021 – DECEMBER 31, 2021	JANUARY 1, 2022 – JUNE 30, 2022
COMPLIANCE PROGRESS:	COMPLIANCE PROGRESS:	COMPLIANCE PROGRESS:
Preliminary	Preliminary	Secondary

Use of Force: ¶213

213. *CPD officers must not use impact weapons (e.g., baton, asp, improvised impact weapons) to intentionally strike a subject in the head or neck, except when deadly force is justified.*

Compliance Progress (Reporting Period: January 1, 2022, through June 31, 2022)

Preliminary:	***In Compliance*** **(FOURTH REPORTING PERIOD)**
Secondary:	***Under Assessment***
Full:	***Not Yet Assessed***

In the sixth reporting period, the CPD maintained Preliminary compliance and remained under assessment for Secondary compliance with the requirements of ¶213.

To assess Preliminary and Secondary compliance, the IMT reviewed relevant policy, the CPD's Use of Force Dashboard, TRED's quarterly and year-end reports, and the CPD's training, including its *Annual Training Report - 2021*.

As we have previously noted, the updated G03-02-07, *Baton Use Incidents* policy went into effect on April 15, 2021, and Section II.D.1 clearly states the requirements of this paragraph: "Head and Neck Strikes. Members will not use batons to intentionally strike a subject in the head or neck except when deadly force is justified."

The CPD's 2020 Use of Force in-service training covered ¶213's requirements, and the CPD has continued to train its officers annually on use of force. During the sixth reporting period, the CPD provided records to show that more than 95% of officers received the two-day *2021 De-Escalation, Response to Resistance, and Use of Force* in-service training, with 96.71% of participants completing the *Communications* eight-hour course and 96.86% completing the *Procedures* eight-hour course.[91] In addition, the IMT reviewed and provided a no-objection notice for training materials for the CPD's *2022 De-Escalation, Response to Resistance, and Use of Force* in-service training, and observed a session of that training.

We also attended a session of CPD recruit training regarding impact weapons in person in March 2022. The 8-hour course featured the basics of handling batons, including holstering and unholstering and different types of uses in the field, such as strikes. The instructors made mention of de-escalation principles only a few times throughout and the training included some limited scenarios but focused mostly on baton-handling drills.

[91] Because of the COVID-19 extension, the CPD had until March 5, 2022, to complete the delivery of its 2021 in-service training.

We have recommended in previous reports, including our Special Report, that the CPD provide "adequate training for all officers on new or revised policies, including use of force, de-escalation, batons, and personal OC spray." The CPD's *Annual Training Report - 2021* indicates that the CPD has made progress toward that goal. We note in particular that the following courses in 2021 that relate to use of force in potential First Amendment situations:

- Advanced Field Force Operations (FFO) 2-Day (1252 attendees)
- Crowd Control and Behavior Refresher 2021/Field Force Operations (3728 attendees)
- Field Force Operations (FFO) for Leaders (115 attendees)

We look forward to the CPD's continued training on this important subject.

All strikes to the head or neck are Level 3 uses of force and require a COPA response. In its *2021 2nd Quarterly Report*, TRED started detailing all Level 3 uses of force individually. TRED reported no intentional baton strikes to the head or neck of a person in 2021.[92]

We look forward to continuing to assess the CPD's progress with ¶213.

Paragraph 213 Compliance Progress History

FIRST REPORTING PERIOD SEPTEMBER 1, 2019 – AUGUST 31, 2019 COMPLIANCE PROGRESS: Not Applicable	SECOND REPORTING PERIOD SEPTEMBER 1, 2019 – FEBRUARY 29, 2020 COMPLIANCE PROGRESS: None	THIRD REPORTING PERIOD MARCH 1, 2020 – DECEMBER 31, 2020 COMPLIANCE PROGRESS: Under Assessment
FOURTH REPORTING PERIOD JANUARY 1, 2021 – JUNE 30, 2021 COMPLIANCE PROGRESS: Preliminary	FIFTH REPORTING PERIOD JULY 1, 2021 – DECEMBER 31, 2021 COMPLIANCE PROGRESS: Preliminary	SIXTH REPORTING PERIOD JANUARY 1, 2022 – JUNE 30, 2022 COMPLIANCE PROGRESS: Preliminary

[92] TRED's *2021 Year-End Report*, CHICAGO POLICE DEPARTMENT (APRIL 29, 2022), https://home.chicagopolice.org/wp-content/uploads/2021-YEAR-END-REPORT.pdf, p. 66.

Use of Force: ¶214

214. *When safe and feasible to do so, CPD officers must give verbal commands and warnings prior to, during, and after using an impact weapon.*

Compliance Progress

(Reporting Period: January 1, 2022, through June 31, 2022)

Preliminary:	***In Compliance*** **(FOURTH REPORTING PERIOD)**
Secondary:	***Not in Compliance***
Full:	***Not Yet Assessed***

In the sixth reporting period, the CPD maintained Preliminary compliance with the requirements of ¶214 but did not achieve Secondary compliance.

To assess compliance, the IMT reviewed TRED's quarterly and year-end reports and the CPD's Use of Force Dashboard, as well as participated in the City's community engagements and discussions on the First Amendment and use of force.

During the sixth reporting period, IMT reviewed data and records demonstrating that more than 95% of officers received the two-day *2021 De-Escalation, Response to Resistance, and Use of Force* in-service training, with 96.71% of participants completing the *Communications* eight-hour course and 96.86% completing the *Procedures* eight-hour course.[93] The 2021 in-service training covered the need to warn prior to use of force, including batons. In addition, the IMT reviewed and provided a no-objection notice for training materials for the CPD's *2022 De-Escalation, Response to Resistance, and Use of Force* in-service training, and observed a session of that training.

As we have noted in previous reports, however, CPD officers' baton use significantly increased in the summer protests of 2020 (see chart below), so the CPD must focuses on protocols to document when officers issue warnings to disperse. As CPD data indicates, baton use averaged 39 instances for the last few of years, with the exception of 2020, when the summer protests drove reported baton use up to 177. The CPD needs to focus on training on baton use specific to protest and crowd control contexts that emphasize the CPD's changes to its First Amendment policy.

[93] Because of the COVID-19 extension, the CPD had until March 5, 2022, to complete the delivery of its 2021 in-service training.

Use of Force Appendix Figure 6.

YEAR	REPORTED INSTANCES OF BATON USE
2016	37
2017	39
2018	41
2019	39
2020	177
2021	30
2022 (Jan-Jun)	14

While the CPD remains in Preliminary compliance with the requirements of ¶214, we look forward to the CPD training all of its officers on proper baton use in protest situations in the near future.

Paragraph 214 Compliance Progress History

FIRST REPORTING PERIOD
SEPTEMBER 1, 2019 – AUGUST 31, 2019
COMPLIANCE PROGRESS:
Not Applicable

SECOND REPORTING PERIOD
SEPTEMBER 1, 2019 – FEBRUARY 29, 2020
COMPLIANCE PROGRESS:
None

THIRD REPORTING PERIOD
MARCH 1, 2020 – DECEMBER 31, 2020
COMPLIANCE PROGRESS:
Under Assessment

FOURTH REPORTING PERIOD
JANUARY 1, 2021 – JUNE 30, 2021
COMPLIANCE PROGRESS:
Preliminary

FIFTH REPORTING PERIOD
JULY 1, 2021 – DECEMBER 31, 2021
COMPLIANCE PROGRESS:
Preliminary

SIXTH REPORTING PERIOD
JANUARY 1, 2022 – JUNE 30, 2022
COMPLIANCE PROGRESS:
Preliminary

Use of Force: ¶215

215. *CPD officers must receive training on proper use of an impact weapon before being permitted to carry such weapon.*

Compliance Progress

(Reporting Period: January 1, 2022, through June 31, 2022)

Preliminary:	***In Compliance*** **(FOURTH REPORTING PERIOD)**
Secondary:	***Under Assessment***
Full:	***Not Yet Assessed***

In the sixth reporting period, the CPD maintained Preliminary compliance with the requirements of ¶215.

To assess Preliminary compliance, the IMT reviewed relevant policies. We also reviewed TRED's quarterly and year-end reports and the CPD's Use of Force Dashboard noting baton use.

We attended a session of CPD recruit training regarding impact weapons in person in March 2022. The 8-hour course featured the basics of handling batons, including holstering and unholstering and different types of uses in the field, such as strikes. The instructors made mention of de-escalation principles only a few times throughout and the training included some limited scenarios but focused mostly on drills. In response to our feedback, the CPD revised its impact weapon test to include de-escalation as a component. We look forward to receiving records demonstrating the administration of the revised training.

We also look forward to evidence of training on proper baton use in protest situations. As we have noted in previous reports, CPD officers' baton use significantly increased in the summer protests of 2020 (see ¶214 above), so the CPD must focus on training on baton use specific to protest and crowd control contexts that emphasize the CPD's changes to its First Amendment policy.

While the CPD remains in Preliminary compliance with the requirements of ¶215, we look forward to the CPD training all of its recruits and all officers on proper use of batons in protest situations in the near future.

Paragraph 215 Compliance Progress History

FIRST REPORTING PERIOD	SECOND REPORTING PERIOD	THIRD REPORTING PERIOD
SEPTEMBER 1, 2019 – AUGUST 31, 2019	SEPTEMBER 1, 2019 – FEBRUARY 29, 2020	MARCH 1, 2020 – DECEMBER 31, 2020
COMPLIANCE PROGRESS:	COMPLIANCE PROGRESS:	COMPLIANCE PROGRESS:
Not Applicable	Preliminary	Under Assessment
FOURTH REPORTING PERIOD	**FIFTH REPORTING PERIOD**	**SIXTH REPORTING PERIOD**
JANUARY 1, 2021 – JUNE 30, 2021	JULY 1, 2021 – DECEMBER 31, 2021	JANUARY 1, 2022 – JUNE 30, 2022
COMPLIANCE PROGRESS:	COMPLIANCE PROGRESS:	COMPLIANCE PROGRESS:
Preliminary	Preliminary	Preliminary

Use of Force: ¶216

> ***216.*** *CPD officers must request appropriate medical aid for a subject who experiences an impact weapon strike when the subject appears to be in any physical distress or complains of injury, or when the subject sustained a strike to the head from an impact weapon or a hard, fixed object. CPD officers must render life-saving aid to the subject consistent with the officers' training until medical professionals arrive on scene.*

Compliance Progress (Reporting Period: January 1, 2022, through June 31, 2022)

Preliminary:	***In Compliance*** **(NEW)**
Secondary:	***In Compliance*** **(NEW)**
Full:	***Not in Compliance***

In the sixth reporting period, the City and the CPD achieved Preliminary and Secondary compliance with ¶216.

To evaluate Preliminary compliance with ¶216, we reviewed the CPD's relevant force policies, including G03-02-07, *Baton Use Incidents*.

As we have noted in prior reporting periods, Section V.B of the current version of the CPD's primary use of force policy, G03-02, *De-Escalation, Response to Resistance, and Use of Force*, states that Department members *will* render life-saving medical aid:

> *[A]s soon as it is safe and feasible to do so, members will provide life saving aid consistent with their Department training, including the Law Enforcement Medical and Rescue Training (LEMART) training, to injured persons until medical professionals arrive on the scene.*

However, this required language is not present in the currently effective version of G03-02-07, *Baton Use Incidents*. On the final day of the reporting period, the CPD provided the IMT with a revised version of G03-02-07 that includes the required language. The IMT and the OAG will have the opportunity to comment on the revised version during the seventh reporting period, but we nevertheless find that the City and the CPD have achieved Preliminary compliance in the sixth reporting period. In order to maintain Preliminary compliance in the seventh reporting period, we expect the CPD to issue and make effective that change to G03-02-07.

With regard to Secondary compliance, the CPD provided records to demonstrate that more than 95% of officers received the two-day *2021 De-Escalation, Response to Resistance, and Use of Force* in-service training, with 96.71% of participants

completing the *Communications* eight-hour course and 96.86% completing the *Procedures* eight-hour course.[94] In addition, the IMT reviewed and provided a no-objection notice for training materials for the CPD's *2022 De-Escalation, Response to Resistance, and Use of Force* in-service training, and observed a session of that training.

Because the currently effective version of G03-02 contains the necessary language for Preliminary compliance with ¶216, the CPD's training on that version of the policy likewise suffices for Secondary compliance. But to maintain Secondary compliance going forward, the CPD needs to train its officers on the revision to G03-02-07 that reflects ¶216's requirements.

Paragraph 216 Compliance Progress History

FIRST REPORTING PERIOD	SECOND REPORTING PERIOD	THIRD REPORTING PERIOD
SEPTEMBER 1, 2019 – AUGUST 31, 2019	SEPTEMBER 1, 2019 – FEBRUARY 29, 2020	MARCH 1, 2020 – DECEMBER 31, 2020
COMPLIANCE PROGRESS:	COMPLIANCE PROGRESS:	COMPLIANCE PROGRESS:
Not Applicable	None	Under Assessment

FOURTH REPORTING PERIOD	FIFTH REPORTING PERIOD	SIXTH REPORTING PERIOD
JANUARY 1, 2021 – JUNE 30, 2021	JULY 1, 2021 – DECEMBER 31, 2021	JANUARY 1, 2022 – JUNE 30, 2022
COMPLIANCE PROGRESS:	COMPLIANCE PROGRESS:	COMPLIANCE PROGRESS:
None	None	Secondary

[94] Because of the COVID-19 extension, the CPD had until March 5, 2022, to complete the delivery of its 2021 in-service training.

Use of Force: ¶217

217. *To be effective, the foundation of CPD's accountability system must be CPD members. When CPD members use force, they must be able to demonstrate that the force used complies with the law and CPD policy. When a member's use of force does not comply with the law and CPD policy, the member's supervisors must be able to identify the non-compliance and take appropriate action to address it. To facilitate evaluation of how CPD members use force, CPD will ensure that members report incidents when they use force and that supervisors collect and review available information about the incidents.*

Compliance Progress (Reporting Period: January 1, 2022, through June 30, 2022)

Preliminary:	***In Compliance*** **(NEW)**
Secondary:	***Not Yet Assessed***
Full:	***Not Yet Assessed***

In the sixth reporting period, the City and the CPD achieved Preliminary compliance with ¶217.

To assess Preliminary Compliance, the IMT reviewed the CPD's *Use of Force* policies to ensure they address the requirements specified in ¶217. We also evaluated the CPD's efforts to obtain and address community engagement and input on the policies that address ¶217's requirements.

To assess Secondary Compliance, we will determine whether the CPD has sufficiently trained on its *Use of Force* policies. We also review the number of officers who have completed *Use of Force* in-service training.

To assess Full Compliance, the IMT will evaluate the extent to which the policies and trainings that reflect ¶217's requirements are operationalized. Along with other sources of information, the IMT may review (1) TRED reports for its findings on patterns and trends, recommendations for follow-up training, and referrals to COPA; (2) the CPD's Use of Force Dashboard and other data sources; and (3) relevant work conducted by the CPD's Audit Division.

This is the first reporting period in which ¶217 is subject to assessment, but throughout the Consent Decree process, the IMT has consistently emphasized that officer accountability – and public transparency about accountability processes – must be a shared responsibility among all leaders in the CPD, from sergeants to the Superintendent.

During the sixth reporting period, we reviewed and determined that the CPD's policies—in particular, the Use of Force policy suite—sufficiently address ¶217's requirements. In addition, the CPD demonstrated its commitment to actively engage the Coalition (*see* ¶669) and community in dialogue regarding the Use of Force policies and their recommendations. We also considered the CPD's process for addressing TRED's recommendations and individual debriefing points.

The CPD demonstrated its TRR Supervisory Dashboard for the IMT during the sixth reporting period. According to TRED's *2021 Year-End Report*, "The information included in this dashboard should allow for Department supervisors to correct the action of individual members and also recommend specific training for their districts/units based on documented need."[95] Similarly, in TRED's *2021 Q4 Report*, TRED stated, "The central goal in building this dashboard is to provide a tool for supervisors and [TRED] to better understand patterns and trends within each unit and to allow supervisors and command staff to better understand how those patterns and trends within their own unit compare to other units throughout the city."[96]

TRED also states, "The best practice is for a supervisor to recognize a training opportunity and take corrective action at the time an incident occurs."[97] TRED reports on how often supervisors indicated that they recognized a training opportunity and took corrective action at the time an incident occurs. TRED's *2021 Q4 Report* reported that for Firearm Pointing Incidents, there were zero instances of supervisors indicating that they recognized a training opportunity and took corrective action at the time an incident occurred (compared to eight and four in Q2 and Q3, respectively). In contrast, TRED made 225 recommendations regarding FPIRs in Q4.[98]

The IMT observed refresher training for supervisors during the sixth reporting period that emphasized the need for front-line supervisors to identify, address, and document body-worn camera issues, but TRED's statistics suggest that more can and should be done. In the fourth quarter of 2021, there were 183 debriefings for late body-worn camera activations alone, which accounts 71% of reports for which TRED made a recommendation.[99] Again, during the fourth quarter of 2021, zero

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95 TRED's *2021 Year-End Report*, CHICAGO POLICE DEPARTMENT (APRIL 29, 2022), https://home.chicagopolice.org/wp-content/uploads/2021-YEAR-END-REPORT.pdf, p. 95.

96 TRED's *2021 Q4 Report*, CHICAGO POLICE DEPARTMENT (APRIL 29, 2022), https://home.chicagopolice.org/wp-content/uploads/Q4-2021-FRD-Report.pdf, p. 22.

97 *Id.* at p. 21.

98 TRED's *2021 Q4 Report*, CHICAGO POLICE DEPARTMENT (APRIL 29, 2022), https://home.chicagopolice.org/wp-content/uploads/Q4-2021-FRD-Report.pdf, p. 21.

99 *Id.* at p. 18.

supervisors indicated that they recognized a training opportunity and took corrective action at the time an incident occurred.[100]

The City and the CPD achieved Preliminary compliance with ¶217 in the sixth reporting period—the first period in which it has been assessed. We look forward to verifying that a sufficient number of supervisors complete the *Supervisor's in-service training*. Based on the data from TRED's reports, however, further training is likely necessary to encourage front-line supervisors to take on a greater responsibility for identifying issues and training opportunities, and taking corrective action, at the time that a firearm pointing incident occurs. In particular, the IMT looks forward to learning more about the training and instructions the CPD will provide in connection with the Supervisory Dashboard and how the dashboard is used. In addition, the CPD's Audit Division has indicated that it plans to initiate a review of TRED's debriefing procedures during 2022; we look forward to the Audit Division's findings.

Paragraph 217 Compliance Progress History

FIRST REPORTING PERIOD SEPTEMBER 1, 2019 – AUGUST 31, 2019 COMPLIANCE PROGRESS: Not Applicable	SECOND REPORTING PERIOD SEPTEMBER 1, 2019 – FEBRUARY 29, 2020 COMPLIANCE PROGRESS: Not Applicable	THIRD REPORTING PERIOD MARCH 1, 2020 – DECEMBER 31, 2020 COMPLIANCE PROGRESS: Not Applicable
FOURTH REPORTING PERIOD JANUARY 1, 2021 – JUNE 30, 2021 COMPLIANCE PROGRESS: Not Applicable	FIFTH REPORTING PERIOD JULY 1, 2021 – DECEMBER 31, 2021 COMPLIANCE PROGRESS: Not Applicable	SIXTH REPORTING PERIOD JANUARY 1, 2022 – JUNE 30, 2022 COMPLIANCE PROGRESS: Preliminary

[100] *Id.* at p. 21.

Use of Force: ¶218

218. *CPD members must report and document any reportable use of force. Beginning January 1, 2019, a reportable use of force will be defined as any use of force by a CPD member included in any of the following three levels: a. A level 1 reportable use of force is the use of any force by a CPD member to overcome the active resistance of a subject that does not rise to a level 2 or level 3 reportable use of force. This would include force that is reasonably expected to cause pain or an injury, but does not result in injury or complaint of injury. The following techniques are level 1 reportable uses of force when applied in response to active resistance: pressure point compliance techniques; joint manipulation techniques; wristlocks; armbars; and any leg sweep, weaponless defense techniques, or takedown that does not result in injury or complaint of injury. It is not a reportable use of force for a CPD member to escort, touch, or handcuff a person with no or minimal resistance. b. A level 2 reportable use of force is the use of any force by a CPD member that includes use of a less-lethal weapon or that causes an injury or results in a complaint of an injury, but that does not rise to a level 3 reportable use of force. Force options in this level include: discharge of an OC device; discharge of a Taser; impact weapon strikes to any part of the body other than the head or neck; use of impact munitions; any physical apprehension by a canine; any reportable use of force against a handcuffed subject; and any leg sweep, weaponless defense technique, or takedown resulting in an injury or complaint of injury. c. A level 3 reportable use of force is when a CPD member does any of the following: uses any force that constitutes deadly force, such as discharging a firearm or using an impact weapon to strike a person's head or neck; uses a chokehold or other maneuver for intentionally putting pressure on a person's airway or carotid artery; uses any force that causes the death of any person; or uses any force that causes injury to any person resulting in admission to a hospital.*

Compliance Progress

(Reporting Period: January 1, 2022, through June 31, 2022)

Preliminary:	***In Compliance*** **(THIRD REPORTING PERIOD)**
Secondary:	***In Compliance*** **(FIFTH REPORTING PERIOD)**
Full:	***Not Yet Assessed***

During the sixth reporting period, the City and the CPD maintained Preliminary compliance and Secondary compliance with ¶218.

To assess Preliminary compliance, the IMT reviewed the applicable policy and notes that the levels of force outlined in this paragraph (i.e., the change from 4 levels of force to 3 levels of force) continue to be echoed in the CPD's General Order G03-02-02*, Incidents Requiring the Completion of a Tactical Response Report* (effective date April 15, 2021).

To assess Secondary compliance, the IMT reviewed TRED's Quarterly Reports and Year-End Report. We also reviewed the curriculum materials for the CPD's 2022 in-service training for supervisors, which also addresses the requirements of this paragraph. Further, we observed a supervisory training session online in April and note that this training addressed all three levels of force, including in its slide deck. While training for supervisors is critically important to institutionalizing the reporting and documenting of uses of force at the CPD, we note that supervisors have been required to respond to the same types of incidents in the past, so the training should serve to reinforce those supervisory behaviors.

We look forward to continuing to review the CPD's progress toward meeting these requirements, tracking the delivery of the 2022 in-service use of force training, and assessing this paragraph for full compliance when appropriate. The CPD will maintain Secondary compliance by continuing to track and demonstrate supervisory training course attendance. To assess Full compliance, the IMT will review potential sources of information to identify unreported uses of force, such as the City's Law Department and COPA.

Paragraph 218 Compliance Progress History

FIRST REPORTING PERIOD SEPTEMBER 1, 2019 – AUGUST 31, 2019 COMPLIANCE PROGRESS: None	SECOND REPORTING PERIOD SEPTEMBER 1, 2019 – FEBRUARY 29, 2020 COMPLIANCE PROGRESS: None	THIRD REPORTING PERIOD MARCH 1, 2020 – DECEMBER 31, 2020 COMPLIANCE PROGRESS: Preliminary
FOURTH REPORTING PERIOD JANUARY 1, 2021 – JUNE 30, 2021 COMPLIANCE PROGRESS: Preliminary	FIFTH REPORTING PERIOD JULY 1, 2021 – DECEMBER 31, 2021 COMPLIANCE PROGRESS: Secondary	SIXTH REPORTING PERIOD JANUARY 1, 2022 – JUNE 30, 2022 COMPLIANCE PROGRESS: Secondary

Use of Force: ¶219

219. *Whenever a CPD member engages in a reportable use of force, the member must complete a TRR, or any similar form of documentation CPD may implement, prior to the end of his or her tour of duty. In addition to completing the TRR, officers must also document the reason for the initial stop, arrest, or other enforcement action per CPD policy. CPD may allow members requiring medical attention a reasonable amount of additional time to complete the required documentation. CPD may allow supervisors to complete the TRR for members who are unable to complete the report due to injury or in other extraordinary circumstances.*

Compliance Progress

(Reporting Period: January 1, 2022, through June 31, 2022)

Preliminary:	***In Compliance*** **(THIRD REPORTING PERIOD)**
Secondary:	***In Compliance*** **(FIFTH REPORTING PERIOD)**
Full:	***Not Yet Assessed***

During the sixth reporting period, the City and the CPD maintained Preliminary compliance and Secondary compliance with ¶219.

To assess Preliminary compliance, the IMT reviewed the applicable policy including the CPD's General Order G03-02-02, *Incidents Requiring the Completion of a Tactical Response Report*, (effective April 15, 2021) and analyzed other records and information provided during the reporting period, such as TRED's Quarterly Reports.

To assess Secondary compliance, the IMT reviewed TRED's Quarterly Reports and Year-End Report, which describe training activities. We also reviewed the curriculum and accompanying materials for the CPD's 2022 in-service training for supervisors, the in-service supervisory refresher training, and the 2022 Constitutional Policing training curriculum, all of which address some requirements of this paragraph. We note that the CPD distributed a *Tactical Response Report Training Guide* on supervisory duties and responsibilities and guide for filling out TRRs, which we also reviewed. Further, we observed a supervisory training session online and note that the training dedicates two hours to reviewing duties and responsibilities of supervisors as it relates to filling out and completing TRRs correctly.

The IMT closely tracks and reviews TRED's Quarterly Reports, which describe "narrative deficiencies" in some TRR forms filled out by CPD officers and the mandatory debriefings designed to address those narrative deficiencies. TRED's Quarterly Reports indicate that narrative deficiencies are addressed. We look forward to reviewing TRED's 2022 Quarterly Reports in the near future. We did review, however, TRED's *2021 Year-End Report*, published in April 2022, which indicates narrative

deficiencies occurring 123 times or in 7.1% of TRRs. The 2021 Q4 Report identifies 29 narrative deficiencies, remaining fairly constant with the 2021 Q3 Report which identified 22.

Maintaining Secondary compliance will depend upon the CPD continuing to feature TRRs in relevant training courses to reinforce their importance and to continue to reduce the narrative deficiencies in the TRR reports reviewed by TRED. Training will also need to continue to focus on the problems and issues identified in the OIG's and the IMT's reports regarding the City's and the CPD's responses to the protests of 2020, which documented the failure of officers to fulfill reporting responsibilities. We look forward to assessing the CPD's continued progress with ¶219 and as we look forward to assessing Full compliance, we will review a sample of TRRs with a focus on Constitutional policing and the CPD's efforts to address the concerns of the protests that occurred in 2022.

Paragraph 219 Compliance Progress History

FIRST REPORTING PERIOD SEPTEMBER 1, 2019 – AUGUST 31, 2019 COMPLIANCE PROGRESS: Not Applicable	SECOND REPORTING PERIOD SEPTEMBER 1, 2019 – FEBRUARY 29, 2020 COMPLIANCE PROGRESS: Not Applicable	THIRD REPORTING PERIOD MARCH 1, 2020 – DECEMBER 31, 2020 COMPLIANCE PROGRESS: Preliminary
FOURTH REPORTING PERIOD JANUARY 1, 2021 – JUNE 30, 2021 COMPLIANCE PROGRESS: Preliminary	FIFTH REPORTING PERIOD JULY 1, 2021 – DECEMBER 31, 2021 COMPLIANCE PROGRESS: Secondary	SIXTH REPORTING PERIOD JANUARY 1, 2022 – JUNE 30, 2022 COMPLIANCE PROGRESS: Secondary

Use of Force: ¶220

220. *In completing the TRR, or whatever similar documentation CPD may implement, CPD members must include a narrative that describes with specificity the use of force incident, the subject's actions, or other circumstances necessitating the level of force used; and the involved member's response, including de-escalation efforts attempted and the specific types and amounts of force used. The narrative requirement does not apply to CPD members who discharged a firearm in the performance of duty or participated in an officer-involved death in the performance of duty. Any CPD member who observes or is present when another CPD member discharges a firearm or uses other deadly force must complete a written witness statement prior to the end of his or her tour of duty. CPD members will note in their TRRs the existence of any body-worn camera or in-car camera audio or video footage, and whether any such footage was viewed in advance of completing the TRR or any other incident reports. CPD members must complete TRRs, or whatever similar documentation CPD may implement, and other reports related to the incident, truthfully and thoroughly.*

Compliance Progress

(Reporting Period: January 1, 2022, through June 31, 2022)

Preliminary:	***In Compliance*** **(THIRD REPORTING PERIOD)**
Secondary:	***In Compliance*** **(FIFTH REPORTING PERIOD)**
Full:	***Not Yet Assessed***

During the sixth reporting period, the City and the CPD maintained Preliminary compliance and Secondary compliance with ¶220.

To assess Preliminary compliance, the IMT reviewed the CPD's applicable policies including the CPD's General Order G03-02-02, *Incidents Requiring the Completion of a Tactical Response Report*, (effective April 15, 2021), G03-02-03, *Firearm Discharge Incidents – Authorized Use and Post-Discharge Administrative Procedures*, (effective April 15, 2021), and G03-06, *Firearm Discharge and Officer-involved Death Incident Response and Investigation,* and analyzed other records and information provided during the reporting period, such as TRED's Quarterly Reports, its *2021 Year-End Report*, and the CPD's Use of Force Dashboard.

To assess Secondary compliance, the IMT reviewed the 2022 in-service use of force training curriculum. Further, the IMT closely tracked and reviewed TRED's Quarterly Reports, which describe trends in TRRs as well as officer "debriefing points," which are conversations in which TRED provides guidance to officers on how to better articulate force mitigation efforts on future reports, for example.

We continue to see hundreds of instances of debriefing points per quarter for "force mitigation – not articulated" and encourage TRED to continue its regular cadence of reviews and debriefings about this officer reporting failure. Specifically, TRED's *2021 Year-End Report* notes 464 debriefings (20%) for "force mitigation – not articulated." The numbers of necessary debriefings seem to be falling and we hope to see that trend continue. For comparison, in 2020, 23% of debriefings addressed "force mitigation – not articulated."

We also note that the *2021 Year-End TRED Report*[101] indicates that TRED issued recommendations and/or advisements to force reviewing supervisors in 17% of its 2021 reviews. Continuing from last reporting period, TRED focused on de-escalation and emphasizing the completeness of TRRs. Specifically, TRED reviews whether each box that was checked for a de-escalation technique has an accompanying narrative. In the next reporting period, the IMT will review documentation about whether officers submit their required reports prior to the conclusion of their shift.

The IMT continues to seek direct access to officer-involved shooting reports to continue our assessment of the requirements of this paragraph. We look forward to the CPD's continued progress on this paragraph.

Paragraph 220 Compliance Progress History

FIRST REPORTING PERIOD SEPTEMBER 1, 2019 – AUGUST 31, 2019 COMPLIANCE PROGRESS: Not Applicable	SECOND REPORTING PERIOD SEPTEMBER 1, 2019 – FEBRUARY 29, 2020 COMPLIANCE PROGRESS: Not Applicable	THIRD REPORTING PERIOD MARCH 1, 2020 – DECEMBER 31, 2020 COMPLIANCE PROGRESS: Secondary
FOURTH REPORTING PERIOD JANUARY 1, 2021 – JUNE 30, 2021 COMPLIANCE PROGRESS: Preliminary	FIFTH REPORTING PERIOD JULY 1, 2021 – DECEMBER 31, 2021 COMPLIANCE PROGRESS: Secondary	SIXTH REPORTING PERIOD JANUARY 1, 2022 – JUNE 30, 2022 COMPLIANCE PROGRESS: Secondary

[101] TRED's *2021 Year-End Report*, CHICAGO POLICE DEPARTMENT (APRIL 29, 2022), https://home.chicagopolice.org/wp-content/uploads/2021-YEAR-END-REPORT.pdf.

Use of Force: ¶221

> ***221.*** *Any CPD member who engages in a reportable use of force must immediately report the incident to OEMC. OEMC is required to notify the involved member's immediate supervisor and the Watch Operations Lieutenant of the district of occurrence.*

Compliance Progress (Reporting Period: January 1, 2022, through June 31, 2022)

Preliminary: ***In Compliance*** **(THIRD REPORTING PERIOD)**
Secondary: ***In Compliance*** **(NEW)**
Full: ***Not Yet Assessed***

In the sixth reporting period, the City and the CPD maintained Preliminary compliance with ¶221 and regained the Secondary compliance level they lost in the fourth reporting period.

To assess compliance, the IMT reviewed relevant policy and training curriculum documents, such as the CPD's G02-02 *First Amendment Rights* policy, and TRED's Quarterly and Year-End Reports. G02-02 was properly posted for public comment in April 2022 and the comment period ended in May 2022. The IMT also held conversations with CPD supervisors and leadership on use of force issues throughout this monitoring period. The IMT also reviewed the CPD's curriculum for its 2022 *In-Service Supervisory Refresher* training.

We also reviewed the CPD's First Amendment eLearning course and the *Constitutional Policing* course, in which Module 7 comprises one hour of instruction addressing First Amendment Rights and public assemblies. The course also includes a participant guide, in which the following topics are addressed: prohibitions on members' behavior, crowd management, dispersal orders, specific forms for protests supervisors must complete, and procedures for mass arrests. The guide specifically states that any force during a protest is not an exception to reporting requirements – that if the force used requires a TRR (*see* ¶218), officers must submit the TRR.

We reiterate once again that the CPD must focus clearly and openly on the force reporting failures of 2020 and must continue to address them adequately and directly through training, reinforced through supervision. The IMT appreciates that these failures of proper and timely reporting to OEMC are addressed in both the 2022 *Constitutional Policing* training course and the *First Amendment eLearning* course.

While the CPD has re-achieved Secondary compliance with the requirements of ¶221 (as depicted on the chart below, the CPD had achieved Secondary compliance in the third reporting period but failed to maintain it during the fourth and

fifth reporting periods), we look forward to continued progress on this paragraph. The CPD will maintain Secondary compliance if it adequately trains its officers that using force in protest situations does not negate an officer's responsibility to report the force used.

Paragraph 221 Compliance Progress History

FIRST REPORTING PERIOD SEPTEMBER 1, 2019 – AUGUST 31, 2019 COMPLIANCE PROGRESS: Not Applicable	SECOND REPORTING PERIOD SEPTEMBER 1, 2019 – FEBRUARY 29, 2020 COMPLIANCE PROGRESS: Not Applicable	THIRD REPORTING PERIOD MARCH 1, 2020 – DECEMBER 31, 2020 COMPLIANCE PROGRESS: Secondary
FOURTH REPORTING PERIOD JANUARY 1, 2021 – JUNE 30, 2021 COMPLIANCE PROGRESS: Preliminary	FIFTH REPORTING PERIOD JULY 1, 2021 – DECEMBER 31, 2021 COMPLIANCE PROGRESS: Preliminary	SIXTH REPORTING PERIOD JANUARY 1, 2022 – JUNE 30, 2022 COMPLIANCE PROGRESS: Secondary

Use of Force: ¶222

222. *A CPD supervisor will immediately respond to the scene when a level 2 or level 3 reportable use of force occurs ("responding supervisor"). CPD supervisors may, at their discretion, respond to the scene when a level 1 reportable use of force occurs, but they are not required to do so.*

Compliance Progress (Reporting Period: January 1, 2022, through June 31, 2022)

Preliminary:	***In Compliance* (FIRST REPORTING PERIOD)**
Secondary:	***Under Assessment***
Full:	***Not Yet Assessed***

In the sixth reporting period, the City and the CPD maintained Preliminary compliance with ¶222 but have not yet achieved Secondary compliance.

To assess compliance with this paragraph, the IMT reviewed applicable CPD policy, data and information from the CPD's TRED such as Quarterly and Year-End Reports, and the CPD's 2022 in-service use of force course for supervisors, including its lesson plan, PowerPoint slides, and the course materials distributed. Moreover, on April 12, 2022, IMT observed a Supervisory training session and we note that the requirements of this paragraph are included on slides 95 and 103. We note that the CPD distributed a *Tactical Response Report Training Guide* on supervisory duties and responsibilities and guide for filling out TRRs, which we also reviewed.

TRED's *2021 Year-End Report* indicates that there were 27 incidents of supervisors failing to respond to scenes when they were required to do so, and since responding to Level 1 uses of force is optional for supervisors, we note that those 27 incidents were Level 2 and 3 uses of force. The *Year-End Report* notes this data in its discussion of debriefing points.[102]

The IMT underscores that it is imperative that supervisors respond to all Level 2 use of force incidents. Moreover, the IMT notes that it is difficult to properly assess with CPD's existing data how quickly supervisors respond to various use of force incidents.

The CPD remains in Preliminary compliance and remains under assessment for Secondary compliance for this paragraph. We look forward to continuing to assess the CPD's progress with the requirements of this paragraph.

[102] TRED's *2021 Year-End Report*, CHICAGO POLICE DEPARTMENT (APRIL 29, 2022), https://home.chicagopolice.org/wp-content/uploads/2021-YEAR-END-REPORT.pdf.

Paragraph 222 Compliance Progress History

FIRST REPORTING PERIOD	SECOND REPORTING PERIOD	THIRD REPORTING PERIOD
SEPTEMBER 1, 2019 – AUGUST 31, 2019	SEPTEMBER 1, 2019 – FEBRUARY 29, 2020	MARCH 1, 2020 – DECEMBER 31, 2020
COMPLIANCE PROGRESS:	COMPLIANCE PROGRESS:	COMPLIANCE PROGRESS:
Preliminary	Preliminary	Preliminary
FOURTH REPORTING PERIOD	**FIFTH REPORTING PERIOD**	**SIXTH REPORTING PERIOD**
JANUARY 1, 2021 – JUNE 30, 2021	JULY 1, 2021 – DECEMBER 31, 2021	JANUARY 1, 2022 – JUNE 30, 2022
COMPLIANCE PROGRESS:	COMPLIANCE PROGRESS:	COMPLIANCE PROGRESS:
Preliminary	Preliminary	Preliminary

Use of Force: ¶223

> ***223.*** *For level 2 and level 3 reportable use of force incidents, the duties of the responding supervisor will include, at a minimum: a. identifying known available witnesses to the use of force to the extent reasonably possible and documenting their identities and statements in a written report, except in incidents for which the Civilian Office of Police Accountability ("COPA") receives administrative notifications and responds to the scene; b. coordinating with COPA, as appropriate; c. gathering and preserving evidence related to the use of force; d. requesting the assignment of an evidence technician to photograph persons involved in the incident, including any injuries sustained; e. ensuring that members and subjects receive appropriate medical care; f. making notifications as required by CPD policy; and g. reviewing reports regarding the incident for legibility and completeness.*

Compliance Progress

(Reporting Period: January 1, 2022, through June 31, 2022)

Preliminary:	***In Compliance*** **(THIRD REPORTING PERIOD)**
Secondary:	***Under Assessment***
Full:	***Not Yet Assessed***

In the sixth reporting period, the City and the CPD maintained Preliminary compliance but have not yet achieved Secondary compliance with the requirements of ¶223.

To assess compliance with this paragraph, the IMT reviewed applicable CPD policy, data and information from the CPD's TRED, such as Quarterly and Year-End Reports, and the CPD's 2022 in-service use of force course for supervisors, including its lesson plan, PowerPoint slides, and the course materials distributed. Moreover, on April 12, 2022, IMT observed a Supervisory training session and we note that the requirements of this paragraph are included on slides 103–106. We note that the CPD distributed a *Tactical Response Report Training Guide* on supervisory duties and responsibilities and guide for filling out TRRs, which we also reviewed.

Our review of TRED's *2021 Year-End Report* indicates that the second most common debriefing point among reviewing supervisors with regard to the requirements of ¶223 remains their failure to request an evidence technician (as required by ¶223(d)) when necessary, which includes any time a person is injured during a use of force incident. Specifically, the *Year-End Report* notes that this failure hap-

pened 114 times in 2021, comprising 20% of all reviewing supervisor debriefings.[103] We hope to see improvement on this requirement in the next reporting period.

The CPD remains in Preliminary compliance and has not yet achieved Secondary compliance with ¶223. The IMT appreciates that the delivery of supervisor training began during this reporting period. We look forward to continued progress with this paragraph in the next reporting period.

Paragraph 223 Compliance Progress History

FIRST REPORTING PERIOD	SECOND REPORTING PERIOD	THIRD REPORTING PERIOD
SEPTEMBER 1, 2019 – AUGUST 31, 2019	SEPTEMBER 1, 2019 – FEBRUARY 29, 2020	MARCH 1, 2020 – DECEMBER 31, 2020
COMPLIANCE PROGRESS:	COMPLIANCE PROGRESS:	COMPLIANCE PROGRESS:
None	None	Preliminary
FOURTH REPORTING PERIOD	**FIFTH REPORTING PERIOD**	**SIXTH REPORTING PERIOD**
JANUARY 1, 2021 – JUNE 30, 2021	JULY 1, 2021 – DECEMBER 31, 2021	JANUARY 1, 2022 – JUNE 30, 2022
COMPLIANCE PROGRESS:	COMPLIANCE PROGRESS:	COMPLIANCE PROGRESS:
Preliminary	Preliminary	Preliminary

[103] TRED's *2021 Year-End Report*, CHICAGO POLICE DEPARTMENT (APRIL 29, 2022), https://home.chicagopolice.org/wp-content/uploads/2021-YEAR-END-REPORT.pdf.

Use of Force: ¶224

224. *In addition, for level 2 and level 3 reportable use of force incidents involving an injury or complaint of injury for which COPA does not have jurisdiction, the responding supervisor will undertake reasonable efforts to identify and interview additional witnesses beyond those that are known and available.*

Compliance Progress

(Reporting Period: January 1, 2022, through June 31, 2022)

Preliminary:	***In Compliance*** **(THIRD REPORTING PERIOD)**
Secondary:	***Under Assessment***
Full:	***Not Yet Assessed***

In the sixth reporting period, the City and the CPD maintained Preliminary compliance but has not yet achieved Secondary compliance with the requirements of ¶224.

To assess compliance for this paragraph the IMT reviewed the CPD's relevant policies, TRED's Year-End and Quarterly Reports, the CPD's use of force dashboard, and the curriculum for the 2022 In-Service Supervisor refresher training, including the newly developed *Tactical Response Report Training Guide*.

Our review of the 2022 curriculum for the in-service supervisor training indicates it addresses this requirement. We also note that the revised TRR form (issued December 2020) also includes the requirement to identify witnesses and document those efforts. On April 12, 2022, the IMT observed the Supervisory refresher training and the requirements of this paragraph were adequately addressed on slide 105 of the training PowerPoint deck.

We note that TRED's *2021 Year-End Report* points out that the third most common debriefing point for responding supervisors is for "witness box issue." In 56 incidents, responding supervisors failed to fully articulate their actions taken in order to locate and identify witnesses to a use of force incident. The *Year-End Report* also notes 27 occasions in which a supervisor did not respond to the scene of a use of force incident when it was required for them to do so.[104]

The extent of Reviewing Supervisors' efforts to identify witnesses and to canvas neighborhoods is difficult to determine from the limited information in TRED reports. The *Year-End Report* identifies 37 incidents of "narrative deficiency" for responding supervisors; whether these deficiencies relate to required witness identification cannot be determined.

[104] TRED's *2021 Year-End Report*, CHICAGO POLICE DEPARTMENT (APRIL 29, 2022), https://home.chicagopolice.org/wp-content/uploads/2021-YEAR-END-REPORT.pdf.

While the CPD did not achieve Secondary compliance with ¶224 during this reporting period, we understand that training is underway. In order for the CPD to move toward Full compliance, the IMT will explore with TRED whether an additional debriefing point may be necessary for responding supervisor's required witness identification efforts. We look forward to such conversations in the next reporting period.

Paragraph 224 Compliance Progress History

FIRST REPORTING PERIOD SEPTEMBER 1, 2019 – AUGUST 31, 2019 COMPLIANCE PROGRESS: None	SECOND REPORTING PERIOD SEPTEMBER 1, 2019 – FEBRUARY 29, 2020 COMPLIANCE PROGRESS: None	THIRD REPORTING PERIOD MARCH 1, 2020 – DECEMBER 31, 2020 COMPLIANCE PROGRESS: Preliminary
FOURTH REPORTING PERIOD JANUARY 1, 2021 – JUNE 30, 2021 COMPLIANCE PROGRESS: Preliminary	FIFTH REPORTING PERIOD JULY 1, 2021 – DECEMBER 31, 2021 COMPLIANCE PROGRESS: Preliminary	SIXTH REPORTING PERIOD JANUARY 1, 2022 – JUNE 30, 2022 COMPLIANCE PROGRESS: Preliminary

Use of Force: ¶225

225. *A supervisor who used force or ordered force to be used during a reportable use of force incident will not perform the duties assigned to the responding supervisor for that incident.*

Compliance Progress

(Reporting Period: January 1, 2022, through June 31, 2022)

Preliminary:	***In Compliance*** **(THIRD REPORTING PERIOD)**
Secondary:	***Under Assessment***
Full:	***Not Yet Assessed***

In the sixth reporting period, the City and the CPD maintained Preliminary compliance but have not yet achieved Secondary compliance with the requirements of ¶225.

To determine compliance, the IMT reviewed relevant CPD policies, TRED's Quarterly and Year-End Reports, the CPD's use of force dashboard, and the 2022 in service supervisory refresher training curriculum. In addition, the IMT observed a supervisor refresher training session in April 2022 and reviewed the supervisor's *Tactical Response Report Training Guide* that was distributed along with that training; we note that the requirements of this paragraph are covered in the *Tactical Response Report Training Guide*.

Our review indicates that the issues related to this paragraph remain somewhat problematic. TRED's *2021 Year-End Report* identifies 39 debriefing points for a supervisor either using or ordering the use of reportable force and conducting the investigation as the reviewing/responding supervisor. Moreover, the *Report* states, "the TRED has never reviewed a TRR where a sergeant has approved the TRR of another sergeant" (at 57). But the *Report* goes on to indicate, that in 2021, there were 57 incidents in which the responding supervisor was of equal rank, conducting the street investigation but not issuing the approval.[105]

The CPD remains in Preliminary compliance with these requirements and has moved toward Secondary compliance during this reporting period. We appreciate the CPD's efforts and look forward to continued progress with these requirements in the remainder of 2022.

[105] TRED's *2021 Year-End Report*, CHICAGO POLICE DEPARTMENT (APRIL 29, 2022), https://home.chicagopolice.org/wp-content/uploads/2021-YEAR-END-REPORT.pdf.

Paragraph 224 Compliance Progress History

FIRST REPORTING PERIOD	SECOND REPORTING PERIOD	THIRD REPORTING PERIOD
SEPTEMBER 1, 2019 – AUGUST 31, 2019	SEPTEMBER 1, 2019 – FEBRUARY 29, 2020	MARCH 1, 2020 – DECEMBER 31, 2020
COMPLIANCE PROGRESS:	COMPLIANCE PROGRESS:	COMPLIANCE PROGRESS:
None	None	Preliminary

FOURTH REPORTING PERIOD	FIFTH REPORTING PERIOD	SIXTH REPORTING PERIOD
JANUARY 1, 2021 – JUNE 30, 2021	JULY 1, 2021 – DECEMBER 31, 2021	JANUARY 1, 2022 – JUNE 30, 2022
COMPLIANCE PROGRESS:	COMPLIANCE PROGRESS:	COMPLIANCE PROGRESS:
Preliminary	Preliminary	Preliminary

Use of Force: ¶226

226. *CPD will continue to require the responding supervisor to document information collected and actions taken in performing his or her investigatory duties in the supervisor's portion of the TRR, or in any other similar form of documentation CPD may implement.*

Compliance Progress (Reporting Period: January 1, 2022, through June 31, 2022)

Preliminary:	***In Compliance* (FIRST REPORTING PERIOD)**
Secondary:	***Under Assessment***
Full:	***Not Yet Assessed***

In the sixth reporting period, the City and the CPD maintained Preliminary compliance but have not yet achieved Secondary compliance with the requirements of ¶226.

To determine compliance, the IMT reviewed relevant CPD policy, CPD forms including the TRR, the TRR-I, and the TRR-R, TRED's and Quarterly Reports, the CPD's use-of-force dashboard, and the 2022 supervisory refresher training curriculum. In our last report, we noted that the CPD planned to provide a Guidance handout along with the training and indeed they did hand out a supervisor *Tactical Response Report Training Guide*. Members of the IMT observed a training session in April 2022 and appreciated the delivery of this training and note that a 2-hour block of that training focused on supervisory reporting responsibilities related to TRRs.

TRED's *2021 Year-End Report* identifies a number of recurring issues regarding these requirements, including supervisors failing to request an evidence technician (114 times in 2021), failing to articulate their efforts to identify relevant witnesses to a use of force incident (56 times in 2021), narrative deficiencies (37 times in 2021), and "TRR Entry – Other" (56 times in 2021).[106] We are also concerned at the continued levels of supervisors failing to notify evidence technicians when required to do so.

All issues and deficiencies regarding responding supervisors are trending downward and the IMT hopes that with the long-awaited delivery of supervisory refresher training and the development and distribution of the supervisor *Tactical Response Report Training Guide* they will continue to do so.

[106] TRED's *2021 Year-End Report*, CHICAGO POLICE DEPARTMENT (APRIL 29, 2022), https://home.chicagopolice.org/wp-content/uploads/2021-YEAR-END-REPORT.pdf.

While the CPD remains in Preliminary compliance with the requirements of ¶226 and with training underway, we anticipate the CPD achieving Secondary compliance during the next reporting period.

Paragraph 226 Compliance Progress History

FIRST REPORTING PERIOD SEPTEMBER 1, 2019 – AUGUST 31, 2019	SECOND REPORTING PERIOD SEPTEMBER 1, 2019 – FEBRUARY 29, 2020	THIRD REPORTING PERIOD MARCH 1, 2020 – DECEMBER 31, 2020
COMPLIANCE PROGRESS: Preliminary	COMPLIANCE PROGRESS: Preliminary	COMPLIANCE PROGRESS: Preliminary
FOURTH REPORTING PERIOD JANUARY 1, 2021 – JUNE 30, 2021	**FIFTH REPORTING PERIOD** JULY 1, 2021 – DECEMBER 31, 2021	**SIXTH REPORTING PERIOD** JANUARY 1, 2022 – JUNE 30, 2022
COMPLIANCE PROGRESS: Preliminary	COMPLIANCE PROGRESS: Preliminary	COMPLIANCE PROGRESS: Preliminary

Use of Force: ¶227

227. *Any CPD member who becomes aware of information indicating that a reportable use of force occurred but was not reported must immediately notify his or her supervisor.*

Compliance Progress

(Reporting Period: January 1, 2022, through June 31, 2022)

Preliminary:	***In Compliance*** **(THIRD REPORTING PERIOD)**
Secondary:	***In Compliance*** **(FIFTH REPORTING PERIOD)**
Full:	***Not Yet Assessed***

In the sixth reporting period, the City and the CPD maintained Preliminary and Secondary compliance with the requirements of ¶227.

To determine compliance, the IMT reviewed relevant CPD policies, TRED's Year-End and Quarterly Reports, documentation on COPA's website, the 2022 in service use of force training curriculum, and the 2022 supervisory refresher training curriculum including all materials and handouts. The IMT also observed a session of the 2022 supervisory refresher training in April 2022.

We have explored requesting additional relevant data from COPA regarding this issue, but they do not have such data readily available at this time. The IMT is aware of one incident that resulted in two referrals to COPA for an officer's failure to perform this duty related to disrespect or maltreatment of a person that occurred last year but is otherwise unaware of any incidents. Moreover, we note that during TRED's reviews of officers who use force, they routinely review all body-worn camera of the officer involved and the officers present, so TRED is in a position to identify unreported force by officers but the IMT has received no such reports.

We remain concerned about the possibility of future failures to report force because both the IMT's Special Report and the OIG's report on the 2020 protests indicate that unreported use of force was a significant issue. We appreciate the emphasis on this issue in training through which the CPD maintains Secondary compliance and look forward to continued emphasis. For the CPD to move toward Full compliance, the IMT will be reviewing documentation from other sources including BIA, COPA, and the City's Law Department and will look for evidence of procedures to capture such information and to identify the agency or unit that would be the repository of such reports.

Paragraph 227 Compliance Progress History

FIRST REPORTING PERIOD SEPTEMBER 1, 2019 – AUGUST 31, 2019	SECOND REPORTING PERIOD SEPTEMBER 1, 2019 – FEBRUARY 29, 2020	THIRD REPORTING PERIOD MARCH 1, 2020 – DECEMBER 31, 2020
COMPLIANCE PROGRESS: None	COMPLIANCE PROGRESS: None	COMPLIANCE PROGRESS: Preliminary
FOURTH REPORTING PERIOD JANUARY 1, 2021 – JUNE 30, 2021	**FIFTH REPORTING PERIOD** JULY 1, 2021 – DECEMBER 31, 2021	**SIXTH REPORTING PERIOD** JANUARY 1, 2022 – JUNE 30, 2022
COMPLIANCE PROGRESS: Preliminary	COMPLIANCE PROGRESS: Secondary	COMPLIANCE PROGRESS: Secondary

Use of Force: ¶228

> ***228.*** *Supervisors play a critical role in ensuring that force is used legally, consistent with CPD policy, and in a manner that will promote community confidence in the Department. Supervisor reviews and investigations of uses of force are essential to identify necessary individual and departmental corrective action.*

Compliance Progress

(Reporting Period: January 1, 2022, through June 31, 2022)

Preliminary:	***In Compliance*** **(FOURTH REPORTING PERIOD)**
Secondary:	***Under Assessment***
Full:	***Not Yet Assessed***

In the sixth reporting period, the CPD remained in Preliminary compliance with the requirements of ¶228 and is under assessment for Secondary compliance.

To assess compliance, the IMT reviewed relevant CPD policies, TRED's Year-End and Quarterly Reports, the CPD's 2022 annual in service training curriculum, the CPD's Use of Force Dashboard, the CPD's supervisory dashboard, and led discussions with members of CPD leadership during our monthly calls. In addition, we reviewed and observed (in April 2022) the 2022 in service Supervisory Refresher training, along with all accompanying materials.

Our observation of the CPD's In-Service Supervisory Refresher training reveals that the training focuses on the need for front-line supervisors to point out training needs and deficiencies when they investigate use of force incidents and emphasizes the CPD's processes for supervisors to do so.

We remain concerned, however, that while front-line supervisors and members of TRED have access to the same reports and body-worn camera videos, the results of their observations differ greatly. TRED reports continue to identify front-line supervisors' failure to take action when there are clear officer deficiencies. For example, TRED's 2021 Q4 Report identifies 225 training recommendations for firearm pointing incidents. A revision to the FIPR allows a supervisor to debrief the involved officer by marking a selection on the FIPR entitled "Individualized Training Occurred at the Time of the Incident." No debriefings or trainings were conducted by front-line supervisors in the fourth quarter of 2021, despite the fact that they were reviewing the same video as TRED.

This is troubling, since the Supervisory Refresher Training that was delivered during this reporting period specifically directs supervisor to (1) identify; (2) address; and (3) document officer deficiencies regarding use of force and reporting requirements. Training and direction around the Supervisory Dashboard must clearly articulate supervisor expectations to immediately address officer issues and not wait

for TRED to review then and take action. Again, the IMT stresses the criticality of front-line supervisors embracing their roles in accountability to move reform forward.

Moreover, the TRR-R, which was revised in 2020, includes boxes for supervisors to check aimed at capturing front-line supervisors' efforts and appropriate actions at the district level. As the IMT has noted many times, officers must be held accountable by their immediate supervisors in the districts.

TRED's *2021 Year-End Report* indicates that supervisors documented corrective action 128 times in 2021, which accounts for 5.4% of reviewed TRRs.[107] This is a new area of focus that the IMT began emphasizing in 2020; it has been addressed in the 2022 Supervisory Refresher training but given the extent of the problem clearly needs to be reinforced.

In conclusion, the IMT stresses that the CPD needs to emphasize timely and effective front-line supervision, clearly addressing these deficiencies through training. The CPD remains in Preliminary compliance and is under assessment for Secondary Compliance. We see an opportunity to further address these shortcomings with the rollout of the Supervisory Dashboard tool. The IMT looks forward to the CPD's additional efforts to address these continuing issues in the next reporting period.

Paragraph 228 Compliance Progress History

FIRST REPORTING PERIOD	SECOND REPORTING PERIOD	THIRD REPORTING PERIOD
SEPTEMBER 1, 2019 – AUGUST 31, 2019	SEPTEMBER 1, 2019 – FEBRUARY 29, 2020	MARCH 1, 2020 – DECEMBER 31, 2020
COMPLIANCE PROGRESS:	COMPLIANCE PROGRESS:	COMPLIANCE PROGRESS:
Not Applicable	None	Status Update
FOURTH REPORTING PERIOD	**FIFTH REPORTING PERIOD**	**SIXTH REPORTING PERIOD**
JANUARY 1, 2021 – JUNE 30, 2021	JULY 1, 2021 – DECEMBER 31, 2021	JANUARY 1, 2022 – JUNE 30, 2022
COMPLIANCE PROGRESS:	COMPLIANCE PROGRESS:	COMPLIANCE PROGRESS:
Preliminary	Preliminary	Preliminary

[107] TRED's *2021 Year-End Report*, CHICAGO POLICE DEPARTMENT (APRIL 29, 2022), https://home.chicagopolice.org/wp-content/uploads/2021-YEAR-END-REPORT.pdf.

Use of Force: ¶229

229. *All reportable uses of force by CPD members must be reviewed by CPD supervisors.*

Compliance Progress (Reporting Period: January 1, 2022, through June 31, 2022)

Preliminary: ***In Compliance*** **(FIRST REPORTING PERIOD)**
Secondary: ***Under Assessment***
Full: ***Not Yet Assessed***

During the sixth reporting period, the CPD maintained Preliminary compliance and is under assessment for Secondary compliance with the requirements of ¶229.

To assess compliance with this paragraph, the IMT relied on several data sources, such as the CPD's relevant policies, including G02-02 *First Amendment Rights* policy, TRED's Year-End and Quarterly Reports, the CPD's Use of Force Dashboard, the CPD's processes regarding its First Amendment policy, and the 2022 in-service Supervisory Refresher Training, which we observed in April 2022 and included a supervisor *Tactical Response Report Training Guide* handout. We also reviewed the curricula and all materials for the 2022 in-service training and the *Constitutional Policing* course.

As we noted in our analysis of ¶227, we remain concerned about the possibility of officers failing to report use of force incidents. We note that TRED's *2021 Year-End Report* does not note any debriefings for failing to report force, as those cases would be sent to COPA. Our past inquiries of COPA on this issue have not yielded any data, as this is a category not currently tracked.

The CPD's in-service annual training addresses the expectations and requirements for officers to report uses of force in their day-to-day policing and the CPD's *First Amendment Rights* policy and accompanying forms address problems associated with the CPD's failures to report force used during the 2020 protests. Moreover, the CPD's *Constitutional Policing* course addresses protests and reporting issues.

We look forward to the CPD's continued efforts to ensure that all reportable uses of force are indeed reported and are appropriately reviewed by CPD supervisors.

Paragraph 229 Compliance Progress History

FIRST REPORTING PERIOD	SECOND REPORTING PERIOD	THIRD REPORTING PERIOD
SEPTEMBER 1, 2019 – AUGUST 31, 2019	SEPTEMBER 1, 2019 – FEBRUARY 29, 2020	MARCH 1, 2020 – DECEMBER 31, 2020
COMPLIANCE PROGRESS:	COMPLIANCE PROGRESS:	COMPLIANCE PROGRESS:
Preliminary	Preliminary	Secondary

FOURTH REPORTING PERIOD	FIFTH REPORTING PERIOD	SIXTH REPORTING PERIOD
JANUARY 1, 2021 – JUNE 30, 2021	JULY 1, 2021 – DECEMBER 31, 2021	JANUARY 1, 2022 – JUNE 30, 2022
COMPLIANCE PROGRESS:	COMPLIANCE PROGRESS:	COMPLIANCE PROGRESS:
Preliminary	Preliminary	Preliminary

Use of Force: ¶230

> ***230.*** *After a reportable use of force has occurred, required TRRs have been completed, and, in the case of level 2 and level 3 incidents, a responding supervisor has documented any investigatory information collected, the incident will be reviewed and evaluated by a CPD supervisor at least the rank of Lieutenant, and in all instances at least one rank level above that of the highest-ranking member who engaged in the reportable use of force, or by a command staff member, when designated ("reviewing supervisor").*

Compliance Progress

(Reporting Period: January 1, 2022, through June 31, 2022)

Preliminary:	***In Compliance*** **(THIRD REPORTING PERIOD)**
Secondary:	***Under Assessment***
Full:	***Not Yet Assessed***

In the sixth reporting period, the City and the CPD maintained Preliminary compliance and is under assessment for Secondary compliance with the requirements of ¶230.

To assess compliance, the IMT reviewed relevant CPD policies, the TRR, TRR-I, TRR-R forms, the 2022 in service Supervisor Refresher Training materials including lesson plans, slides and handouts, TRED Year-End and Quarterly Reports, and the 2022 in-service officer training materials.

Our observation in April of the 2022 in service Supervisor Refresher Training indicates that the curriculum addresses the requirements of this paragraph, and we note that TRED's *2021 Year-End Report* indicates that a CPD sergeant has never approved a TRR for another sergeant.[108]

In conclusion, while the CPD remains in Preliminary compliance with the requirements of ¶230, the fact that TRED reported 70 instances of inappropriate reviews in the first three Quarterly Reports of 2021 demands the CPD's attention from a training standpoint. We look forward to the CPD completing the delivery of the 2022 in service Supervisor Refresher Training and the CPD's continued progress with this paragraph.

[108] TRED's *2021 Year-End Report*, CHICAGO POLICE DEPARTMENT (APRIL 29, 2022), https://home.chicagopolice.org/wp-content/uploads/2021-YEAR-END-REPORT.pdf.

Paragraph 230 Compliance Progress History

FIRST REPORTING PERIOD SEPTEMBER 1, 2019 – AUGUST 31, 2019	SECOND REPORTING PERIOD SEPTEMBER 1, 2019 – FEBRUARY 29, 2020	THIRD REPORTING PERIOD MARCH 1, 2020 – DECEMBER 31, 2020
COMPLIANCE PROGRESS: None	COMPLIANCE PROGRESS: None	COMPLIANCE PROGRESS: Preliminary
FOURTH REPORTING PERIOD JANUARY 1, 2021 – JUNE 30, 2021	**FIFTH REPORTING PERIOD** JULY 1, 2021 – DECEMBER 31, 2021	**SIXTH REPORTING PERIOD** JANUARY 1, 2022 – JUNE 30, 2022
COMPLIANCE PROGRESS: Preliminary	COMPLIANCE PROGRESS: Preliminary	COMPLIANCE PROGRESS: Preliminary

Use of Force: ¶231

231. *The reviewing supervisor will conduct an investigation into the reportable use of force incident by reviewing all information reasonably available regarding the incident, including written reports, video or audio recordings, and, in the case of level 2 and level 3 reportable use of force incidents, witness statements, photographs (if available), and other evidence or information collected by the responding supervisor. After advising the subject of his or her right not to answer questions and other applicable rights, and only if the subject voluntarily consents to an interview, the reviewing supervisor will interview the subject solely about the reportable use of force. In addition, the reviewing supervisor will visually inspect the subject and document any injuries observed.*

Compliance Progress (Reporting Period: January 1, 2022, through June 31, 2022)

Preliminary:	***In Compliance*** **(FIRST REPORTING PERIOD)**
Secondary:	***Under Assessment***
Full:	***Not Yet Assessed***

In the sixth reporting period, the CPD maintained Preliminary compliance but has not yet achieved Secondary compliance with the requirements of ¶231.

To assess compliance, the IMT reviewed relevant CPD policies, the 2022 in service Supervisory Refresher Training materials, TRED Year-End and Quarterly Reports, and the CPD's use of force Dashboard. We also observed an April 2022 session of the Supervisory Refresher Training, which also included the handout of a supervisor *Tactical Response Report Training Guide*. The Supervisory Refresher Training and accompanying materials emphasized the importance of the watch operations lieutenant inspecting subjects for injuries and responding to a hospital if required (it appears in the *Tactical Response Report Training Guide,* p.2 and pp. 12–13, in notes 1–4).

Data from TRED reports indicate the following debriefing points for reviewing supervisor performance on the requirements of this paragraph in 2021: approving supervisor of equal rank of involved member (57 debriefings in 2021); reports not completed within 48 hours without documented approval (37 debriefings in 2021); TRR reviewed by supervisor who used or ordered force (20 debriefings in 2021).[109] All of these deficiencies cause the IMT some concern; we hope to see improvement during the next reporting period.

[109] TRED's *2021 Year-End Report*, CHICAGO POLICE DEPARTMENT (APRIL 29, 2022), https://home.chicagopolice.org/wp-content/uploads/2021-YEAR-END-REPORT.pdf.

Paragraph 231 Compliance Progress History

FIRST REPORTING PERIOD SEPTEMBER 1, 2019 – AUGUST 31, 2019 COMPLIANCE PROGRESS: Preliminary	SECOND REPORTING PERIOD SEPTEMBER 1, 2019 – FEBRUARY 29, 2020 COMPLIANCE PROGRESS: Preliminary	THIRD REPORTING PERIOD MARCH 1, 2020 – DECEMBER 31, 2020 COMPLIANCE PROGRESS: Preliminary
FOURTH REPORTING PERIOD JANUARY 1, 2021 – JUNE 30, 2021 COMPLIANCE PROGRESS: Preliminary	FIFTH REPORTING PERIOD JULY 1, 2021 – DECEMBER 31, 2021 COMPLIANCE PROGRESS: Preliminary	SIXTH REPORTING PERIOD JANUARY 1, 2022 – JUNE 30, 2022 COMPLIANCE PROGRESS: Preliminary

Use of Force: ¶232

232. *For all reportable uses of force, the reviewing supervisor will determine, based on the information reviewed, if the use of force requires a notification to COPA and will assess whether the use of force was in compliance with CPD policy (except for incidents involving deadly force or an officer-involved death). The reviewing supervisor will also review the TRR, or any similar form of documentation CPD may implement, for sufficiency and completeness.*

Compliance Progress (Reporting Period: January 1, 2022, through June 31, 2022)

Preliminary:	***In Compliance* (THIRD REPORTING PERIOD)**
Secondary:	***Under Assessment***
Full:	***Not Yet Assessed***

In the sixth reporting period, the City and the CPD maintained Preliminary compliance but have not yet achieved Secondary compliance with the requirements of ¶232.

To assess compliance with these requirements, the IMT reviewed relevant CPD policies, TRED's Year-End and Quarterly Reports, the CPD's Use of Force Dashboard, and the 2022 in-service Supervisor Refresher training lesson plans, PowerPoint slides, and *Tactical Response Report Training Guide*. Moreover, the IMT observed a session of the Supervisor Refresher training in April 2022.

Data reported by TRED during this reporting period indicates that supervisors are referring cases to COPA with relative frequency. Specifically, TRED's *2021 Year-End Report* indicates that the number of cases tagged for COPA review by CPD district and unit personnel was 256, or 10.8% of all 2021 TRRs, a slight decrease from 2020 when 266 cases were tagged for COPA review. We note that this decrease is likely consistent with the lower numbers of TRRs and arrests being made by the CPD.

Moreover, TRED's *2021 Year-End Report* indicates a notable increase in Complaint Log (CL) numbers[110] being obtained at District/Unit level.[111] The *Report* goes on to note that many of the CLs obtained in 2021 were not as a result of observed misconduct but were obtained because of the possibility that misconduct may have been captured on video.

[110] "When misconduct is observed or an allegation of misconduct is made, a Complaint Log (CL) number is obtained from the Civilian Office of Police Accountability (COPA), which initiates the investigatory process." *2021 Year-End Report,* CPD FORCE REVIEW DIVISION, at 53.

[111] TRED's *2021 Year-End Report*, CHICAGO POLICE DEPARTMENT (APRIL 29, 2022), https://home.chicagopolice.org/wp-content/uploads/2021-YEAR-END-REPORT.pdf.

Finally, the IMT notes that CPD's Use of Force Dashboard indicates compliance with CPD policy as determined by the approving supervisor at 95%, with 3.5% not in compliance and the remainder not subject to review.

We appreciate the CPD's efforts toward achieving Secondary compliance during this reporting period.

Paragraph 232 Compliance Progress History

FIRST REPORTING PERIOD	SECOND REPORTING PERIOD	THIRD REPORTING PERIOD
SEPTEMBER 1, 2019 – AUGUST 31, 2019	SEPTEMBER 1, 2019 – FEBRUARY 29, 2020	MARCH 1, 2020 – DECEMBER 31, 2020
COMPLIANCE PROGRESS:	COMPLIANCE PROGRESS:	COMPLIANCE PROGRESS:
None	None	Preliminary
FOURTH REPORTING PERIOD	**FIFTH REPORTING PERIOD**	**SIXTH REPORTING PERIOD**
JANUARY 1, 2021 – JUNE 30, 2021	JULY 1, 2021 – DECEMBER 31, 2021	JANUARY 1, 2022 – JUNE 30, 2022
COMPLIANCE PROGRESS:	COMPLIANCE PROGRESS:	COMPLIANCE PROGRESS:
Preliminary	Preliminary	Preliminary

Use of Force: ¶233

233. *For all reportable use of force incidents, the reviewing supervisor will: provide timely, constructive feedback, where appropriate, to the officer who engaged in the reportable use of force, the officer's supervisor, or both; recommend additional training and/or support as necessary based on the incident; take appropriate action, including referring uses of force that may violate law or CPD policy to COPA.*

Compliance Progress

(Reporting Period: January 1, 2022, through June 31, 2022)

Preliminary:	***In Compliance*** **(THIRD REPORTING PERIOD)**
Secondary:	***Under Assessment***
Full:	***Not Yet Assessed***

In the sixth reporting period, the City and the CPD maintained Preliminary compliance but have not yet achieved Secondary compliance with the requirements of ¶233.

To assess compliance, the IMT reviewed relevant CPD policies, TRED's Year-End and Quarterly Reports, the TRR, TRR-I, TRR-R forms, TRED's system for ensuring the documentation of debriefing points, and the curriculum for the 2022 Supervisory Refresher training course.

In our review of CPD policy G03-02-02 *Incidents Requiring the Completion of Tactical Response Report* (effective date April 15, 2021), we noted that section VI.B.2.g.(1)–(3) addresses the requirements of this paragraph.

We also note that the TRR-I form requires the watch operations lieutenant to indicate via check boxes which (if any) actions they recommend for officer improvement; those actions address the requirements of this paragraph.

In our observation of the Supervisory Refresher Training course, we noted that the CPD issued a *Tactical Response Report Training Guide* that clearly advises watch operations lieutenants to identify issues, address issues, and document issues with officers and supervisors. We appreciate the progress on this paragraph during this reporting period and look forward to continued progress in the seventh reporting period.

Paragraph 233 Compliance Progress History

FIRST REPORTING PERIOD	SECOND REPORTING PERIOD	THIRD REPORTING PERIOD
SEPTEMBER 1, 2019 – AUGUST 31, 2019	SEPTEMBER 1, 2019 – FEBRUARY 29, 2020	MARCH 1, 2020 – DECEMBER 31, 2020
COMPLIANCE PROGRESS:	COMPLIANCE PROGRESS:	COMPLIANCE PROGRESS:
None	None	Preliminary

FOURTH REPORTING PERIOD	FIFTH REPORTING PERIOD	SIXTH REPORTING PERIOD
JANUARY 1, 2021 – JUNE 30, 2021	JULY 1, 2021 – DECEMBER 31, 2021	JANUARY 1, 2022 – JUNE 30, 2022
COMPLIANCE PROGRESS:	COMPLIANCE PROGRESS:	COMPLIANCE PROGRESS:
Preliminary	Preliminary	Preliminary

Use of Force: ¶234

234. *CPD will continue to require the reviewing supervisor to document in a Tactical Response Report – Investigation ("TRR-I"), or in any other similar form of documentation CPD may implement, his or her detailed assessment of compliance with CPD policy, any constructive feedback, and any required or recommended action. In addition, the reviewing supervisor will include in the TRR-I or in any other similar form of documentation CPD may implement, the identities of CPD members on scene during the incident who are reasonably believed to have relevant knowledge or information regarding the reportable use of force.*

Compliance Progress

(Reporting Period: January 1, 2022, through June 31, 2022)

Preliminary:	***In Compliance*** **(THIRD REPORTING PERIOD)**
Secondary:	***Under Assessment***
Full:	***Not Yet Assessed***

In the sixth reporting period the City and the CPD maintained Preliminary compliance but have not yet achieved Secondary compliance with the requirements of ¶234.

To assess compliance, the IMT reviewed the CPD's relevant policies, TRED's Year-End and Quarterly Reports, the CPD's Use of Force Dashboard data, the TRR, TRR-I, and TRR-R forms, and the lesson plans, handouts, and slides for the 2022 in-service Supervisory Refresher Training, which we observed on April 12, 2022.

The Supervisory Refresher Training clearly addressed the required duties of the reviewing and approving supervisors and included handouts to further reinforce those responsibilities.

TRED's reports point to issues with supervisors fulfilling their responsibilities regarding the "witness box" on the form, but do not detail failures of supervisors to document officers on scene. It is our understanding that TRED reviews all body-worn camera footage of involved officers and uninvolved officers who respond to a use of force incident scene.

We look forward to continued progress with these requirements; we plan to review a sample of TRR-I forms in the near future to learn more about the issues with the "witness box" as noted in TRED's *2021 Year-End Report* on page 55.[112]

[112] TRED's *2021 Year-End Report*, CHICAGO POLICE DEPARTMENT (APRIL 29, 2022), https://home.chicagopolice.org/wp-content/uploads/2021-YEAR-END-REPORT.pdf.

Paragraph 234 Compliance Progress History

FIRST REPORTING PERIOD SEPTEMBER 1, 2019 – AUGUST 31, 2019	SECOND REPORTING PERIOD SEPTEMBER 1, 2019 – FEBRUARY 29, 2020	THIRD REPORTING PERIOD MARCH 1, 2020 – DECEMBER 31, 2020
COMPLIANCE PROGRESS: None	COMPLIANCE PROGRESS: None	COMPLIANCE PROGRESS: Preliminary
FOURTH REPORTING PERIOD JANUARY 1, 2021 – JUNE 30, 2021	**FIFTH REPORTING PERIOD** JULY 1, 2021 – DECEMBER 31, 2021	**SIXTH REPORTING PERIOD** JANUARY 1, 2022 – JUNE 30, 2022
COMPLIANCE PROGRESS: Preliminary	COMPLIANCE PROGRESS: Preliminary	COMPLIANCE PROGRESS: Preliminary

Use of Force: ¶235

235. *All district-level supervisory review documentation regarding a reportable use of force incident must be completed within 48 hours of the incident, unless an extension is approved by a command staff member.*

Compliance Progress

(Reporting Period: January 1, 2022, through June 31, 2022)

Preliminary:	***In Compliance*** **(THIRD REPORTING PERIOD)**
Secondary:	***Under Assessment***
Full:	***Not Yet Assessed***

In the sixth reporting period, the City and the CPD maintained Preliminary compliance but have not yet achieved Secondary compliance with the requirements of ¶235.

To assess compliance, the IMT reviewed the relevant CPD policy, TRED's Year-End and Quarterly Reports, the CPD's use of force Dashboard, the curriculum for the 2022 in-service Supervisory Refresher training including the lesson plan, the slides, and the guidance in the form of a supervisory *Tactical Response Report Training Guide*, and participated in numerous conversations with CPD personnel on regularly scheduled calls. Moreover, we observed a session of the Supervisory Refresher training in April 2022.

TRED's *2021 Year-End Report* indicates that there were 37 incidents in 2021 in which investigations exceeded 48 hours without documented approval and TRED conducted debriefings with those supervisors.[113]

The IMT appreciates the CPD beginning delivery of the 2022 in-service Supervisory Refresher training during this reporting period, which addresses the requirements of ¶235 in its curriculum. We look forward to continued progress in the next reporting period.

Paragraph 235 Compliance Progress History

FIRST REPORTING PERIOD SEPTEMBER 1, 2019 – AUGUST 31, 2019 COMPLIANCE PROGRESS:	SECOND REPORTING PERIOD SEPTEMBER 1, 2019 – FEBRUARY 29, 2020 COMPLIANCE PROGRESS:	THIRD REPORTING PERIOD MARCH 1, 2020 – DECEMBER 31, 2020 COMPLIANCE PROGRESS:
None	None	Preliminary
FOURTH REPORTING PERIOD **JANUARY 1, 2021 – JUNE 30, 2021** **COMPLIANCE PROGRESS:**	**FIFTH REPORTING PERIOD** **JULY 1, 2021 – DECEMBER 31, 2021** **COMPLIANCE PROGRESS:**	**SIXTH REPORTING PERIOD** **JANUARY 1, 2022 – JUNE 30, 2022** **COMPLIANCE PROGRESS:**
Preliminary	**Preliminary**	**Preliminary**

[113] TRED's *2021 Year-End Report*, CHICAGO POLICE DEPARTMENT (April 29, 2022) at 57, https://home.chicagopolice.org/wp-content/uploads/2021-YEAR-END-REPORT.pdf.

Use of Force: ¶236

236. *CPD will continue to develop, implement, and maintain a system of video recording officers' encounters with the public with body-worn cameras. The use of body-worn cameras will be designed to increase officer accountability, improve trust and CPD legitimacy in the community, and augment CPD's records of law enforcement-related activities.*

Compliance Progress

(Reporting Period: January 1, 2022, through June 31, 2022)

Preliminary:	***Under Assessment***
Secondary:	***Not Yet Assessed***
Full:	***Not Yet Assessed***

In the sixth reporting period the City and the CPD have not yet achieved Preliminary compliance and remain under assessment.

To assess compliance, the IMT reviewed the current version of the CPD's *Body Worn Cameras* Special Order (effective April 30, 2019), and, in May 2022, a revised draft of Special Order S03-14, *Body Worn Cameras*. We also reviewed TRED's Year-End and Quarterly Reports and held many conversations with CPD personnel during regularly scheduled meetings. As we noted in our last report, given the impact of body worn cameras on community trust, the City and the CPD will not reach Preliminary compliance until they gather the community input required by ¶160.

The IMT appreciates CPD's work on the Supervisory dashboard and awaits training of supervisors that underscores how they will use it to understand body-worn camera compliance issues and take appropriate action. We anticipate that training will set expectations about how supervisors will use the dashboard and recognize and act upon officers' repeated body-worn-camera failures.

We continue to await the creation of an effective and efficient system in which front-line supervisors monitor and address deficiencies of all sorts, including body-worn camera deficiencies. Once supervisors have been trained to use the Supervisory dashboard and it is operational, we expect that supervisors will be reminded to pay close attention to their officers' body-worn camera usage.

TRED's *2021 Year-End Report* indicates they conducted 824 debriefings for body-worn-camera-related issues, which is nearly double the debriefings noted in TRED's *2020 Year-End Report*, which reported 416 body-worn-camera-related debriefings.[114] We note that TRED reports only measure body-worn camera usage

[114] TRED's *2021 Year-End Report*, CHICAGO POLICE DEPARTMENT (APRIL 29, 2022), https://home.chicagopolice.org/wp-content/uploads/2021-YEAR-END-REPORT.pdf.

during use of force events, not all encounters between community members and CPD officers.

The IMT continues to seek more information to understand any discipline resulting from repeated body-worn-camera-related failures. However, during this reporting period, TRED began enrolling officers in a required body-worn camera eLearning course upon their second recommendation or debriefing for a body-worn-camera-related issue. We also understand that negotiations about progressive discipline for officers related to body-worn camera failures continue between the City and the FOP.

The IMT awaits the finalization of Special Order S03-14, *Body Worn Cameras*, after it appropriately incorporates community feedback, followed by clear training on the policy, which will move the CPD toward Secondary compliance.

Paragraph 236 Compliance Progress History

FIRST REPORTING PERIOD SEPTEMBER 1, 2019 – AUGUST 31, 2019 COMPLIANCE PROGRESS: Not Applicable	SECOND REPORTING PERIOD SEPTEMBER 1, 2019 – FEBRUARY 29, 2020 COMPLIANCE PROGRESS: Not Applicable	THIRD REPORTING PERIOD MARCH 1, 2020 – DECEMBER 31, 2020 COMPLIANCE PROGRESS: Not Applicable
FOURTH REPORTING PERIOD JANUARY 1, 2021 – JUNE 30, 2021 COMPLIANCE PROGRESS: Under Assessment	FIFTH REPORTING PERIOD JULY 1, 2021 – DECEMBER 31, 2021 COMPLIANCE PROGRESS: Under Assessment	SIXTH REPORTING PERIOD JANUARY 1, 2022 – JUNE 30, 2022 COMPLIANCE PROGRESS: Under Assessment

Use of Force: ¶237

237. *CPD will continue to require all officers assigned to patrol field duties to wear body-worn cameras and microphones with which to record law-enforcement related activities as outlined in the Illinois Law Enforcement Officer-Worn Body Camera Act (50 ILCS 706/10-1 et seq.), with limited exceptions, including, but not limited to, when requested by a victim or witness of a crime, or interacting with a confidential informant. CPD will develop and implement a written policy delineating the circumstances when officers will not be equipped with body-worn cameras.*

Compliance Progress

(Reporting Period: January 1, 2022, through June 31, 2022)

Preliminary:	***Under Assessment***
Secondary:	***Not Yet Assessed***
Full:	***Not Yet Assessed***

In the sixth reporting period, the City and the CPD remains under assessment with ¶237, pending the requisite community engagement on the body-worn camera policy, Special Order S03-14 *Body Worn Cameras*. As we noted in our last two reports, given the impact of body-worn cameras on community trust, the City and the CPD will not reach Preliminary compliance until they gather community input and meaningfully consider it. We encourage the CPD to hear community concerns about cameras and privacy.

To assess compliance, we reviewed the current and proposed drafts of S03-14 *Body Worn Cameras*, applicable Illinois law, and TRED's Year-End and Quarterly Reports. In our previous assessments of the CPD's progress on these requirements, we noted concerns with the CPD clearly articulating "when officers will not be equipped with body-worn cameras." The current version of the policy that the IMT reviewed most recently addresses this issue and appears to address the criteria of this paragraph. We note that the current version of S03-14, *Body Worn Cameras*, addresses who should be equipped in Section IV subsection F6, which states, "Commanding officers of units identified above will ensure that all members under their command that are not equipped and required to use BWC are properly documented in the Clear Watch application."

The IMT is concerned about the CPD giving direction to its officers as soon as possible – through the finalization of this policy and the appropriate corresponding training – in part because of an incident that occurred during this reporting period in which a CPD SWAT officer shot and killed a man but was not wearing a body-

worn camera.[115] We look forward to the CPD's continued progress toward finalizing the *Body Worn Cameras* policy and delivering the necessary training to its officers.

Paragraph 237 Compliance Progress History

FIRST REPORTING PERIOD SEPTEMBER 1, 2019 – AUGUST 31, 2019 COMPLIANCE PROGRESS: Not Applicable	SECOND REPORTING PERIOD SEPTEMBER 1, 2019 – FEBRUARY 29, 2020 COMPLIANCE PROGRESS: Not Applicable	THIRD REPORTING PERIOD MARCH 1, 2020 – DECEMBER 31, 2020 COMPLIANCE PROGRESS: Not Applicable
FOURTH REPORTING PERIOD JANUARY 1, 2021 – JUNE 30, 2021 COMPLIANCE PROGRESS: Under Assessment	FIFTH REPORTING PERIOD JULY 1, 2021 – DECEMBER 31, 2021 COMPLIANCE PROGRESS: Under Assessment	SIXTH REPORTING PERIOD JANUARY 1, 2022 – JUNE 30, 2022 COMPLIANCE PROGRESS: Under Assessment

[115] Heather Cherone, *Chicago Officer Who Shot, Killed Man Sunday Was Not Equipped With Body-Worn Camera,* WTTW NEWS (April 4, 2022), https://news.wttw.com/2022/04/04/chicago-officer-who-shot-killed-man-sunday-was-not-equipped-body-worn-camera; Rob Elgas, *Chicago Police Release New Details on Fatal Shooting of Suspect Who Allegedly Fired at Officers,* NBC 5 CHICAGO NEWS (April 4, 2022), https://www.nbcchicago.com/news/local/chicago-police-release-new-details-on-fatal-shooting-of-suspect-who-allegedly-fired-at-officers/2799054/.

Use of Force: ¶238

238. *CPD will continue to maintain a policy regarding body-worn camera video and audio recording that will require officers to record their law-enforcement related activities, and that will ensure the recordings are retained in compliance with the Department's Forms Retention Schedule (CPD-11.717) and the Illinois Law Enforcement Officer-Worn Body Camera Act. At a minimum, CPD's body-worn camera policy will: a. clearly state which officers are required to use body-worn cameras and under which circumstances; b. require officers, subject to limited exceptions specified in writing, to activate their cameras when responding to calls for service and during all law enforcement-related activities that occur while on duty, and to continue recording until the conclusion of the incident(s); c. require officers to articulate in writing or on camera their reason(s) for failing to record an activity that CPD policy otherwise requires to be recorded; d. require officers to inform subjects that they are being recorded unless doing so would be unsafe, impractical, or impossible; e. address relevant privacy considerations, including restrictions on recording inside a home, and the need to protect witnesses, victims, and children; f. establish a download and retention protocol; g. require periodic random review of officers' videos for compliance with CPD policy and training purposes; h. require that the reviewing supervisor review videos of incidents involving reportable uses of force by a subordinate; and i. specify that officers who knowingly fail to comply with the policy may be subject to progressive discipline, training, or other remedial action.*

Compliance Progress

(Reporting Period: January 1, 2022, through June 31, 2022)

Preliminary:	***Under Assessment***
Secondary:	***Not Yet Assessed***
Full:	***Not Yet Assessed***

In the sixth reporting period, the City and the CPD remains under assessment with the requirements of ¶238, pending the requisite community engagement on the body-worn camera policy, Special Order S03-14, *Body Worn Cameras*. As we noted in our last two reports, given the impact of body-worn cameras on community trust, the City and the CPD will not reach Preliminary compliance until they gather community input.

To assess compliance for this paragraph, the IMT reviewed the most current draft of S03-14 *Body Worn Cameras*, applicable Illinois law, and TRED's Year-End and Quarterly Reports which provide information on officer usage of body-worn cameras. In our previous assessments of the CPD's progress on these requirements,

we noted concerns with the CPD clearly articulating "when officers will not be equipped with body-worn cameras." (See ¶237.) The current version of the policy that the IMT reviewed most recently addresses this issue and appears to address the criteria of this paragraph.

We note some encouraging signs that the CPD is moving in the right direction. TRED's *2021 Year-End report* indicates that it reviewed 2363 TRRs in 2021, 85% of which included body-worn camera footage, which is an increase of 9% from 2020, in which only 76% of TRRs included body-worn camera footage. TRED's *2021 Year-End Report* further breaks down officer body-worn camera usage failures by category and by unit, placing responsibility on unit supervisors to address these recurring issues.[116]

The IMT notes that the new and evolving Supervisory dashboard has the potential to address body-worn camera patterns and trends at the local level, should the training accompanying the dashboard clearly articulate supervisor expectations to do so.

We look forward to the CPD's continued progress toward finalizing the *Body Worn Cameras* policy and the necessary training.

Paragraph 238 Compliance Progress History

FIRST REPORTING PERIOD SEPTEMBER 1, 2019 – AUGUST 31, 2019 COMPLIANCE PROGRESS: Not Applicable	SECOND REPORTING PERIOD SEPTEMBER 1, 2019 – FEBRUARY 29, 2020 COMPLIANCE PROGRESS: Not Applicable	THIRD REPORTING PERIOD MARCH 1, 2020 – DECEMBER 31, 2020 COMPLIANCE PROGRESS: Not Applicable
FOURTH REPORTING PERIOD JANUARY 1, 2021 – JUNE 30, 2021 COMPLIANCE PROGRESS: Under Assessment	FIFTH REPORTING PERIOD JULY 1, 2021 – DECEMBER 31, 2021 COMPLIANCE PROGRESS: Under Assessment	SIXTH REPORTING PERIOD JANUARY 1, 2022 – JUNE 30, 2022 COMPLIANCE PROGRESS: Under Assessment

[116] TRED's *2021 Year-End Report*, CHICAGO POLICE DEPARTMENT (APRIL 29, 2022), https://home.chicagopolice.org/wp-content/uploads/2021-YEAR-END-REPORT.pdf.

Use of Force: ¶239

239. *CPD officers must comply with the body-worn camera policy. CPD will impose progressive discipline, training, or other remedial action on officers who do not comply with the body-worn camera policy, as permitted by applicable law.*

Compliance Progress (Reporting Period: January 1, 2022, through June 31, 2022)

Preliminary:	***Under Assessment***
Secondary:	***Not Yet Assessed***
Full:	***Not Yet Assessed***

In the sixth reporting period, the City and the CPD remain under assessment for Preliminary compliance with ¶239.

To assess compliance, the IMT reviewed Special Order S03-14, *Body Worn Cameras*, and TRED's year-end and quarterly reports, and participated in many conversations with CPD officials during regularly scheduled meetings.

We note that the CPD has not yet finalized Special Order S03-14, *Body Worn Cameras*; the CPD still needs to gather and consider the requisite community engagement on the body-worn camera policy. As we noted in our last several reports, given the impact of body-worn cameras on community trust, the City and the CPD will not reach Preliminary compliance until they gather community input.

We have also carefully observed the development of the Supervisory Dashboard, which is near completion and requires the CPD to set expectations for its use by supervisors. The Supervisory Dashboard is a tool that can be utilized by supervisors to observe operational deficiencies, such as failures in use of body-worn cameras. The IMT is unaware of any planned training and policy expectations for supervisors' use of the Dashboard.

Further, we note that the CPD's *Constitutional Policing* course mentions that failure to knowingly activate body-worn cameras is a criminal violation.[117] We understand that the City and CPD continue to negotiate with the FOP about issues related to discipline for failures to use body-worn cameras.

TRED's *2021 Year-End Report*[118] details the following recommendations regarding body-worn camera issues from its review of TRRs:

[117] Law Enforcement Officer-Worn Body Camera Act, 50 ILCS 706/10-20, https://www.ilga.gov/legislation/ilcs/ilcs4.asp?ActID=3662&ChapterID=11&SeqStart=100000&SeqEnd=1000000

[118] TRED's *2021 Year-End Report*, CHICAGO POLICE DEPARTMENT (APRIL 29, 2022), https://home.chicagopolice.org/wp-content/uploads/2021-YEAR-END-REPORT.pdf.

Use of Force Appendix Figure 7.

TRED's 2021 Review of TRRs	
BWC: late activation	255
BWC: early de-activation	69
BWC: no activation	47
BWC: other	22
BWC: no buffering	1
Total BWC issues	***394***

TRED's *2021 Year-End Report* indicates the following recommendations regarding body-worn cameras from their review of Firearm Pointing Incidents:

Use of Force Appendix Figure 8.

TRED's 2021 Review of FPIs	
BWC: late activation	695
BWC: no activation	94
BWC: no buffering	35
Total BWC issues	*824*

The use of body-worn cameras has improved but remains a significant issue as the above data indicates. The ability to identify repeat offenders and impose training and progressive discipline, where warranted, is necessary for the CPD to continue to improve. In the fourth quarter of 2021, TRED began to re-enroll department members in the body-worn camera eLearning module; an officer's first violation results in a supervisory debriefing, and the second results in TRED re-enrolling the officer in eLearning, which the IMT appreciates.

While we appreciate TRED's efforts to identify officers who need further training on body-worn camera policy and procedures, we have seen no evidence of progressive discipline with regard to body-worn cameras, but we understand that negotiations with the FOP regarding the implementation of such discipline are ongoing.

Now that it has been developed, the IMT awaits the use of the Supervisory Dashboard by supervisors, which may help identify and rectify some of the persistent body-worn camera issues. We look forward to clarifying in future reporting periods how and whether the CPD imposes progressive discipline as ¶239 requires.

Paragraph 239 Compliance Progress History

FIRST REPORTING PERIOD	SECOND REPORTING PERIOD	THIRD REPORTING PERIOD
SEPTEMBER 1, 2019 – AUGUST 31, 2019	SEPTEMBER 1, 2019 – FEBRUARY 29, 2020	MARCH 1, 2020 – DECEMBER 31, 2020
COMPLIANCE PROGRESS:	COMPLIANCE PROGRESS:	COMPLIANCE PROGRESS:
Not Applicable	Not Applicable	Not Applicable
FOURTH REPORTING PERIOD	**FIFTH REPORTING PERIOD**	**SIXTH REPORTING PERIOD**
JANUARY 1, 2021 – JUNE 30, 2021	JULY 1, 2021 – DECEMBER 31, 2021	JANUARY 1, 2022 – JUNE 30, 2022
COMPLIANCE PROGRESS:	COMPLIANCE PROGRESS:	COMPLIANCE PROGRESS:
Under Assessment	Under Assessment	Under Assessment

Use of Force: ¶240

240. *Any CPD officer required to wear a body-worn camera must: a. visually and physically inspect the body-worn camera and ensure that it is the member's assigned camera, fully charged, and operational at the beginning of each tour of duty; and b. notify a supervisor as soon as practical if, at any time, the member's assigned body-worn camera becomes inoperable (including when either or both of the audio or video recording functions is inoperable) or is damaged.*

Compliance Progress

(Reporting Period: January 1, 2022, through June 31, 2022)

Preliminary: ***Under Assessment***
Secondary: ***Under Assessment***
Full: ***Not Yet Assessed***

In the sixth reporting period, the City and the CPD remained under assessment for Preliminary and Secondary compliance with ¶240.

To assess compliance with these requirements, the IMT reviewed a draft of CPD policy S03-14, *Body Worn Cameras*. The draft of Special Order S03-14 contains language responsive to this requirement, closely tracking the language of this paragraph and clearly articulating, for example, that damaged cameras will be replaced promptly in order to ensure that officers have properly functioning cameras.

As in the last reporting period, the CPD remains under assessment, however, because S03-14 was not finalized and issued during this reporting period. The CPD has not yet completed the requisite community engagement on this policy.

We look forward to reviewing the finalized policy in the next reporting period.

Paragraph 240 Compliance Progress History

FIRST REPORTING PERIOD	SECOND REPORTING PERIOD	THIRD REPORTING PERIOD
SEPTEMBER 1, 2019 – AUGUST 31, 2019	SEPTEMBER 1, 2019 – FEBRUARY 29, 2020	MARCH 1, 2020 – DECEMBER 31, 2020
COMPLIANCE PROGRESS:	COMPLIANCE PROGRESS:	COMPLIANCE PROGRESS:
Not Applicable	Not Applicable	Not Applicable
FOURTH REPORTING PERIOD	**FIFTH REPORTING PERIOD**	**SIXTH REPORTING PERIOD**
JANUARY 1, 2021 – JUNE 30, 2021	JULY 1, 2021 – DECEMBER 31, 2021	JANUARY 1, 2022 – JUNE 30, 2022
COMPLIANCE PROGRESS:	COMPLIANCE PROGRESS:	COMPLIANCE PROGRESS:
Under Assessment	Under Assessment	Under Assessment

Use of Force: ¶241

241. *CPD will ensure that any CPD officer who reports an inoperable or damaged body-worn camera is promptly provided with a temporary or replacement body-worn camera, which will in no event be later than the beginning of the member's next tour of duty.*

Compliance Progress

(Reporting Period: January 1, 2022, through June 31, 2022)

Preliminary:	***Under Assessment***
Secondary:	***Not Yet Assessed***
Full:	***Not Yet Assessed***

In the sixth reporting period, the City and the CPD remains under assessment for the requirements of ¶241, pending the requisite community engagement on the body-worn camera policy, Special Order S03-14, *Body Worn Cameras*. As we noted in our last two reports, given the impact of body-worn cameras on community trust, the City and the CPD will not reach Preliminary compliance until they gather community input.

To assess compliance, the IMT reviewed the draft of S03-14, which addresses the requirements of this paragraph, stating that Chicago's Office of Public Safety Administration[119] is responsible for "promptly providing department members who have reported an inoperable or damaged BWC with a replacement (temporary or permanent) no later than the beginning of the reporting members next tour of duty." We also reviewed applicable Illinois law.

We anticipate that the CPD will achieve Preliminary compliance with this paragraph after community input has been gathered and incorporated into the policy and the policy is finalized. We look forward to additional progress in the next reporting period.

Paragraph 241 Compliance Progress History

FIRST REPORTING PERIOD	SECOND REPORTING PERIOD	THIRD REPORTING PERIOD
SEPTEMBER 1, 2019 – AUGUST 31, 2019	SEPTEMBER 1, 2019 – FEBRUARY 29, 2020	MARCH 1, 2020 – DECEMBER 31, 2020
COMPLIANCE PROGRESS:	COMPLIANCE PROGRESS:	COMPLIANCE PROGRESS:
Not Applicable	Not Applicable	Not Applicable
FOURTH REPORTING PERIOD	**FIFTH REPORTING PERIOD**	**SIXTH REPORTING PERIOD**
JANUARY 1, 2021 – JUNE 30, 2021	JULY 1, 2021 – DECEMBER 31, 2021	JANUARY 1, 2022 – JUNE 30, 2022
COMPLIANCE PROGRESS:	COMPLIANCE PROGRESS:	COMPLIANCE PROGRESS:
Under Assessment	Under Assessment	Under Assessment

[119] *See Office of Public Safety Administration*, CITY OF CHICAGO, https://www.chicago.gov/city/en/depts/opsa.html.

Use of Force: ¶242

242. *CPD will ensure that CPD officers assigned to Department vehicles that are equipped with in-car cameras check that the cameras are fully functional at the beginning of each watch and make appropriate notifications when they are not. CPD will ensure that any nonfunctioning or malfunctioning in-car camera is repaired or replaced within two weeks of a CPD officer reporting that the in-car camera is not functioning properly.*

Compliance Progress (Reporting Period: January 1, 2022, through June 30, 2022)

Preliminary: ***Not in Compliance***
Secondary: ***Not Yet Assessed***
Full: ***Not Yet Assessed***

In the sixth reporting period, the City and the CPD are not in compliance with the requirements of ¶242. This is the first time the IMT has assessed the requirements of this paragraph.

To assess compliance, the IMT reviewed the CPD's Special Order S03-05, *In-Car Video Systems* (effective date November 27, 2018), which has not been updated since the consent decree began in 2019.

The current policy requires that officers determine whether in-car cameras are operational prior to beginning their shift and requires supervisors to monitor which cars have functioning in-car cameras and which do not, along with proper documentation.

The current policy does not provide for non-functioning in-car cameras to be repaired within two weeks, as this policy requires.

As the CPD works to update this policy, the IMT emphasizes the importance of seeking the requisite community feedback on this important policy. We look forward to the CPD's progress on these requirements in the next reporting period.

Paragraph 242 Compliance Progress History

FIRST REPORTING PERIOD	SECOND REPORTING PERIOD	THIRD REPORTING PERIOD
SEPTEMBER 1, 2019 – AUGUST 31, 2019	SEPTEMBER 1, 2019 – FEBRUARY 29, 2020	MARCH 1, 2020 – DECEMBER 31, 2020
COMPLIANCE PROGRESS:	COMPLIANCE PROGRESS:	COMPLIANCE PROGRESS:
Not Applicable	Not Applicable	Not Applicable
FOURTH REPORTING PERIOD	**FIFTH REPORTING PERIOD**	**SIXTH REPORTING PERIOD**
JANUARY 1, 2021 – JUNE 30, 2021	JULY 1, 2021 – DECEMBER 31, 2021	JANUARY 1, 2022 – JUNE 30, 2022
COMPLIANCE PROGRESS:	COMPLIANCE PROGRESS:	COMPLIANCE PROGRESS:
Not Applicable	Not Applicable	None

Use of Force: ¶243

243. *CPD's pre-service and in-service training must provide officers with knowledge of policies and laws regulating the use of force; equip officers with tactics and skills, including de-escalation techniques, to prevent or reduce the need to use force or, when force must be used, to use force that is objectively reasonable, necessary, and proportional under the totality of the circumstances; and ensure appropriate supervision and accountability.*

Compliance Progress

(Reporting Period: January 1, 2022, through June 31, 2022)

Preliminary:	***In Compliance*** **(FIFTH REPORTING PERIOD)**
Secondary:	***Under Assessment***
Full:	***Not Yet Assessed***

In the sixth reporting period, the City and the CPD maintained Preliminary compliance and are under assessment for Secondary compliance with the requirements of ¶243.

To assess compliance, the IMT reviewed relevant CPD policy, TRED's Year-End and Quarterly Reports, and in-service training curricula, including the 2022 Supervisory Refresher Training and the 2022 in-service training. We also observed demonstrations of both the Supervisory Dashboard and the De-escalation Dashboards and reviewed TRED's debriefing points on de-escalation in its *2021 Year-End Report.*

Overall, CPD policy and training provides officers with the knowledge and skills regulating use of force and de-escalation. The CPD describes in policy the requirements of ¶243 in General Order G03-02, *De-escalation, Response to Resistance, and Use of Force*. Specifically, it states in Section X, Use of Force Training: "At a minimum, Department members will receive annual training on the laws and Department policies regulating the use of force, including, but not limited to, de-escalation, force options, and appropriate supervision and accountability."

The IMT acknowledges the CPD's efforts to equip officers with knowledge of policy and law related to using force, tactics and skills and particularly appreciates the focus on de-escalation during this reporting period. The IMT's area of concern continues to be supervision and accountability. The CPD must emphasize the importance of front-line supervisors immediately pointing out deficiencies and must encourage its supervisors to use proper documentation.

The IMT believes ensuring appropriate supervision and accountability remains an area requiring further training. The IMT appreciates the 2022 Supervisory Refresher training and CPD's work to develop the long-awaited Supervisory Dash-

board. We note, however, that the IMT has not observed any training or instruction on the expectations for using the Supervisory Dashboard, nor for the De-escalation Dashboard. Both these new tools provide excellent opportunities to encourage better supervision and accountability at the district and unit levels.

Accountability must become the responsibility of front-line supervisors. We look forward to the CPD's clear communications to supervisors regarding expectations for using the Supervisory and De-escalation Dashboards in the next reporting period.

Paragraph 243 Compliance Progress History

FIRST REPORTING PERIOD SEPTEMBER 1, 2019 – AUGUST 31, 2019 COMPLIANCE PROGRESS: Not Applicable	SECOND REPORTING PERIOD SEPTEMBER 1, 2019 – FEBRUARY 29, 2020 COMPLIANCE PROGRESS: Not Applicable	THIRD REPORTING PERIOD MARCH 1, 2020 – DECEMBER 31, 2020 COMPLIANCE PROGRESS: Status Update
FOURTH REPORTING PERIOD JANUARY 1, 2021 – JUNE 30, 2021 COMPLIANCE PROGRESS: Under Assessment	FIFTH REPORTING PERIOD JULY 1, 2021 – DECEMBER 31, 2021 COMPLIANCE PROGRESS: Preliminary	SIXTH REPORTING PERIOD JANUARY 1, 2022 – JUNE 30, 2022 COMPLIANCE PROGRESS: Preliminary

Use of Force: ¶244

244. *CPD's training regarding the use of firearms, Tasers, OC devices, impact weapons, and other force options that CPD currently authorizes or may authorize in the future will be consistent with its commitment to de-escalation as a core principle. Any initial training, qualification, or requalification regarding these force options will incorporate scenario-based elements, including scenarios in which officers achieve resolution without employing force. CPD's training regarding these force options will also provide specific guidance to officers regarding required procedures and techniques after each of these force options are used, including procedures and techniques for limiting a subject's injuries.*

Compliance Progress

(Reporting Period: January 1, 2022, through June 31, 2022)

Preliminary:	***In Compliance*** **(FIFTH REPORTING PERIOD)**
Secondary:	***Under Assessment***
Full:	***Not Yet Assessed***

In the sixth reporting period, the City and the CPD maintained Preliminary compliance for the requirements of ¶244 and remain under assessment for Secondary compliance.

To assess compliance, we reviewed the CPD's use-of-force policy suite and community engagement efforts related to ¶244's requirements, including CPD General Order G03-02, *De-escalation, Response to Resistance, and Use of Force*, which describes the requirements for Use of Force training. We note that policy provides clear guidance on what types of force are authorized depending on the situation and the nature of resistance. We also reviewed relevant policy and training regarding officers rendering aid after a force incident. Overall, the CPD's use of scenario-based training and interactive discussions on decision-making has improved.

Prior to firearm qualification, CPD officers are required to complete an eLearning course on firearms. According to CPD's *2021 Annual Report*, 100% of CPD officers (11,472) completed this training.

Additionally, in this reporting period, the IMT attended a session of CPD recruit training regarding impact weapons in person in March 2022. The 8-hour course featured the basics of handling batons, including holstering and unholstering and different types of uses in the field, such as strikes. The instructors made mention of de-escalation principles only a few times throughout and the training included some limited scenarios but focused mostly on baton-handling drills. The training did not include a scenario "in which officers achieve resolution without employing

force" nor did it include "procedures and techniques for limiting a subject's injuries" as required by this paragraph.

Throughout this reporting period, the IMT had conversations regarding scenario-based training during the qualification for firearms. The CPD continues to explore complying with this requirement alongside safety concerns.

The IMT emphasizes the need for more scenarios at all levels of force training in which the issue is resolved without officers resorting to force. We look forward to further progress on these requirements in the next reporting period.

Paragraph 244 Compliance Progress History

FIRST REPORTING PERIOD	SECOND REPORTING PERIOD	THIRD REPORTING PERIOD
SEPTEMBER 1, 2019 – AUGUST 31, 2019	SEPTEMBER 1, 2019 – FEBRUARY 29, 2020	MARCH 1, 2020 – DECEMBER 31, 2020
COMPLIANCE PROGRESS:	COMPLIANCE PROGRESS:	COMPLIANCE PROGRESS:
Not Applicable	Not Applicable	Under Assessment
FOURTH REPORTING PERIOD	**FIFTH REPORTING PERIOD**	**SIXTH REPORTING PERIOD**
JANUARY 1, 2021 – JUNE 30, 2021	JULY 1, 2021 – DECEMBER 31, 2021	JANUARY 1, 2022 – JUNE 30, 2022
COMPLIANCE PROGRESS:	COMPLIANCE PROGRESS:	COMPLIANCE PROGRESS:
Under Assessment	Preliminary	Preliminary

Use of Force: ¶245

245. *CPD will provide all current CPD officers with in-service use of force training on at least an annual basis, and more frequently when necessitated by developments in applicable law and CPD policy. CPD will coordinate and review all use of force training to ensure quality, consistency, and compliance with federal and state law, CPD policy, and this Agreement.*

Compliance Progress

(Reporting Period: January 1, 2022, through June 31, 2022)

Recurring Schedule:	March 5, 2022*	✓	**Met**	**Missed**

*Extended from December 31, 2021, due to COVID-19

Preliminary:	***In Compliance*** **(THIRD REPORTING PERIOD)**
Secondary:	***In Compliance*** **(NEW)**
Full:	***Not Yet Assessed***

In the sixth reporting period, the City and the CPD maintained Preliminary compliance and achieved Secondary compliance with ¶245.

To assess Preliminary compliance, the IMT reviewed relevant CPD policy. To assess Secondary compliance, the IMT reviewed and observed the 2021 in-service training, which included applicable legal updates, and we note that the PowerPoint slide presentation featured the latest revisions to relevant CPD policies. The CPD provided records to show that as of February 18, 2022, more than 95% of officers received the two-day *2021 De-Escalation, Response to Resistance, and Use of Force* in-service training, with 96.71% of participants completing the *Communications* eight-hour course and 96.86% completing the *Procedures* eight-hour course.[120] As a result, the City and the CPD reached Secondary compliance with ¶245 this reporting period.

The CPD is also preparing for 2022 in-service training and we look forward to that. We note that the 2022 in-service curriculum includes recent updates to Illinois criminal law addressing topics including choke holds, duty to intervene, duty to render aid, and penalties for the failure to activate body-worn cameras. The CPD's forthcoming *Constitutional Policing* course addresses many recent critical issues, including G02-02 *First Amendment Rights* policy and G03-07 *Foot Pursuits* policy.

[120] Because of the COVID-19 extension, the CPD had until March 5, 2022, to complete the delivery of its 2021 in-service training.

Paragraph 245 Compliance Progress History

FIRST REPORTING PERIOD	SECOND REPORTING PERIOD	THIRD REPORTING PERIOD
SEPTEMBER 1, 2019 – AUGUST 31, 2019	SEPTEMBER 1, 2019 – FEBRUARY 29, 2020	MARCH 1, 2020 – DECEMBER 31, 2020
COMPLIANCE PROGRESS:	COMPLIANCE PROGRESS:	COMPLIANCE PROGRESS:
Not Applicable	Not Applicable	Preliminary

FOURTH REPORTING PERIOD	FIFTH REPORTING PERIOD	SIXTH REPORTING PERIOD
JANUARY 1, 2021 – JUNE 30, 2021	JULY 1, 2021 – DECEMBER 31, 2021	JANUARY 1, 2022 – JUNE 30, 2022
COMPLIANCE PROGRESS:	COMPLIANCE PROGRESS:	COMPLIANCE PROGRESS:
Preliminary	Preliminary	Secondary

Use of Force: ¶246

246. *The annual use of force training will include the following topics: a. CPD policies and Fourth Amendment law governing the use of force; b. proper use of force decision-making that utilizes a critical thinking framework in which officers gather relevant facts; assess the situation, threats, and risks; consider CPD policy; identify options and determine the best course of action; and act, review, and reassess the situation; c. role-playing scenarios and interactive exercises that illustrate proper use of force decision-making; d. ethical decision-making and peer intervention, principles of procedural justice, the role of implicit bias, and strategies for interacting with individuals in crisis; e. de-escalation techniques and tactics to prevent or reduce the need for force, including exercising persuasion and advice, and providing a warning; stabilizing the situation through the use of time, distance, or positioning to isolate and contain a subject; and requesting additional personnel to respond or make use of specialized units or equipment; the proper deployment of CPD-issued or -approved weapons or technologies, including firearms and Tasers; f. use of force reporting, investigation, and review requirements, including documenting reportable use of force incidents; and g. other topics as determined based on the training needs assessment required by this Agreement.*

Compliance Progress

(Reporting Period: January 1, 2022, through June 31, 2022)

Recurring Schedule: March 5, 2022* ☑ **Met** ☐ **Missed**

*Extended from December 31, 2021, due to COVID-19

Preliminary: ***In Compliance*** **(THIRD REPORTING PERIOD)**

Secondary: ***In Compliance*** **(FOURTH REPORTING PERIOD)**

Full: ***Under Assessment***

In the sixth reporting period, the CPD maintained Preliminary and Secondary compliance and is under assessment for Full compliance with the requirements of ¶246.

To assess compliance, the IMT reviewed all applicable use-of-force policies and use of force training curricula, as well as observed use of force training both in person and online. Specifically, we reviewed and observed the 2022 in-service training focused on de-escalation, and the in-service Supervisory Refresher Training, including a review of the lesson plan and the participant's handbook *Tactical Response Report Training Guide* which was provided to all participants. Those training curricula address in part the requirements of this paragraph and we appreciate the CPD's efforts to meaningfully develop those lesson plans and materials.

The CPD's 2022 in-service curriculum includes all aspects of this paragraph's requirements and for the first time touches upon critical decision-making theory, which the IMT finds encouraging.

The IMT notes that recruit training and in-service use-of-force training curricula and lesson plans have consistently improved over time. Again, we stress that along with training, supervision and accountability are paramount to achieving Full compliance. We look forward to continued progress on ¶246.

Paragraph 246 Compliance Progress History

FIRST REPORTING PERIOD SEPTEMBER 1, 2019 – AUGUST 31, 2019 COMPLIANCE PROGRESS: Not Applicable	SECOND REPORTING PERIOD SEPTEMBER 1, 2019 – FEBRUARY 29, 2020 COMPLIANCE PROGRESS: Not Applicable	THIRD REPORTING PERIOD MARCH 1, 2020 – DECEMBER 31, 2020 COMPLIANCE PROGRESS: Preliminary
FOURTH REPORTING PERIOD JANUARY 1, 2021 – JUNE 30, 2021 COMPLIANCE PROGRESS: Secondary	FIFTH REPORTING PERIOD JULY 1, 2021 – DECEMBER 31, 2021 COMPLIANCE PROGRESS: Secondary	SIXTH REPORTING PERIOD JANUARY 1, 2022 – JUNE 30, 2022 COMPLIANCE PROGRESS: Secondary

Use of Force: ¶247

247. *CPD will also provide initial training on all of the topics identified above, as well as others, to all recruits as part of its recruit training curriculum.*

Compliance Progress

(Reporting Period: January 1, 2022, through June 31, 2022)

Recurring Schedule: Ongoing ☑ **Met** ☐ **Missed**

Preliminary: ***In Compliance*** **(FIFTH REPORTING PERIOD)**
Secondary: ***Under Assessment***
Full: ***Not Yet Assessed***

In the sixth reporting period, the City and the CPD maintained Preliminary compliance and remains under assessment for Secondary compliance with the requirements of ¶247.

To assess compliance, the IMT reviewed the updated Special Order S11-10-01, *Recruit Training* (effective February 28, 2022), which contains all required elements of ¶247. We also reviewed the CPD's relevant use of force and de-escalation policies, as well as the recruit training curriculum package provided to the IMT in May 2022, including lesson plans and slide presentations, which address all the elements required elements by ¶246.

The CPD did not receive, however, letters of no objection from the IMT and the OAG for the *Recruit Force Options* training course during this reporting period; therefore, they remain under assessment.

We also observed a session of CPD's recruit training regarding impact weapons in person in March 2022. The 8-hour course featured the basics of handling batons, including holstering and unholstering and different types of uses in the field, such as strikes. The instructors made mention of de-escalation principles only a few times throughout and the training included some limited scenarios but focused mostly on baton-handling drills. The training did not include a scenario "in which officers achieve resolution without employing force" nor did it include "procedures and techniques for limiting a subject's injuries" as required by ¶244.

We look forward to the CPD's continued progress toward Secondary compliance in the next reporting period.

Paragraph 247 Compliance Progress History

FIRST REPORTING PERIOD	SECOND REPORTING PERIOD	THIRD REPORTING PERIOD
SEPTEMBER 1, 2019 – AUGUST 31, 2019	SEPTEMBER 1, 2019 – FEBRUARY 29, 2020	MARCH 1, 2020 – DECEMBER 31, 2020
COMPLIANCE PROGRESS:	COMPLIANCE PROGRESS:	COMPLIANCE PROGRESS:
Not Applicable	Not Applicable	Status Update

FOURTH REPORTING PERIOD	FIFTH REPORTING PERIOD	SIXTH REPORTING PERIOD
JANUARY 1, 2021 – JUNE 30, 2021	JULY 1, 2021 – DECEMBER 31, 2021	JANUARY 1, 2022 – JUNE 30, 2022
COMPLIANCE PROGRESS:	COMPLIANCE PROGRESS:	COMPLIANCE PROGRESS:
None	Preliminary	Preliminary

Use of Force: ¶248

248. *Supervisors of all ranks, as part of their initial pre-service promotional training and other identified supervisory training, will receive training on the following: a. conducting use of force reviews or investigations appropriate to their rank; b. strategies for effectively directing officers in de-escalation principles and acting to intervene on the subject's behalf when any use of force is observed that is excessive or otherwise in violation of policy; and c. supporting officers who report objectively unreasonable or unreported force, or who are retaliated against for attempting to prevent objectively unreasonable force.*

Compliance Progress

(Reporting Period: January 1, 2022, through June 31, 2022)

Preliminary:	***In Compliance*** **(FIFTH REPORTING PERIOD)**
Secondary:	***Under Assessment***
Full:	***Not Yet Assessed***

In the sixth reporting period, the City and the CPD maintained Preliminary compliance with and remained under assessment for Secondary compliance with the requirements of ¶248.

To assess compliance, the IMT reviewed relevant CPD policy regarding training, including CPD's S11-10-02, *Pre-Service Training* (effective February 28, 2022), which contains all elements required by ¶248 in Section III(A)(5).

We also reviewed the curriculum for the 2021 and 2022 in-service training and observed the training, reviewed the curriculum for the Supervisory Refresher Training and observed the training, and reviewed TRED's Year-End and Quarterly Reports.

Our review and observation of the 2022 in-service Supervisory Refresher Training revealed that it features support for supervisors, emphasizes their responsibilities in use of force review, reporting, and investigations, and allocates time to address retaliation and assisting officers who report objectively unreasonable or unreported force. Moreover, the CPD also provided a handout to participants entitled *Tactical Response Report Training Guide.*

The IMT looks forward to the continuing delivery of the 2022 in-service Supervisory Refresher Training and reviewing the training attendance records which will move the CPD toward Secondary compliance.

Paragraph 248 Compliance Progress History

FIRST REPORTING PERIOD	SECOND REPORTING PERIOD	THIRD REPORTING PERIOD
SEPTEMBER 1, 2019 – AUGUST 31, 2019	SEPTEMBER 1, 2019 – FEBRUARY 29, 2020	MARCH 1, 2020 – DECEMBER 31, 2020
COMPLIANCE PROGRESS:	COMPLIANCE PROGRESS:	COMPLIANCE PROGRESS:
Not Applicable	Not Applicable	Not Applicable
FOURTH REPORTING PERIOD	**FIFTH REPORTING PERIOD**	**SIXTH REPORTING PERIOD**
JANUARY 1, 2021 – JUNE 30, 2021	JULY 1, 2021 – DECEMBER 31, 2021	JANUARY 1, 2022 – JUNE 30, 2022
COMPLIANCE PROGRESS:	COMPLIANCE PROGRESS:	COMPLIANCE PROGRESS:
None	Preliminary	Preliminary

Appendix 5
Recruitment, Hiring & Promotions Compliance Assessments, by Paragraph

Appendix 4
Recruitment, Hiring & Promotions Compliance Assessments, by Paragraph

¶253 ¶256 ¶259 ¶262
¶254 ¶257 ¶260 ¶263
¶255 ¶258 ¶261 ¶264

Recruitment, Hiring, and Promotions: ¶253

253. *The City and CPD will ensure that its recruitment, hiring, and promotion policies and practices are lawful, fair, and consistent with best practices, anti-discrimination laws, and the terms of this Agreement.*

Compliance Progress

(Reporting Period: January 1, 2022, through June 30, 2022)

Preliminary:	***In Compliance*** **(FIFTH REPORTING PERIOD)**
Secondary:	***Not in Compliance***
Full:	***Not Yet Assessed***

The City and the CPD maintained Preliminary compliance with the requirements of ¶253 during this reporting period.

To assess Preliminary compliance with ¶253, we reviewed the City's and the CPD's relevant policies and documents following the process described in the Consent Decree (¶¶626–41), which outlines applicable consultation, resolution, workout, and public comment periods. To assess Secondary compliance with this paragraph, we need to review substantive data demonstrating that recruitment and hiring practices align with the requirements of this paragraph, including records reflecting the development of clear guidance on the relevant policies and procedures and the allocation of responsibility thereunder.[1]

Progress before the Sixth Reporting Period

This paragraph was assessed for the first time in the fourth reporting period when the IMT determined that CPD failed to achieve Preliminary compliance. The City and the CPD first achieved Preliminary compliance in the fifth reporting period. During the fifth reporting period, we reviewed the CPD recruitment, hiring, and promotion records to determine if the City and the CPD developed and finalized policies, written in plain language, with proper procedures. The City and the CPD submitted the following records to support Preliminary compliance during the previous reporting period:

- *CPD Sworn Member Recruitment and Hiring*, IAP 07-01 (produced on December 30, 2021)

[1] By way of example, as explained below, the documents submitted depicting Police Promotions Committee activities substantiate the City's commitment to lawful and fair promotion practices, satisfying Secondary compliance for the promotions component of this paragraph. Submission of similar data related to recruitment and hiring practices would support Secondary compliance for the recruitment and hiring components of this paragraph.

- *CPD Sworn Member Promotions*, IAP 07-02
  (produced on December 30, 2021)

- *Police Promotions Committee*, HR CPCD INPC01
  (produced on December 31, 2021)

We noted that the collective documents included the requirements that demonstrated Preliminary compliance.

Progress in the Sixth Reporting Period

The City and the CPD submitted the following document to substantiate compliance during this reporting period: E05-34, *Department Recruitment, Selection and Hiring Plan*. Additionally, the City and the CPD produced revised versions of IAP 07-01, *CPD Sworn Member Recruitment*, and IAP 07-02, *CPD Sworn Member Promotions*. IAP 07-01 revisions added the requirement for submission to the IMT and the OAG (per ¶638) and a change in V(2) from every four years to every three years (per ¶258). IAP 07-02 revisions added the requirement for submission to the IMT and the OAG (per ¶638) and a change in III(2) from every four years to every three years (per ¶261). The City and the CPD also produced multiple documents depicting Police Promotions Committee activities, substantiating the City's commitment to lawful and fair promotion practices.

E05-34 clearly establishes responsibility for ensuring that its recruitment and hiring practices are meeting ¶253 requirements. Section III(A) provides that the Office of the Inspector General will monitor employment activity, such as recruitment, selection, hiring, and promotions for Equal Employment Opportunity. While these policies make evident that recruitment, hiring, and promotions policies meet ¶253 requirements, substantial data demonstrating that recruitment and hiring practices align with requirements was not provided. The CPD, however, maintains Preliminary compliance with E05-34 combined with IAP 07-01 and IAP 07-02.

***

The City and the CPD maintained Preliminary compliance during this reporting period. Looking forward, data addressing the promotions component would indicate Secondary compliance only on promotions practices, but substantive data demonstrating Secondary compliance has not been provided for recruiting and hiring practices. Secondary compliance with recruitment and hiring practices requires the City and the CPD to submit data demonstrating that they have sufficiently developed clear guidance on E05-34 and IAP 07-02 policies and procedures and have allocated related responsibilities, such as by providing records similar to the documents submitted depicting Police Promotions Committee activities, which satisfy Secondary compliance for promotions practices under this paragraph.

Paragraph 253 Compliance Progress History

FIRST REPORTING PERIOD	SECOND REPORTING PERIOD	THIRD REPORTING PERIOD
SEPTEMBER 1, 2019 – AUGUST 31, 2019	SEPTEMBER 1, 2019 – FEBRUARY 29, 2020	MARCH 1, 2020 – DECEMBER 31, 2020
COMPLIANCE PROGRESS:	COMPLIANCE PROGRESS:	COMPLIANCE PROGRESS:
Not Applicable	Not Applicable	Status Update

FOURTH REPORTING PERIOD	FIFTH REPORTING PERIOD	SIXTH REPORTING PERIOD
JANUARY 1, 2021 – JUNE 30, 2021	JULY 1, 2021 – DECEMBER 31, 2021	JANUARY 1, 2022 – JUNE 30, 2022
COMPLIANCE PROGRESS:	COMPLIANCE PROGRESS:	COMPLIANCE PROGRESS:
None	Preliminary	Preliminary

Recruitment, Hiring, and Promotions: ¶254

254. *CPD will provide clear guidance on its policies and procedures for recruiting, hiring, and promoting police officers and will clearly allocate responsibilities for recruitment, hiring, and promotion efforts.*

Compliance Progress (Reporting Period: January 1, 2022, through June 30, 2022)

Preliminary:	***In Compliance*** **(FIFTH REPORTING PERIOD)**
Secondary:	***Not in Compliance***
Full:	***Not Yet Assessed***

The City and the CPD maintained Preliminary compliance with the requirements of ¶254 during this reporting period.

To assess Preliminary compliance with ¶254, we reviewed the City's and the CPD's relevant policies and documents following the process described in the Consent Decree (¶¶626–41), which outlines applicable consultation, resolution, workout, and public comment periods. To assess Secondary compliance with this paragraph, we will need to review data demonstrating that the responsibilities allocated by the relevant policies are being executed by those designated under such policy.

The IMT sought to review policy sources, data sources, and job sources including a review of the developed job descriptions and requirements for each sworn member.

Progress before the Sixth Reporting Period

This paragraph was assessed for the first time in the fourth reporting period when the IMT determined that the CPD failed to achieve Preliminary compliance. During the fifth reporting period, we reviewed the CPD recruitment, hiring, and promotion records, and the City and the CPD achieved Preliminary compliance for the first time. We noted that the collective documents included the specified responsibilities and roles that would demonstrate Preliminary compliance.

Progress in the Sixth Reporting Period

The City and the CPD submitted the following documents to substantiate compliance during this reporting period: E05-34, *Department Recruitment, Selection and Hiring Plan*; a revised version of IAP 07-01, *CPD Sworn Member Recruitment*; and a revised version of IAP 07-02, *CPD Sworn Member Promotions*.[2]

[2] Prior versions of IAP 07-01 and IAP 07-02 were produced on the last day of the prior reporting period and were reviewed by the IMT in finding that the City and the CPD achieved Preliminary compliance with this paragraph in the fifth reporting period.

E05-34 clearly establishes responsibility for ensuring that the CPD's recruitment and hiring policies and procedures are meeting ¶254 requirements. Section III(A) provides that the Office of the Inspector General will monitor employment activity, such as recruitment, selection, hiring, and promotions to ensure the principal of Equal Employment Opportunity is followed.

IAP 07-01 allocates certain responsibilities to the following City agencies responsible for leading different aspects of the CPD's sworn member hiring and recruitment efforts: (1) the CPD, (2) the Office of Public Safety Administration, (3) the Department of Human Resources, and (4) the Department of Law. IAP 07-01 directs each agency to issue internal guidance (e.g., policies, procedures, and/or training) as needed to implement their responsibilities under IAP 07-01. The goal of IAP 07-01 is to provide clear guidance on the policies and procedures necessary for implementing each of the agency's responsibilities in recruitment and hiring processes, including allocating responsibilities to personnel as necessary for proper implementation. IAP 07-01 revisions added the requirement for submission to the IMT and the OAG (per ¶638) and a change in V(2) from every four years to every three years (per ¶258).

IAP 07-02 allocates certain responsibilities to the following City agencies with responsibilities over different aspects of the CPD's sworn member promotions efforts: (1) the CPD, (2) the Office of Public Safety Administration, (3) the Department of Human Resources, and (4) the Department of Law. IAP 07-02 revisions added the requirement for submission to the IMT and the OAG (per ¶638) and a change in III(2) from every four years to every three years (per ¶261). The City and the CPD also produced multiple documents depicting Police Promotions Committee activities, substantiating the City's commitment to lawful and fair promotion practices.

These policies make evident that recruitment, hiring and promotions policies and procedures meet ¶254 requirements by clearly allocating responsibilities for ¶254 efforts. However, no data was provided that demonstrates that recruitment and hiring activities articulated in the policies are occurring, facilitated by those designated in policy. Therefore, through submission of E05-34 combined with the revised versions of IAP 07-01 and IAP 07-02, CPD maintains Preliminary compliance, but does not achieve Secondary compliance.

***

The City and the CPD maintained Preliminary compliance during this reporting period. Looking forward, Secondary compliance may be met by submission of data demonstrating that the responsibilities allocated by the relevant policies are being executed by those designated under such policies.

Paragraph 254 Compliance Progress History

FIRST REPORTING PERIOD	SECOND REPORTING PERIOD	THIRD REPORTING PERIOD
SEPTEMBER 1, 2019 – AUGUST 31, 2019	SEPTEMBER 1, 2019 – FEBRUARY 29, 2020	MARCH 1, 2020 – DECEMBER 31, 2020
COMPLIANCE PROGRESS:	COMPLIANCE PROGRESS:	COMPLIANCE PROGRESS:
Not Applicable	Not Applicable	Status Update

FOURTH REPORTING PERIOD	FIFTH REPORTING PERIOD	SIXTH REPORTING PERIOD
JANUARY 1, 2021 – JUNE 30, 2021	JULY 1, 2021 – DECEMBER 31, 2021	JANUARY 1, 2022 – JUNE 30, 2022
COMPLIANCE PROGRESS:	COMPLIANCE PROGRESS:	COMPLIANCE PROGRESS:
None	Preliminary	Preliminary

Recruitment, Hiring, and Promotions: ¶255

255. *To further this goal, the City and CPD will publish job descriptions for each sworn member title code, specifying the current duties, responsibilities, and minimum qualifications for each position.*

Compliance Progress

(Reporting Period: January 1, 2022, through June 30, 2022)

Preliminary:	***In Compliance*** **(FIFTH REPORTING PERIOD)**
Secondary:	***In Compliance*** **(FIFTH REPORTING PERIOD)**
Full:	***Not Yet Assessed***

The City and the CPD maintained Secondary compliance with the requirements of ¶255 during this reporting period.

To assess Preliminary compliance with ¶255, we reviewed the City's and the CPD's relevant policies and documents following the process described in the Consent Decree (¶¶626–41), which outlines applicable consultation, resolution, workout, and public comment periods. To assess Secondary compliance, we reviewed published job descriptions and requirements for each sworn member, as well as policy and standard operating procedures that guide the process of periodical updates to such job descriptions. To assess Full compliance, we will need to review data sufficient to demonstrate implementation and sustainment of a systematic policy- and procedure-guided process for developing, revising, and publishing job descriptions for each sworn member.

Progress before the Sixth Reporting Period

In the previous reporting period, the IMT assessed documents that the City and the CPD produced to demonstrate compliance. The City and the CPD achieved Preliminary and Secondary compliance. The records demonstrated requirements for updating and publishing job descriptions, including key Consent Decree concepts.

Progress in the Sixth Reporting Period

The City and the CPD produced the following records as data to demonstrate compliance with ¶255 during this reporting period:

- *CPD Sworn Member Recruitment and Hiring*, IAP 07-01
  (produced on June 30, 2022)
- *CPD Sworn Member Promotions*, IAP 07-02
  (produced on June 30, 2022)

IAP 07-01 § IV., *Job Descriptions*, requires the Department of Human Resources to review, update, and publish the job descriptions for each sworn and civilian member title code, specifying the current duties, responsibilities, and minimum qualifications for each position, as required by ¶255.

Unlike the previous reporting period, the CPD did not provide a link or updates to job descriptions or activities during this reporting period related to job descriptions. The IMT examined some CPD job descriptions published online and did not identify any substantive changes this reporting period. The status on updates and revisions to job descriptions will be required in future reporting periods to substantiate Secondary compliance.

The City and the CPD did not establish Full compliance this reporting period, which requires the submission of data sufficient to demonstrate implementation and sustainment of a systematic policy- and procedure-guided process for developing, revising, and publishing job descriptions for each sworn member.

***

The City and the CPD maintained Secondary compliance during this reporting period. Unlike the previous reporting period, the CPD did not provide a link or updates to job descriptions or activities during this reporting period related to job descriptions. Looking forward, this information will be required to substantiate Secondary compliance with ¶255. Full compliance will require the City and the CPD to demonstrate sufficient implementation and sustainment of a systematic policy- and procedure-guided process for developing, revising and publishing job descriptions for each sworn member.

Paragraph 255 Compliance Progress History

FIRST REPORTING PERIOD	SECOND REPORTING PERIOD	THIRD REPORTING PERIOD
SEPTEMBER 1, 2019 – AUGUST 31, 2019	SEPTEMBER 1, 2019 – FEBRUARY 29, 2020	MARCH 1, 2020 – DECEMBER 31, 2020
COMPLIANCE PROGRESS:	COMPLIANCE PROGRESS:	COMPLIANCE PROGRESS:
Not Applicable	Not Applicable	Status Update
FOURTH REPORTING PERIOD	**FIFTH REPORTING PERIOD**	**SIXTH REPORTING PERIOD**
JANUARY 1, 2021 – JUNE 30, 2021	JULY 1, 2021 – DECEMBER 31, 2021	JANUARY 1, 2022 – JUNE 30, 2022
COMPLIANCE PROGRESS:	COMPLIANCE PROGRESS:	COMPLIANCE PROGRESS:
None	Secondary	Secondary

Recruitment, Hiring, and Promotions: ¶256

256. *The City and CPD will continue to review any hiring and promotional exams to ensure they are fair, validated, and properly administered.*

Compliance Progress

(Reporting Period: January 1, 2022, through June 30, 2022)

Preliminary:	***In Compliance*** **(FIFTH REPORTING PERIOD)**
Secondary:	***Not In Compliance***
Full:	***Not Yet Assessed***

The City and the CPD maintained Preliminary compliance during this reporting period.

To assess Preliminary compliance with ¶256, we reviewed the City's and the CPD's relevant policies and documents following the process described in the Consent Decree (¶¶626–41), which outlines applicable consultation, resolution, workout, and public comment periods. Our evaluation included a review of whether such policies and the processes described therein ensure fairness, validity, and proper administration of hiring and promotional exams. To assess Secondary compliance, we need to review data sufficient to determine if the City and the CPD are collecting, tracking, and maintaining data about hiring and promotional exams as required by this paragraph. The IMT will also need to assess job postings and hirings to determine if the City and the CPD have created the requisite positions and have staffed those positions with qualified personnel required to ensure fairness, validity, and proper administration of such exams.

Progress before the Sixth Reporting Period

In the previous reporting period, the IMT assessed documents the City and the CPD produced to demonstrate compliance. The City and the CPD achieved Preliminary compliance. The documents assessed included requirements for reviewing promotional exams and ensuring that they are administered according to Consent Decree requirements. We suggested that the City and the CPD make changes to the frequency of periodic reviews to align with all requirements of the Consent Decree.

Progress in the Sixth Reporting Period

The City and the CPD produced the following documents during this reporting period related to ¶256:

- IAP 07-01, *CPD Sworn Member Recruitment* (revised)
  (produced on June 30, 2022)

- IAP 07-02, *CPD Sworn Member Promotions* (revised)
  (produced on June 30, 2022)

- DHR SOP, *Department of Human Resources (DHR) Review of Hiring and Promotional Exams*
  (produced on June 30, 2022)

IAP 07-02 requires the Department of Human Resources (DHR) to review promotional examinations to ensure they are fair, validated, and properly administered. It further requires each promotional exam, and its administration process, to be reviewed no less frequently than every three years.

The Department of Human Resources Standard Operating Procedure (DHR SOP) is intended to reflect the Department of Human Resources' process for review of hiring and promotional exams. The DHR SOP addresses the Department of Human Resources' responsibilities for exam review, development, and administration by category, substance of exam review, procuring a developing or administering consultant, exam development, exam administration, exam security, post exam activities, and review. The document submitted by the City is an unsigned, draft version of a standard operating procedure and the IMT cannot consider it to be substantive data demonstrating compliance during this reporting period.

No additional supporting documentation was provided this reporting period relevant to the requirements of ¶256.

***

The City and the CPD maintained Preliminary compliance during this reporting period through production of the aforementioned policies. Looking forward, achieving Secondary compliance requires the City and the CPD to demonstrate that they have sufficiently assessed processes to ensure fairness, validity, and proper administration of exams. Specifically, the IMT will assess policies, processes, and other records to determine if the City and the CPD are collecting, tracking, and maintaining data about hiring and promotional exams as required by this paragraph. The IMT will also assess job postings and hirings to determine if the City and the CPD have created the requisite positions and have staffed those positions with qualified personnel required to ensure fairness, validity, and proper administration of such exams.

Paragraph 256 Compliance Progress History

FIRST REPORTING PERIOD SEPTEMBER 1, 2019 – AUGUST 31, 2019	SECOND REPORTING PERIOD SEPTEMBER 1, 2019 – FEBRUARY 29, 2020	THIRD REPORTING PERIOD MARCH 1, 2020 – DECEMBER 31, 2020
COMPLIANCE PROGRESS: Not Applicable	COMPLIANCE PROGRESS: Not Applicable	COMPLIANCE PROGRESS: Status Update
FOURTH REPORTING PERIOD JANUARY 1, 2021 – JUNE 30, 2021	**FIFTH REPORTING PERIOD** JULY 1, 2021 – DECEMBER 31, 2021	**SIXTH REPORTING PERIOD** JANUARY 1, 2022 – JUNE 30, 2022
COMPLIANCE PROGRESS: None	COMPLIANCE PROGRESS: Preliminary	COMPLIANCE PROGRESS: Preliminary

Recruitment, Hiring, and Promotions: ¶257

257. *CPD will inform officers of the role of the Office of the Inspector General ("OIG") in overseeing the hiring and promotions processes.*

Compliance Progress (Reporting Period: January 1, 2022, through June 30, 2022)

Preliminary:	***In Compliance*** **(FIFTH REPORTING PERIOD)**
Secondary:	***Not In Compliance*** **(NEW: LOST COMPLIANCE)**
Full:	***Not In Compliance*** **(NEW: LOST COMPLIANCE)**

The City and the CPD demonstrated Preliminary compliance with this paragraph, but failed to maintain Secondary and Full compliance.

To assess Preliminary compliance with ¶257, we reviewed the City's and the CPD's relevant policies and documents following the process described in the Consent Decree (¶¶626–41), which outlines applicable consultation, resolution, workout, and public comment periods. To assess Secondary compliance, we need to review current data demonstrating that the CPD has informed at least 95% of CPD officers of the Office of the Inspector General's role and sufficiently and fully developed and implemented a sustainable process to inform CPD officers of the Office of the Inspector General's role.

Progress before the Sixth Reporting Period

During the previous reporting period, we reviewed CPD training records to assess compliance and found that the City and the CPD achieved Full compliance with this paragraph. We reviewed training records that showed a 98% completion for the e-learning training. The last reporting period was the second consecutive period of sustained Secondary compliance. We noted that to continue to sustain Full compliance, the City and the CPD would need to continue to demonstrate that they have implemented a sustainable process for informing CPD officers of the OIG's role.

Progress in the Sixth Reporting Period

The City and the CPD did not submit any relevant data this reporting period. The IMT recognizes that an Office of Inspector General eLearning course was created and was previously used to train at least 98% of CPD officers about this paragraph's requirements, but that data was only current through April of 2021 and the City and the CPD did not submit any data to demonstrate continued compliance beyond April 2021.

***

The City and the CPD demonstrated Preliminary compliance with this paragraph, but failed to maintain Secondary and Full compliance. Looking forward, Secondary compliance requires the City and the CPD to provide data demonstrating that at least 95% of CPD officers have received the requisite training required by this paragraph. Achieving and sustaining Full compliance requires the City and the CPD to demonstrate they have fully developed and implemented a sustainable process to inform CPD officers, especially Academy recruits, of the Office of the Inspector General's role in overseeing the hiring and promotional processes.

Paragraph 257 Compliance Progress History

FIRST REPORTING PERIOD	SECOND REPORTING PERIOD	THIRD REPORTING PERIOD
SEPTEMBER 1, 2019 – AUGUST 31, 2019	SEPTEMBER 1, 2019 – FEBRUARY 29, 2020	MARCH 1, 2020 – DECEMBER 31, 2020
COMPLIANCE PROGRESS:	COMPLIANCE PROGRESS:	COMPLIANCE PROGRESS:
Not Applicable	Not Applicable	Status Update

FOURTH REPORTING PERIOD	FIFTH REPORTING PERIOD	SIXTH REPORTING PERIOD
JANUARY 1, 2021 – JUNE 30, 2021	JULY 1, 2021 – DECEMBER 31, 2021	JANUARY 1, 2022 – JUNE 30, 2022
COMPLIANCE PROGRESS:	COMPLIANCE PROGRESS:	COMPLIANCE PROGRESS:
Secondary	Full	Preliminary

Recruitment, Hiring, and Promotions: ¶258

> ***258.*** *By December 31, 2020, and at least every three years thereafter, CPD will assess its recruitment and hiring processes to ensure that its policies and practices comply with the law, are transparent, and are consistent with this Agreement.*

Compliance Progress

(Reporting Period: January 1, 2022, through June 30, 2022)

Recurring Schedule: Every Three Years ☑ **Not Yet Applicable**

Preliminary: ***In Compliance*** **(FIFTH REPORTING PERIOD)**
Secondary: ***Not In Compliance***
Full: ***Not Yet Assessed***

The City and the CPD maintained Preliminary compliance.

To assess Preliminary compliance with ¶258, we reviewed the City's and the CPD's relevant policies and documents following the process described in the Consent Decree (¶¶626–41), which outlines applicable consultation, resolution, workout, and public comment periods. To assess Secondary compliance, we need to review an assessment prepared by a qualified consultant engaged to assess whether the CPD's recruitment and hiring policies and practices comply with the law, are transparent, and are consistent with ¶258 requirements. The IMT understands that a consultant has been engaged and that this assessment is underway, but has not yet been completed.

Progress before the Sixth Reporting Period

During the previous reporting period, we reviewed the CPD's recruitment, hiring, and promotion records, as well as the draft Assessment Scope from a third-party consultant and the operating procedure for consultant engagements. The City and the CPD achieved Preliminary compliance. We noted that the IMT would conduct a further assessment during the next reporting period, following the extended deadline provided due to the COVID-19 pandemic.

Progress in the Sixth Reporting Period

The City and the CPD produced the following records as data demonstrating compliance with ¶258 during this reporting period:

- *CPD Sworn Member Recruitment and Hiring*, IAP 07-01 (produced on June 30, 2022)
- *CPD Sworn Member Promotions*, IAP 07-02 (produced on June 30, 2022)

IAP 07-01 states the following:

> *To ensure that the City and CPD deliver services in a manner that fully complies with the Constitution and laws of the United States and the State of Illinois, respects the rights of the people of Chicago, builds trust between officers and the communities they serve, and promotes community and officer safety; to ensure that Chicago police officers are provided with the training, resources, and support they need to perform their jobs professionally and safely; and to ensure that the Law Department can conduct the law business of the City and protect the rights and interest of the City, the City will take the necessary steps to engage a qualified consultant.*

This "qualified consultant" will evaluate whether the CPD's recruitment and hiring policies and practices comply with the law, are transparent, and are consistent with the Consent Decree (per ¶258). The scope of the consultant's assessment covers ¶259(a–g) requirements. This work is intended to ensure that the City and the CPD deliver services in a manner that fully complies with the Constitution and laws of the United States and the State of Illinois, respects the rights of the people of Chicago, builds trust between officers and the communities they serve, and promotes community and officer safety; to ensure that Chicago police officers are provided with the training, resources, and support they need to perform their jobs professionally and safely; and to ensure that the Law Department can conduct the law business of the City and protect the rights and interests of the City. The consultant's work has begun but is not completed, as required for Secondary compliance with this paragraph.

In addition to the policy review, the IMT attended Recruitment, Hiring, and Promotions meetings where the consultant presented updates to their work, obviating that the policy is being applied.

***

The City and the CPD failed to achieve Secondary compliance during this reporting period. Looking forward, Secondary compliance requires completion of the consultant assessments described above and the IMT's review of those assessments. Full compliance may be demonstrated by the consultant's timely work product submission reflecting that the CPD's recruitment and hiring processes comply with the law, are transparent, and are consistent with Consent Decree requirements to be regularly scheduled and completed every three years.

Paragraph 258 Compliance Progress History

FIRST REPORTING PERIOD
SEPTEMBER 1, 2019 – AUGUST 31, 2019
COMPLIANCE PROGRESS:
Not Applicable

SECOND REPORTING PERIOD
SEPTEMBER 1, 2019 – FEBRUARY 29, 2020
COMPLIANCE PROGRESS:
Not Applicable

THIRD REPORTING PERIOD
MARCH 1, 2020 – DECEMBER 31, 2020
COMPLIANCE PROGRESS:
Not Applicable

FOURTH REPORTING PERIOD
JANUARY 1, 2021 – JUNE 30, 2021
COMPLIANCE PROGRESS:
None

FIFTH REPORTING PERIOD
JULY 1, 2021 – DECEMBER 31, 2021
COMPLIANCE PROGRESS:
Preliminary

SIXTH REPORTING PERIOD
JANUARY 1, 2022 – JUNE 30, 2022
COMPLIANCE PROGRESS:
Preliminary

Recruitment, Hiring, and Promotions: ¶259

259. *The recruitment and hiring assessment will identify and consider: a. the core set of characteristics and capabilities of qualified recruits; b. methods for consideration of discriminatory or biased behavior by the applicant against a member of a protected class in hiring decisions; c. barriers and challenges to successfully completing the recruit application process; d. Department strategies for attracting and hiring qualified applicants that reflect a broad cross section of the Chicago community; e. input, which could consider surveys, from successful and unsuccessful applicants, recruits and other CPD members, community members, community-based organizations, legal and law enforcement professionals, and internal and external subject matter experts regarding the strengths and weaknesses of the recruitment and hiring processes; f. recommendations for any modifications to the current recruitment and hiring processes that would enable CPD to satisfy the requirements of this section; and g. a plan for implementing any recommended modifications with a timeline for implementation.*

Compliance Progress

(Reporting Period: January 1, 2022, through June 30, 2022)

Preliminary:	***In Compliance*** **(FIFTH REPORTING PERIOD)**
Secondary:	***Not In Compliance***
Full:	***Not Yet Assessed***

The City and the CPD maintained Preliminary compliance during this reporting period.

To assess Preliminary compliance with ¶259, we reviewed the City's and the CPD's relevant policies and documents following the process described in the Consent Decree (¶¶626–41), which outlines applicable consultation, resolution, workout, and public comment periods. To assess Secondary compliance, we need to review the final work product from a qualified consultant engaged to assess whether the CPD's recruitment and hiring policies and practices comply with the law, are transparent, and are consistent with ¶259(a–g) requirements. The IMT understands that a consultant has been engaged and that this assessment is underway, but has not yet been completed.

Progress in the Sixth Reporting Period

In the previous reporting period, the IMT assessed documents the City and the CPD produced to demonstrate compliance and the City and the CPD achieved Preliminary compliance. The documents showed that the CPD's recruitment, hiring, and promotion records, draft *Assessment Scope*, and the operating procedures, document the appropriate responsibilities and procedures required by this paragraph.

Progress in the Sixth Reporting Period

The City and the CPD produced the following records as data demonstrating compliance with ¶259 during this reporting period:

- *CPD Sworn Member Recruitment and Hiring*, IAP 07-01 (produced on June 30, 2022)
- *CPD Sworn Member Promotions*, IAP 07-02 (produced on June 30, 2022)

IAP 07-01 states the following:

> *To ensure that the City and CPD deliver services in a manner that fully complies with the Constitution and laws of the United States and the State of Illinois, respects the rights of the people of Chicago, builds trust between officers and the communities they serve, and promotes community and officer safety; to ensure that Chicago police officers are provided with the training, resources, and support they need to perform their jobs professionally and safely; and to ensure that the Law Department can conduct the law business of the City and protect the rights and interest of the City, the City will take the necessary steps to engage a qualified consultant.*

This "qualified consultant" will evaluate whether the CPD's recruitment and hiring policies and practices comply with the law, are transparent, and are consistent with the Consent Decree (per ¶258). The scope of the consultant's assessment covers ¶259(a–g) requirements. This work is intended to ensure that the City and the CPD deliver services in a manner that fully complies with the Constitution and laws of the United States and the State of Illinois, respects the rights of the people of Chicago, builds trust between officers and the communities they serve, and promotes community and officer safety; to ensure that Chicago police officers are provided with the training, resources, and support they need to perform their jobs professionally and safely; and to ensure that the Law Department can conduct the law business of the City and protect the rights and interests of the City.

In addition to the policy review, the IMT attended Recruitment, Hiring, and Promotions meetings where the consultant presented updates to their work, obviating that the applicable policy is being applied.

***

The City and the CPD maintained Preliminary compliance during this reporting period. Looking forward, Secondary compliance requires the City and the CPD to substantiate the consultant's work and work product to meet ¶259(a–g) requirements.

Paragraph 259 Compliance Progress History

FIRST REPORTING PERIOD	SECOND REPORTING PERIOD	THIRD REPORTING PERIOD
SEPTEMBER 1, 2019 – AUGUST 31, 2019	SEPTEMBER 1, 2019 – FEBRUARY 29, 2020	MARCH 1, 2020 – DECEMBER 31, 2020
COMPLIANCE PROGRESS:	COMPLIANCE PROGRESS:	COMPLIANCE PROGRESS:
Not Applicable	Not Applicable	Not Applicable
FOURTH REPORTING PERIOD	**FIFTH REPORTING PERIOD**	**SIXTH REPORTING PERIOD**
JANUARY 1, 2021 – JUNE 30, 2021	JULY 1, 2021 – DECEMBER 31, 2021	JANUARY 1, 2022 – JUNE 30, 2022
COMPLIANCE PROGRESS:	COMPLIANCE PROGRESS:	COMPLIANCE PROGRESS:
None	Preliminary	Preliminary

Recruitment, Hiring, and Promotions: ¶260

260. *CPD will implement the plan above in Paragraph 259 in accordance with the specified timeline for implementation.*

Compliance Progress

(Reporting Period: January 1, 2022, through June 30, 2022)

Preliminary:	***In Compliance*** **(FIFTH REPORTING PERIOD)**
Secondary:	***Not in Compliance***
Full:	***Not Yet Assessed***

The City and the CPD maintained Preliminary Compliance during this reporting period.

To assess Preliminary compliance with ¶260, we reviewed the City's and the CPD's relevant policies and documents following the process described in the Consent Decree (¶¶626–41), which outlines applicable consultation, resolution, workout, and public comment periods. To assess Secondary compliance, we need to review the final work product from a qualified consultant engaged to assess whether the CPD's recruitment and hiring policies and practices comply with the law, are transparent, and are consistent with ¶259(a–g) requirements, as well as data demonstrating that the consultant's assessments have been timely completed within eight months of the consultant's engagement. The IMT understands that a consultant has been engaged and that this assessment is underway, but has not yet been completed.

Progress before the Sixth Reporting Period

In the previous reporting period, the IMT assessed documents the City and the CPD produced to demonstrate compliance and the City and the CPD achieved Preliminary compliance. The documents showed that the recruitment, hiring, and promotion records included requirements that demonstrated Preliminary compliance.

Progress in the Sixth Reporting Period

The City and the CPD produced the following records as data demonstrating compliance with ¶260 during this reporting period:

- *CPD Sworn Member Recruitment and Hiring*, IAP 07-01 (produced on June 30, 2022)
- *CPD Sworn Member Promotions*, IAP 07-02 (produced on June 30, 2022)

IAP 07-01 states the following:

> *To ensure that the City and CPD deliver services in a manner that fully complies with the Constitution and laws of the United States and the State of Illinois, respects the rights of the people of Chicago, builds trust between officers and the communities they serve, and promotes community and officer safety; to ensure that Chicago police officers are provided with the training, resources, and support they need to perform their jobs professionally and safely; and to ensure that the Law Department can conduct the law business of the City and protect the rights and interest of the City, the City will take the necessary steps to engage a qualified consultant.*

This "qualified consultant" will evaluate whether the CPD's recruitment and hiring policies and practices comply with the law, are transparent, and are consistent with the Consent Decree (per ¶258). The scope of the consultant's assessment covers ¶259(a–g) requirements. This work is intended to ensure that the City and the CPD deliver services in a manner that fully complies with the Constitution and laws of the United States and the State of Illinois, respects the rights of the people of Chicago, builds trust between officers and the communities they serve, and promotes community and officer safety; to ensure that Chicago police officers are provided with the training, resources, and support they need to perform their jobs professionally and safely; and to ensure that the Law Department can conduct the law business of the City and protect the rights and interests of the City.

In addition to the policy review, the IMT attended Recruitment, Hiring, and Promotions meetings where the consultant presented updates to their work, obviating that the applicable policy is being applied.

While IAP 07-01 mandates compliance with ¶259(a-g), Section III(E)(2) requires the consultant to complete the *Recruitment and Hiring Assessment* and the *Recruitment and Hiring Implementation Plan* within eight months from the date that the consultant was retained. The City and the CPD did not produce data substantiating this, therefore it has maintained Preliminary Compliance, but has not attained a further level of compliance.

***

The City and the CPD maintained Preliminary compliance during this reporting period. Looking forward, to meet Secondary compliance the City and the CPD must complete and submit the consultant assessment discussed above in accordance with the requirements of this paragraph within the specified timeline.

Paragraph 260 Compliance Progress History

FIRST REPORTING PERIOD
SEPTEMBER 1, 2019 – AUGUST 31, 2019
COMPLIANCE PROGRESS:
Not Applicable

SECOND REPORTING PERIOD
SEPTEMBER 1, 2019 – FEBRUARY 29, 2020
COMPLIANCE PROGRESS:
Not Applicable

THIRD REPORTING PERIOD
MARCH 1, 2020 – DECEMBER 31, 2020
COMPLIANCE PROGRESS:
Not Applicable

FOURTH REPORTING PERIOD
JANUARY 1, 2021 – JUNE 30, 2021
COMPLIANCE PROGRESS:
None

FIFTH REPORTING PERIOD
JULY 1, 2021 – DECEMBER 31, 2021
COMPLIANCE PROGRESS:
Preliminary

SIXTH REPORTING PERIOD
JANUARY 1, 2022 – JUNE 30, 2022
COMPLIANCE PROGRESS:
Preliminary

Recruitment, Hiring, and Promotions: ¶261

261. *Within 18 months of the Effective Date, and at least every three years thereafter, CPD will obtain an independent expert assessment of its promotions processes for the ranks of Sergeant and Lieutenant to ensure that its policies and practices comply with the law, are transparent, and are consistent with this Agreement. The independent expert will review the existing Hiring Plan, and any relevant collective bargaining agreements in order to conduct the assessment of the Sergeant and Lieutenant promotions processes. The Sergeant and Lieutenant promotions assessment, at a minimum, will identify: a. the processes by which CPD selects candidates for promotion to Sergeant and Lieutenant who possess a core set of competencies, characteristics, and capabilities and, when applicable, who are effective supervisors in compliance with CPD policy and this Agreement; b. methods for consideration of each candidate's disciplinary history in the selection process; c. Department strategies for promoting qualified applicants who reflect a broad cross section of the Chicago community; d. the frequency with which CPD should hold promotional exams; e. opportunities to increase transparency and officer awareness about the promotions process and promotions decisions, including, but not limited to, identifying criteria for promotions; and f. recommendations for any modifications to the current promotions processes, which would enable CPD to address the requirements of this section.*

Compliance Progress

(Reporting Period: January 1, 2022, through June 30, 2022)

Recurring Schedule: Every Three Years ☑ **Not Yet Applicable**

Preliminary: ***In Compliance*** **(THIRD REPORTING PERIOD)**
Secondary: ***In Compliance*** **(THIRD REPORTING PERIOD)**
Full: ***Not Yet Assessed***

The City and the CPD maintained Secondary compliance during this reporting period.

To assess Preliminary compliance with ¶261, we reviewed the City's and the CPD's relevant policies and documents following the process described in the Consent Decree (¶¶626–41), which outlines applicable consultation, resolution, workout, and public comment periods. To assess Secondary compliance, we reviewed data to determine whether each promotional exam, and its administration process, are reviewed by a qualified expert no less frequently than every three years. Because

this paragraph requires a three-year assessment period, the next period to fully assess compliance, including the aforementioned expert assessment documentation, ends in fourth quarter 2023.

Progress before the Sixth Reporting Period

During the previous reporting period, we reviewed the CPD recruitment, hiring, and promotion records, draft *Assessment Scope*, and the operating procedures documents. The City and the CPD maintained Preliminary and Secondary compliance. We noted that policies demonstrated requirements for periodic reviews of exams and the promotion process.

Progress in the Sixth Reporting Period

The City and the CPD maintained Preliminary and Secondary compliance with this paragraph in the fifth reporting period.

In the previous reporting period, the City and the CPD did not submit a *Scope Statement* by the end of the reporting period. They did, however, maintain Preliminary and Secondary compliance because ¶261 has a three-year assessment period requirement.

The City and the CPD produced the following records as proofs of compliance with ¶261 during this reporting period:

- *CPD Sworn Member Recruitment and Hiring*, IAP 07-01
  (produced on June 30, 2022)

- *CPD Sworn Member Promotions*, IAP 07-02
  (produced on June 30, 2022)

IAP 07-02 requires the Department of Human Resources to review promotional exams to ensure they are fair, validated, and properly administered. *See* ¶256. It further requires each promotional exam, and its administration process, to be reviewed no less frequently than every three years.

This policy further requires the City and the CPD to engage a qualified expert to assess the CPD's promotions processes for the ranks of Sergeant and Lieutenant and commits the Law Department to take the necessary steps to hire an expert ("Expert") to conduct an independent assessment ("Sergeant and Lieutenant Assessment"). This assessment is meant to ensure that the City's and the CPD's policies and practices comply with the law, are transparent, and are consistent with the Consent Decree. *See* ¶261. It requires that (i) the assessment address each requirement specified in ¶261 (a–f), (ii) the Expert develop the Sergeant and Lieutenant Implementation Plan within 60 days of the completion of the Sergeant and

Lieutenant Assessment (*see* ¶262), and (iii) the CPD share the results of the assessment and its implementation plan with the IMT for review and approval. Within 60 days of receiving the IMT's approval, the CPD must begin to implement the plan.

The Law Department in a previous reporting period submitted Law Department Standard Operating Procedure 03-02, *Independent Sergeant and Lieutenant Expert Engagement*. This standard operating procedure designates the Law Department with responsibility for selecting and hiring the Expert to conduct the Sergeant and Lieutenant Assessment of the CPD's promotions processes for the ranks of Sergeant and Lieutenant following the requirements set forth in ¶261. The Public Safety Reform Division will implement this responsibility on behalf of the Department of Law, and § I(1) requires the Expert to complete the Sergeant and Lieutenant Assessment every three years. This process must be initiated with Expert engagement completed in fourth quarter 2023, and at least every three years thereafter. However, no such document was produced during this reporting period.

These policies collectively demonstrate Preliminary compliance during this reporting period.

***

The City and the CPD maintained Secondary compliance during this reporting period. Because this paragraph requires promotions processes assessments every three years, the next period to fully assess compliance ends in fourth quarter 2023.

Paragraph 261 Compliance Progress History

FIRST REPORTING PERIOD	SECOND REPORTING PERIOD	THIRD REPORTING PERIOD
SEPTEMBER 1, 2019 – AUGUST 31, 2019	SEPTEMBER 1, 2019 – FEBRUARY 29, 2020	MARCH 1, 2020 – DECEMBER 31, 2020
COMPLIANCE PROGRESS:	COMPLIANCE PROGRESS:	COMPLIANCE PROGRESS:
Not Applicable	Not Applicable	Secondary
FOURTH REPORTING PERIOD	**FIFTH REPORTING PERIOD**	**SIXTH REPORTING PERIOD**
JANUARY 1, 2021 – JUNE 30, 2021	JULY 1, 2021 – DECEMBER 31, 2021	JANUARY 1, 2022 – JUNE 30, 2022
COMPLIANCE PROGRESS:	COMPLIANCE PROGRESS:	COMPLIANCE PROGRESS:
Secondary	Secondary	Secondary

Recruitment, Hiring, and Promotions: ¶262

262. *Within 60 days of the completion of the independent expert's promotions assessment, CPD will develop an implementation plan to respond to any recommendations identified in the assessment, including any recommended modifications to the promotions processes and a timeline for implementation. Upon completion, CPD will share the results of the assessment and its implementation plan with the Monitor for review and approval. Within 60 days of receiving the Monitor's approval, CPD will begin to implement the plan.*

Compliance Progress

(Reporting Period: January 1, 2022, through June 30, 2022)

Preliminary:	***In Compliance*** **(FIFTH REPORTING PERIOD)**
Secondary:	***Not In Compliance***
Full:	***Not Yet Assessed***

The City and the CPD maintained Preliminary compliance during this reporting period.

To assess Preliminary compliance with ¶262, we reviewed the City's and the CPD's relevant policies and documents following the process described in the Consent Decree (¶¶626–41), which outlines applicable consultation, resolution, workout, and public comment periods. Specifically, the IMT assessed Preliminary compliance by reviewing policies and data to determine whether the CPD has developed a policy to create, adopt, and implement an implementation plan based on the independent expert's promotions assessment recommendations. To assess Secondary compliance, we will need to review the independent expert's promotions assessment and data to determine whether the CPD has sufficiently developed an implementation plan to implement the expert's recommendations as required by this paragraph. Our review will include a determination of whether the expert's assessment and the implementation plan related to that assessment identified all requisite criteria, such as a job-task analysis.

Progress before the Sixth Reporting Period

During the previous reporting period, we reviewed the CPD's recruitment, hiring, and promotional records. The City and the CPD achieved Preliminary compliance because of the CPD's requirement for a qualified expert to assess its promotions processes and develop an implementation plan related to the expert's assessment and recommendations. We noted that Secondary compliance may be achieved when records produced demonstrate that the implementation plan is completed, shared, and approved.

Progress in the Sixth Reporting Period

The City and the CPD produced the following records as proofs of compliance with ¶262 during this reporting period:

- *CPD Sworn Member Recruitment and Hiring*, IAP 07-01 (produced on June 30, 2022)
- *CPD Sworn Member Promotions*, IAP 07-02 (produced on June 30, 2022)

This policy further requires the City and the CPD to engage a qualified expert to assess the CPD's promotions process for the ranks of Sergeant and Lieutenant, and commits the Law Department to take the necessary steps to hire an expert ("Expert") to conduct an independent assessment ("Sergeant and Lieutenant Assessment"). This assessment is meant to ensure that the City and the CPD's policies and practices comply with the law, are transparent, and are consistent with the Consent Decree. *See* ¶261. It requires that the assessment (i) address each requirement specified in ¶261 (a–f), (ii) the Expert to develop the Sergeant and Lieutenant Implementation Plan within 60 days of the completion of the Sergeant and Lieutenant Assessment (*see* ¶262), and (iii) the CPD to share the results of the assessment and its implementation plan with the IMT for review and approval. Within 60 days of receiving the IMT's approval, the CPD must begin to implement the plan.

This language meets ¶262 Preliminary compliance requirements. No additional data were submitted to substantiate either the selection of the expert or the selected expert's work product.

***

The City and the CPD maintained Preliminary compliance during this reporting period. Looking forward, Secondary compliance requires the City and the CPD to demonstrate that they have sufficiently developed the implementation plan required by this paragraph. Full compliance requires development and implementation of a full implementation plan required by this paragraph.

Paragraph 262 Compliance Progress History

FIRST REPORTING PERIOD SEPTEMBER 1, 2019 – AUGUST 31, 2019 COMPLIANCE PROGRESS: Not Applicable	SECOND REPORTING PERIOD SEPTEMBER 1, 2019 – FEBRUARY 29, 2020 COMPLIANCE PROGRESS: Not Applicable	THIRD REPORTING PERIOD MARCH 1, 2020 – DECEMBER 31, 2020 COMPLIANCE PROGRESS: Not Applicable
FOURTH REPORTING PERIOD JANUARY 1, 2021 – JUNE 30, 2021 COMPLIANCE PROGRESS: None	FIFTH REPORTING PERIOD JULY 1, 2021 – DECEMBER 31, 2021 COMPLIANCE PROGRESS: Preliminary	SIXTH REPORTING PERIOD JANUARY 1, 2022 – JUNE 30, 2022 COMPLIANCE PROGRESS: Preliminary

Recruitment, Hiring, and Promotions: ¶263

263. *Within 365 days of the Effective Date, CPD will identify and publish, both internally and externally, for the ranks of Captain and Commander, the duties, eligibility criteria, knowledge, skills, and abilities considered to select qualified candidates who are effective supervisors in compliance with CPD policy and this Agreement.*

Compliance Progress

(Reporting Period: January 1, 2022, through June 30, 2022)

Preliminary:	***In Compliance*** **(FIFTH REPORTING PERIOD)**
Secondary:	***Not in Compliance*** **(NEW: LOST COMPLIANCE)**
Full:	***Not in Compliance***

The City and the CPD maintained Preliminary compliance during this reporting period, but did not maintain Secondary compliance.

To assess Preliminary compliance with ¶263, we reviewed the City's and the CPD's relevant policies and documents following the process described in the Consent Decree (¶¶626–41), which outlines applicable consultation, resolution, workout, and public comment periods. We also reviewed publicly available Captain and Commander job descriptions. To assess Secondary compliance, we need to review data sufficient to demonstrate that Captain and Commander job descriptions and eligibility criteria are published internally and externally as required by this paragraph. To assess Full compliance, we need to review data demonstrating that the CPD has developed a "feedback loop" with candidates to revise and improve future processes applicable to the hiring of Captain and Commander roles.

Progress before the Sixth Reporting Period

In the previous reporting period, the IMT assessed documents the City and the CPD produced to demonstrate compliance. The City and the CPD achieved Preliminary and Secondary compliance. The documents showed that the Captain and Commander job descriptions were revised and published. We noted that achieving Full compliance will require establishing a "feedback loop" with candidates.

Progress in the Sixth Reporting Period

The City and the CPD produced the following records as proofs of compliance with ¶263 during this reporting period:

- *CPD Sworn Member Recruitment and Hiring*, IAP 07-01
  (produced on June 30, 2022)

- *CPD Sworn Member Promotions*, IAP 07-02
  (produced on June 30, 2022)

IAP 07-02 § V(1-4), *Captain and Commander Promotions,* has the requisite language to establish and maintain Preliminary compliance with ¶263.

The IMT additionally reviewed publicly accessible Captain and Commander job descriptions. No links or actual job description documents or internal or external publications citing the duties, eligibility criteria, knowledge, skills, and abilities considered to select qualified candidates were directly provided as compliance data. These are required to demonstrate Secondary compliance.

The IMT informed the City and the CPD in the second reporting period that to achieve Full compliance, they should establish a "feedback loop" with candidates to revise and improve future processes. Compliance data submitted during this reporting period did not substantiate the presence and adoption of that critical methodological step. The CPD also should ensure that step is included to close the communication loop with CPD personnel.

***

The City and the CPD maintained Preliminary compliance during this reporting period, but did not maintain Secondary compliance. Looking forward, Secondary compliance requires the City and the CPD to demonstrate that job descriptions and eligibility criteria are published internally and externally. The IMT informed the City and the CPD in the second reporting period that to achieve Full compliance, they should establish a "feedback loop" with candidates to revise and improve future processes.

Paragraph 263 Compliance Progress History

FIRST REPORTING PERIOD	SECOND REPORTING PERIOD	THIRD REPORTING PERIOD
SEPTEMBER 1, 2019 – AUGUST 31, 2019	SEPTEMBER 1, 2019 – FEBRUARY 29, 2020	MARCH 1, 2020 – DECEMBER 31, 2020
COMPLIANCE PROGRESS:	COMPLIANCE PROGRESS:	COMPLIANCE PROGRESS:
Not Applicable	Preliminary	Secondary
FOURTH REPORTING PERIOD	**FIFTH REPORTING PERIOD**	**SIXTH REPORTING PERIOD**
JANUARY 1, 2021 – JUNE 30, 2021	JULY 1, 2021 – DECEMBER 31, 2021	JANUARY 1, 2022 – JUNE 30, 2022
COMPLIANCE PROGRESS:	COMPLIANCE PROGRESS:	COMPLIANCE PROGRESS:
Under Assessment	Secondary	Preliminary

Recruitment, Hiring, and Promotions: ¶264

264. *Within 365 days of the Effective Date, CPD will develop strategies to increase transparency and awareness about the promotions process for the ranks of Captain and Commander, including, but not limited to, criteria for promotions and promotion decisions.*

Compliance Progress (Reporting Period: January 1, 2022, through June 30, 2022)

Preliminary:	***In Compliance*** **(THIRD REPORTING PERIOD)**
Secondary:	***Not in Compliance***
Full:	***Not Yet Assessed***

The City and the CPD maintained Preliminary compliance during this reporting period.

To assess Preliminary compliance with ¶264, we reviewed the City's and the CPD's relevant policies and documents following the process described in the Consent Decree (¶¶626–41), which outlines applicable consultation, resolution, workout, and public comment periods. We also reviewed publicly available Captain and Commander job descriptions. To assess Secondary compliance, we need to review data demonstrating the incorporation of the required promotions criteria required under this paragraph into policy. Specifically, that evaluation will include a review of data reflecting that the City and the CPD have developed and implemented strategic plans to improve internal communications among the CPD officers to increase transparency and officer awareness about the promotions process for the ranks of Captain and Commander.

Progress before the Sixth Reporting Period

In the previous reporting period, the IMT assessed documents the City and the CPD produced to demonstrate compliance. The City and the CPD maintained Preliminary compliance, but did not achieve Secondary compliance. The documents showed that the CPD established communication plans to increase transparency and awareness and also revised Captain and Commander job descriptions. We noted that to assess Secondary compliance, we need to assess the incorporation of the required promotions criteria into policy and evaluate the CPD's internal communication strategic plans.

Progress in the Sixth Reporting Period

The City and the CPD produced the following records as proofs of compliance with ¶264 during this reporting period:

- *CPD Sworn Member Recruitment and Hiring*, IAP 07-01 (produced on June 30, 2022)

- *CPD Sworn Member Promotions*, IAP 07-02 (produced on June 30, 2022)

IAP 07-02 § V(4), *Captain and Commander Promotions,* has the requisite language for Preliminary compliance with ¶264. No additional documents were submitted during this reporting period to establish proof of Secondary compliance.

***

The City and the CPD maintained Preliminary compliance during this reporting period. Looking forward, to assess Secondary compliance, the IMT will need to review policy, training, and data sources, including observing meetings and communications within the CPD; assess incorporation of required criteria for promotions into policy statements; and review the CPD's internal communication strategic plans to evaluate effective outreach and transparency.

Paragraph 264 Compliance Progress History

FIRST REPORTING PERIOD	SECOND REPORTING PERIOD	THIRD REPORTING PERIOD
SEPTEMBER 1, 2019 – AUGUST 31, 2019	SEPTEMBER 1, 2019 – FEBRUARY 29, 2020	MARCH 1, 2020 – DECEMBER 31, 2020
COMPLIANCE PROGRESS:	COMPLIANCE PROGRESS:	COMPLIANCE PROGRESS:
Not Applicable	None	Preliminary

FOURTH REPORTING PERIOD	FIFTH REPORTING PERIOD	SIXTH REPORTING PERIOD
JANUARY 1, 2021 – JUNE 30, 2021	JULY 1, 2021 – DECEMBER 31, 2021	JANUARY 1, 2022 – JUNE 30, 2022
COMPLIANCE PROGRESS:	COMPLIANCE PROGRESS:	COMPLIANCE PROGRESS:
Preliminary	Preliminary	Preliminary

Appendix 6
Training
Compliance Assessments, by Paragraph

Appendix 6
Training
Compliance Assessments, by Paragraph

¶270 ¶290 ¶308 ¶326
¶271 ¶291 ¶309 ¶327
¶272 ¶292 ¶310 ¶328
¶273 ¶294 ¶311 ¶329
¶277 ¶295 ¶312 ¶331
¶278 ¶296 ¶313 ¶332
¶279 ¶297 ¶314 ¶333
¶280 ¶298 ¶315 ¶334
¶281 ¶299 ¶316 ¶335
¶282 ¶300 ¶317 ¶336
¶283 ¶301 ¶318 ¶337
¶284 ¶302 ¶319 ¶338
¶285 ¶303 ¶320 ¶339
¶286 ¶304 ¶321 ¶340
¶287 ¶305 ¶322
¶288 ¶306 ¶323
¶289 ¶307 ¶324

Training: ¶270

270. *The TOC, or other similarly-structured oversight entity, will continue to review and oversee the Department's training program and will be chaired by the First Deputy Superintendent, or other high-ranking member of CPD's command staff. The TOC will also include, in some capacity, personnel from various units of the Department that are responsible for overseeing patrol field operations; administering training; providing legal advice; coordinating and exercising supervision over disciplinary matters; managing data, technology, and information systems; overseeing and coordinating the community relations strategy; and reviewing reportable use of force incidents. It will meet at least once a month and continue to record meeting minutes.*

Compliance Progress

(Reporting Period: January 1, 2022, through June 30, 2022)

Recurring Schedule: Monthly ☑ **Met** ☐ **Missed**

Preliminary: ***In Compliance*** **(FIFTH REPORTING PERIOD)**
Secondary: ***In Compliance*** **(FIFTH REPORTING PERIOD)**
Full: ***Not in Compliance***

The City and the CPD maintained Preliminary and Secondary compliance with the requirements of ¶270 during this reporting period.

To evaluate Preliminary compliance with ¶270, we reviewed the City's and the CPD's relevant policies and documents following the process described in the Consent Decree (¶¶626–41), which outlines applicable consultation, resolution, workout, and public comment periods. This review focused on determining whether the requirements of this paragraph are written into policy and if the structure of the Training Oversight Committee (also known as the TOC) is clearly outlined and understandable to CPD personnel. To evaluate Secondary compliance with this paragraph, we reviewed data to determine whether TOC meetings occurred with required representatives in attendance and whether TOC meetings were held monthly as required with meeting minutes produced following each meeting. To evaluate Full compliance, we reviewed data points to determine whether sufficient resources have been allocated to consistently conduct the annual needs assessment, training planning, and training delivery processes in a timely and sequentially appropriate fashion.

Progress before the Sixth Reporting Period

During the previous reporting period, the IMT reviewed CPD training records. We found that the City and the CPD did achieve Preliminary and Secondary compliance

with the requirements of ¶270. We reviewed policy and data sources to determine the requirements of this paragraph are written into policy demonstrating Preliminary compliance. We found that documentation of monthly Training Oversight Committee meetings and Training Oversight Committee meeting minutes demonstrated Secondary compliance.

Progress in the Sixth Reporting Period

To demonstrate compliance with ¶270, this reporting period the City and the CPD submitted meeting materials from Training Oversight Committee meetings occurring in December of 2021 and in January, February, March, and April of 2022. The IMT virtually attended and observed the May 2022 Training Oversight Committee meeting held on May 17, 2022. The Training Oversight Committee meeting materials produced include minutes and agendas for the meetings occurring in December 2021 through April 2022, as well as virtual votes on the following: (i) the *2022 Training Plan*; (ii) the *2022 Detention Facility Annual Review*; (iii) the *2022 Peer Support 8-Hour Refresher Course*; (iv) the *Peer Support Facility*; and (v) the *Active Bystandership for Law Enforcement (ABLE) Training*. The Training Oversight Committee meeting materials produced also included a *Field Training and Evaluation Program Recommendation Memorandum* and a *Needs Assessment PowerPoint* presented at the April 28, 2022 Training Oversight Committee meeting. The production documents not only demonstrate that the Training Oversight Committee met, but also were substantively involved in reviewing, deliberating, and decision-making exercises consistent with their oversight responsibilities.

IMT notes that processes that are reviewed and approved by the Training Oversight Committee, including the annual Needs Assessment and Training Plan, have thus far not been created and produced on schedule and in the proper sequence. Course start dates often are delayed due to insufficient training resources required to move and maintain efficient processes. This condition seems to be exacerbated by the City's and the CPD's redeployment of critical training resources out of the training environment to support other priorities. The Training Oversight Committee should take a more active role in ensuring the training function is at least sufficiently resourced to timely and efficiently execute the training mission.

***

The City and the CPD maintained Preliminary and Secondary compliance during this reporting period. Looking forward, to demonstrate Full compliance the Training Oversight Committee must assure sufficient resources are allocated to conduct the annual needs assessment, training planning, and delivery processes in a timely and sequentially appropriate fashion.

Paragraph 270 Compliance Progress History

FIRST REPORTING PERIOD	SECOND REPORTING PERIOD	THIRD REPORTING PERIOD
SEPTEMBER 1, 2019 – AUGUST 31, 2019	SEPTEMBER 1, 2019 – FEBRUARY 29, 2020	MARCH 1, 2020 – DECEMBER 31, 2020
COMPLIANCE PROGRESS:	COMPLIANCE PROGRESS:	COMPLIANCE PROGRESS:
Not Applicable	Preliminary	Preliminary
FOURTH REPORTING PERIOD	**FIFTH REPORTING PERIOD**	**SIXTH REPORTING PERIOD**
JANUARY 1, 2021 – JUNE 30, 2021	JULY 1, 2021 – DECEMBER 31, 2021	JANUARY 1, 2022 – JUNE 30, 2022
COMPLIANCE PROGRESS:	COMPLIANCE PROGRESS:	COMPLIANCE PROGRESS:
None	Secondary	Secondary

Training: ¶271

***271**. Within 180 days of the Effective Date, and on an annual basis thereafter, CPD's Education and Training Division will, under the supervision of the TOC, conduct a needs assessment, which will, among other things identify and consider: a. information collected from use of force reviews, discipline and civilian complaints, and reports of officer safety issues; b. input from CPD members of all ranks and their respective collective bargaining units, if applicable; c. input from members of the community; d. recommendations from CPD oversight entities, including, but not limited to COPA, the Deputy Inspector General for Public Safety ("Deputy PSIG"), and the Police Board; e. changes in the law, to the Illinois Law Enforcement Training and Standards Board requirements, and to CPD policy, if any; f. court decisions and litigation; g. research reflecting the latest in training and law enforcement best practices; h. information obtained from evaluation of training courses, instructors, and FTOs; and i. member reaction to, and satisfaction with, the training they received.*

Compliance Progress

(Reporting Period: January 1, 2022, through June 30, 2022)

Recurring	Annual	☑ **Met**	☐ **Missed**

Preliminary:	***In Compliance*** **(SECOND REPORTING PERIOD)**
Secondary:	***In Compliance*** **(FIFTH REPORTING PERIOD)**
Full:	***Not in Compliance***

The City and the CPD maintained Preliminary and Secondary compliance with the requirements of ¶271 in this reporting period.

To evaluate Preliminary compliance with ¶271, we reviewed the City's and the CPD's relevant policies and documents following the process described in the Consent Decree (¶¶626–41), which outlines applicable consultation, resolution, workout, and public comment periods. To evaluate Secondary compliance with this paragraph, we reviewed data to determine whether the annual *Needs Assessment* sufficiently addressed the requirements of this paragraph. To evaluate Full compliance, we reviewed data points to determine whether sufficient resources have been allocated to timely and consistently conduct the ongoing annual needs assessments required by this paragraph, including the appropriate sequencing of the annual *Needs Assessment* and *Training Plan*.

Progress before the Sixth Reporting Period

During the previous reporting period, the IMT reviewed CPD training policy and data sources to evaluate compliance. We found that the City and the CPD did achieve Preliminary and Secondary compliance. We reviewed *the 2022 Training Plan* and the *2022 Needs Assessment* materials to assess Secondary compliance with the requirements of this paragraph. We recommended that the CPD amend training directive S11-10 (*Department Training Records Maintenance*) to include the requirement of subparagraph (f) and include more detailed information to the survey to determine whether the *Needs Assessment* results are representative of the City's diversity.

Progress in the Sixth Reporting Period

To demonstrate compliance with ¶271, this reporting period the City and the CPD submitted the *Needs Assessment for the 2023 Training Plan* (May 2022), as well as the May 2022 Training Oversight Committee meeting agenda and minutes discussing, in part, the *Needs Assessment for the 2023 Training Plan*. The IMT also reviewed the *Needs Assessment Combined Responses* collecting feedback from numerous stakeholders, internal and external, regarding the needs of the *2023 Training Plan*, as described in the Executive Summary of the *Needs Assessment for the 2023 Training Plan*. The "Purpose Statement" of the *Needs Assessment for the 2023 Training Plan* appropriately states that the CPD's Training and Support Group (also known as the TSG) "sought input from diverse sources to ensure a current, relevant, comprehensive report accounting for different perspectives necessary for effective training," including both internal and external entities, and that the Training and Support Group "reviewed the information provided through surveys, input letters, and reports" from these stakeholders "to determine several areas of instructional focus in 2023."

***

The City and the CPD maintained Secondary compliance through this reporting period. Looking forward, achieving Full compliance requires a determination that the City and the CPD have allocated sufficient resources to conduct ongoing annual needs assessments while demonstrating consistency in executing these approaches. This is the first *Needs Assessment* and *Training Plan* cycle where the CPD has demonstrated the ability to timely sequence the *Needs Assessment* with the annual *Training Plan*. Continued Secondary compliance through another full year cycle should result in a Full compliance finding as CPD will have demonstrated consistency in executing these processes.

Paragraph 271 Compliance Progress History

FIRST REPORTING PERIOD	SECOND REPORTING PERIOD	THIRD REPORTING PERIOD
SEPTEMBER 1, 2019 – AUGUST 31, 2019	SEPTEMBER 1, 2019 – FEBRUARY 29, 2020	MARCH 1, 2020 – DECEMBER 31, 2020
COMPLIANCE PROGRESS:	COMPLIANCE PROGRESS:	COMPLIANCE PROGRESS:
Not Applicable	Preliminary	Preliminary
FOURTH REPORTING PERIOD	**FIFTH REPORTING PERIOD**	**SIXTH REPORTING PERIOD**
JANUARY 1, 2021 – JUNE 30, 2021	JULY 1, 2021 – DECEMBER 31, 2021	JANUARY 1, 2022 – JUNE 30, 2022
COMPLIANCE PROGRESS:	COMPLIANCE PROGRESS:	COMPLIANCE PROGRESS:
Preliminary	Secondary	Secondary

Training: ¶272

272. Within one year of the Effective Date, and on an annual basis thereafter, the Education and Training Division will develop—and the TOC will review and approve—a written Training Plan for CPD's recruit, field, in-service, and pre-service promotional training to ensure that CPD members are trained to safely, effectively, and lawfully carry out their duties in accordance with the law, CPD policy, best practices, and this Agreement. CPD will implement the Training Plan in accordance with the specified timeline for implementation. The Training Plan will: a. identify training priorities, principles, and broad goals consistent with this Agreement; b. prioritize the needs identified during the needs assessment and identify those needs that will be addressed by the plan; c. include a plan and schedule for delivering all CPD training as necessary to fulfill the requirements and goals of this Agreement; d. identify subject areas for CPD training; e. determine the mandatory and elective courses, consistent with this Agreement, to be provided as part of the In-Service Training Program; f. develop a plan to inform officers about the In-Service Training Program, its course offerings, and its requirements; g. determine which aspects of the In-Service Training Program can be delivered in a decentralized manner, including e-learning, and which training requires more intensive, centralized delivery, to ensure effective delivery and comprehension of the material; 79 h. address any needed modification of the Field Training and Evaluation Program to fulfill the requirements and goals of this Agreement; i. identify necessary training resources including, but not limited to, instructors, curricula, equipment, and training facilities; j. determine the content, consistent with this Agreement, to be provided as part of pre-service promotional training for Sergeants, Lieutenants, Captains, and command staff; k. develop a plan to implement and utilize a centralized electronic system for scheduling and tracking all CPD training; l. develop a plan to implement and utilize a system for assessing the content and delivery of all CPD training, including training provided by outside instructors or non-CPD entities; and m. identify community-based organizations that represent a broad cross section of the City to participate, as feasible, practical, and appropriate, in the development and delivery of the curriculum regarding subjects including, but not limited to, procedural justice, de-escalation, impartial policing, and community

policing, and make efforts to encourage such participation by such organizations.

Compliance Progress

(Reporting Period: January 1, 2022, through June 30, 2022)

Recurring Schedule: Annually ☐ **Met** ☑ **Missed**

Preliminary: ***In Compliance*** **(THIRD REPORTING PERIOD)**
Secondary: ***Not in Compliance***
Full: ***Not Yet Assessed***

The City and the CPD maintained Preliminary compliance with the requirements of ¶272 during this reporting period.

To evaluate Preliminary compliance with ¶272, we reviewed the City's and the CPD's relevant policies and documents following the process described in the Consent Decree (¶¶626–41), which outlines applicable consultation, resolution, workout, and public comment periods. This included a review of the *2022 Training Plan.* To evaluate Secondary compliance with this paragraph, we reviewed data sources to determine whether the annual *Training Plan* required under this paragraph sufficiently met each of the enumerated requirements of this paragraph and was executed pursuant to those requirements, including the timely completion and proper sequencing of the annual *Training Plan*.

Progress before the Sixth Reporting Period

During the previous reporting period, the IMT reviewed the CPD's *2022 Training Plan* materials. We found that the *2022 Training Plan* met the requirements of this paragraph and that the City and the CPD achieved Preliminary compliance. We determined that the City and the CPD could achieve Secondary compliance by incorporating the requirements of this paragraph into existing CPD training directives by the end of the reporting period. We also emphasized the need for the *2022 Training Plan* to be finalized before the 2022 training year began to allow the CPD to make informed and strategic modifications to its training when confronted with unanticipated challenges. Notably, the CPD produced a revised *2022 Training Plan* on December 21, 2021, only a few days before the 2022 training year began and the previous reporting period ended.

Progress in the Sixth Reporting Period

During this reporting period the IMT reviewed a Revised Draft *2022 Training Plan*, a Comment Matrix, and a Training Oversight Committee virtual vote on the *2022*

Training Plan, voting to approve the *2022 Training Plan*.[1] As we previously reported, the *2022 Training Plan* is thorough and well written, and we commend the CPD for improving its approach to community engagement throughout its trainings. However, the IMT reiterates our prior concerns about the production schedule and the effective date of annual training plans, including the fact that the *2022 Training Plan* continued to be reviewed well into the 2022 training year. The IMT hopes to receive the *2023 Training Plan* from the CPD with sufficient time to allow the City, the CPD, the IMT, and the Office of the Illinois Attorney General to review, comment, and approve the *2023 Training Plan* before the 2023 training year begins.

***

The City and the CPD maintained Preliminary compliance during this reporting period. Looking forward, Secondary compliance may be achieved by timely submission and approval of the *2023 Training Plan* prior to the start of the new training year and incorporating ¶272 requirements into one or more prominent training directives.

Paragraph 272 Compliance Progress History

FIRST REPORTING PERIOD	SECOND REPORTING PERIOD	THIRD REPORTING PERIOD
SEPTEMBER 1, 2019 – AUGUST 31, 2019	SEPTEMBER 1, 2019 – FEBRUARY 29, 2020	MARCH 1, 2020 – DECEMBER 31, 2020
COMPLIANCE PROGRESS:	COMPLIANCE PROGRESS:	COMPLIANCE PROGRESS:
Not Applicable	None	Preliminary

FOURTH REPORTING PERIOD	FIFTH REPORTING PERIOD	SIXTH REPORTING PERIOD
JANUARY 1, 2021 – JUNE 30, 2021	JULY 1, 2021 – DECEMBER 31, 2021	JANUARY 1, 2022 – JUNE 30, 2022
COMPLIANCE PROGRESS:	COMPLIANCE PROGRESS:	COMPLIANCE PROGRESS:
Preliminary	Preliminary	Preliminary

[1] The *Revised Draft 2022 Training Plan* was produced by the CPD on April 6, 2022, and incorporated comments that the IMT and the Office of the Illinois Attorney General provided to the prior revised version of the *2022 Training Plan* produced on December 21, 2021.

Training: ¶273

273. *With oversight from the TOC, CPD will develop and implement recruit, field, in service, and pre-service promotional training curricula and lesson plans that comport with CPD's Training Plan and that address the requirements and goals of this Agreement.*

Compliance Progress

(Reporting Period: January 1, 2022, through June 30, 2022)

Preliminary:	***In Compliance*** **(THIRD REPORTING PERIOD)**
Secondary:	***Not in Compliance***
Full:	***Not Yet Assessed***

The City and the CPD maintained Preliminary compliance with the requirements of ¶273 during this reporting period.

To evaluate Preliminary compliance with ¶273, we reviewed the City's and the CPD's relevant policies and documents following the process described in the Consent Decree (¶¶626–41), which outlines applicable consultation, resolution, workout, and public comment periods. To evaluate Secondary compliance, we reviewed data to determine whether the CPD has developed and implemented the trainings required by this paragraph and that such trainings comport with the annual *Training Plan* and address Consent Decree requirements. Specifically, to assess both Preliminary and Secondary compliance, the IMT reviewed training curricula, lesson plans, special orders, Training Oversight Committee meeting documents, and other policy, training, and data sources. These sources are needed to determine whether the CPD has sufficiently developed training, curricula, and lesson plans in alignment with the requirements of this paragraph.

Progress before the Sixth Reporting Period

During the previous reporting period, the IMT reviewed CPD training curricula, lesson plans, special orders, Training Oversight Committee meeting documents, and other policy, training, and data sources. We determined that CPD maintained Preliminary compliance, but did not achieve Secondary compliance. We noted that to achieve Secondary compliance, produced documents should demonstrate that the *Needs Assessment*, *Training Plan* and corresponding Training Oversight Committee approval, course curriculum development and corresponding Training Oversight Committee approval, and training delivery occur in sequential steps that demonstrate adherence to the requirements in this paragraph. Further, we noted that post-delivery evaluation documentation is required for Secondary compliance.

Progress in the Sixth Reporting Period

To demonstrate compliance with ¶273, this reporting period the City and the CPD submitted Training Oversight Committee meeting minutes and materials for the monthly Training Oversight Committee meetings occurring in December of 2021 and in January through April of 2022. The Training Oversight Committee meeting materials included a *Field Training and Evaluation Program Recommendation Memorandum* (January 2022), a *Needs Assessment* PowerPoint presented at the April 28, 2022 Training Oversight Committee meeting, and virtual votes on the following: (i) *2022 Training Plan* (November 2021); (ii) *2022 Peer Support 8-Hour Refresher Course* (January 2022); (iii) *2022 Detention Facility Annual Review* (February 2022); (iv) *Peer Support Facility* (March 2022); and (v) *Active Bystandership for Law Enforcement (ABLE) Training* (April 2022). The IMT also reviewed a Revised *2022 Training Plan* (April 2022) and *Needs Assessment for the 2023 Training Plan* that was discussed in the April and May 2022 Training Oversight Committee meetings.

Additionally, the IMT reviewed Special Order S11-11 (*Training Oversight Committee*). Section III(A)(7) requires the Training Oversight Committee to oversee "the development and implementation of recruit, field, in-service, and pre-service promotional training curricula and lesson plans that comport with the Training Plan and that address the requirements and goals of the consent decree." S11-11 also requires the Training Oversight Committee to oversee and approve the Training and Support Group development of training curricula, lesson plans, and course materials that are:

a. consistent across subjects;

b. of sufficient quality to adequately communicate the intended subject matter to Department members; and

c. in accordance with the law, policy, best practices, and the consent decree.

Data indicate that the TOC's oversight is consistent with S11-11 requirements. It is more difficult to determine whether training curricula and lesson plans comport with the CPD's *Training Plan* because many of the training curricula provided for IMT review were not submitted pursuant to an approved and finalized training plan.

***

The City and the CPD maintained Preliminary compliance during this reporting period. Looking forward, attaining Secondary compliance requires determining if the CPD has sufficiently developed training in alignment with the requirements of this paragraph and evaluating the implementation of that training. No evaluative or

follow-up documents were produced that demonstrate that the CPD has sufficiently developed, implemented, and delivered training in alignment with the requirements of this paragraph.

Paragraph 273 Compliance Progress History

FIRST REPORTING PERIOD SEPTEMBER 1, 2019 – AUGUST 31, 2019	SECOND REPORTING PERIOD SEPTEMBER 1, 2019 – FEBRUARY 29, 2020	THIRD REPORTING PERIOD MARCH 1, 2020 – DECEMBER 31, 2020
COMPLIANCE PROGRESS: Not Applicable	COMPLIANCE PROGRESS: Not Applicable	COMPLIANCE PROGRESS: Preliminary
FOURTH REPORTING PERIOD JANUARY 1, 2021 – JUNE 30, 2021	FIFTH REPORTING PERIOD JULY 1, 2021 – DECEMBER 31, 2021	SIXTH REPORTING PERIOD JANUARY 1, 2022 – JUNE 30, 2022
COMPLIANCE PROGRESS: Preliminary	COMPLIANCE PROGRESS: Preliminary	COMPLIANCE PROGRESS: Preliminary

Training: ¶274

274. *Under the supervision of the TOC, CPD's Education and Training Division, pursuant to the Training Plan, will develop and approve training curricula, lesson plans, and course materials that are (a) consistent across subjects; (b) of sufficient quality to adequately communicate the intended subject matter to CPD members; and (c) in accordance with the law, CPD policy, best practices, and this Agreement.*

Compliance Progress

(Reporting Period: January 1, 2022, through June 30, 2022)

Preliminary:	***In Compliance*** **(THIRD REPORTING PERIOD)**
Secondary:	***Not in Compliance***
Full:	***Not Yet Assessed***

The City and the CPD maintained Preliminary compliance with the requirements of ¶274 during this reporting period.

To evaluate Preliminary compliance with ¶274, we reviewed the City's and the CPD's relevant policies and documents following the process described in the Consent Decree (¶¶626–41), which outlines applicable consultation, resolution, workout, and public comment periods. To evaluate Secondary compliance we reviewed data to determine whether the CPD Education and Training Division (also known as the ETD), pursuant to the terms of the annual *Training Plan*, has reviewed and approved the training curricula, lesson plans, and course materials with Training Oversight Committee supervision, that are consistent across subjects, quality, lawful, and within policy and best practices. Data sources assessed for this review included training criteria and plans, training attendance, Training Oversight Committee documents, and the IMT's in-person and virtual observations of training sessions. The IMT also sought to verify sufficient attendance records (*i.e.*, 95% of relevant personnel), including hours attended.

Progress before the Sixth Reporting Period

During the previous reporting period, the IMT reviewed CPD training curricula, lesson plans, special orders, Training Oversight Committee meeting documents, and other policy, training, and data sources. We determined that the City and the CPD maintained Preliminary compliance but did not achieve Secondary compliance. We noted that produced documents should demonstrate that the *Needs Assessment*, *Training Plan* and corresponding Training Oversight Committee approval, course curriculum, development and corresponding Training Oversight Committee approval, and training delivery occur in sequential steps that demonstrate adherence to requirements in this paragraph. Further, we noted that post-delivery evaluation documentation is required for Secondary compliance.

Progress in the Sixth Reporting Period

To demonstrate compliance with ¶274, this reporting period the City and the CPD submitted Training Oversight Committee meeting minutes and materials for the monthly Training Oversight Committee meetings occurring in December of 2021 and in January through April of 2022. The Training Oversight Committee meeting materials included a *Field Training and Evaluation Program Recommendation Memorandum* (January 2022), a *Needs Assessment PowerPoint* presented at the April 28, 2022 Training Oversight Committee meeting, and virtual votes on the following: (i) *2022 Training Plan* (November 2021); (ii) *2022 Peer Support 8-Hour Refresher Course* (January 2022); (iii) *2022 Detention Facility Annual Review (February 2022); (iv) Peer Support Facility* (March 2022); and (v) *Active Bystandership for Law Enforcement (ABLE) Training* (April 2022). The IMT also reviewed a Revised *2022 Training Plan* (April 2022) and *Needs Assessment for the 2023 Training Plan* that was discussed in the April and May 2022 Training Oversight Committee meetings.

Additionally, the IMT reviewed Special Order S11-11 (*Training Oversight Committee*). § III(A)(7) requires the Training Oversight Committee to oversee "the development and implementation of recruit, field, in-service, and pre-service promotional training curricula and lesson plans that comport with the Training Plan and that address the requirements and goals of the consent decree." S11-11 also requires the Training Oversight Committee to oversee and approve the Training and Support Group development of training curricula, lesson plans, and course materials that are:

a. consistent across subjects;

b. of sufficient quality to adequately communicate the intended subject matter to Department members; and

c. in accordance with the law, policy, best practices, and the consent decree.

Data submitted indicate Training Oversight Committee oversight is consistent with S11-11 requirements. It is more difficult to determine if training curricula and lesson plans comport with the CPD's *Training Plan* because many of the training curricula provided for IMT review were not submitted pursuant to a finalized and approved *Training Plan*.

***

The City and the CPD has maintained Preliminary compliance during this reporting period. Looking forward, attaining Secondary compliance requires determining whether the CPD Education and Training Division, pursuant to the terms of the *Annual Training Plan*, has reviewed and approved the training curricula, lesson

plans, and course materials with Training Oversight Committee supervision, that are consistent across subjects, quality, lawful, and within policy and best practices and evaluating the implementation of that training. No evaluative or follow-up documents were produced that demonstrate that the CPD has sufficiently developed, implemented, and delivered training in alignment with the requirements of this paragraph.

Full compliance requires the CPD Education and Training Division to demonstrate a systematic methodology to regularly review and approve training in accordance with ¶274 requirements.

Paragraph 274 Compliance Progress History

FIRST REPORTING PERIOD	SECOND REPORTING PERIOD	THIRD REPORTING PERIOD
SEPTEMBER 1, 2019 – AUGUST 31, 2019	SEPTEMBER 1, 2019 – FEBRUARY 29, 2020	MARCH 1, 2020 – DECEMBER 31, 2020
COMPLIANCE PROGRESS:	COMPLIANCE PROGRESS:	COMPLIANCE PROGRESS:
Not Applicable	Not Applicable	Preliminary
FOURTH REPORTING PERIOD	**FIFTH REPORTING PERIOD**	**SIXTH REPORTING PERIOD**
JANUARY 1, 2021 – JUNE 30, 2021	JULY 1, 2021 – DECEMBER 31, 2021	JANUARY 1, 2022 – JUNE 30, 2022
COMPLIANCE PROGRESS:	COMPLIANCE PROGRESS:	COMPLIANCE PROGRESS:
Preliminary	Preliminary	Preliminary

Training: ¶275

275. *The TOC will oversee the integration of the concepts of procedural justice, de-escalation, impartial policing, and community policing into CPD training, including, but not limited to use of force, weapons training, and Fourth Amendment subjects, as appropriate.*

Compliance Progress

(Reporting Period: January 1, 2022, through June 30, 2022)

Preliminary:	***In Compliance*** **(THIRD REPORTING PERIOD)**
Secondary:	***Not in Compliance***
Full:	***Not Yet Assessed***

The City and the CPD has maintained Preliminary compliance during this reporting period.

To evaluate Preliminary compliance with ¶275, we reviewed the City's and the CPD's relevant policies and documents following the process described in the Consent Decree (¶¶626–41), which outlines applicable consultation, resolution, workout, and public comment periods. To evaluate Secondary compliance with this paragraph, we reviewed data to determine whether the CPD has fully implemented Training Oversight Committee oversight of key concepts' integration that also are consistent with the CPD's *Annual Training Plan.* Specifically, we reviewed Training Oversight Committee minutes, directives, and other policy, training, and job sources, including lesson plans and curricula, to determine whether they substantiate the Training Oversight Committee's review and oversight of CPD training to ensure that they have appropriately integrated the key concepts of procedural justice, de-escalation, impartial policing, and community policing.

Progress before the Sixth Reporting Period

During the previous reporting period, we found the City and the CPD maintained Preliminary compliance, but did not achieve Secondary Compliance. We noted that Secondary compliance requires that the CPD's plans, policies, and oversight efforts must substantiate Training Oversight Committee review and that such training oversight ensures CPD trainings have integrated key concepts of procedural justice, de-escalation, impartial policing, and community policing.

Progress in the Sixth Reporting Period

To demonstrate compliance with ¶275, this reporting period the CPD submitted the *2022 Annual In-Service Field Training Officer Refresher Training Curriculum* (March 2022), including a PowerPoint slide-deck, an outline of the *2022 Training Curriculum*, and a Comments Matrix showing changes from the 2021 training materials. After receiving and incorporating comments from the IMT and the Office

of the Illinois Attorney General, the CPD submitted a revised *2022 Annual In-Service Field Training Officer Refresher Training Curriculum* (June 2022), including a revised PowerPoint slide deck, a revised outline of the *2022 Training Curriculum*, a set of *2022 Field Training Officer Pre-and Post-Training Test Questions* recommended by the IMT, and a Comment Review document responding to the IMT's and the Office of the Illinois Attorney General's comments.

The CPD also supplied Training Oversight Committee minutes and meeting materials for Training Oversight Committee meetings occurring in December of 2021 and January through April of 2022. The Training Oversight Committee meeting materials included a *Field Training and Evaluation Program Recommendation Memorandum* (January 2022), a *Needs Assessment PowerPoint* presented at the April 28, 2022 Training Oversight Committee meeting, and virtual votes on the following: (i) *2022 Training Plan* (November 2021); (ii) *2022 Peer Support 8-Hour Refresher Course* (January 2022); (iii) *2022 Detention Facility Annual Review* (February 2022); (iv) Peer Support Facility (March 2022); and (v) *Active Bystandership for Law Enforcement (ABLE) Training* (April 2022). The IMT also reviewed a *Revised 2022 Training Plan* (April 2022) and *Needs Assessment for the 2023 Training Plan* that was discussed in the April and May 2022 Training Oversight Committee meetings.

Additionally, the IMT reviewed Special Order S11-11 (*Training Oversight Committee*). § III(A)(8) requires the Training Oversight Committee to oversee "the integration of the concepts of procedural justice, de-escalation, impartial policing, and community policing into the Department Training Plan and curriculum, including, but not limited to use of force, weapons training, and Fourth Amendment subjects, as appropriate."

Data submitted indicate that Training Oversight Committee oversight policy S11-11 is consistent with ¶275 requirements. However, the Training Oversight Committee meeting minutes provided do not detail any discussions or deliberations on the key concepts. There is not a separate report nor record documenting the Training Oversight Committee's effort to ensure integration of the key concepts into CPD training materials. Additionally, a substantial proportion of the lesson plans and course curricula reviewed during this reporting period post Training Oversight Committee review and approval were returned with IMT and Office of the Illinois Attorney General comments suggesting the need to enhance the integration of at least one of these core concepts, indicating a need for more Training Oversight Committee rigor in their oversight.

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The City and the CPD has maintained Preliminary compliance during this reporting period. Looking forward, to assess Secondary compliance the IMT will review data demonstrating continued application of controlling policy, curricula, lesson plans, and course material that sufficiently integrate the required key concepts into CPD

trainings. The City and the CPD will need to produce Training Oversight Committee meeting minutes that reflect guidance on these key concepts and submit lesson plans and curricula for IMT review that consistently integrate these key concepts of procedural justice, de-escalation, impartial policing, and community policing.

Full compliance requires the CPD to sufficiently develop a method for the Training Oversight Committee to sustain regular review and oversight of required key concepts into CPD trainings.

Paragraph 275 Compliance Progress History

FIRST REPORTING PERIOD	SECOND REPORTING PERIOD	THIRD REPORTING PERIOD
SEPTEMBER 1, 2019 – AUGUST 31, 2019	SEPTEMBER 1, 2019 – FEBRUARY 29, 2020	MARCH 1, 2020 – DECEMBER 31, 2020
COMPLIANCE PROGRESS:	COMPLIANCE PROGRESS:	COMPLIANCE PROGRESS:
Not Applicable	Not Applicable	Preliminary
FOURTH REPORTING PERIOD	**FIFTH REPORTING PERIOD**	**SIXTH REPORTING PERIOD**
JANUARY 1, 2021 – JUNE 30, 2021	JULY 1, 2021 – DECEMBER 31, 2021	JANUARY 1, 2022 – JUNE 30, 2022
COMPLIANCE PROGRESS:	COMPLIANCE PROGRESS:	COMPLIANCE PROGRESS:
Preliminary	Preliminary	Preliminary

Training: ¶276

276. *The TOC will oversee continued development and integration of instructional strategies that incorporate active learning methods such as problem-solving, scenario-based activities, and adult learning techniques—in addition to traditional lecture formats—into training delivery.*

Compliance Progress

(Reporting Period: January 1, 2022, through June 30, 2022)

Preliminary:	***In Compliance*** **(FOURTH REPORTING PERIOD)**
Secondary:	***Not in Compliance***
Full:	***Not Yet Assessed***

The City and the CPD has maintained Preliminary compliance with the requirements of ¶276 through this reporting period.

To evaluate Preliminary compliance with ¶276, we reviewed the City's and the CPD's relevant policies and documents following the process described in the Consent Decree (¶¶626–41), which outlines applicable consultation, resolution, workout, and public comment periods. To evaluate Secondary compliance with this paragraph, we reviewed data reflecting training development, implementation, and evaluation to determine whether the City and the CPD have developed training plans and curricula with appropriate Training Oversight Committee input and delivered that training to the relevant personnel during the necessary intervals. Where applicable, we assessed whether the City and the CPD have created the requisite positions and staffed those positions with qualified personnel in order to achieve the requirements of this paragraph. We also reviewed data to assess whether the training required under this paragraph is evidence-based and conforms to best practices, as applicable, and that data include sufficient attendance records (*i.e.*, 95% of relevant personnel), including data reflecting hours attended.

Progress before the Sixth Reporting Period

In the previous reporting period, the IMT assessed compliance by reviewing policy, training, and job sources—as well as Training Oversight Committee review criteria—and plans and determined that the City and the CPD maintained Preliminary compliance, but did not attain Secondary compliance. We noted that data supporting Secondary compliance should include Training Oversight Committee review criteria and plans and a process that ensures integration and delivery of instructional strategies incorporating the requirements of this paragraph into course instruction. We further noted that Full compliance requires the CPD to fully develop a systematic method for the Training Oversight Committee to sustain regular instructional strategies review and oversight following ¶276 requirements.

Progress in the Sixth Reporting Period

To demonstrate compliance with ¶276, this reporting period the CPD submitted the *2022 Annual In-Service Field Training Officer Refresher Training Curriculum* (March 2022), including a PowerPoint slide-deck, an outline of the 2022 Training Curriculum, and a Comments Matrix showing changes from the 2021 training materials. After receiving and incorporating comments from the IMT the Office of the Illinois Attorney General, the CPD submitted a revised *2022 Annual In-Service Field Training Officer Refresher Training Curriculum* (June 2022), including a revised PowerPoint slide deck, a revised outline of the 2022 Training Curriculum, a set of *2022 Field Training Officer Pre-and Post-Training Test Questions* recommended by the IMT, and a Comment Review document responding to the IMT's and the Office of the Illinois Attorney General's comments.

The CPD also supplied Training Oversight Committee minutes and meeting materials for Training Oversight Committee meetings occurring in December of 2021 and January through April of 2022. The Training Oversight Committee meeting materials included a *Field Training and Evaluation Program Recommendation Memorandum* (January 2022), a *Needs Assessment* PowerPoint presented at the April 28, 2022 Training Oversight Committee meeting, and virtual votes on the following: (i) *2022 Training Plan* (November 2021); (ii) *2022 Peer Support 8-Hour Refresher Course* (January 2022); (iii) *2022 Detention Facility Annual Review* (February 2022); (iv) *Peer Support Facility* (March 2022); and (v) *Active Bystandership for Law Enforcement (ABLE) Training* (April 2022). The IMT also reviewed a *Revised 2022 Training Plan* (April 2022) and *Needs Assessment for the 2023 Training Plan* that was discussed in the April and May 2022 Training Oversight Committee meetings.

Additionally, the IMT reviewed Special Order S11-11 (*Training Oversight Committee*). Section III(A)(9) requires the Training Oversight Committee to oversee "the continued development and integration of instructional strategies that incorporate active learning methods such as problem-solving, scenario-based activities, and adult learning techniques, in addition to traditional lecture format, into training delivery."

Data submitted indicate that Training Oversight Committee oversight policy S11-11 is consistent with ¶276 requirements. However, the Training Oversight Committee meeting minutes provided do not detail any discussions or deliberations on the integration of the required instructional strategies of this paragraph into training delivery. There were no separate reports or records produced documenting the Training Oversight Committee's effort to ensure integration of these strategies into CPD trainings.

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The City and the CPD has maintained Preliminary compliance through this reporting period. Looking forward, Secondary compliance can be achieved by the CPD developing a method for how the Training Oversight Committee reviews, oversees, and ensures integration of the instructional strategies required by this paragraph.

Full compliance may be demonstrated by fully developing and implementing a systematic method for the Training Oversight Committee to sustain regular instructional strategies review and oversight following ¶276 requirements.

Paragraph 276 Compliance Progress History

FIRST REPORTING PERIOD	SECOND REPORTING PERIOD	THIRD REPORTING PERIOD
SEPTEMBER 1, 2019 – AUGUST 31, 2019	SEPTEMBER 1, 2019 – FEBRUARY 29, 2020	MARCH 1, 2020 – DECEMBER 31, 2020
COMPLIANCE PROGRESS:	COMPLIANCE PROGRESS:	COMPLIANCE PROGRESS:
Not Applicable	Not Applicable	Status Update
FOURTH REPORTING PERIOD	**FIFTH REPORTING PERIOD**	**SIXTH REPORTING PERIOD**
JANUARY 1, 2021 – JUNE 30, 2021	JULY 1, 2021 – DECEMBER 31, 2021	JANUARY 1, 2022 – JUNE 30, 2022
COMPLIANCE PROGRESS:	COMPLIANCE PROGRESS:	COMPLIANCE PROGRESS:
Preliminary	Preliminary	Preliminary

Training: ¶277

277. *Where it would add to the quality or effectiveness of the training program, the Education and Training Division will seek the assistance of outside expertise, as feasible, practical, and appropriate, either in developing or reviewing CPD curricula and lesson plans, or reviewing pilot versions of CPD courses.*

Compliance Progress

(Reporting Period: January 1, 2022, through June 30, 2022)

Preliminary:	***In Compliance*** **(FIFTH REPORTING PERIOD)**
Secondary:	***Not in Compliance***
Full:	***Not Yet Assessed***

The City and the CPD have maintained Preliminary compliance with ¶277 during this reporting period.

To evaluate Preliminary compliance with ¶277, we reviewed the City's and the CPD's relevant policies and documents following the process described in the Consent Decree (¶¶626–41), which outlines applicable consultation, resolution, workout, and public comment periods.

To evaluate Secondary compliance with this paragraph, we reviewed data to determine whether the City and the CPD have created and staffed positions with qualified personnel, including creating and implementing a process to acquire "outside expertise" as required by ¶277. This process must ensure that such outside experts are qualified to "add to the quality or effectiveness of the training program." Where applicable, we assessed whether the City and the CPD have created the requisite positions and staffed those positions with qualified personnel in order to achieve the requirements of this paragraph. The IMT also sought to verify sufficient attendance records (*i.e.*, 95% of relevant personnel), including hours attended.

Progress before the Sixth Reporting Period

During the previous reporting period, the IMT assessed compliance by reviewing Training Directives S11-10 (*Department Training Records Maintenance*) and S11-11 (*Training Oversight Committee*), which track ¶277 language and meet the requirements for Preliminary compliance. However, the CPD had not articulated or enacted processes to hire, retain, evaluate, and terminate outside experts, nor had it established a criterion for the selection and retention of outside experts. We noted this would be necessary to gain Secondary compliance.

Progress in the Sixth Reporting Period

To demonstrate compliance with ¶277, this reporting period the CPD submitted an August 20, 2021, Training Community Advisory Committee (also known as the TCAC) invitation signed by Deputy Chief inviting community partners to attend several Training Community Advisory Committee meetings scheduled in September and October 2021, along with a Training Community Advisory Committee Fall 2021 Agenda. Topics covered in the Training Community Advisory Committee Fall 2021 Agenda, included de-escalation, response to resistance, use of force, fourth amendment, crisis intervention, Active Bystandership for Law Enforcement, and gender-based violence. The CPD also submitted meeting notes from Training Community Advisory Committee meetings that occurred on September 9, 20, 23, 27, 30, and October 7, 2021, as well as a Fourth Amendment Comment Matrix showing the CPD's responses to Training Community Advisory Committee comments provided to the 2022 Fourth Amendment PowerPoint and Lesson Plan presented at the September 27 and 30, 2021, Training Community Advisory Committee meetings.

Additionally, the CPD submitted Training Community Advisory Committee meeting notes for Training Community Advisory Committee meetings occurring in February, March, April, and May 2022, along with a bullet point summary of the Training Community Advisory Committee feedback offered to the Modules discussed at the March 3, 2022 Training Community Advisory Committee meeting, which included (i) student performance objections, (ii) key concepts, including integration of guiding principles, (iii) adult learning activities, and (iv) evaluation and assessment. Finally, the CPD also submitted *Community Group Training for School Resource Officers* that CPD described as being developed by several Chicago area community groups.

In assessing compliance for the current reporting period, the IMT also reviewed Training Directives S11-10 (*Department Training Records Maintenance*) and S11-11 (*Training Oversight Committee*). S11-10 § VII(A)(3) (29 December 2021) tracks ¶277 language and meets the requirements for Preliminary compliance. However, the City and the CPD have not articulated or enacted processes to hire, retain, evaluate, and terminate outside experts, nor have they established a criterion for the selection and retention of outside experts, which are required to obtain Secondary compliance. As suggested in our last report, the City and the CPD should include these steps in the controlling policy to reach Secondary compliance.

***

The City and the CPD have maintained Preliminary compliance during this reporting period. Looking forward, Secondary compliance requires the CPD to sufficiently take steps to implement a plan to receive subject-matter-expert assistance, including outside experts.

Full compliance requires CPD to have implemented a plan to continue to receive subject-matter-expert assistance and standards to evaluate subject-matter-expert contributions for impact on training programs' quality and effectiveness.

Paragraph 277 Compliance Progress History

FIRST REPORTING PERIOD	SECOND REPORTING PERIOD	THIRD REPORTING PERIOD
SEPTEMBER 1, 2019 – AUGUST 31, 2019	SEPTEMBER 1, 2019 – FEBRUARY 29, 2020	MARCH 1, 2020 – DECEMBER 31, 2020
COMPLIANCE PROGRESS:	COMPLIANCE PROGRESS:	COMPLIANCE PROGRESS:
Not Applicable	Not Applicable	None

FOURTH REPORTING PERIOD	FIFTH REPORTING PERIOD	SIXTH REPORTING PERIOD
JANUARY 1, 2021 – JUNE 30, 2021	JULY 1, 2021 – DECEMBER 31, 2021	JANUARY 1, 2022 – JUNE 30, 2022
COMPLIANCE PROGRESS:	COMPLIANCE PROGRESS:	COMPLIANCE PROGRESS:
None	Preliminary	Preliminary

Training: ¶278

278. *The TOC will continue to oversee a process that effectively incorporates material changes in relevant case law, statutes, and the CPD policy into recruit, field, in-service, and preservice promotional training in a timely and effective manner.*

Compliance Progress

(Reporting Period: January 1, 2022, through June 30, 2022)

Preliminary:	***In Compliance*** **(THIRD REPORTING PERIOD)**
Secondary:	***Not in Compliance***
Full:	***Not Yet Assessed***

The City and the CPD maintained Preliminary compliance with the requirements of ¶278 during this reporting period.

To evaluate Preliminary compliance with ¶278, we reviewed the City's and the CPD's relevant policies and documents following the process described in the Consent Decree (¶¶626–41), which outlines applicable consultation, resolution, workout, and public comment periods. To evaluate Secondary compliance with this paragraph, we reviewed data to determine whether the City and the CPD have a reliable process to substantiate Training Oversight Committee oversight for incorporation of material changes in case law, statutes, and CPD policy into trainings and Training Oversight Committee meeting discussions on such material changes. The IMT also sought to verify sufficient attendance records (*i.e.*, 95% of relevant personnel), including hours attended. Where applicable, we assessed whether the City and the CPD have created the requisite positions and staffed those positions with qualified personnel in order to achieve the requirements of this paragraph.

Progress before the Sixth Reporting Period

During the previous reporting period, the IMT reviewed policy, jobs, and training sources, including plans, policies, procedures, training materials and directives, as well as Training Oversight Committee meeting minutes, and determined that the City and the CPD maintained Preliminary compliance with this paragraph. We noted that Secondary compliance may be achieved after the Training Oversight Committee sustains oversight of processes to incorporate material changes in case law, statutes, and CPD policy into training. The City and the CPD also must provide adequate data, such as a process map and actual examples of the steps involved in timely and effectively moving a relevant change in case law or policy through this process to become the focus of recruit, field, in-service, or promotional training.

Progress in the Sixth Reporting Period

To demonstrate compliance with ¶278, this reporting period the CPD submitted Training Oversight Committee minutes and meeting materials for Training Oversight Committee meetings occurring in December of 2021 through April of 2022. The Training Oversight Committee meeting materials included a *Field Training and Evaluation Program Recommendation Memorandum* (January 2022), a *Needs Assessment PowerPoint* presented at the April 28, 2022 Training Oversight Committee meeting, and virtual votes on the following: (i) *2022 Training Plan* (November 2021); (ii) *2022 Peer Support 8-Hour Refresher Course* (January 2022); (iii) *2022 Detention Facility Annual Review* (February 2022); (iv*) Peer Support Facility* (March 2022); and (v) *Active Bystandership for Law Enforcement (ABLE) Training* (April 2022). The IMT also reviewed a *Revised 2022 Training Plan* (April 2022) and *Needs Assessment for the 2023 Training Plan* that was discussed in the April and May 2022 Training Oversight Committee meetings.

Additionally, the IMT reviewed Special Order S11-11 (*Training Oversight Committee*). § III(A)(12) requires the Training Oversight Committee to oversee "a process that effectively incorporates material changes in relevant case law, statutes, and Department policy in to recruit, field, in-service, and pre-service promotional training in a timely and effective manner."

Data indicate Training Oversight Committee oversight policy S11-11 is consistent with ¶278 requirements. However, the Training Oversight Committee meeting minutes provided do not detail any discussions or deliberations on timely and effectively incorporating material changes in relevant case law, statutes, and CPD policy as required by ¶278. There were no separate reports or records produced documenting the Training Oversight Committee's effort to ensure timely and effective incorporation of these material changes in relevant case law, statutes, and CPD policy into CPD trainings.

***

The City and the CPD maintained Preliminary compliance during this reporting period. Looking forward, Secondary compliance may be achieved by substantiating the Training Oversight Committee oversight process for incorporation of material changes in case law, statutes, and CPD policy into trainings and Training Oversight Committee meeting discussions on such material changes. Full compliance may be demonstrated after the CPD sustains oversight of the process described in ¶278.

Paragraph 278 Compliance Progress History

FIRST REPORTING PERIOD	SECOND REPORTING PERIOD	THIRD REPORTING PERIOD
SEPTEMBER 1, 2019 – AUGUST 31, 2019	SEPTEMBER 1, 2019 – FEBRUARY 29, 2020	MARCH 1, 2020 – DECEMBER 31, 2020
COMPLIANCE PROGRESS:	COMPLIANCE PROGRESS:	COMPLIANCE PROGRESS:
Not Applicable	Not Applicable	Preliminary

FOURTH REPORTING PERIOD	FIFTH REPORTING PERIOD	SIXTH REPORTING PERIOD
JANUARY 1, 2021 – JUNE 30, 2021	JULY 1, 2021 – DECEMBER 31, 2021	JANUARY 1, 2022 – JUNE 30, 2022
COMPLIANCE PROGRESS:	COMPLIANCE PROGRESS:	COMPLIANCE PROGRESS:
Preliminary	Preliminary	Preliminary

Training: ¶279

279. *All training materials disseminated to CPD members and displayed at CPD facilities will reflect current CPD policy.*

Compliance Progress

(Reporting Period: January 1, 2022, through June 30, 2022)

Preliminary:	***In Compliance* (FIFTH REPORTING PERIOD)**
Secondary:	***Not in Compliance***
Full:	***Not Yet Assessed***

The City and the CPD maintained Preliminary compliance with the requirements of ¶279 during this reporting period.

To evaluate Preliminary compliance with ¶279, we reviewed the City's and the CPD's relevant policies and documents following the process described in the Consent Decree (¶¶626–41), which outlines applicable consultation, resolution, workout, and public comment periods. To evaluate Secondary compliance with this paragraph, we reviewed data to determine whether the City and the CPD have a reliable process to ensure that training materials disseminated to CPD officers and displayed at every CPD facility reflect current CPD policy. Where applicable, we assessed whether the City and the CPD have created the requisite positions and staffed those positions with qualified personnel in order to achieve the requirements of this paragraph. The IMT also sought to verify sufficient attendance records (*i.e.*, 95% of relevant personnel), including hours attended.

Progress before the Sixth Reporting Period

During the previous reporting period, the IMT reviewed policy, training, and job sources, including policies and procedures. We found that the City and the CPD achieved Preliminary compliance because training directive S11-10, *Department Training Records Maintenance* met the requirements of this paragraph. We noted that to achieve Secondary compliance, we will assess the dissemination, audit, and inspection processes to ensure that training materials disseminated to CPD officers and displayed at every CPD facility reflect current CPD policy. We recommended that additional auditing or site inspection processes should be considered.

Progress before the Sixth Reporting Period

The City and CPD did not submit any relevant data during this reporting period. The IMT reviewed S11-10, *Department Training Records Maintenance* (29 December 2021). Section VII(A) reflects ¶279 language, thus maintaining Preliminary compliance.

***

The City and the CPD maintained Preliminary compliance during this reporting period. Looking forward, to achieve Secondary compliance, the CPD must establish a process to ensure that training materials disseminated to CPD officers and displayed at every CPD facility reflect current CPD policy. While some document control may be ascertained with the requirement that the Graphic Arts and Print Shop, Public Safety Administration ensures that the production of all training materials reflect Training and Support Group approved content, additional auditing or site inspection processes should also be considered.

Paragraph 279 Compliance Progress History

FIRST REPORTING PERIOD	SECOND REPORTING PERIOD	THIRD REPORTING PERIOD
SEPTEMBER 1, 2019 – AUGUST 31, 2019	SEPTEMBER 1, 2019 – FEBRUARY 29, 2020	MARCH 1, 2020 – DECEMBER 31, 2020
COMPLIANCE PROGRESS:	COMPLIANCE PROGRESS:	COMPLIANCE PROGRESS:
Not Applicable	Not Applicable	Not Applicable
FOURTH REPORTING PERIOD	**FIFTH REPORTING PERIOD**	**SIXTH REPORTING PERIOD**
JANUARY 1, 2021 – JUNE 30, 2021	JULY 1, 2021 – DECEMBER 31, 2021	JANUARY 1, 2022 – JUNE 30, 2022
COMPLIANCE PROGRESS:	COMPLIANCE PROGRESS:	COMPLIANCE PROGRESS:
Under Assessment	Preliminary	Preliminary

Training: ¶280

> ***280.*** *CPD will develop, implement, and utilize a centralized electronic system for scheduling and tracking all CPD training to allow the Education and Training Division to effectively plan and manage training schedules and instructor assignments for all training.*

Compliance Progress (Reporting Period: January 1, 2022, through June 30, 2022)

Preliminary:	***In Compliance*** **(THIRD REPORTING PERIOD)**
Secondary:	***Not in Compliance***
Full:	***Not in Compliance***

The City and the CPD maintained Preliminary compliance with the requirements of ¶280 during this reporting period.

To evaluate Preliminary compliance with ¶280, we reviewed the City's and the CPD's relevant policies and documents following the process described in the Consent Decree (¶¶626–41), which outlines applicable consultation, resolution, workout, and public comment periods. To evaluate Secondary compliance with this paragraph, we reviewed data to determine whether the CPD has established and uses a centralized electronic system for scheduling and tracking all CPD training to allow the Education and Training Division to effectively plan and manage training schedules and instructor assignments for all trainings. We also confirmed whether this system is in continual use and whether the City and the CPD have developed policies for the Education and Training Division to use the system as required.

Progress before the Sixth Reporting Period

During the previous reporting period, the IMT reviewed Training Directives S11-10 (*Department Training Records Maintenance*) and S11-11 (*Training Oversight Committee*) for compliance with this paragraph and determined that Preliminary compliance had been maintained. We noted that Secondary compliance may be achieved by utilizing the centralized electronic system for scheduling and tracking all CPD training.

Progress in the Sixth Reporting Period

The City and the CPD did not submit any data to substantiate maintained Preliminary compliance during this reporting period. The IMT did, however, review Training Directives S11-10 (*Department Training Records Maintenance*) and S11-11 (*Training Oversight Committee*) for compliance with this paragraph. According to S11-10 XIII, "The Training Division will utilize a centralized electronic system for

scheduling and tracking all Department officers' training, and a centralized electronic file system for assessing the content and delivery of all Department training." This language meets the policy requirements of this paragraph. Therefore, Preliminary compliance is maintained.

***

The City and the CPD maintained Preliminary compliance during this reporting period. Looking forward, Secondary compliance requires the CPD to use a centralized electronic system for scheduling and tracking all CPD training to allow the Education and Training Division to effectively plan and manage training schedules and instructor assignments for all training.

Full compliance requires the CPD's continuous and ongoing use of a centralized electronic system for scheduling and tracking all CPD training and for the Education and Training Division to effectively plan and manage training schedules and instructor assignments for all training using this system.

Paragraph 280 Compliance Progress History

FIRST REPORTING PERIOD	SECOND REPORTING PERIOD	THIRD REPORTING PERIOD
SEPTEMBER 1, 2019 – AUGUST 31, 2019	SEPTEMBER 1, 2019 – FEBRUARY 29, 2020	MARCH 1, 2020 – DECEMBER 31, 2020
COMPLIANCE PROGRESS:	COMPLIANCE PROGRESS:	COMPLIANCE PROGRESS:
Not Applicable	None	Preliminary
FOURTH REPORTING PERIOD	**FIFTH REPORTING PERIOD**	**SIXTH REPORTING PERIOD**
JANUARY 1, 2021 – JUNE 30, 2021	JULY 1, 2021 – DECEMBER 31, 2021	JANUARY 1, 2022 – JUNE 30, 2022
COMPLIANCE PROGRESS:	COMPLIANCE PROGRESS:	COMPLIANCE PROGRESS:
Preliminary	Preliminary	Preliminary

Training: ¶281

281. *The City will be responsible for providing appropriate training facilities that offer adequate access to safe and effective training.*

Compliance Progress

(Reporting Period: January 1, 2022, through June 30, 2022)

Preliminary: ***In Compliance*** **(NEW)**
Secondary: ***Not Yet Assessed***
Full: ***Not Yet Assessed***

The City and the CPD achieved Preliminary compliance during this reporting period.

To evaluate Preliminary compliance with ¶281, we reviewed the City's and the CPD's relevant policies and documents following the process described in the Consent Decree (¶¶626–41), which outlines applicable consultation, resolution, workout, and public comment periods. To evaluate Secondary compliance with this paragraph, we will need to review data to determine whether the City and the CPD have developed and begun the implementation of plans and appropriate guidance and staffing to provide appropriate training facilities, including allocating sufficient resources. The IMT will also seek to verify sufficient attendance records (*i.e.*, 95% of relevant personnel), including hours attended. Where applicable, we will assess whether the City and the CPD have created the requisite positions and staffed those positions with qualified personnel in order to achieve the requirements of this paragraph.

Progress before the Sixth Reporting Period

During the previous reporting period, the IMT assessed policy sources and records to demonstrate that the City and the CPD have developed plans to provide appropriate training facilities according to the requirements of this paragraph, resulting in Preliminary compliance. We noted that Secondary compliance may be achieved through documentation that the City and CPD have begun to implement plans to provide appropriate training facilities.

Progress in the Sixth Reporting Period

The City and the CPD did not submit any written data to substantiate Secondary compliance during this reporting period. In support of Preliminary compliance, the IMT conducted site visits to the Academy, the Professional Development Center, and the new Public Safety Training Facility currently under construction in June 2021. The CPD advised that it expects the Public Safety Training Facility to be open and operational for training by the first quarter of 2023. Overall, we were very impressed by the progress and potential of the new Public Safety Training Facility,

particularly with regards to opportunities for improving overall officer training. We provided the CPD verbal feedback and recommendations on potential additional uses and improvements to the facility, particularly with regards to opportunities to improve community engagement through adding certain amenities to the existing community room and the involvement of CPD alumni and community members in scenario-based officer trainings.

The City and the CPD should provide documents that detail training facility needs and the City's strategic approach to addressing those needs. This information will allow the IMT to further assess compliance with ¶281 requirements.

***

The City and the CPD achieved Preliminary compliance during this reporting period. Looking forward, Secondary compliance can be substantiated with policies, procedures, plans, evaluations, and training materials that indicate the City and the CPD have developed and begun the implementation of plans to provide appropriate training facilities, including allocating sufficient resources.

Full compliance may be achieved after the CPD provides evidence that adequate, safe, and effective training is conducted in its facilities according to the requirements of ¶281. Policies, procedures, plans, processes, and demonstrations of system operations may all be used to substantiate compliance.

Paragraph 281 Compliance Progress History

FIRST REPORTING PERIOD	SECOND REPORTING PERIOD	THIRD REPORTING PERIOD
SEPTEMBER 1, 2019 – AUGUST 31, 2019	SEPTEMBER 1, 2019 – FEBRUARY 29, 2020	MARCH 1, 2020 – DECEMBER 31, 2020
COMPLIANCE PROGRESS:	COMPLIANCE PROGRESS:	COMPLIANCE PROGRESS:
Not Applicable	Not Applicable	Not Applicable
FOURTH REPORTING PERIOD	**FIFTH REPORTING PERIOD**	**SIXTH REPORTING PERIOD**
JANUARY 1, 2021 – JUNE 30, 2021	JULY 1, 2021 – DECEMBER 31, 2021	JANUARY 1, 2022 – JUNE 30, 2022
COMPLIANCE PROGRESS:	COMPLIANCE PROGRESS:	COMPLIANCE PROGRESS:
Not Applicable	None	Preliminary

Training: ¶282

282. *All CPD training instructors must be appropriately qualified for their instructional roles and use only approved curricula and lesson plans. CPD will actively recruit and retain qualified instructors to ensure that CPD has sufficient qualified instructors to meet the needs of the Department and requirements of the Training Plan.*

Compliance Progress

(Reporting Period: January 1, 2022, through June 30, 2022)

Preliminary:	***In Compliance*** **(FIFTH REPORTING PERIOD)**
Secondary:	***Not Yet Assessed***
Full:	***Not Yet Assessed***

The City and the CPD maintained Preliminary compliance during this reporting period.

To evaluate Preliminary compliance with ¶282, we reviewed the City's and the CPD's relevant policies and documents following the process described in the Consent Decree (¶¶626–41), which outlines applicable consultation, resolution, workout, and public comment periods. To evaluate Secondary compliance with this paragraph, we will need to review data to determine whether the City and the CPD have plans and criteria in place to acquire qualified experts to develop and instruct courses. Assessment sources include policy, procedure, qualifications, and training plans to determine if the City and the CPD have sufficiently taken steps to evaluate and acquire experts to develop and instruct courses. The IMT will also seek to verify sufficient attendance records (*i.e.*, 95% of relevant personnel), including hours attended. Where applicable, we will assess whether the City and the CPD have created the requisite positions and staffed those positions with qualified personnel in order to achieve the requirements of this paragraph.

Progress before the Sixth Reporting Period

During the previous reporting period, the IMT reviewed Training Directive S11-10 (*Department Training Records Maintenance*) to determine that the City and the CPD achieved Preliminary compliance. We noted that Secondary compliance may be achieved by implementing a strategy to determine and review instructor qualifications and to ensure that instructors use only approved lesson plans and curricula.

Progress in the Sixth Reporting Period

The City and the CPD did not submit any data to establish Secondary compliance during this reporting period. However, Training Directive S11-10 (*Department*

Training Records Maintenance) produced in the prior reporting period continues to support Preliminary compliance.

***

The City and the CPD maintained Preliminary compliance during this reporting period. Looking forward, Secondary compliance may be achieved by implementing a strategy to determine and review instructor qualifications and to ensure that instructors use only approved lesson plans and curricula.

Full compliance requires the CPD to systematically determine and review appropriate instructor qualifications and ensure that instructors use only approved lesson plans and curricula. The CPD's periodically refined instructor recruiting and retention strategy must ensure that there are sufficient qualified instructors to meet the CPD's *Needs Assessment* and *Training Plan* requirements.

Paragraph 282 Compliance Progress History

FIRST REPORTING PERIOD	SECOND REPORTING PERIOD	THIRD REPORTING PERIOD
SEPTEMBER 1, 2019 – AUGUST 31, 2019	SEPTEMBER 1, 2019 – FEBRUARY 29, 2020	MARCH 1, 2020 – DECEMBER 31, 2020
COMPLIANCE PROGRESS:	COMPLIANCE PROGRESS:	COMPLIANCE PROGRESS:
Not Applicable	Not Applicable	None

FOURTH REPORTING PERIOD	FIFTH REPORTING PERIOD	SIXTH REPORTING PERIOD
JANUARY 1, 2021 – JUNE 30, 2021	JULY 1, 2021 – DECEMBER 31, 2021	JANUARY 1, 2022 – JUNE 30, 2022
COMPLIANCE PROGRESS:	COMPLIANCE PROGRESS:	COMPLIANCE PROGRESS:
None	Preliminary	Preliminary

Training: ¶283

283. *As appropriate to accomplish the requirements and goals of this Agreement, CPD will incorporate experts and guest speakers to participate in the development and instruction of relevant courses, as feasible, practical, and appropriate, including, but not limited to: a. CPD members of all ranks; b. members of the community; c. legal and law enforcement professionals, such as judges, prosecutors, and public defenders; d. crime victims; and e. subject matter experts.*

Compliance Progress

(Reporting Period: January 1, 2022, through June 30, 2022)

Preliminary:	***In Compliance*** **(FOURTH REPORTING PERIOD)**
Secondary:	***In Compliance*** **(NEW)**
Full:	***Not Yet Assessed***

The City and the CPD achieved Secondary compliance with the requirements of ¶283 during this reporting period.

To evaluate Preliminary compliance with ¶283, we reviewed the City's and the CPD's relevant policies and documents following the process described in the Consent Decree (¶¶626–41), which outlines applicable consultation, resolution, workout, and public comment periods. To evaluate Secondary compliance with this paragraph, we reviewed data to determine whether the City and the CPD have developed a strategy to incorporate experts and guest speakers to participate in the development and instruction of relevant courses, as feasible, practical, and appropriate in accordance with the requirements of this paragraph. Specifically, the IMT reviewed CPD policy, lesson plans, training plans, and training schedules to determine if the CPD has sufficiently implemented its policy and training plans, that course instructors' qualifications comply with the requirements of this paragraphs, and that guest speakers, including CPD officers, community members, and outside experts, are involved in course instruction where feasible, practical, and appropriate.

Progress before the Sixth Reporting Period

During the previous reporting period, the IMT assessed compliance by reviewing CPD policy, lesson plans, training plan, and training schedules and found the City and the CPD maintained Preliminary compliance according to the language included in Training Directive S11-10 (*Department Training Records Maintenance*). We advised that Secondary compliance requires the CPD to demonstrate that it has sufficiently taken steps to evaluate and acquire appropriate experts to develop and instruct courses as required by this paragraph.

Progress in the Sixth Reporting Period

To demonstrate compliance with ¶283, this reporting period the CPD submitted an August 20, 2021 Training Community Advisory Committee invitation signed by Deputy Chief inviting community partners to attend several Training Community Advisory Committee meetings scheduled in September and October 2021 along with a Training Community Advisory Committee Fall 2021 Agenda. Topics covered in the agenda include De-escalation, Response to Resistance, Use of Force, Fourth Amendment, Crisis Intervention, Active Bystandership for Law Enforcement, and Gender-Based violence. The CPD also submitted meeting notes from Training Community Advisory Committee meetings that occurred on September 9, 20, 23, 27, 30, and October 7, 2021, as well as a Fourth Amendment Comment Matrix showing the CPD's responses to Training Community Advisory Committee comments provided to the 2022 Fourth Amendment PowerPoint and Lesson Plan presented at the September 27 and 30, 2021 Training Community Advisory Committee meetings.

Additionally, the CPD submitted Training Community Advisory Committee meeting notes for Training Community Advisory Committee meetings occurring in February, March, April, and May 2022, along with a bullet point summary of the Training Community Advisory Committee feedback offered to the Modules discussed at the March 3, 2022, Training Community Advisory Committee meeting, which included (i) student performance objections, (ii) key concepts, including integration of guiding principles, (iii) adult learning activities, and (iv) evaluation and assessment. Finally, the CPD also submitted *Community Group Training for SROs* that CPD described as being developed by several Chicago area community groups.

IMT also attended several training classes virtually and in person. We note, for example, that some segments of the *Crisis Intervention Training Refresher* courses conducted in June 2022 used outside actors and an instructor.

Data indicate that the CPD has incorporated experts and guest speakers to participate in the development and instruction of relevant courses, as required by this paragraph.

***

The City and the CPD achieved Secondary compliance during this reporting period. Looking forward, Full compliance may be achieved after sustained Secondary compliance where CPD sufficiently evaluates and acquires experts to initially and periodically develop and instruct courses in accordance with the requirements of this paragraph.

Paragraph 283 Compliance Progress History

FIRST REPORTING PERIOD
SEPTEMBER 1, 2019 – AUGUST 31, 2019
COMPLIANCE PROGRESS:
Not Applicable

SECOND REPORTING PERIOD
SEPTEMBER 1, 2019 – FEBRUARY 29, 2020
COMPLIANCE PROGRESS:
Not Applicable

THIRD REPORTING PERIOD
MARCH 1, 2020 – DECEMBER 31, 2020
COMPLIANCE PROGRESS:
Status Update

FOURTH REPORTING PERIOD
JANUARY 1, 2021 – JUNE 30, 2021
COMPLIANCE PROGRESS:
Preliminary

FIFTH REPORTING PERIOD
JULY 1, 2021 – DECEMBER 31, 2021
COMPLIANCE PROGRESS:
Preliminary

SIXTH REPORTING PERIOD
JANUARY 1, 2022 – JUNE 30, 2022
COMPLIANCE PROGRESS:
Secondary

Training: ¶284

284. *CPD will require that all new and current Education and Training Division instructors and curriculum developers are certified by the Illinois Law Enforcement Training and Standards Board and, as appropriate to their roles, receive initial and annual refresher training on subjects including, but not limited to, effective teaching, adult-learning techniques, and curriculum development. CPD will further require that instructors are trained in the specific subject matter they are assigned to teach and are also cross-trained in other related subjects so that they are equipped to deliver effective interdisciplinary instruction. Instructor training will also include peer review.*

Compliance Progress

(Reporting Period: January 1, 2022, through June 30, 2022)

Preliminary:	***In Compliance*** **(FIFTH REPORTING PERIOD)**
Secondary:	***Not in Compliance***
Full:	***Not Yet Assessed***

The City and the CPD maintained Preliminary compliance with the requirements of ¶284 during this reporting period.

To evaluate Preliminary compliance with ¶284, we reviewed the City's and the CPD's relevant policies and documents following the process described in the Consent Decree (¶¶626–41), which outlines applicable consultation, resolution, workout, and public comment periods.

To evaluate Secondary compliance with this paragraph, we reviewed data to determine whether the City and the CPD have developed and implemented a process for course and instructor training evaluation, including officer feedback and analysis of the extent to which such training is reflected in how officers perform, if this information is used in creating the *Needs Assessment*, and whether the CPD has demonstrated that training is having the intended impact. Specifically, we reviewed the CPD's training plans and curricula and data demonstrating that training was delivered to the relevant personnel during the necessary intervals. This assessment included a review of the City's, the CPD's, and the other relevant entities' training development, implementation, and evaluation to determine whether training is evidence-based and conforms to best practices, as applicable. The IMT also sought to verify through data sufficient attendance records (*i.e.*, 95% of relevant personnel), including hours attended. Where applicable, we assessed whether the City and the CPD have created the requisite positions and staffed those positions with qualified personnel in order to achieve the requirements of this paragraph.

Progress before the Sixth Reporting Period

During the previous reporting period, the IMT assessed compliance by reviewing CPD policy, lesson plans, training plans, and training schedules and found that the City and the CPD maintained Preliminary compliance according to the language included in Training Directive S11-10 (*Department Training Records Maintenance*). We noted that Secondary compliance requires the CPD to ensure that all instructors are properly credentialed.

Progress in the Sixth Reporting Period

The City and the CPD did not submit any data to establish Secondary compliance during this reporting period. However, Training Directive S11-10 (*Department Training Records Maintenance*) produced in the prior reporting period continues to support Preliminary compliance.

The IMT did attend several training courses in-person in June 2022. We noted and discussed with CPD supervisors an observation where students and the instructors were almost solely focused on the tactics specific to that training and missed opportunities to reinforce routine principles and practices that are native to other officer disciplines. This demonstrated an absence of the cross-training in interdisciplinary instruction as required by this paragraph.

***

The City and the CPD maintained Preliminary compliance during this reporting period. Looking forward, achieving Secondary compliance will require the CPD to implement a plan to ensure that all instructors are properly credentialed. Full compliance will require Secondary compliance status and for all instructors to be credentialed in accordance with ¶284 standards on an ongoing basis.

Paragraph 284 Compliance Progress History

FIRST REPORTING PERIOD	SECOND REPORTING PERIOD	THIRD REPORTING PERIOD
SEPTEMBER 1, 2019 – AUGUST 31, 2019	SEPTEMBER 1, 2019 – FEBRUARY 29, 2020	MARCH 1, 2020 – DECEMBER 31, 2020
COMPLIANCE PROGRESS:	COMPLIANCE PROGRESS:	COMPLIANCE PROGRESS:
Not Applicable	None	Status Update
FOURTH REPORTING PERIOD	**FIFTH REPORTING PERIOD**	**SIXTH REPORTING PERIOD**
JANUARY 1, 2021 – JUNE 30, 2021	JULY 1, 2021 – DECEMBER 31, 2021	JANUARY 1, 2022 – JUNE 30, 2022
COMPLIANCE PROGRESS:	COMPLIANCE PROGRESS:	COMPLIANCE PROGRESS:
None	Preliminary	Preliminary

Training: ¶285

285. *The Education and Training Division will conduct annual instructor performance reviews. Performance reviews will include classroom observations, member feedback, and in-person meetings with instructors to discuss performance and areas of improvement. These performance reviews will be considered in assessing whether instructors may continue to serve in that role.*

Compliance Progress

(Reporting Period: January 1, 2022, through June 30, 2022)

Preliminary:	***In Compliance*** **(FIFTH REPORTING PERIOD)**
Secondary:	***Not Yet Assessed***
Full:	***Not Yet Assessed***

The City and the CPD maintained Preliminary compliance with the requirements of ¶285 during this reporting period.

To evaluate Preliminary compliance with ¶285, we reviewed the City's and the CPD's relevant policies and documents following the process described in the Consent Decree (¶¶626–41), which outlines applicable consultation, resolution, workout, and public comment periods. To evaluate Secondary compliance with this paragraph, we will need to review data to determine whether the City and the CPD have developed policies and procedures to conduct annual instructor performance reviews according to the requirements of ¶285.

Progress before the Sixth Reporting Period

During the previous reporting period, the IMT assessed Preliminary compliance for the first time by examining policy and procedures to determine if the City and the CPD have developed policies to conduct annual instructor performance reviews. We found that the City and the CPD achieved Preliminary compliance through Training Directive S11-10 (*Department Training Records Maintenance*), which contains the requisite language that exactly mirrors language in ¶285. We noted that Secondary compliance may be achieved once the City and the CPD substantiate through policies, procedures, plans, training materials, and communication materials that they have established and implemented a process to conduct annual instructor performance reviews as required by this paragraph.

Progress in the Sixth Reporting Period

The City and the CPD did not submit any data to establish Secondary compliance during this reporting period. However, Training Directive S11-10 (*Department Training Records Maintenance*) produced in the prior reporting period continues to support Preliminary compliance.

***

The City and the CPD maintained Preliminary compliance during this reporting period. Looking forward, Secondary compliance may be achieved by producing policies and procedures, plans, training materials, and communication materials that substantiate the City and the CPD have established and implemented a process to conduct annual instructor performance reviews according to the requirements of ¶285. A training methodology that includes reviewing the City's, the CPD's, and the other relevant entities' training development, implementation, and evaluation (¶286) also applies. The IMT will rely upon the "ADDIE model" of curriculum development and implementation as our evaluation standard, which typically incorporates the following elements: training needs assessment, curriculum design, curriculum development, training implementation (training delivery), and training evaluation. Each of these five elements is considered an essential component of effective training. Training evaluation includes student and trainee evaluations—both formative and summative evaluations—as well as measurements of how specific training goals are implemented at the organizational level. We will also assess whether training is evidence-based and conforms to best practices, as applicable. We will also use this model to measure the effectiveness of the trainers (¶¶283–85). When applicable, we will also assess whether the City, the CPD, and the other relevant entities adequately sought, received, and incorporated community input and facilitated community participation. The IMT will also seek to verify sufficient attendance records (*i.e.*, 95% of relevant personnel), including hours attended.

Full compliance may be achieved by demonstrating through policies, procedures, plans, processes, and demonstrations of systems operations, reports, and audits, that the City and the CPD have fully implemented annual instructor performance reviews according to the requirements of this paragraph.

Paragraph 285 Compliance Progress History

FIRST REPORTING PERIOD	SECOND REPORTING PERIOD	THIRD REPORTING PERIOD
SEPTEMBER 1, 2019 – AUGUST 31, 2019	SEPTEMBER 1, 2019 – FEBRUARY 29, 2020	MARCH 1, 2020 – DECEMBER 31, 2020
COMPLIANCE PROGRESS:	COMPLIANCE PROGRESS:	COMPLIANCE PROGRESS:
Not Applicable	Not Applicable	Not Applicable
FOURTH REPORTING PERIOD	**FIFTH REPORTING PERIOD**	**SIXTH REPORTING PERIOD**
JANUARY 1, 2021 – JUNE 30, 2021	JULY 1, 2021 – DECEMBER 31, 2021	JANUARY 1, 2022 – JUNE 30, 2022
COMPLIANCE PROGRESS:	COMPLIANCE PROGRESS:	COMPLIANCE PROGRESS:
Not Applicable	Preliminary	Preliminary

Training: ¶286

286. *The review and analysis of the content and delivery of training will enable CPD to determine whether the training provided to members effectively prepares them to police fairly, safely, and in accordance with the law, CPD policy, best practices, and this Agreement.*

Compliance Progress

(Reporting Period: January 1, 2022, through June 30, 2022)

Preliminary:	***Not in Compliance***
Secondary:	***Not in Compliance***
Full:	***Not Yet Assessed***

The City and the CPD did not achieve any level of compliance with the requirements of ¶286 during this reporting period.

To evaluate Preliminary compliance with ¶286, we reviewed the City's and the CPD's relevant policies and documents following the process described in the Consent Decree (¶¶626–41), which outlines applicable consultation, resolution, workout, and public comment periods. To evaluate Secondary compliance with this paragraph, we reviewed data to determine whether the City and the CPD have developed acceptable policies, procedures, and plans to conduct an analysis and review of the content and delivery of training according to the requirements of ¶286.

Progress before the Sixth Reporting Period

During the last reporting period, the IMT assessed compliance with this paragraph for the first time by reviewing policies and procedures and found that the City and the CPD did not achieve any level of compliance. The City and the CPD did not produce any documents substantiating Preliminary compliance, and the City indicated its position that this paragraph lacks an assessable requirement. The IMT respectfully disagreed and noted that Secondary compliance may be substantiated by providing documentation demonstrating that CPD has established and implemented a process to analyze the content and delivery of training.

Progress in the Sixth Reporting Period

The City and the CPD did not submit any data to establish any level of compliance during this reporting period.

***

The City and the CPD did not achieve any level of compliance during this reporting period. Looking forward, Preliminary compliance requires the City and the CPD to

develop acceptable policies, procedures, and plans to conduct an analysis and review of the content and delivery of training according to the requirements of ¶286.

Secondary compliance will require policy and procedure, planning, training materials, communication materials, and meeting minutes, including but not limited to from Training Community Advisory Committee and Training Oversight Committee meetings, to substantiate whether the CPD has established and implemented a process to analyze and review the content and delivery of training according to the requirements of this paragraph.

Full compliance may be achieved when records submitted indicate and substantiate that the City and the CPD have conducted an analysis and review of the content and delivery of trainings and the CPD has determined if trainings are effective in preparing officers according to the requirements of this paragraph.

Paragraph 286 Compliance Progress History

FIRST REPORTING PERIOD	SECOND REPORTING PERIOD	THIRD REPORTING PERIOD
SEPTEMBER 1, 2019 – AUGUST 31, 2019	SEPTEMBER 1, 2019 – FEBRUARY 29, 2020	MARCH 1, 2020 – DECEMBER 31, 2020
COMPLIANCE PROGRESS:	COMPLIANCE PROGRESS:	COMPLIANCE PROGRESS:
Not Applicable	Not Applicable	Not Applicable
FOURTH REPORTING PERIOD	**FIFTH REPORTING PERIOD**	**SIXTH REPORTING PERIOD**
JANUARY 1, 2021 – JUNE 30, 2021	JULY 1, 2021 – DECEMBER 31, 2021	JANUARY 1, 2022 – JUNE 30, 2022
COMPLIANCE PROGRESS:	COMPLIANCE PROGRESS:	COMPLIANCE PROGRESS:
Not Applicable	None	None

Training: ¶287

287. *Pursuant to its Training Plan, CPD will develop and implement a process that provides for the collection, analysis, and review of course and instructor evaluations to document the effectiveness of existing training and to improve the quality of future instruction and curriculum. This process will include member feedback on the training they have received and analysis of the extent to which such training is reflected in how members perform. The Education and Training Division will consider this information in conducting its annual needs assessment.*

Compliance Progress (Reporting Period: January 1, 2022, through June 30, 2022)

Preliminary:	***Not in Compliance***
Secondary:	***Not in Compliance***
Full:	***Not Yet Assessed***

The City and the CPD did not achieve any level of compliance with the requirements of ¶287 during this reporting period.

To evaluate Preliminary compliance with ¶287, we reviewed the City's and the CPD's relevant policies and documents following the process described in the Consent Decree (¶¶626–41), which outlines applicable consultation, resolution, workout, and public comment periods. To evaluate Secondary compliance with this paragraph, we reviewed data to determine whether the annual *Training Plan* or related policies require the CPD to develop and implement a process for collection, analysis, and review of course and instructor training evaluations, including officer feedback and an analysis of the extent to which such training is reflected in how officers perform and how this information will be used in the annual *Needs Assessment*. The IMT also sought to verify sufficient attendance records (*i.e.*, 95% of relevant personnel), including hours attended. Where applicable, we assessed whether the City and the CPD have created the requisite positions and staffed those positions with qualified personnel in order to achieve the requirements of this paragraph.

Progress before the Sixth Reporting Period

During the previous reporting period, the IMT assessed compliance by reviewing the *2021 Training Plan* and current and draft Training Directives S11-10 (*Department Training Records Maintenance Program*), S11-10-01 (*Training Notification and Attendance Responsibilities*) and S11-11 (*Training Oversight Committee*). We found that these plans and directives attempted to include the language required in this paragraph, but lacked documentation containing the requisite language. We

determined that the City and the CPD had not yet achieved Preliminary compliance. We noted that supporting documentation with the necessary language would be necessary to demonstrate Preliminary compliance.

Progress in the Sixth Reporting Period

The City and the CPD did not submit any data to establish any level of compliance during this reporting period.

***

The City and the CPD did not achieve any level of compliance during this reporting period. Looking forward, Preliminary compliance requires the City and the CPD to develop and implement a process for collection, analysis, and review of course and instructor training evaluation, including officer feedback and analysis of the extent to which such training is reflected in how officers perform and how this information will be used in the annual *Needs Assessment*.

To achieve Secondary compliance, the City and the CPD must demonstrate that they have implemented a process for course and instructor training evaluations, including officer feedback and analysis of the extent to which such training is reflected in how officers perform. This information must then used in the annual training *Needs Assessment* to determine whether the CPD has demonstrated that training is having the intended impact.

Full compliance may be achieved when policies, lesson plans, training plans, training schedules, and evaluation instruments are components of a sustained evaluation process that meets the requirements of this paragraph.

Paragraph 287 Compliance Progress History

FIRST REPORTING PERIOD	SECOND REPORTING PERIOD	THIRD REPORTING PERIOD
SEPTEMBER 1, 2019 – AUGUST 31, 2019	SEPTEMBER 1, 2019 – FEBRUARY 29, 2020	MARCH 1, 2020 – DECEMBER 31, 2020
COMPLIANCE PROGRESS:	COMPLIANCE PROGRESS:	COMPLIANCE PROGRESS:
Not Applicable	Not Applicable	None

FOURTH REPORTING PERIOD	FIFTH REPORTING PERIOD	SIXTH REPORTING PERIOD
JANUARY 1, 2021 – JUNE 30, 2021	JULY 1, 2021 – DECEMBER 31, 2021	JANUARY 1, 2022 – JUNE 30, 2022
COMPLIANCE PROGRESS:	COMPLIANCE PROGRESS:	COMPLIANCE PROGRESS:
None	None	None

Training: ¶288

> ***288.*** *The Education and Training Division will develop and implement a process to maintain audits, reviews, assessments, or evaluations of the sufficiency or effectiveness of the training programs.*

Compliance Progress (Reporting Period: January 1, 2022, through June 30, 2022)

Preliminary:	***Not in Compliance***
Secondary:	***Not Yet Assessed***
Full:	***Not Yet Assessed***

The City and the CPD did not achieve any level of compliance with the requirements of ¶288 during this reporting period.

To evaluate Preliminary compliance with ¶288, we reviewed the City's and the CPD's relevant policies and documents following the process described in the Consent Decree (¶¶626–41), which outlines applicable consultation, resolution, workout, and public comment periods. To evaluate Secondary compliance with this paragraph, we will need to review data to determine whether the Education and Training Division has developed and implemented a process to maintain audits, reviews, assessments, or evaluations of the sufficiency or effectiveness of the CPD's training program. The IMT will also seek to verify sufficient attendance records (*i.e.*, 95% of relevant personnel), including hours attended. Where applicable, we will assess whether the City and the CPD have created the requisite positions and staffed those positions with qualified personnel in order to achieve the requirements of this paragraph.

Progress before the Sixth Reporting Period

During the previous reporting period, the City and the CPD did not seek Preliminary compliance for this paragraph. The City indicated that the CPD intended to work towards integrating the requirements of this paragraph into policy during the sixth reporting period.

Progress in the Sixth Reporting Period

The City and the CPD did not submit any data to establish any level of compliance during this reporting period.

***

The City and the CPD did not achieve any level of compliance during this reporting period. Looking forward, Preliminary compliance requires The City and the CPD to develop and implement plans and controlling policies for Education and Training

Division to develop and implement a process to maintain audits, reviews, assessments, or evaluations of the sufficiency or effectiveness of the CPD's training programs.

To achieve Secondary compliance, the City and the CPD must demonstrate that they have established a process to maintain audits, reviews, assessments, or evaluations of the sufficiency or effectiveness of the training programs.

Full compliance may be achieved when the Education and Training Division has fully developed and implemented a process to maintain audits, reviews, assessments, or evaluations of the sufficiency or effectiveness of the CPD's training programs.

Paragraph 288 Compliance Progress History

FIRST REPORTING PERIOD	SECOND REPORTING PERIOD	THIRD REPORTING PERIOD
SEPTEMBER 1, 2019 – AUGUST 31, 2019	SEPTEMBER 1, 2019 – FEBRUARY 29, 2020	MARCH 1, 2020 – DECEMBER 31, 2020
COMPLIANCE PROGRESS:	COMPLIANCE PROGRESS:	COMPLIANCE PROGRESS:
Not Applicable	Not Applicable	Not Applicable
FOURTH REPORTING PERIOD	**FIFTH REPORTING PERIOD**	**SIXTH REPORTING PERIOD**
JANUARY 1, 2021 – JUNE 30, 2021	JULY 1, 2021 – DECEMBER 31, 2021	JANUARY 1, 2022 – JUNE 30, 2022
COMPLIANCE PROGRESS:	COMPLIANCE PROGRESS:	COMPLIANCE PROGRESS:
None	None	None

Training: ¶289

289. *CPD will develop and implement testing policies and procedures to ensure that any member testing that is administered is reliable and fair. To achieve this purpose, both knowledge-based and performance-based tests will be designed, developed, administered, and scored according to best practices. All tests will assess the knowledge and skills required for successful job performance and will align with the materials delivered in training.*

Compliance Progress

(Reporting Period: January 1, 2022, through June 30, 2022)

Preliminary:	***In Compliance*** **(FIFTH REPORTING PERIOD)**
Secondary:	***Not in Compliance***
Full:	***Not yet Assessed***

The City and the CPD maintained Preliminary compliance with ¶289 during this reporting period.

To evaluate Preliminary compliance with ¶289, we reviewed the City's and the CPD's relevant policies and documents following the process described in the Consent Decree (¶¶626–41), which outlines applicable consultation, resolution, workout, and public comment periods. To evaluate Secondary compliance with this paragraph, we reviewed data to determine whether the CPD has developed testing policies and procedures consistent with the requirements of this paragraph. The IMT also sought to determine if the CPD has established a process to ensure that testing that is administered is reliable and fair and uses both knowledge-based and performance-based tests that are designed, developed, administered, and scored according to best practices. The IMT further sought to determine that all tests are designed to assess the knowledge and skills required for successful job performance and align with the materials delivered in trainings. Where applicable, we assessed whether the City and the CPD have created the requisite positions and staffed those positions with qualified personnel in order to achieve the requirements of this paragraph.

Progress before the Sixth Reporting Period

During the previous reporting period, the IMT assessed compliance by reviewing Training Directive S11-10 (*Department Training Records Maintenance*) and found that the City and the CPD achieved Preliminary compliance. We noted that Secondary compliance may be achieved once the CPD implements a process to ensure testing is reliable and fair and uses both knowledge-based and performance-based tests according to best practices.

Progress in the Sixth Reporting Period

To demonstrate compliance with ¶289, this reporting period the CPD submitted BIA eLearning materials, including draft eLearning materials and a pre-and post-test. These documents alone do not demonstrate that CPD has established a process to ensure that testing that is administered is reliable and fair, and uses both knowledge based and performance-based tests that are designed, developed, administered, and scored according to best practices.

***

The City and the CPD maintained Preliminary compliance during this reporting period. Looking forward, Secondary compliance may be achieved after the CPD has established a process to ensure that testing that is administered is reliable and fair, and uses both knowledge-based and performance-based tests that are designed, developed, administered, and scored according to best practices. All tests are designed to assess the knowledge and skills required for successful job performance and align with materials developed in training. Assessment sources include policy, procedure, plans and processes, and testing materials.

Full compliance may be demonstrated when the CPD implements testing policies and procedures that are reliable and fair and use both knowledge-based and performance-based tests that are designed, developed, administered, and scored according to best practices, and when the CPD demonstrates that all tests assess the knowledge and skills required for successful job performance and align with the materials delivered in training.

Paragraph 289 Compliance Progress History

FIRST REPORTING PERIOD	SECOND REPORTING PERIOD	THIRD REPORTING PERIOD
SEPTEMBER 1, 2019 – AUGUST 31, 2019	SEPTEMBER 1, 2019 – FEBRUARY 29, 2020	MARCH 1, 2020 – DECEMBER 31, 2020
COMPLIANCE PROGRESS:	COMPLIANCE PROGRESS:	COMPLIANCE PROGRESS:
Not Applicable	Not Applicable	Not Applicable
FOURTH REPORTING PERIOD	**FIFTH REPORTING PERIOD**	**SIXTH REPORTING PERIOD**
JANUARY 1, 2021 – JUNE 30, 2021	JULY 1, 2021 – DECEMBER 31, 2021	JANUARY 1, 2022 – JUNE 30, 2022
COMPLIANCE PROGRESS:	COMPLIANCE PROGRESS:	COMPLIANCE PROGRESS:
None	Preliminary	Preliminary

Training: ¶290

290. *CPD will develop, implement, and utilize a centralized electronic file system for assessing the content and delivery of all CPD training, including training provided by outside instructors or non-CPD entities. This system will allow the Education and Training Division to electronically track and maintain complete and accurate records of all training provided to CPD members, including curricula, lesson plans, training delivered, member feedback, assessments, and other training materials. This system will, at a minimum: a. maintain training records for each member of the Department; b. record the course description, duration, curriculum, date, location, and the members who completed the training; and c. identify members who did not complete required training and describe remedial training actions that were taken.*

Compliance Progress

(Reporting Period: January 1, 2022, through June 30, 2022)

Preliminary:	***Not in Compliance***
Secondary:	***Not Yet Assessed***
Full:	***Not Yet Assessed***

The City and the CPD did not achieve any level of compliance with the requirements of this paragraph during this reporting period.

To evaluate Preliminary compliance with ¶290, we reviewed the City's and the CPD's relevant policies and documents following the process described in the Consent Decree (¶¶626–41), which outlines applicable consultation, resolution, workout, and public comment periods. To evaluate Secondary compliance with this paragraph, we will need to review data to determine whether the City and the CPD have established a process to implement an electronic file system in accordance with the requirements of this paragraph. The IMT will also seek to verify sufficient attendance records (*i.e.*, 95% of relevant personnel), including hours attended. Where applicable, we will assess whether the City and the CPD have created the requisite positions and staffed those positions with qualified personnel in order to achieve the requirements of this paragraph.

Progress before the Sixth Reporting Period

During the previous reporting period, the City and the CPD did not provide any production demonstrating compliance, and we found that the City and the CPD did not achieve any level of compliance with this paragraph. The City indicated that the CPD intended to work towards Preliminary compliance during the sixth reporting period by memorializing the requirements of this paragraph into policy.

Progress in the Sixth Reporting Period

The City and the CPD did not submit any data to establish any level of compliance during this reporting period.

***

The City and the CPD did not achieve any level of compliance with this paragraph during this reporting period. Looking forward, achieving Secondary compliance will require the CPD to establish an "electronic file system" in accordance with the requirements of this paragraph. Assessment sources would include policies, procedures, plans and processes, and demonstrations of system operations.

Paragraph 290 Compliance Progress History

FIRST REPORTING PERIOD	SECOND REPORTING PERIOD	THIRD REPORTING PERIOD
SEPTEMBER 1, 2019 – AUGUST 31, 2019	SEPTEMBER 1, 2019 – FEBRUARY 29, 2020	MARCH 1, 2020 – DECEMBER 31, 2020
COMPLIANCE PROGRESS:	COMPLIANCE PROGRESS:	COMPLIANCE PROGRESS:
Not Applicable	Not Applicable	Not Applicable
FOURTH REPORTING PERIOD	**FIFTH REPORTING PERIOD**	**SIXTH REPORTING PERIOD**
JANUARY 1, 2021 – JUNE 30, 2021	JULY 1, 2021 – DECEMBER 31, 2021	JANUARY 1, 2022 – JUNE 30, 2022
COMPLIANCE PROGRESS:	COMPLIANCE PROGRESS:	COMPLIANCE PROGRESS:
None	None	None

Training: ¶291

> ***291.*** *The Education and Training Division will document all training provided to or received by CPD members, whether required or not. Members will sign an acknowledgement of attendance or digitally acknowledge completion of training.*

Compliance Progress

(Reporting Period: January 1, 2022, through June 30, 2022)

Preliminary:	***In Compliance*** **(NEW)**
Secondary:	***Not Yet Assessed***
Full:	***Not Yet Assessed***

The City and the CPD achieved Preliminary compliance with the requirements of ¶291 during this reporting period.

To evaluate Preliminary compliance with ¶291, we reviewed the City's and the CPD's relevant policies and documents following the process described in the Consent Decree (¶¶626–41), which outlines applicable consultation, resolution, workout, and public comment periods. To evaluate Secondary compliance with this paragraph, we will need to review data to determine whether the City and the CPD have sufficiently established a process to document all CPD trainings. Assessment sources would include policy, procedure, and training records. The IMT will also seek to verify sufficient attendance records (*i.e.*, 95% of relevant personnel), including hours attended. Where applicable, we will assess whether the City and the CPD have created the requisite positions and staffed those positions with qualified personnel in order to achieve the requirements of this paragraph.

Progress before the Sixth Reporting Period

During the previous reporting period, the IMT assessed compliance by reviewing the submitted Training Directives S11-10 (*Department Training Records Maintenance*) and S11-11 (*Training Oversight Committee*) and found that the City and the CPD did not maintain Preliminary compliance with the requirements of this paragraph because they did not submit any documents or data to establish its compliance during the prior reporting period.

Progress in the Sixth Reporting Period

To demonstrate compliance with ¶291, this reporting period the City and the CPD submitted a cover letter seeking to clarify its position that the Training Directives S11-10 (*Department Training Records Maintenance*), S11-01 (*Recruit Training*), S11-10-02 (*Pre-Service Training*), and S11-10-03 (*In-Service Training*) previously produced on December 29, 2021 support Preliminary compliance with the requirements of this paragraph. Additionally, the IMT reviewed Employee Resource E05-04 (*Merit Board*), E05-04-01 (*Academic Selection Board*), and E02-07 (*Travel,*

Department-Funded Training, and Reimbursement Guidelines). S11-10 § III(A), and §§ VII(B) & (C) provide the requisite language for Preliminary compliance.

***

The City and the CPD achieved Preliminary compliance during this reporting period. Looking forward, the CPD may achieve Secondary compliance when it demonstrates that it has sufficiently established a process to document all CPD trainings. Assessment sources would include policy, procedure, training records, and training attendance records.

Paragraph 291 Compliance Progress History

FIRST REPORTING PERIOD	SECOND REPORTING PERIOD	THIRD REPORTING PERIOD
SEPTEMBER 1, 2019 – AUGUST 31, 2019	SEPTEMBER 1, 2019 – FEBRUARY 29, 2020	MARCH 1, 2020 – DECEMBER 31, 2020
COMPLIANCE PROGRESS:	COMPLIANCE PROGRESS:	COMPLIANCE PROGRESS:
Not Applicable	Not Applicable	Not Applicable
FOURTH REPORTING PERIOD	**FIFTH REPORTING PERIOD**	**SIXTH REPORTING PERIOD**
JANUARY 1, 2021 – JUNE 30, 2021	JULY 1, 2021 – DECEMBER 31, 2021	JANUARY 1, 2022 – JUNE 30, 2022
COMPLIANCE PROGRESS:	COMPLIANCE PROGRESS:	COMPLIANCE PROGRESS:
Preliminary	None	Preliminary

Training: ¶292

***292**. The Education and Training Division will, on an annual basis, report on training to the TOC and the Superintendent. At a minimum, this report will: a. contain a description of each course, including a summary of the subject matter; b. state the duration, date, location, and number of persons by rank who completed the training; c. identify whether the training was part of the recruit, in-service, or pre-service promotional training program; d. state whether the training was centralized or decentralized, and delivered in person or through electronic means; e. list whether the training was mandatory, elective, or remedial; and f. document the members who did not complete required training and any remedial training actions taken.*

Compliance Progress

(Reporting Period: January 1, 2022, through June 30, 2022)

Recurring Schedule: Annually ☑ **Not Yet Applicable**

Preliminary: ***In Compliance*** **(FIFTH REPORTING PERIOD)**
Secondary: ***Not in Compliance***
Full: ***Not Yet Assessed***

The City and the CPD maintained Preliminary compliance with the requirements of ¶292 during this reporting period.

To evaluate Preliminary compliance with ¶292, we reviewed the City's and the CPD's relevant policies and documents following the process described in the Consent Decree (¶¶626–41), which outlines applicable consultation, resolution, workout, and public comment periods. To evaluate Secondary compliance with this paragraph, we reviewed data to determine whether the City and the CPD have implemented a policy requiring an annual report on training and provided the annual report, as required. The IMT also sought to verify sufficient attendance records (*i.e.*, 95% of relevant personnel), including hours attended. Where applicable, we assessed whether the City and the CPD have created the requisite positions and staffed those positions with qualified personnel in order to achieve the requirements of this paragraph.

Progress in the Sixth Reporting Period

During the previous reporting period, the IMT reviewed the *2022 Training Plan* and Training Directive S11-10-01 (*Training Notification and Attendance Responsibilities*) and found that the City and the CPD achieved Preliminary compliance.

Progress in the Sixth Reporting Period

To demonstrate compliance with ¶292, this reporting period the City and the CPD submitted the *2021 Annual Training Report* (March 2022) and related materials, including a PowerPoint presentation regarding the *2021 Annual Training Report* presented to the Training Oversight Committee at the March 23, 2022 Training Oversight Committee meeting and Training Oversight Committee meeting minutes.

A submission consistent with ¶292(f) requirements could not be identified in review of the documents produced. The IMT recognizes that the CPD has been working on an In-Service Training Deviation Dashboard that may ultimately, in part, address this requirement, but its applicability is limited to In-Service Training and has not yet achieved No Objection status. All other ¶292 Secondary compliance requirements appear to be met. Secondary compliance fails because of the ¶292(f) requirement.

***

The City and the CPD maintained Preliminary compliance during this reporting period. Looking forward, Secondary compliance may be achieved when the CPD provides the annual report and ¶292(a–f) criteria are met in the report. Full compliance may be achieved after the CPD has sustained the annual report on training, as required.

Paragraph 292 Compliance Progress History

FIRST REPORTING PERIOD	SECOND REPORTING PERIOD	THIRD REPORTING PERIOD
SEPTEMBER 1, 2019 – AUGUST 31, 2019	SEPTEMBER 1, 2019 – FEBRUARY 29, 2020	MARCH 1, 2020 – DECEMBER 31, 2020
COMPLIANCE PROGRESS:	COMPLIANCE PROGRESS:	COMPLIANCE PROGRESS:
Not Applicable	Not Applicable	None

FOURTH REPORTING PERIOD	FIFTH REPORTING PERIOD	SIXTH REPORTING PERIOD
JANUARY 1, 2021 – JUNE 30, 2021	JULY 1, 2021 – DECEMBER 31, 2021	JANUARY 1, 2022 – JUNE 30, 2022
COMPLIANCE PROGRESS:	COMPLIANCE PROGRESS:	COMPLIANCE PROGRESS:
None	Preliminary	Preliminary

Training: ¶294

294. *CPD will ensure that upon graduation from the Academy, recruits demonstrate a firm grasp of the basic technical and tactical skills, critical thinking, problem-solving, and interpersonal skills that form the basis for safe and effective policing. In order to do so, CPD will rely on appropriate evaluation tools to measure recruits' skills and qualifications.*

Compliance Progress

(Reporting Period: January 1, 2022, through June 30, 2022)

Preliminary:	***Not in Compliance***
Secondary:	***Not in Compliance***
Full:	***Not Yet Assessed***

The City and the CPD failed to achieve any level of compliance with the requirements of ¶294 during this reporting period.

To evaluate Preliminary compliance with ¶294, we reviewed the City's and the CPD's relevant policies and documents following the process described in the Consent Decree (¶¶626–41), which outlines applicable consultation, resolution, workout, and public comment periods. To evaluate Secondary compliance with this paragraph, we reviewed data to determine whether the CPD has a policy that requires recruits to demonstrate the requirements of this paragraph. Such policy should also fully align with the CPD's training goals generally.

Progress before the Sixth Reporting Period

During the previous reporting period, the City and the CPD did not submit any documents to demonstrate compliance with the requirements of this paragraph. During the fourth reporting period, we determined that the CPD had written the recruit requirements of this paragraph into policy, but we noted that for continued Preliminary compliance, the CPD would need to demonstrate the validity of the recruit evaluation tools. As the CPD did not provide any data of such validity during the last reporting period, we determined that the CPD had lost Preliminary compliance. The City indicated that the CPD planned to work towards Secondary compliance during the sixth reporting period.

Progress in the Sixth Reporting Period

The IMT did not identify any data submitted by the City and the CPD to establish compliance with ¶294.

***

The City and the CPD failed to achieve any level of compliance during this reporting period. Looking forward, Preliminary compliance requires the CPD to have a policy that requires recruits to demonstrate the requirements of this paragraph and that also fully aligns with the training goals of this paragraph. Secondary compliance requires the CPD to have developed and use tools designed to measure recruits' grasp of the basic technical and tactical skills, critical thinking, problem-solving, and interpersonal skills that form the basis for safe and effective policing. To do so, the CPD must rely on appropriate evaluation tools to measure recruits' skills and qualifications upon graduation from the Academy.

Paragraph 294 Compliance Progress History

FIRST REPORTING PERIOD	SECOND REPORTING PERIOD	THIRD REPORTING PERIOD
SEPTEMBER 1, 2019 – AUGUST 31, 2019	SEPTEMBER 1, 2019 – FEBRUARY 29, 2020	MARCH 1, 2020 – DECEMBER 31, 2020
COMPLIANCE PROGRESS:	COMPLIANCE PROGRESS:	COMPLIANCE PROGRESS:
Not Applicable	Not Applicable	None
FOURTH REPORTING PERIOD	**FIFTH REPORTING PERIOD**	**SIXTH REPORTING PERIOD**
JANUARY 1, 2021 – JUNE 30, 2021	JULY 1, 2021 – DECEMBER 31, 2021	JANUARY 1, 2022 – JUNE 30, 2022
COMPLIANCE PROGRESS:	COMPLIANCE PROGRESS:	COMPLIANCE PROGRESS:
Preliminary	None	None

Training: ¶295

295. *The Parties acknowledge that CPD, through its Recruit Curriculum Working Group, revised and updated the content and delivery of its recruit training curriculum in 2017. CPD will further modify the amount, content, and delivery of its recruit training to comport with its Training Plan and the requirements and goals of this Agreement.*

Compliance Progress (Reporting Period: January 1, 2022, through June 30, 2022)

Preliminary:	***In Compliance*** **(FIFTH REPORTING PERIOD)**
Secondary:	***Not Yet Assessed***
Full:	***Not Yet Assessed***

The City and the CPD maintained Preliminary compliance with these requirements during this reporting period.

To evaluate Preliminary compliance with ¶295, we reviewed the City's and the CPD's relevant policies and documents following the process described in the Consent Decree (¶¶626–41), which outlines applicable consultation, resolution, workout, and public comment periods. To evaluate Secondary compliance with this paragraph, we will need to review data to determine whether the CPD has policy, plans, and processes for modifying recruit training in accordance with this paragraph. The IMT will also seek to verify sufficient attendance records (*i.e.*, 95% of relevant personnel), including hours attended.

Progress before the Sixth Reporting Period

During the previous reporting period, the IMT assessed compliance by reviewing the *2022 Training Plan* and Training Directive S11-11-01 (*Training Notification and Attendance Responsibilities*) and found that the City and the CPD achieved Preliminary compliance. We noted that Secondary compliance would require documents to demonstrate the implementation of a verifiable process to modify recruit training.

Progress in the Sixth Reporting Period

Training Directive S11-10-01 (*Training Notification and Attendance Responsibilities*) produced in the prior reporting period continues to support Preliminary compliance.

During this reporting period, the IMT reviewed the Annual Training Report, Training Oversight Committee Minutes (23 Mar 22), Annual Training Report presentation, and a To-From from First Deputy to the Superintendent. The Training Oversight Committee Minutes indicate the Annual Training Report was delivered to the

Training Oversight Committee on March 23, 2022 and the To-From from the First Deputy to the Superintendent indicates the Annual Training Report was delivered on April 20, 2021. More information is needed to resolve this date conflict. Neither the Annual Training Report nor any other document produced indicates modifications to the amount, content, and delivery of recruit training to comport with the *Training Plan*. The materials identify differences between the basic state curriculum and the CPD Academy training requirements, but do not provide any information regarding year-to-year changes to the CPD recruit training itself.

***

The City and the CPD maintained Preliminary compliance during this reporting period. Looking forward, Secondary compliance requires the CPD to have established a verifiable process to modify recruit training. Full compliance requires the CPD to have sufficiently modified recruit training to align with the requirements of its *Training Plan* and ¶295.

Paragraph 294 Compliance Progress History

FIRST REPORTING PERIOD	SECOND REPORTING PERIOD	THIRD REPORTING PERIOD
SEPTEMBER 1, 2019 – AUGUST 31, 2019	SEPTEMBER 1, 2019 – FEBRUARY 29, 2020	MARCH 1, 2020 – DECEMBER 31, 2020
COMPLIANCE PROGRESS:	COMPLIANCE PROGRESS:	COMPLIANCE PROGRESS:
Not Applicable	Not Applicable	Not Applicable
FOURTH REPORTING PERIOD	**FIFTH REPORTING PERIOD**	**SIXTH REPORTING PERIOD**
JANUARY 1, 2021 – JUNE 30, 2021	JULY 1, 2021 – DECEMBER 31, 2021	JANUARY 1, 2022 – JUNE 30, 2022
COMPLIANCE PROGRESS:	COMPLIANCE PROGRESS:	COMPLIANCE PROGRESS:
None	Preliminary	Preliminary

Training: ¶296

296. *CPD will ensure that the Academy is sufficiently staffed to effectively train recruits. CPD will further ensure that, except in extraordinary circumstances, courses are scheduled with sufficient advance time for instructors to be notified of the class and to properly prepare and deliver quality instruction.*

Compliance Progress

(Reporting Period: January 1, 2022, through June 30, 2022)

Preliminary:	***In Compliance* (FIFTH REPORTING PERIOD)**
Secondary:	***Not in Compliance***
Full:	***Not Yet Assessed***

The City and CPD maintained Preliminary compliance with the requirements of ¶296 during this reporting period.

To evaluate Preliminary compliance with ¶296, we reviewed the City's and the CPD's relevant policies and documents following the process described in the Consent Decree (¶¶626–41), which outlines applicable consultation, resolution, workout, and public comment periods. To evaluate Secondary compliance with this paragraph, we reviewed data to determine whether the City and the CPD have effective policies and plans for ensuring adequate staffing levels in the Academy. We further sought to review data to determine whether the City and the CPD have developed training plans and curriculum and delivered that training to the relevant personnel during the necessary intervals. Our review requires the CPD to provide data reflecting sufficient attendance records (*i.e.*, 95% of relevant personnel), including hours attended. Where applicable, we assessed whether the City and the CPD have created the requisite positions and staffed those positions with qualified personnel in order to achieve the requirements of this paragraph.

Progress before the Sixth Reporting Period

During the previous reporting period, the IMT assessed compliance by reviewing policy, procedure, processes, staffing levels, training schedules, and materials for instructors. We found that the City and the CPD achieved Preliminary compliance, as evidenced by the language included in Training Directive S11-10-01 (*Training Notification and Attendance Responsibilities*). We noted that Secondary compliance may be achieved by demonstrating an implemented process to ensure adequate Academy staffing levels.

Progress in the Sixth Reporting Period

The City and the CPD did not submit any data to establish any level of compliance during this reporting period. However, Training Directive S11-10-01 (*Training Notification and Attendance Responsibilities*) produced in the prior reporting period continues to support Preliminary compliance.

The IMT participated in a site visit to the Academy occurring over multiple days in June 2022. We spoke with and observed staff officers who the CPD deployed to other CPD assignments to the detriment of being able to fully focus on meeting the training objectives of the CPD. Academy personnel in some cases had worked more than three consecutive weeks without a day off. Training staff must be able to plan, implement, train, evaluate, remediate, and modify trainings. The Training mission cannot be adequately met without investing in and maintaining the requisite staffing resources.

***

The City and the CPD maintained Preliminary compliance during this reporting period. Looking forward, Secondary compliance requires the CPD to establish a process to ensure adequate Academy staffing levels. Full compliance can be achieved if policy, procedure, processes, staffing levels, training schedules, materials for instructors, communication/notification, and other materials are submitted to demonstrate that the CPD maintains sufficient Academy staffing levels and that courses are scheduled with sufficient advance time in accordance with ¶296 requirements.

Paragraph 296 Compliance Progress History

FIRST REPORTING PERIOD	SECOND REPORTING PERIOD	THIRD REPORTING PERIOD
SEPTEMBER 1, 2019 – AUGUST 31, 2019	SEPTEMBER 1, 2019 – FEBRUARY 29, 2020	MARCH 1, 2020 – DECEMBER 31, 2020
COMPLIANCE PROGRESS:	COMPLIANCE PROGRESS:	COMPLIANCE PROGRESS:
Not Applicable	Not Applicable	Not Applicable
FOURTH REPORTING PERIOD	**FIFTH REPORTING PERIOD**	**SIXTH REPORTING PERIOD**
JANUARY 1, 2021 – JUNE 30, 2021	JULY 1, 2021 – DECEMBER 31, 2021	JANUARY 1, 2022 – JUNE 30, 2022
COMPLIANCE PROGRESS:	COMPLIANCE PROGRESS:	COMPLIANCE PROGRESS:
None	Preliminary	Preliminary

Training: ¶297

297. *CPD will require end-of-course training evaluations of recruits that ensure they graduate with the requisite knowledge and skills to engage in policing activities safely, effectively, and lawfully.*

Compliance Progress

(Reporting Period: January 1, 2022, through June 30, 2022)

Preliminary:	***In Compliance*** **(FIFTH REPORTING PERIOD)**
Secondary:	***Not Yet Assessed***
Full:	***Not Yet Assessed***

The City and the CPD maintained Preliminary compliance with these requirements during this reporting period.

To evaluate Preliminary compliance with ¶297, we reviewed the City's and the CPD's relevant policies and documents following the process described in the Consent Decree (¶¶626–41), which outlines applicable consultation, resolution, workout, and public comment periods. To evaluate Secondary compliance with this paragraph, we will need to review data to determine whether the City and the CPD are constructing and administering a validated end-of-course knowledge and skills evaluation to ensure recruits can police safely, effectively, and lawfully.

Progress before the Sixth Reporting Period

During the previous reporting period, the IMT assessed compliance by reviewing Training Directive S11-10-01 (*Training Notification and Attendance Responsibilities*). We determined that the City and the CPD achieved Preliminary compliance by incorporating the requirements of this paragraph into policy. We noted that Secondary compliance requires constructing and administering a validated end-of-course knowledge and skills evaluation to ensure recruits can police safely, effectively, and lawfully.

Progress in the Sixth Reporting Period

The City and the CPD did not submit any data to establish any level of compliance during this reporting period. However, Training Directive S11-10-01 (*Training Notification and Attendance Responsibilities*) produced in the prior reporting period continues to support Preliminary compliance.

***

The City and the CPD maintained Preliminary compliance during this reporting period. Looking forward, Secondary compliance requires constructing and administering a validated end-of-course knowledge and skills evaluation to ensure recruits

can police safely, effectively, and lawfully. Full compliance can be achieved when end-of-course evaluations demonstrate efficacy in identifying recruits with the requisite knowledge and skills to engage in policing activities.

Paragraph 297 Compliance Progress History

FIRST REPORTING PERIOD SEPTEMBER 1, 2019 – AUGUST 31, 2019	SECOND REPORTING PERIOD SEPTEMBER 1, 2019 – FEBRUARY 29, 2020	THIRD REPORTING PERIOD MARCH 1, 2020 – DECEMBER 31, 2020
COMPLIANCE PROGRESS: Not Applicable	COMPLIANCE PROGRESS: Not Applicable	COMPLIANCE PROGRESS: Status Update
FOURTH REPORTING PERIOD JANUARY 1, 2021 – JUNE 30, 2021	**FIFTH REPORTING PERIOD** JULY 1, 2021 – DECEMBER 31, 2021	**SIXTH REPORTING PERIOD** JANUARY 1, 2022 – JUNE 30, 2022
COMPLIANCE PROGRESS: None	COMPLIANCE PROGRESS: Preliminary	COMPLIANCE PROGRESS: Preliminary

Training: ¶298

298. *An effective field training program is necessary for reinforcing the policies, practices, and skills taught in recruit training and instilling in new police officers the principles of safe, effective, and lawful policing that will guide them throughout their careers. CPD will sufficiently staff, supervise, and manage its field training program ("Field Training and Evaluation Program") to train and evaluate new officers in the necessary skills required to deescalate or use force in accordance with the sanctity of life, the law, CPD policy, and this Agreement.*

Compliance Progress (Reporting Period: January 1, 2022, through June 30, 2022)

Preliminary:	***In Compliance*** **(NEW)**
Secondary:	***Not Yet Assessed***
Full:	***Not Yet Assessed***

The City and the CPD achieved Preliminary compliance with the requirements of ¶298 during this reporting period.

To evaluate Preliminary compliance with ¶298, we reviewed the City's and the CPD's relevant policies and documents following the process described in the Consent Decree (¶¶626–41), which outlines applicable consultation, resolution, workout, and public comment periods. To evaluate Secondary compliance with this paragraph, we will need to review data to determine whether the City and the CPD have developed acceptable policies, procedures, and plans to sufficiently staff, supervise, and manage its field training program according to requirements of ¶298. "Sufficiently staff" must also be clearly defined by objective criteria.

Progress before the Sixth Reporting Period

During the previous reporting period, the IMT assessed compliance by reviewing Training Directive S11-02 (*Field Training and Evaluation Program*), and found that the City and the CPD maintained Preliminary compliance. No other documents were produced to demonstrate Secondary compliance, which involves the implementation of a process to review and revise the Field Training and Evaluation Program (also known as the FTEP) as necessary.

Progress in the Sixth Reporting Period

To demonstrate compliance with ¶298, this reporting period the CPD submitted a revised version of S11-02, *Field Training and Evaluation Program* (May and June 2022), including a Comments Matrix showing changes to the prior version of S11-02 produced in the last reporting period and the CPD's responses to comments offered by the IMT. The finalized policy along with finalized revisions to S11-02-01

(*Field Training and Evaluation Review Board*) were issued effective June 30, 2022 and produced July 2, 2022.

Section II(A) declares the "primary objective of the FTEP is to:

1. Ensure that all Probationary Police Officers (also known as PPOs) receive effective field training, predicated upon staffing the Field Training Officer (also known as the FTO) position with qualified officers.

2. Instill the guiding principles of safety and lawful policing that will sustain Probationary Police Officers throughout their career.

3. Ensure through proper training and evaluation that only competent, motivated, and ethical individuals become Chicago police officers."

Section VI, *Administration*, declares "The FTEP will be administered through a partnership between the Training and Support Group and the Bureau of Patrol to ensure the FTEP program is sufficiently staffed, supervised, and able to provide proper management for the FTEP program. Evaluation will be a two-part process administered by the Training and Support Group and the Bureau of Patrol."

Section III, *Definitions*, acknowledges the Probationary Police Officers progression through the Field Training and Evaluation Program should bridge "the knowledge and skills learned in the academic phase and the practical application in the field to merit consideration to work with officers who are not Field Training Officers."

The ¶298 terminology—"…to train and evaluate new officers in the necessary skills required to *deescalate or use force in accordance with the sanctity of life…*"—is not included in S11-02. While it may be implied in § II (A)(2), it should be added and very clearly stated in future revisions of S11-02 and S11-02-01. Notwithstanding, the City and the CPD achieved Preliminary compliance.

***

The City and the CPD achieved Preliminary compliance during this reporting period. Looking forward, Secondary compliance may be achieved by the City and the CPD establishing and implementing a process and determining and applying objective applicable formulas to sufficiently staff, supervise, and manage its field training program according to requirements of ¶298.

Paragraph 298 Compliance Progress History

FIRST REPORTING PERIOD	SECOND REPORTING PERIOD	THIRD REPORTING PERIOD
SEPTEMBER 1, 2019 – AUGUST 31, 2019	SEPTEMBER 1, 2019 – FEBRUARY 29, 2020	MARCH 1, 2020 – DECEMBER 31, 2020
COMPLIANCE PROGRESS:	COMPLIANCE PROGRESS:	COMPLIANCE PROGRESS:
Not Applicable	Not Applicable	Not Applicable
FOURTH REPORTING PERIOD	**FIFTH REPORTING PERIOD**	**SIXTH REPORTING PERIOD**
JANUARY 1, 2021 – JUNE 30, 2021	JULY 1, 2021 – DECEMBER 31, 2021	JANUARY 1, 2022 – JUNE 30, 2022
COMPLIANCE PROGRESS:	COMPLIANCE PROGRESS:	COMPLIANCE PROGRESS:
Not Applicable	Not Applicable	Preliminary

Training: ¶299

299. *CPD will revise, as necessary and appropriate, the Field Training and Evaluation Program to comport with CPD's Training Plan and this Agreement.*

Compliance Progress (Reporting Period: January 1, 2022, through June 30, 2022)

Preliminary: ***In Compliance*** **(FOURTH REPORTING PERIOD)**
Secondary: ***Not in Compliance***
Full: ***Not Yet Assessed***

The City and the CPD maintained Preliminary compliance during this reporting period.

To evaluate Preliminary compliance with ¶299, we reviewed the City's and the CPD's relevant policies and documents following the process described in the Consent Decree (¶¶626–41), which outlines applicable consultation, resolution, workout, and public comment periods. To evaluate Secondary compliance with this paragraph, we reviewed data to determine whether CPD policies and plans follow the requirements for Field Training and Evaluation Program operation, and to determine whether the CPD has sufficiently taken steps to follow requirements for Field Training and Evaluation Program operation as required by this paragraph. The IMT also sought to verify sufficient attendance records (*i.e.*, 95% of relevant personnel), including hours attended. Where applicable, we assessed whether the City and the CPD have created the requisite positions and staffed those positions with qualified personnel in order to achieve the requirements of this paragraph.

Progress in the Sixth Reporting Period

During the previous reporting period, the IMT assessed compliance by reviewing Training Directive S11-02 (*Field Training and Evaluation Program*) and found that the City and the CPD maintained Preliminary compliance. No other documents were produced to demonstrate Secondary compliance, which involves the implementation of a process to review and revise the Field Training and Evaluation Program as necessary.

Progress in the Sixth Reporting Period

To demonstrate compliance with ¶298, this reporting period the CPD submitted revised versions of S11-02, *Field Training Evaluation Program* (May and June 2022), including a Comments Matrix showing changes to the prior version of S11-02 produced in the last reporting period and the CPD's responses to comments offered by the IMT. The finalized policy along with finalized revisions to S11-02-01 (Field Training and Evaluation Review Board) were issued effective June 30, 2022, and produced July 2, 2022.

S11-02, VI(F) states, "periodic revisions to the FTEP will be made based on the Department Annual Needs Assessment report, the Department Training Plan, the Annual Training Summary Report, and recommendations from the Training Oversight Committee." Because this language tracks ¶299, CPD meets the requirements for Preliminary compliance. No additional documents were submitted to establish Secondary compliance.

***

The City and the CPD maintained Preliminary compliance during this reporting period. Looking forward, assessing Secondary compliance requires reviewing policy, procedure, plans, and other submissions to determine if the CPD has established a process to review and revise the Field Training and Evaluation Program, as necessary.

Full compliance may be achieved if policy, procedure, plans, training plans, and other field training program documents demonstrate that the CPD has sufficiently and systematically reviewed and revised the Field Training and Evaluation Program in accordance with ¶299 requirements.

Paragraph 299 Compliance Progress History

FIRST REPORTING PERIOD	SECOND REPORTING PERIOD	THIRD REPORTING PERIOD
SEPTEMBER 1, 2019 – AUGUST 31, 2019	SEPTEMBER 1, 2019 – FEBRUARY 29, 2020	MARCH 1, 2020 – DECEMBER 31, 2020
COMPLIANCE PROGRESS:	COMPLIANCE PROGRESS:	COMPLIANCE PROGRESS:
Not Applicable	Not Applicable	Not Applicable
FOURTH REPORTING PERIOD	**FIFTH REPORTING PERIOD**	**SIXTH REPORTING PERIOD**
JANUARY 1, 2021 – JUNE 30, 2021	JULY 1, 2021 – DECEMBER 31, 2021	JANUARY 1, 2022 – JUNE 30, 2022
COMPLIANCE PROGRESS:	COMPLIANCE PROGRESS:	COMPLIANCE PROGRESS:
Preliminary	Preliminary	Preliminary

Training: ¶300

300. *The Field Training and Evaluation Program will follow recruit training and be at least 12 weeks in duration and include at least three training cycles. The Field Training and Evaluation Program will not designate probationary police officers ("PPOs") as "field qualified," as defined by this Agreement, until they have successfully completed the entire program.*

Compliance Progress

(Reporting Period: January 1, 2022, through June 30, 2022)

Preliminary: ***In Compliance*** **(FIFTH REPORTING PERIOD)**
Secondary: ***Not in Compliance***
Full: ***Not yet Assessed***

The City and the CPD maintained Preliminary compliance with the requirements of ¶300 during this reporting period.

To evaluate Preliminary compliance with ¶300, we reviewed the City's and the CPD's relevant policies and documents following the process described in the Consent Decree (¶¶626–41), which outlines applicable consultation, resolution, workout, and public comment periods. To evaluate Secondary compliance with this paragraph, we reviewed data to determine whether the CPD has written the requirements of this paragraph into policy. Policy direction should include guidance on how changes to training curricula will be addressed. Data should further allow the IMT to determine whether the CPD has taken steps to deliver initial and refresher training in an effective manner, including sufficient attendance records (*i.e.*, 95% of relevant personnel), including hours attended. Where applicable, we will assess whether the City and the CPD have created the requisite positions and staffed those positions with qualified personnel in order to achieve the requirements of this paragraph.

Progress before the Sixth Reporting Period

During the previous reporting period, the IMT assessed compliance by reviewing three areas of amended policy in Training Directive S11-02 (*Field Training and Evaluation Program*) and found the City and the CPD achieved Preliminary compliance. Secondary compliance requires substantive documents demonstrating that the CPD has implemented the approved policy, directive, and standard operating procedure reflected in this paragraph. We noted that the IMT will rely on the ADDIE

model of curriculum development as our evaluation standard, including evaluations of student and instructors.[2] We will also consider whether the City and the CPD integrate community input, as applicable.

Progress in the Sixth Reporting Period

To demonstrate compliance with ¶298, this reporting period the CPD submitted revised versions of S11-02, *Field Training and Evaluation Program* (May and June 2022), including a Comments Matrix showing changes to the prior version of S11-02 produced in the last reporting period and the CPD's responses to comments offered by the IMT. The finalized policy along with finalized revisions to S11-02-01 (*Field Training And Evaluation Review Board*) were issued effective June 30, 2022, and produced July 2, 2022.

The IMT reviewed three different areas of amended policy S11-02 to ascertain Preliminary compliance status. S11-02, § III provides the definition of "Field-Qualified." It reads as follows:

> [A]fter the probationary police officer has completed all cycles required under the Field Training and Evaluation program and, in the Field Training Officers experience, the Probationary Police Officer has progress consistently in bridging the knowledge and skills learned in the academic phase and the practical application in the field to merit consideration to work with officers who are not Field Training Officers. A field qualified Probationary Police Officer is still in probationary status and is not allowed to work alone in a 10-99 capacity.

S11-02, § VIII(A)(2) mandates each Probationary Police Officer to complete a minimum of three 28-day cycles. S11-02 § VIII(B)(2)(e), (g), and (h), establishes the evaluative criteria, requires completion of a Cycle Summary Report at the end of a Probationary Police Officer's first and second training cycle, and the completion of a Final Summary Report at the end of a Probationary Police Officer's third training cycle. These three subparagraphs collectively contain the language required to meet Preliminary compliance. Secondary compliance was neither sought nor achieved during this reporting.

***

The City and the CPD maintained Preliminary compliance during this reporting period. Looking forward, to meet Secondary compliance the CPD must demonstrate that it has implemented the approved policy, directive, and standard operating

[2] The IMT evaluates training materials using as our standard the "ADDIE" model of curriculum development and implementation: Analysis, Design, Development, Implementation, and Evaluation.

procedure reflecting training imperatives of this paragraph. A training methodology that includes reviewing the City's, the CPD's, and the other relevant entities' training development, implementation, and evaluation (¶286) also applies to Secondary compliance requirements. The IMT relies upon the ADDIE model of curriculum development and implementation as our evaluation standard, which typically incorporates the following elements: training needs assessment, curriculum design, curriculum development, training implementation (training delivery), and training evaluation.

When applicable, we will also assess whether the City, the CPD, and the other relevant entities adequately sought, received, and incorporated community input and participation. The IMT will also seek to verify sufficient attendance records, including hours attended.

The Field Training and Evaluation Program training records should correspond with policy and procedural requirements.

Paragraph 300 Compliance Progress History

FIRST REPORTING PERIOD SEPTEMBER 1, 2019 – AUGUST 31, 2019 COMPLIANCE PROGRESS: Not Applicable	SECOND REPORTING PERIOD SEPTEMBER 1, 2019 – FEBRUARY 29, 2020 COMPLIANCE PROGRESS: Not Applicable	THIRD REPORTING PERIOD MARCH 1, 2020 – DECEMBER 31, 2020 COMPLIANCE PROGRESS: Not Applicable
FOURTH REPORTING PERIOD JANUARY 1, 2021 – JUNE 30, 2021 COMPLIANCE PROGRESS: None	FIFTH REPORTING PERIOD JULY 1, 2021 – DECEMBER 31, 2021 COMPLIANCE PROGRESS: Preliminary	SIXTH REPORTING PERIOD JANUARY 1, 2022 – JUNE 30, 2022 COMPLIANCE PROGRESS: Preliminary

Training: ¶301

301. *CPD will review and revise as necessary its FTO selection policies and procedures to establish and implement a program that effectively attracts and retains qualified FTOs.*

Compliance Progress (Reporting Period: January 1, 2022, through June 30, 2022)

Preliminary: ***Not in Compliance***
Secondary: ***Not Yet Assessed***
Full: ***Not Yet Assessed***

The City and the CPD did not achieve any level of compliance with these requirements during this reporting period.

To evaluate Preliminary compliance with ¶301, we reviewed the City's and the CPD's relevant policies and documents following the process described in the Consent Decree (¶¶626–41), which outlines applicable consultation, resolution, workout, and public comment periods. To evaluate Secondary compliance with this paragraph, the IMT will review data to determine whether the CPD's policies and plans for reviewing and revising its Field Training Officer selection policies and procedures follow the requirements of ¶301. Where applicable, we assessed whether the City and the CPD have created the requisite positions and staffed those positions with qualified personnel in order to achieve the requirements of this paragraph.

Progress before the Sixth Reporting Period

During the previous reporting period, the IMT assessed compliance for this paragraph for the first time. We reviewed Training Directive S11-02 (*Field Training And Evaluation Program*) and found it to include the requisite language to achieve Preliminary compliance, however it did not prescribe reviewing and revising as necessary the Field Training Officer selection policies and procedures, as mandated by ¶301. As a result, we determined that the City and the CPD had not yet achieved Preliminary compliance.

Progress in the Sixth Reporting Period

The City and the CPD did not submit any data to establish any level of compliance during this reporting period. No sections of S11-02 (*Field Training And Evaluation Program*) or S11-02-01 (*Field Training And Evaluation Review Board*) contain the requisite language for compliance. Therefore, Preliminary compliance is not achieved.

***

The City and the CPD did not achieve any level of compliance during this reporting period. Looking forward, Secondary compliance may be achieved after the City and the CPD have reviewed and revised its Field Training Officer selection policies and procedures and implemented a Field Training Officer program that follows the requirements of this paragraph. Secondary assessment sources include policy, procedure, processes, training schedules, Field Training Officer, Probationary Police Officers , and other evaluations, reports, Notice of Job Opportunities , job descriptions, and personnel allocation records that show course completion for Probationary Police Officers.

Paragraph 301 Compliance Progress History

FIRST REPORTING PERIOD	SECOND REPORTING PERIOD	THIRD REPORTING PERIOD
SEPTEMBER 1, 2019 – AUGUST 31, 2019	SEPTEMBER 1, 2019 – FEBRUARY 29, 2020	MARCH 1, 2020 – DECEMBER 31, 2020
COMPLIANCE PROGRESS:	COMPLIANCE PROGRESS:	COMPLIANCE PROGRESS:
Not Applicable	Not Applicable	Not Applicable
FOURTH REPORTING PERIOD	**FIFTH REPORTING PERIOD**	**SIXTH REPORTING PERIOD**
JANUARY 1, 2021 – JUNE 30, 2021	JULY 1, 2021 – DECEMBER 31, 2021	JANUARY 1, 2022 – JUNE 30, 2022
COMPLIANCE PROGRESS:	COMPLIANCE PROGRESS:	COMPLIANCE PROGRESS:
Not Applicable	None	None

Training: ¶302

302. *CPD's policies and procedures will continue to delineate the criteria and methodology for selecting FTOs. Subject to its collective bargaining agreements with the CPD unions, CPD will review and, as appropriate, revise its eligibility criteria and promotional practices to ensure that FTOs are selected based on their applications, previous performance as police officers, FTO training examination scores, and disciplinary histories.*

Compliance Progress

(Reporting Period: January 1, 2022, through June 30, 2022)

Preliminary:	***Not in Compliance***
Secondary:	***Not Yet Assessed***
Full:	***Not Yet Assessed***

We assessed the City's and the CPD's compliance with ¶302 for the first time in the sixth reporting period. The City and the CPD did not achieve Preliminary compliance during this reporting period.

To evaluate Preliminary compliance with ¶302, we reviewed the City's and the CPD's relevant policies and documents following the process described in the Consent Decree (¶¶626–41), which outlines applicable consultation, resolution, workout, and public comment periods. To evaluate Secondary compliance with this paragraph, we will need to review data to determine whether the City and the CPD have developed a process to review and revise eligibility criteria and promotional practices and have created acceptable policies, procedures, and plans to continue to delineate the criteria and methods for selecting Field Training Officers according to requirements of ¶302.

No relevant documents were submitted by the City and the CPD to demonstrate compliance. The IMT reviewed S11-02 (*Field Training And Evaluation Program*) and found no applicable sections. As a result, Preliminary compliance requirements are not met.

***

The City and the CPD did not achieve Preliminary compliance during this reporting period. Looking forward, Preliminary compliance requires the City and the CPD to develop a process to review and revise eligibility criteria and promotional practices and create acceptable policies, procedures, and plans to continue to delineate the criteria and methods for selecting Field Training Officers according to requirements of ¶302. Secondary compliance requires the City and the CPD to establish and implement a process to continue to delineate the criteria and methodology

for selecting Field Training Officers and the resultant policies and procedures, according to requirements of ¶302.

Paragraph 302 Compliance Progress History

FIRST REPORTING PERIOD SEPTEMBER 1, 2019 – AUGUST 31, 2019	SECOND REPORTING PERIOD SEPTEMBER 1, 2019 – FEBRUARY 29, 2020	THIRD REPORTING PERIOD MARCH 1, 2020 – DECEMBER 31, 2020
COMPLIANCE PROGRESS: Not Applicable	COMPLIANCE PROGRESS: Not Applicable	COMPLIANCE PROGRESS: Not Applicable
FOURTH REPORTING PERIOD JANUARY 1, 2021 – JUNE 30, 2021	**FIFTH REPORTING PERIOD** JULY 1, 2021 – DECEMBER 31, 2021	**SIXTH REPORTING PERIOD** JANUARY 1, 2022 – JUNE 30, 2022
COMPLIANCE PROGRESS: Not Applicable	COMPLIANCE PROGRESS: Not Applicable	COMPLIANCE PROGRESS: None

Training: ¶303

***303**. FTOs will receive initial and refresher training that is adequate in quality, quantity, scope, and type, and that addresses subjects including, but not limited to management and mentoring, community policing, effective problem-solving techniques, ethics, diversity, field communication, and any recent substantive changes made to the recruit training curriculum. FTOs will receive refresher training on an annual basis as part of the In-Service Training Program outlined in this Agreement. FTOs will be promptly notified of any substantive changes to policies and practices that affect their roles as mentors and trainers of PPOs.*

Compliance Progress

(Reporting Period: January 1, 2022, through June 30, 2022)

Recurring Schedule: Annual ☑ **Met** ☐ **Missed**

Preliminary: ***In Compliance*** **(FIFTH REPORTING PERIOD)**
Secondary: ***Not in Compliance***
Full: ***Not Yet Assessed***

The City and the CPD maintained Preliminary compliance with the requirements of ¶303 during this reporting period.

To evaluate Preliminary compliance with ¶303, we reviewed the City's and the CPD's relevant policies and documents following the process described in the Consent Decree (¶¶626–41), which outlines applicable consultation, resolution, workout, and public comment periods. To evaluate Secondary compliance with this paragraph, we reviewed data to determine whether the CPD has developed plans and policies for evaluating Field Training Officer proficiency in managing and mentoring Probationary Police Officers, teaching key principles, and maintaining documentation of Field Training Officer trainings and evaluations. The IMT also sought to determine if the CPD has sufficiently taken steps to evaluate Field Training Officer proficiency in managing and mentoring Probationary Police Officers and to maintain documentation of Field Training Officer training and evaluation.

Progress before the Sixth Reporting Period

During the previous reporting period, the IMT assessed compliance by determining whether the CPD wrote the requirements of this paragraph into policy, including how changes to curriculum will be addressed. We reviewed three training directives and found the City and the CPD had achieved Preliminary compliance.

Progress in the Sixth Reporting Period

To demonstrate compliance with ¶303, this reporting period the CPD submitted the *2022 Annual In-Service Field Training Officer Refresher Training Curriculum* (March 2022), including a PowerPoint, an outline of the Curriculum, and a Comment Matrix showing changes from the 2021 Annual In-Service Field Training Officer Refresher Training Curriculum. The CPD also provided revised *2022 Annual In-Service Field Training Officer Refresher Training Curriculum* (June 2022), including a revised PowerPoint, a revised outline of the Curriculum, a 2022 Field Training Officer Pre- and Post-Training Test Questions, and a Comment Review showing the CPD's responses and edits based on feedback from the IMT and the Office of the Illinois Attorney General to the earlier version of the training materials. The CPD also provided revised versions of Training Directive S11-02, *Field Training and Evaluation Program* (May and June 2022), including a Comments Matrix showing changes to the prior version of S11-02 produced in the last reporting period and the CPD's responses to comments offered by the IMT.

S11-02 § VIII(B)(1), (2)(a), and (2)(d) commits the City and the CPD to all aspects of ¶303. Collectively, these policies affirm Preliminary compliance status during this reporting period.

The training data demonstrate the adequacy of the training courses in fulfilling ¶303 requirements. However, no documents were produced indicating that at least 95% of Field Training Officers have received the required annual refresher training.

***

The City and the CPD maintained Preliminary compliance during this reporting period. Looking forward, the CPD may achieve Secondary compliance after it has sufficiently taken steps to evaluate Field Training Officer proficiency in managing and mentoring Probationary Police Officers and to maintain and provide documentation of Field Training Officer training and evaluation. Secondary assessment sources include policy, procedure, processes, training schedules, training and evaluation records, attendance logs and other policy, data, jobs, and training sources. Full compliance may be realized once the CPD has sufficiently, systematically, and consistently evaluated Field Training Officer proficiency in managing and mentoring Probationary Police Officers and maintains documentation of Field Training Officer training and evaluations.

Paragraph 303 Compliance Progress History

FIRST REPORTING PERIOD
SEPTEMBER 1, 2019 – AUGUST 31, 2019
COMPLIANCE PROGRESS:
Not Applicable

SECOND REPORTING PERIOD
SEPTEMBER 1, 2019 – FEBRUARY 29, 2020
COMPLIANCE PROGRESS:
Not Applicable

THIRD REPORTING PERIOD
MARCH 1, 2020 – DECEMBER 31, 2020
COMPLIANCE PROGRESS:
None

FOURTH REPORTING PERIOD
JANUARY 1, 2021 – JUNE 30, 2021
COMPLIANCE PROGRESS:
None

FIFTH REPORTING PERIOD
JULY 1, 2021 – DECEMBER 31, 2021
COMPLIANCE PROGRESS:
Preliminary

SIXTH REPORTING PERIOD
JANUARY 1, 2022 – JUNE 30, 2022
COMPLIANCE PROGRESS:
Preliminary

Training: ¶304

304. *FTOs will be required to maintain and demonstrate their proficiency in managing and mentoring PPOs, as well as modeling and teaching, by their example, procedural justice, de-escalation, impartial policing, and community policing. The Education and Training Division will maintain documentation of the training of FTOs. The Bureau of Patrol will maintain documentation of the evaluations of FTOs.*

Compliance Progress

(Reporting Period: January 1, 2022, through June 30, 2022)

Preliminary:	***In Compliance*** **(FIFTH REPORTING PERIOD)**
Secondary:	***Not in Compliance***
Full:	***Not Yet Assessed***

The City and the CPD maintained Preliminary compliance with the requirements of ¶304 during this reporting period.

To evaluate Preliminary compliance with ¶304, we reviewed the City's and the CPD's relevant policies and documents following the process described in the Consent Decree (¶¶626–41), which outlines applicable consultation, resolution, workout, and public comment periods. To evaluate Secondary compliance with this paragraph, we reviewed data to determine whether the CPD has developed plans and policies for evaluating Field Training Officer proficiency in managing and mentoring Probationary Police Officers (also known as PPOs), teaching key principles, and maintaining documentation of Field Training Officer training and evaluation. The IMT also sought to determine if the CPD has sufficiently taken steps to evaluate Field Training Officer proficiency in managing and mentoring Probationary Police Officers and to maintain documentation of Field Training Officer training and evaluation. The IMT also sought to verify sufficient attendance records (*i.e.*, 95% of relevant personnel), including hours attended. Where applicable, we assessed whether the City and the CPD have created the requisite positions and staffed those positions with qualified personnel in order to achieve the requirements of this paragraph.

Progress before the Sixth Reporting Period

During the previous reporting period, the IMT assessed compliance by reviewing CPD Training Directive S11-02 (*Field Training and Evaluation Program*) and found this training directive to include the requisite language required by this paragraph to achieve Preliminary compliance.

Progress in the Sixth Reporting Period

To demonstrate compliance with ¶304, this reporting period the CPD submitted the *2022 Annual In-Service Field Training Officer Refresher Training Curriculum* (March 2022), including a PowerPoint, an outline of the Curriculum, and a Comment Matrix showing changes from the *2021 Annual In-Service Field Training Officer Refresher Training Curriculum*. The CPD also provided revised *2022 Annual In-Service Field Training Officer Refresher Training Curriculum* (June 2022), including a revised PowerPoint, a revised outline of the Curriculum, a 2022 Field Training Officer Pre- and Post-Training Test Questions, and a Comment Review showing the CPD's responses and edits based on feedback from the IMT the Office of the Illinois Attorney General to the earlier version of the training materials. The CPD also provided revised versions of Training Directive S11-02, *Field Training and Evaluation Program* (May and June 2022), including a Comments Matrix showing changes to the prior version of S11-02 produced in the last reporting period and the CPD's responses to comments offered by the IMT.

S11-02 § VIII(B)(2)(b-c) requires the Field Training Officer mentor his or her assigned Probationary Police Officer to facilitate the proper field performance and teach by example, emphasizing procedural justice, de-escalation, impartial policing, and community policing.

S11-02 § VIII(J)(2) requires the City and the CPD to document all training of Field Training Officers consistent with the department directive titled "Department Training."

S11-02 § VIII(I)(7) requires the Field Training and Evaluation Section (FTES) Bureau of Patrol, "conduct and maintain documentation of the Field Training and Evaluation Program Critique Survey quarterly and share feedback with the Training and Support Group, the Training Oversight Committee, and as necessary to Field Training Officers and Field Training Officer supervisors, including but not limited to..."

Taken together, these S11-10 (*Department Training Records Maintenance*) subparagraphs exhibit the requisite language to meet Preliminary compliance status. No submitted documents demonstrate Field Training Officer proficiency in managing and mentoring Probationary Police Officers, or document Field Training Officer training and evaluations.

***

The City and the CPD maintained Preliminary compliance during this reporting period. Looking forward, Secondary compliance may be achieved after the CPD has sufficiently taken steps to evaluate Field Training Officer proficiency in managing and mentoring Probationary Police Officers and maintained documentation of

Field Training Officer training and evaluation. Secondary assessment sources include policy, procedure, processes, training schedules, training and evaluation records, and other policy, data, jobs, and training sources.

Paragraph 304 Compliance Progress History

FIRST REPORTING PERIOD	SECOND REPORTING PERIOD	THIRD REPORTING PERIOD
SEPTEMBER 1, 2019 – AUGUST 31, 2019	SEPTEMBER 1, 2019 – FEBRUARY 29, 2020	MARCH 1, 2020 – DECEMBER 31, 2020
COMPLIANCE PROGRESS:	COMPLIANCE PROGRESS:	COMPLIANCE PROGRESS:
Not Applicable	Not Applicable	None

FOURTH REPORTING PERIOD	FIFTH REPORTING PERIOD	SIXTH REPORTING PERIOD
JANUARY 1, 2021 – JUNE 30, 2021	JULY 1, 2021 – DECEMBER 31, 2021	JANUARY 1, 2022 – JUNE 30, 2022
COMPLIANCE PROGRESS:	COMPLIANCE PROGRESS:	COMPLIANCE PROGRESS:
None	Preliminary	Preliminary

Training: ¶305

305. *CPD will revise the Field Training and Evaluation Program to ensure that no more than one PPO is assigned to an FTO during each training cycle. The City will provide CPD with the necessary support and resources to designate a sufficient number of FTOs to meet the requirements of this Agreement. Officers performing FTO duties in a temporary capacity are considered FTOs under this Agreement so long as they meet the requirements set forth for FTOs in this Agreement, except for the selection requirements.*

Compliance Progress (Reporting Period: January 1, 2022, through June 30, 2022)

Preliminary:	***In Compliance*** **(FOURTH REPORTING PERIOD)**
Secondary:	***Not in Compliance***
Full:	***Not Yet Assessed***

The City and the CPD maintained Preliminary compliance with ¶305 during this reporting period.

To evaluate Preliminary compliance with ¶305, we reviewed the City's and the CPD's relevant policies and documents following the process described in the Consent Decree (¶¶626–41), which outlines applicable consultation, resolution, workout, and public comment periods. To evaluate Secondary compliance with this paragraph, we reviewed data to determine whether the CPD has developed policy and plans to revise Field Training and Evaluation Program to meet ¶305 requirements. Such data must confirm that Field Training and Evaluation Program revisions are completed and implemented. The IMT also sought to verify sufficient attendance records (*i.e.*, 95% of relevant personnel), including hours attended. Where applicable, we assessed whether the City and the CPD have created the requisite positions and staffed those positions with qualified personnel in order to achieve the requirements of this paragraph.

Progress before the Sixth Reporting Period

During the previous reporting period, the IMT assessed and determined that the City and the CPD maintained Preliminary compliance with this paragraph. The CPD provided no documentation to substantiate Secondary compliance.

Progress in the Sixth Reporting Period

To demonstrate compliance with ¶305, this reporting period the CPD submitted revised versions of Training Directive S11-02, *Field Training and Evaluation Program* (May and June 2022), including a Comments Matrix showing changes to the

prior version of S11-02 produced in the last reporting period and the CPD's responses to comments offered by the IMT. S11-02 § VII(C) provides the requisite language for Preliminary compliance. Documents substantiating Secondary compliance were not submitted for review during this reporting period.

***

The City and the CPD maintained Preliminary compliance during this reporting period. Looking forward, Secondary compliance may be demonstrated when Field Training and Evaluation Program training plans, policies, field training program documentation, and other policy, data, jobs, and training sources indicate requirements of this paragraph are being met. Full compliance is demonstrated when data confirms a one-to-one Probationary Police Officer to Field Training Officer ratio sustained through training cycles and the CPD has implemented a process that will ensure that Probationary Police Officers are not placed on assignments in the field without adequate supervision.

Paragraph 305 Compliance Progress History

FIRST REPORTING PERIOD	SECOND REPORTING PERIOD	THIRD REPORTING PERIOD
SEPTEMBER 1, 2019 – AUGUST 31, 2019	SEPTEMBER 1, 2019 – FEBRUARY 29, 2020	MARCH 1, 2020 – DECEMBER 31, 2020
COMPLIANCE PROGRESS:	COMPLIANCE PROGRESS:	COMPLIANCE PROGRESS:
Not Applicable	Not Applicable	Not Applicable
FOURTH REPORTING PERIOD	**FIFTH REPORTING PERIOD**	**SIXTH REPORTING PERIOD**
JANUARY 1, 2021 – JUNE 30, 2021	JULY 1, 2021 – DECEMBER 31, 2021	JANUARY 1, 2022 – JUNE 30, 2022
COMPLIANCE PROGRESS:	COMPLIANCE PROGRESS:	COMPLIANCE PROGRESS:
Preliminary	Preliminary	Preliminary

Training: ¶306

306. *CPD will ensure that PPOs in the Field Training and Evaluation Program train with different FTOs during each of their training cycles.*

Compliance Progress

(Reporting Period: January 1, 2022, through June 30, 2022)

Preliminary:	***In Compliance* (FOURTH REPORTING PERIOD)**
Secondary:	***Not in Compliance***
Full:	***Not Yet Assessed***

The City and the CPD maintained Preliminary compliance with the requirements of ¶306 during this reporting period.

To evaluate Preliminary compliance with ¶306, we reviewed the City's and the CPD's relevant policies and documents following the process described in the Consent Decree (¶¶626–41), which outlines applicable consultation, resolution, workout, and public comment periods. To evaluate Secondary compliance with this paragraph, we reviewed data to determine whether ¶306 requirements are met. Specifically, we reviewed policy, processes, Probationary Police Officers (also known as PPOs) and Field Training Officer assignments, and Field Training and Evaluation Program-related materials. These data sources must confirm a one-to-one Probationary Police Officer to Field Training Officer ratio sustained through training cycles and that Probationary Police Officers train with a different Field Training Officer each training cycle. Such data must also demonstrate that CPD has implemented a process that will ensure that Probationary Police Officers are not placed on assignments in the field without adequate supervision, and that they train with a different Field Training Officer each training cycle.

Progress before the Sixth Reporting Period

During the previous reporting period, the IMT assessed compliance by reviewing Training Directive S11-02 (*Field Training and Evaluation Program*) and found that the City and the CPD had maintained Preliminary compliance with this paragraph.

Progress in the Sixth Reporting Period

To demonstrate compliance with ¶306, this reporting period the CPD submitted revised versions of Training Directive S11-02, *Field Training and Evaluation Program* (May and June 2022), including a Comments Matrix showing changes to the prior version of S11-02 produced in the last reporting period and the CPD's responses to comments offered by the IMT.

S11-02 § VIII(A)(3) requires Probationary Police Officers to "train with a different FTO during each of their training cycles." This matches the language in ¶306, bringing this paragraph into Preliminary compliance.

No additional documents provided by the CPD indicate Secondary compliance.

***

The City and the CPD maintained Preliminary compliance during this reporting period. Looking forward, Secondary compliance may be achieved by demonstrating the Probationary Police Officers in the Field Training and Evaluation Program train with different Field Training Officers during each of their training cycles. Secondary assessment sources may include policy, procedure, processes, training schedules, and training evaluation records. Full compliance may be achieved when the CPD has sufficiently, systemically, and consistently ensured that Probationary Police Officers placed in field assignments train with different Field Training Officers during each of their training cycles.

Paragraph 306 Compliance Progress History

FIRST REPORTING PERIOD	SECOND REPORTING PERIOD	THIRD REPORTING PERIOD
SEPTEMBER 1, 2019 – AUGUST 31, 2019	SEPTEMBER 1, 2019 – FEBRUARY 29, 2020	MARCH 1, 2020 – DECEMBER 31, 2020
COMPLIANCE PROGRESS:	COMPLIANCE PROGRESS:	COMPLIANCE PROGRESS:
Not Applicable	Not Applicable	Not Applicable
FOURTH REPORTING PERIOD	**FIFTH REPORTING PERIOD**	**SIXTH REPORTING PERIOD**
JANUARY 1, 2021 – JUNE 30, 2021	JULY 1, 2021 – DECEMBER 31, 2021	JANUARY 1, 2022 – JUNE 30, 2022
COMPLIANCE PROGRESS:	COMPLIANCE PROGRESS:	COMPLIANCE PROGRESS:
Preliminary	Preliminary	Preliminary

Training: ¶307

307. *CPD will ensure that PPOs awaiting assignment to an FTO will not be placed on assignments in the field without adequate supervision. CPD will track and document all instances of PPOs placed in field assignments prior to starting the Field Training and Evaluation Program.*

Compliance Progress

(Reporting Period: January 1, 2022, through June 30, 2022)

Preliminary:	***In Compliance*** **(FOURTH REPORTING PERIOD)**
Secondary:	***Not in Compliance***
Full:	***Not Yet Assessed***

The City and the CPD maintained Preliminary compliance with ¶307 during this reporting period.

To evaluate Preliminary compliance, we reviewed the City's and the CPD's relevant policies and documents following the process described in the Consent Decree (¶¶626–41), which outlines applicable consultation, resolution, workout, and public comment periods. To evaluate Secondary compliance with this paragraph, we reviewed data to determine if Field Training and Evaluation Program revisions are completed and implemented. Data must confirm that a one-to-one Probationary Police Officer to Field Training Officer ratio is sustained through training cycles and that the CPD has implemented a process that will ensure that Probationary Police Officers are not placed on assignments in the field without adequate supervision. The IMT also sought to verify sufficient attendance records (*i.e.*, 95% of relevant personnel), including hours attended. Where applicable, we assessed whether the City and the CPD have created the requisite positions and staffed those positions with qualified personnel in order to achieve the requirements of this paragraph.

Progress before the Sixth Reporting Period

During the previous reporting period, the IMT assessed compliance and found the City and the CPD maintained Preliminary compliance with this paragraph. We noted that Secondary compliance may be achieved if policies, processes, assignments, Field Training and Evaluation Program-related materials, and other policy, data, job, and training sources indicate the requirements of this paragraph are fully met.

Progress in the Sixth Reporting Period

To demonstrate compliance with ¶307, this reporting period the CPD submitted revised versions of Training Directive S11-02, *Field Training and Evaluation Program* (May and June 2022), including a Comments Matrix showing changes to the

prior version of S11-02 produced in the last reporting period and the CPD's responses to comments offered by the IMT.

The IMT reviewed S11-02 and found S11-02 § VI(D) contains the requisite language for Preliminary compliance with ¶307. As a result, Preliminary compliance is maintained. No additional data of Secondary compliance were submitted or reviewed.

***

The City and the CPD maintained Preliminary compliance during this reporting period. Looking forward, Secondary compliance may be achieved if policies, processes, assignments, Field Training and Evaluation Program-related materials, and other policy, data, job, and training sources indicate the requirements of this paragraph are fully met. Full compliance may be achieved when data confirms a one-to-one Probationary Police Officer to Field Training Officer ratio sustained through training cycles and the CPD has implemented and maintained a process that will ensure that Probationary Police Officers are not placed on assignments in the field without adequate supervision.

Paragraph 307 Compliance Progress History

FIRST REPORTING PERIOD	SECOND REPORTING PERIOD	THIRD REPORTING PERIOD
SEPTEMBER 1, 2019 – AUGUST 31, 2019	SEPTEMBER 1, 2019 – FEBRUARY 29, 2020	MARCH 1, 2020 – DECEMBER 31, 2020
COMPLIANCE PROGRESS:	COMPLIANCE PROGRESS:	COMPLIANCE PROGRESS:
Not Applicable	Not Applicable	Not Applicable
FOURTH REPORTING PERIOD	**FIFTH REPORTING PERIOD**	**SIXTH REPORTING PERIOD**
JANUARY 1, 2021 – JUNE 30, 2021	JULY 1, 2021 – DECEMBER 31, 2021	JANUARY 1, 2022 – JUNE 30, 2022
COMPLIANCE PROGRESS:	COMPLIANCE PROGRESS:	COMPLIANCE PROGRESS:
Preliminary	Preliminary	Preliminary

Training: ¶308

308. *The Field Training and Evaluation Program will continue to require that FTOs document PPO progress and performance each day in the Daily Observation Report, at the end of each of the first two cycles in the Cycle Summary Report, at the end of the third cycle in the Final Summary Report and, if necessary, at the end of any additional cycles in the Remedial Summary Report. FTOs will identify and document in those reports areas for PPO improvement.*

Compliance Progress

(Reporting Period: January 1, 2022, through June 30, 2022)

Preliminary:	***In Compliance*** **(FIFTH REPORTING PERIOD)**
Secondary:	***Not Yet Assessed***
Full:	***Not Yet Assessed***

The City and the CPD maintained Preliminary compliance during this reporting period.

To evaluate Preliminary compliance with ¶308, we reviewed the City's and the CPD's relevant policies and documents following the process described in the Consent Decree (¶¶626–41), which outlines applicable consultation, resolution, workout, and public comment periods. To evaluate Secondary compliance with this paragraph, we will need to review data to determine if the CPD's plans and policies ensure that Field Training Officers document Probationary Police Officers (also known as PPOs) progress and performance as specified in this paragraph. Data must demonstrate that Field Training Officer training on policy has been completed and that a full training cycle has been completed.

Progress before the Sixth Reporting Period

During the previous reporting period, the IMT assessed compliance by reviewing Training Directive S11-02 (*Field Training And Evaluation Program*). We found that this Training Directive includes requisite language for this paragraph and found the City and the CPD obtained Preliminary compliance. We noted that Field Training Officer and supervisor training on policy and a full training cycle, at a minimum, must be completed to demonstrate Secondary compliance.

Progress in the Sixth Reporting Period

To demonstrate compliance with ¶308, this reporting period the CPD submitted revised versions of Training Directive S11-02, *Field Training and Evaluation Program* (May and June 2022), including a Comments Matrix showing changes to the prior version of S11-02 produced in the last reporting period and the CPD's responses to comments offered by the IMT.

S11-02 §§ VIII(B)(2)(e–j) and VIII(B)(3) track the language from ¶308, therefore meeting the Preliminary compliance threshold for this paragraph.

***

The City and the CPD has maintained Preliminary compliance during this reporting period. Looking forward, Secondary compliance can be attained with plans and policies for insuring Field Training Officers document Probationary Police Officers' progress and performance as specified in this paragraph. Field Training Officer and supervisor training on policy and a full training cycle must, at minimum, be completed. Secondary assessment sources include policy, training plans, and observation reports.

Paragraph 308 Compliance Progress History

FIRST REPORTING PERIOD	SECOND REPORTING PERIOD	THIRD REPORTING PERIOD
SEPTEMBER 1, 2019 – AUGUST 31, 2019	SEPTEMBER 1, 2019 – FEBRUARY 29, 2020	MARCH 1, 2020 – DECEMBER 31, 2020
COMPLIANCE PROGRESS:	COMPLIANCE PROGRESS:	COMPLIANCE PROGRESS:
Not Applicable	Not Applicable	Not Applicable
FOURTH REPORTING PERIOD	**FIFTH REPORTING PERIOD**	**SIXTH REPORTING PERIOD**
JANUARY 1, 2021 – JUNE 30, 2021	JULY 1, 2021 – DECEMBER 31, 2021	JANUARY 1, 2022 – JUNE 30, 2022
COMPLIANCE PROGRESS:	COMPLIANCE PROGRESS:	COMPLIANCE PROGRESS:
None	Preliminary	Preliminary

Training: ¶309

309. *In each Cycle Summary Report, the FTO will assess whether the PPO should progress to the next cycle of training based on the PPO's performance and compliance with the Field Training and Evaluation Program standards.*

Compliance Progress

(Reporting Period: January 1, 2022, through June 30, 2022)

Preliminary:	***In Compliance*** **(FIFTH REPORTING PERIOD)**
Secondary:	***Not in Compliance***
Full:	***Not Yet Assessed***

The City and the CPD maintained Preliminary compliance during this reporting period.

To evaluate Preliminary compliance with ¶309, we reviewed the City's and the CPD's relevant policies and documents following the process described in the Consent Decree (¶¶626–41), which outlines applicable consultation, resolution, workout, and public comment periods. To evaluate Secondary compliance with this paragraph, we reviewed data to determine if the CPD's plans and policies provide for Field Training Officer assessment and reporting as specified in this paragraph. Data must establish that Field Training Officer and supervisors training on policy has been completed and that at least a full training cycle has been completed.

Progress before the Sixth Reporting Period

During the previous reporting period, the IMT assessed compliance by reviewing CPD plans and policies for ensuring Field Training Officers document Probationary Police Officers (also known as PPOs) progress and performance. We reviewed Training Directive S11-02 (*Field Training and Evaluation Program*) and found that the CPD included the requisite language required to achieve Preliminary compliance.

Progress in the Sixth Reporting Period

To demonstrate compliance with ¶305, this reporting period the CPD submitted revised versions of Training Directive S11-02, *Field Training and Evaluation Program* (May and June 2022), including a Comments Matrix showing changes to the prior version of S11-02 produced in the last reporting period and the CPD's responses to comments offered by the IMT.

S11-02 § VIII(B)(2)(g) and (h) and § VIII(D)(4) reflect the policy language required to achieve Preliminary compliance. No additional documents were submitted or reviewed to substantiate Secondary compliance.

***

The City and the CPD maintained Preliminary compliance during this reporting period. Looking forward, Secondary compliance will require IMT review of Field Training Reports, including Cycle Summary reports, which were not submitted by the end of this reporting period. The City and the CPD will achieve Secondary compliance when Field Training Officer training on policy is finalized and a full training cycle has been completed with ¶309 required documentation. Full compliance can be attained when Field Training Officer training on policy and methodology is completed and multiple consecutive training cycles meeting these requirements are successfully completed.

Paragraph 309 Compliance Progress History

FIRST REPORTING PERIOD	SECOND REPORTING PERIOD	THIRD REPORTING PERIOD
SEPTEMBER 1, 2019 – AUGUST 31, 2019	SEPTEMBER 1, 2019 – FEBRUARY 29, 2020	MARCH 1, 2020 – DECEMBER 31, 2020
COMPLIANCE PROGRESS:	COMPLIANCE PROGRESS:	COMPLIANCE PROGRESS:
Not Applicable	Not Applicable	Not Applicable
FOURTH REPORTING PERIOD	**FIFTH REPORTING PERIOD**	**SIXTH REPORTING PERIOD**
JANUARY 1, 2021 – JUNE 30, 2021	JULY 1, 2021 – DECEMBER 31, 2021	JANUARY 1, 2022 – JUNE 30, 2022
COMPLIANCE PROGRESS:	COMPLIANCE PROGRESS:	COMPLIANCE PROGRESS:
None	Preliminary	Preliminary

Training: ¶310

310. *A PPO must be deemed "field qualified" in order to complete the Field Training and Evaluation Program. For a PPO to be deemed "field qualified," all end-of-cycle reports must be completed by the FTO and reviewed and approved by the necessary supervisors.*

Compliance Progress

(Reporting Period: January 1, 2022, through June 30, 2022)

Preliminary:	***In Compliance*** **(FIFTH REPORTING PERIOD)**
Secondary:	***Not in Compliance***
Full:	***Not Yet Assessed***

The City and the CPD maintained Preliminary compliance during this reporting period.

To evaluate Preliminary compliance with ¶310, we reviewed the City's and the CPD's relevant policies and documents following the process described in the Consent Decree (¶¶626–41), which outlines applicable consultation, resolution, workout, and public comment periods. To evaluate Secondary compliance with this paragraph, we reviewed data to determine whether the CPD's plans and policies ensure Probationary Police Officers (also known as PPOs) are deemed "field qualified" at completion of the Field Training and Evaluation Program and that end-of-cycle reports are completed by the Field Training Officer and approved by the necessary supervisors as specified in this paragraph.

Progress before the Sixth Reporting Period

During the previous reporting period, the IMT assessed compliance by reviewing policy and data sources, processes, and Field Training and Evaluation Program-related materials to determine whether the CPD has policies and processes in place to ensure Probationary Police Officers are field qualified before completing the Field Training and Evaluation Program. We reviewed Training Directive S11-02 (*Field Training and Evaluation Program*) and found the directive to include the requisite language to achieve Preliminary compliance. We noted that the IMT must review Field Training and Evaluation Program-related materials and Field Training Reports, including but not limited to Cycle Summary Reports, and Daily Observation Reports to advance to Secondary compliance. We also advised that CPD must provide finalized Field Training Officer and supervisors training on policy and training records demonstrating that 95% of eligible CPD officers have been trained for at least a full training cycle.

Progress in the Sixth Reporting Period

To demonstrate compliance with ¶305, this reporting period the CPD submitted revised versions of Training Directive S11-02, *Field Training and Evaluation Program* (May and June 2022), including a Comments Matrix showing changes to the prior version of S11-02 produced in the last reporting period and the CPD's responses to comments offered by the IMT.

The IMT identified S11-02 § III, S11-02 § VIII(B)(1–7), S11-02 § VIII(D)(4), S11-02 § VIII(E)(4), and S11-02 § VIII(G)(1), as key sections that reflect the policy language required to achieve Preliminary compliance.

Deconstructing ¶310, it first indicates that "a PPO must be deemed 'field qualified' in order to complete the Field Training and Evaluation Program." S11-02 § III provides a definition of "field qualified," and delineates that it succeeds completion of all required Field Training and Evaluation Program cycles.

Paragraph 310 then conditions "field qualified" status upon completion of all end-of-cycle reports reviewed and approved by the "necessary supervisors." S11-02 § VIII(B)(2)(g) and (h) mandates the Field Training Officer complete a Cycle Summary Report at the end of the Probationary Police Officer's first and second training cycles and a Final Summary Report at the end of the third cycle. S11-02 § VIII(D)(4) requires the "Evaluating Sergeant" to ensure that the assigned Field Training Officer indicates that the Probationary Police Officer met the minimum competency in each key performance characteristic in the Cycle and Final Summary Report and that the Field Training Officer indicated that the Probationary Police Officer was field qualified in the Final Summary Report.

S11-02 § VIII(E)(4) binds the "Designated District Lieutenant" to "ensure completeness of, and if appropriate approve, the Final Summary Report when submitted by the evaluating Sergeant, including reviewing and approving any document recommendations (e.g., 'field-qualified' or remedial training)." S11-02 § VIII(G)(1) mandates the executive officer in each district "ensure the assigned field training officers and evaluations sergeants are performing the duties as outlined in this directive."

These S11-02 subsections, woven together, form the policy web that substantiates Preliminary compliance with ¶310 during this reporting period. No additional documents substantiating Secondary compliance were submitted or reviewed.

***

The City and the CPD maintained Preliminary compliance during this reporting period. Looking forward, Secondary compliance requires the IMT to review Field

Training and Evaluation Program-related materials and Field Training Reports, including but not limited to Cycle Summary Reports and Daily Observation Reports. The CPD must also provide finalized Field Training Officer and supervisors training on policy and training records demonstrating that 95% of eligible CPD officers have been trained for at least a full training cycle. Full compliance requires Field Training Officer and supervisors training on policy and methodology is completed and multiple consecutive training cycles meeting these requirements are successfully completed.

Paragraph 310 Compliance Progress History

FIRST REPORTING PERIOD	SECOND REPORTING PERIOD	THIRD REPORTING PERIOD
SEPTEMBER 1, 2019 – AUGUST 31, 2019	SEPTEMBER 1, 2019 – FEBRUARY 29, 2020	MARCH 1, 2020 – DECEMBER 31, 2020
COMPLIANCE PROGRESS:	COMPLIANCE PROGRESS:	COMPLIANCE PROGRESS:
Not Applicable	Not Applicable	Not Applicable
FOURTH REPORTING PERIOD	**FIFTH REPORTING PERIOD**	**SIXTH REPORTING PERIOD**
JANUARY 1, 2021 – JUNE 30, 2021	JULY 1, 2021 – DECEMBER 31, 2021	JANUARY 1, 2022 – JUNE 30, 2022
COMPLIANCE PROGRESS:	COMPLIANCE PROGRESS:	COMPLIANCE PROGRESS:
None	Preliminary	Preliminary

Training: ¶311

311. *FTOs may recommend specific remedial field or classroom training for a PPO. Any recommendation for remedial training will be provided as promptly as possible to the necessary supervisors and must be documented in the PPO's training record, including, but not limited to, the Final Summary Report or Remedial Summary Report. Recommendations for remedial training must be reviewed by the necessary supervisors and, if approved, recommended training must be completed by the PPO before the PPO completes the Field Training and Evaluation Program.*

Compliance Progress (Reporting Period: January 1, 2022, through June 30, 2022)

Preliminary:	***In Compliance*** **(NEW)**
Secondary:	***Not in Compliance***
Full:	***Not Yet Assessed***

The City and the CPD achieved Preliminary compliance during this reporting period.

To evaluate Preliminary compliance with ¶311, we reviewed the City's and the CPD's relevant policies and documents following the process described in the Consent Decree (¶¶626–41), which outlines applicable consultation, resolution, workout, and public comment periods. To evaluate Secondary compliance with this paragraph, we reviewed data to determine if the CPD's plans and policies ensure that remedial training is provided promptly and is documented as required by the paragraph.

Progress before the Sixth Reporting Period

During the previous reporting period, the IMT assessed compliance by reviewing CPD plans and policies to ensure remedial training is promptly provided and documented as required by this paragraph. We determined that the City and the CPD did not achieve Preliminary compliance due to the omission of the required time-bound requirement in Training Directive S11-02 (*Field Training And Evaluation Program*), as indicated in ¶311.

Progress in the Sixth Reporting Period

To demonstrate compliance with ¶311, this reporting period the City and the CPD submitted revised versions of Training Directive S11-02, *Field Training and Evaluation Program* (May and June 2022), including a Comments Matrix showing changes to the prior version of S11-02 produced in the last reporting period and the CPD's responses to comments offered by the IMT.

The IMT identified S11-02 § VIII(B)(4–5) as key sections that reflect the policy language required to achieve Preliminary compliance.

S11-02 § VIII(B)(5) specifically addresses a scenario where a recruit is not responding to training. In this instance, a Field Training Officer is directed to notify the evaluation sergeant and designated district lieutenant (S11-02 § VIII(B)(5)(a)), submit a To-From-Subject Report through the chain of command to the Chief, Bureau of Patrol, or designee (S11-02 VIII § (B)(5)(b)), and document this fact in the DOR, CSR, or Final Summary Report at least seven days prior to the start of the next period, if feasible (S11-02 § VIII(B)(5)(c)).

Additional training cycles may be added at any time during the probationary cycle. Probationary Police Officers must complete all additional training before he or she is deemed field qualified and complete the Field Training and Evaluation Program (S11-02 § VIII (A)(8)).

The assigned Field Training Officer must complete a Remedial Summary Report on a recruit that goes through a remedial training cycle. That report establishes if a Probationary Police Officer is "field qualified" (S11-02 § VIII(B)(4)).

To meet Preliminary compliance, the CPD must demonstrate that its policies and plans ensure "any recommendation for remedial training is provided as promptly as possible to the necessary supervisors" and is documented as required in the paragraph. The June 30, 2022 revision to S11-02 § VIII(B)(5) does stipulate "immediately," reaching the requirements for Preliminary compliance.

No additional documents or data were submitted or reviewed to establish Secondary compliance.

***

The City and the CPD has achieved Preliminary compliance during this reporting period. Looking forward, Secondary compliance requires the CPD to demonstrate that Field Training Officer and supervisors training on applicable policy is completed and all ¶311 requirements are met and maintained for a full training cycle.

Paragraph 311 Compliance Progress History

FIRST REPORTING PERIOD	SECOND REPORTING PERIOD	THIRD REPORTING PERIOD
SEPTEMBER 1, 2019 – AUGUST 31, 2019	SEPTEMBER 1, 2019 – FEBRUARY 29, 2020	MARCH 1, 2020 – DECEMBER 31, 2020
COMPLIANCE PROGRESS:	COMPLIANCE PROGRESS:	COMPLIANCE PROGRESS:
Not Applicable	Not Applicable	Not Applicable
FOURTH REPORTING PERIOD	**FIFTH REPORTING PERIOD**	**SIXTH REPORTING PERIOD**
JANUARY 1, 2021 – JUNE 30, 2021	JULY 1, 2021 – DECEMBER 31, 2021	JANUARY 1, 2022 – JUNE 30, 2022
COMPLIANCE PROGRESS:	COMPLIANCE PROGRESS:	COMPLIANCE PROGRESS:
None	None	Preliminary

Training: ¶312

312. *The Field Training and Evaluation Review Board, or other entity with similar responsibilities, will review a PPO's performance at the request of an assigned FTO or supervisor and have the power to recommend separation, re-training by the Academy, or additional field training. A request for review by the Board must be made, and the Board must convene, if a PPO is not deemed "field qualified" at the end of any remedial training cycle. The Field Training and Evaluation Review Board will provide all such referrals and recommendations for action to the Chief of the Bureau of Patrol.*

Compliance Progress

(Reporting Period: January 1, 2022, through June 30, 2022)

Preliminary:	***In Compliance*** **(NEW)**
Secondary:	***Not in Compliance***
Full:	***Not Yet Assessed***

The City and the CPD achieved Preliminary compliance with the requirements of ¶312 during this reporting period.

To evaluate Preliminary compliance with ¶312, we reviewed the City's and the CPD's relevant policies and documents following the process described in the Consent Decree (¶¶626–41), which outlines applicable consultation, resolution, workout, and public comment periods. To evaluate Secondary compliance with this paragraph, we reviewed data to determine if the CPD's plans and policies ensure remedial training is provided promptly and is documented as required in this paragraph. Such data must establish that Field Training Officers' and supervisors' training on the relevant policy is completed and that a full training cycle is completed.

Progress before the Sixth Reporting Period

During the previous reporting period, the IMT assessed compliance by reviewing CPD plans and policies to determine whether they require the Field Training and Evaluation Review Board's (also known as the FTEB) review of Probationary Police Officers' performance, as required by this paragraph. We reviewed Training Directive S11-02 (*Field Training and Evaluation Program*), and found that this directive lacked the components required by this paragraph. Specifically, S11-02 did not require the Field Training and Evaluation Review Board to review Probationary Police Officers' performance at the request of an assigned Field Training Officer or supervisor and did not speak to the Field Training and Evaluation Review Board's ability to provide referrals or recommendations for Probationary Police Officers

not deemed "field qualified" for action by the Chief of the Bureau of Patrol. Therefore, we found the City and the CPD to have not achieved Preliminary compliance.

Progress in the Sixth Reporting Period

To demonstrate compliance with ¶312, this reporting period the CPD submitted revised versions of Training Directive S11-02, *Field Training and Evaluation Program* (May and June 2022), including a Comments Matrix showing changes to the prior version of S11-02 produced in the last reporting period and the CPD's responses to comments offered by the IMT. The CPD also provided S11-02-01 (*Field Training and Evaluation Review Board*), including a Comment Matrix showing revisions to an earlier version of S11-02-01 based on feedback provided by the IMT.

S11-02 § VIII(B)(5) directs a Field Training Officer's action when that Field Training Officer determines a Probationary Police Officer's performance needs to be reviewed by the Field Training and Evaluation Review Board. S11-02 §§ VII(C)(3) and VIII(D)(10) direct a supervisor's action when that supervisor determines a Probationary Police Officer's performance is deficient in any category or needs to be reviewed by the Board.

S11-02-01 § II(F) (30 June 2022) states, "The process for initiating the Review Board by an Field Training Officer or a supervisor is via To-From-Subject Report through the chain of command to the Chief, Bureau of Patrol, or designees." S11-02-01 §V(B) states, "The Chief, Bureau of Patrol, will convene a Review Board within 14 days of a request for a review received from a Field Training Officer or supervisory officer." S11-02-01 § V(F) requires all recommendations by the Board be sent to the Chief, Bureau of Patrol, for review. Together, these policies meet the Preliminary compliance threshold.

No additional data were submitted or reviewed to establish Secondary compliance.

***

The City and the CPD achieved Preliminary compliance during this reporting period. Looking forward, to achieve Secondary compliance, the CPD must demonstrate that Field Training Officers, supervisors, and Field Training and Evaluation Program Review Board training on the applicable policy is completed and substantiated, and this paragraph's requirements achieved for a full recruit training cycle. Full compliance can be ascertained when Field Training Officer, supervisors, and Field Training and Evaluation Program Review Board training on policy and methodology is completed and substantiated and multiple consecutive training cycles meeting these requirements are successfully completed.

Paragraph 312 Compliance Progress History

FIRST REPORTING PERIOD	SECOND REPORTING PERIOD	THIRD REPORTING PERIOD
SEPTEMBER 1, 2019 – AUGUST 31, 2019	SEPTEMBER 1, 2019 – FEBRUARY 29, 2020	MARCH 1, 2020 – DECEMBER 31, 2020
COMPLIANCE PROGRESS:	COMPLIANCE PROGRESS:	COMPLIANCE PROGRESS:
Not Applicable	Not Applicable	Not Applicable

FOURTH REPORTING PERIOD	FIFTH REPORTING PERIOD	SIXTH REPORTING PERIOD
JANUARY 1, 2021 – JUNE 30, 2021	JULY 1, 2021 – DECEMBER 31, 2021	JANUARY 1, 2022 – JUNE 30, 2022
COMPLIANCE PROGRESS:	COMPLIANCE PROGRESS:	COMPLIANCE PROGRESS:
None	None	Preliminary

Training: ¶313

313. *CPD will create a mechanism for PPOs to provide confidential feedback regarding their field training, including the extent to which their field training was consistent with what they learned at the Academy; whether their FTOs did or did not provide effective guidance and instruction; and suggestions for changes to recruit training based upon their experience in the Field Training and Evaluation Program.*

Compliance Progress

(Reporting Period: January 1, 2022, through June 30, 2022)

Preliminary:	***In Compliance*** **(NEW)**
Secondary:	***Not Yet Assessed***
Full:	***Not Yet Assessed***

The City and the CPD achieved Preliminary compliance with the requirements of ¶313 during this reporting period.

To evaluate Preliminary compliance with ¶313, we reviewed the City's and the CPD's relevant policies and documents following the process described in the Consent Decree (¶¶626–41), which outlines applicable consultation, resolution, workout, and public comment periods. To evaluate Secondary compliance with this paragraph, we will need to review data to determine whether the CPD's plans and policies provide for receiving and reviewing Probationary Police Officer (also known as PPO) feedback.

Progress before the Sixth Reporting Period

During the previous reporting period, the IMT assessed compliance by reviewing CPD plans and policies to aggregate Probationary Police Officer feedback on a quarterly basis as indicated in this paragraph. We noted that CPD Training Directive S11-02 (*Field Training and Evaluation Program*) does require Probationary Police Officers to complete the Field Training and Evaluation Program (also known as the FTEP) Critique Survey on a quarterly basis and forward it confidentially to the Field Training and Evaluation Program Section of the Bureau of Patrol (also known BoP). S11-02 does not require the CPD to document received Probationary Police Officer feedback and is silent on the Education and Training Division and Bureau of Patrol feedback sharing requirements. Therefore, we found the City and the CPD to not have achieved Preliminary compliance.

Progress in the Sixth Reporting Period

To demonstrate compliance with ¶313, this reporting period the CPD submitted revised versions of Training Directive S11-02, *Field Training and Evaluation Program* (May and June 2022), including a Comments Matrix showing changes to the

prior version of S11-02 produced in the last reporting period and the CPD's responses to comments offered by the IMT. The CPD also submitted the *2022 Annual In-Service Field Training Officer Refresher Training Curriculum* (June 2022), including a revised PowerPoint, a revised outline of the Curriculum, a 2022 Field Training Officer Pre- and Post-Training Test Questions, and a Comment Review document showing the CPD's responses and edits based on feedback from the IMT and the Office of the Illinois Attorney General to the earlier version of the training materials.

S11-02 § VIII(A)(9) requires Probationary Police Officers to critique the Field Training and Evaluation Program (also known as FTEP) quarterly by completing the Field Training and Evaluation Program Critique Survey and forwarding it directly and confidentially to the Field Training and Evaluation Program Section, Bureau of Patrol. The policy specifies the parameters for that feedback to include ¶313 required language, meeting Preliminary compliance thresholds. No additional substantive data were provided.

***

The City and the CPD achieved Preliminary compliance during this reporting period. Looking forward, Secondary compliance can be demonstrated by completion of Field Training Officer, supervisors and recruit training or orientation on the policy and completion of a full recruit training cycle using the prescribed feedback process. The IMT will assess policy, training plans, Field Training and Evaluation Program-related materials, and data collection instruments rate to assess Secondary compliance with the requirements of this paragraph.

Paragraph 313 Compliance Progress History

FIRST REPORTING PERIOD	SECOND REPORTING PERIOD	THIRD REPORTING PERIOD
SEPTEMBER 1, 2019 – AUGUST 31, 2019	SEPTEMBER 1, 2019 – FEBRUARY 29, 2020	MARCH 1, 2020 – DECEMBER 31, 2020
COMPLIANCE PROGRESS:	COMPLIANCE PROGRESS:	COMPLIANCE PROGRESS:
Not Applicable	Not Applicable	Status Update
FOURTH REPORTING PERIOD	**FIFTH REPORTING PERIOD**	**SIXTH REPORTING PERIOD**
JANUARY 1, 2021 – JUNE 30, 2021	JULY 1, 2021 – DECEMBER 31, 2021	JANUARY 1, 2022 – JUNE 30, 2022
COMPLIANCE PROGRESS:	COMPLIANCE PROGRESS:	COMPLIANCE PROGRESS:
None	None	Preliminary

Training: ¶314

314. *The Education and Training Division and Bureau of Patrol will review, consistent with their scope of responsibility within the Field Training and Evaluation Program, aggregate PPO feedback on a quarterly basis; document their responses, including the rationale behind any responsive action taken or decision to take no action; and share such feedback with the TOC and, as necessary, FTOs and FTO supervisors.*

Compliance Progress (Reporting Period: January 1, 2022, through June 30, 2022)

Recurring Schedule: Quarterly ☑ **Met** ☐ **Missed**

Preliminary: ***In Compliance*** **(NEW)**
Secondary: ***Not in Compliance***
Full: ***Not Yet Assessed***

The City and the CPD achieved Preliminary compliance with the requirements of ¶314 during this reporting period.

To evaluate Preliminary compliance with ¶314, we reviewed the City's and the CPD's relevant policies and documents following the process described in the Consent Decree (¶¶626–41), which outlines applicable consultation, resolution, workout, and public comment periods. To evaluate Secondary compliance with this paragraph, we reviewed data to determine if the CPD's plans and policies ensure that the Education and Training Division and Bureau of Patrol review aggregate Probationary Police Officers' feedback on a quarterly basis, documents their responses as required by this paragraph, and share such feedback with the Training Oversight Committee, Field Training Officers (FTOs) and FTO supervisors as appropriate and necessary.

Progress before the Sixth Reporting Period

During the previous reporting period, the IMT assessed compliance by reviewing CPD plans and policies to aggregate Probationary Police Officer feedback on a quarterly basis as indicated in this paragraph. We noted that CPD Training Directive S11-02 (*Field Training and Evaluation Program*) does require Probationary Police Officers to complete the Field Training and Evaluation Program Critique Survey on a quarterly basis and forward it confidentially to the Field Training and Evaluation Program Section, Bureau of Patrol. S11-02 does not require the CPD to document received Probationary Police Officer feedback and is silent on the Education and Training Division and Bureau of Patrol feedback sharing requirements. Therefore, we found the City and the CPD to not have achieved Preliminary compliance.

Progress in the Sixth Reporting Period

To demonstrate compliance with ¶314, this reporting period the CPD submitted revised versions of Training Directive S11-02, *Field Training and Evaluation Program* (May and June 2022), including a Comments Matrix showing changes to the prior version of S11-02 produced in the last reporting period and the CPD's responses to comments offered by the IMT. The CPD also submitted the *2022 Annual In-Service Field Training Officer Refresher Training Curriculum* (June 2022), including a revised PowerPoint, a revised outline of the Curriculum, a 2022 Field Training Officer Pre- and Post-Training Test Questions, and a Comment Review document showing the CPD's responses and edits based on feedback from the IMT and the Office of the Illinois Attorney General to the earlier version of the training materials.

S11-02 § VIII (A)(9) requires Probationary Police Officers to critique the Field Training and Evaluation Program quarterly by completing the Field Training and Evaluation Program Critique Survey and forwarding it directly and confidentially to the Field Training and Evaluation Program Section, Bureau of Patrol. S11-02 § VIII(A)(9)(c) requires the Strategic Initiatives Division to collect and enter the information into a Tableau dashboard for the Bureau of Patrol and Training and Support Group to review, document, share relevant feedback and submit documentation to the Training Oversight Committee, as required by ¶314. S11-02 § VIII(I)(7) requires the Field Training and Evaluation Section, Bureau of Patrol, to "conduct and maintain documentation of the Field Training and Evaluation Program Critique Survey quarterly and share feedback with the Training and Support Group, the Training Oversight Committee, and as necessary to FTOs and FTO supervisors…" These collective policies cite the requirements of ¶314, reaching the Preliminary compliance threshold.

The City and the CPD did not provide substantive data for Secondary compliance in the sixth reporting period.

***

The City and the CPD achieved Preliminary compliance during this reporting period. Looking forward, to achieve Secondary compliance status, the Education and Training Division, Bureau of Patrol, Field Training Officers, Field Training Officer supervisors, and Training Oversight Committee training or orientation on the applicable ¶314 compliant policy must be completed, and a full recruit training cycle completed. Full compliance requires that the Education and Training Division, Bureau of Patrol, Field Training Officers, Field Training Officer supervisors, and Training Oversight Committee training or orientation on policy is completed and Probationary Police Officer feedback is reviewed, documented, and shared as required by this paragraph.

Paragraph 314 Compliance Progress History

FIRST REPORTING PERIOD	SECOND REPORTING PERIOD	THIRD REPORTING PERIOD
SEPTEMBER 1, 2019 – AUGUST 31, 2019	SEPTEMBER 1, 2019 – FEBRUARY 29, 2020	MARCH 1, 2020 – DECEMBER 31, 2020
COMPLIANCE PROGRESS:	COMPLIANCE PROGRESS:	COMPLIANCE PROGRESS:
Not Applicable	Not Applicable	Not Applicable
FOURTH REPORTING PERIOD	**FIFTH REPORTING PERIOD**	**SIXTH REPORTING PERIOD**
JANUARY 1, 2021 – JUNE 30, 2021	JULY 1, 2021 – DECEMBER 31, 2021	JANUARY 1, 2022 – JUNE 30, 2022
COMPLIANCE PROGRESS:	COMPLIANCE PROGRESS:	COMPLIANCE PROGRESS:
None	None	Preliminary

Training: ¶315

***315**. CPD will create a mechanism for FTOs to provide feedback regarding the quality of the Field Training and Evaluation Program, including suggestions for changes to FTO training, the PPO evaluation process, and recruit training. The Education and Training Division and Bureau of Patrol will review, consistent with their scope of responsibility within the Field Training and Evaluation Program, FTO feedback on a quarterly basis and, as necessary and appropriate, share such feedback with the Training Oversight Committee, FTOs, and FTO supervisors.*

Compliance Progress

(Reporting Period: January 1, 2022, through June 30, 2022)

Recurring Schedule: Quarterly ☐ **Met** ☑ **Missed**

Preliminary: ***Not in Compliance***
Secondary: ***Not in Compliance***
Full: ***Not Yet Assessed***

The City and the CPD failed to achieve any level of compliance with the requirements of ¶315 during this reporting period.

To evaluate Preliminary compliance with ¶315, we reviewed the City's and the CPD's relevant policies and documents following the process described in the Consent Decree (¶¶626–41), which outlines applicable consultation, resolution, workout, and public comment periods. To evaluate Secondary compliance with this paragraph, we reviewed data to determine if the CPD's plans and policies ensure that a mechanism is in place for Field Training Officers (FTO) to provide feedback regarding the quality of the Field Training and Evaluation Program as required by this paragraph and that the Education Training Division and Bureau of Patrol review FTO feedback quarterly and share such feedback with the Training Oversight Committee, FTOs and FTO supervisors as necessary and appropriate. The IMT also sought to determine if the Education and Training Division, Bureau of Patrol, FTO, FTO supervisors, and Training Oversight Committee training or orientation on the policy required under this paragraph is completed and that a full recruit training cycle completed.

Progress before the Sixth Reporting Period

During the previous reporting period, the IMT assessed compliance and determined that the City and the CPD lost Preliminary compliance with this paragraph. Preliminary compliance necessitates that CPD has incorporated the requirements of this paragraph into policy. We reviewed CPD Training Directive S11-11 (*Training Oversight Committee*) to substantiate maintenance of Preliminary compliance

achieved during the fourth reporting period. However, S11-11 lacks a requirement to review quarterly Field Training Officer feedback and share, as appropriate, with the Training Oversight Committee, Field Training Officers, and Field Training Officer supervisors. Additionally, we noted that Preliminary compliance requires a process to include "quality of the Field Training and Evaluation Program, including suggestions for changes to Field Training Officer training, the Probationary Police Officer evaluation process, and recruit training."

Progress in the Sixth Reporting Period

The City and the CPD did not submit any data to establish any level of compliance during this reporting period. The IMT did however review a memo dated January 19, 2022 from the First Deputy to the Superintendent regarding the 2021 Annual Field Training and Evaluation Review.

That document states:

> *Paragraph 315 of the Consent Decree requires Field Training Officer feedback on the program. The Field Training and Evaluation Section continues to conduct quarterly surveys. Field Training Officer feedback was aggregated, and responses were documented. The survey results are shared with the Training and Support Group to assist training development and modifications. The feedback recommends more training in report writing, traffic-related offenses, arrest procedures, and more scenario-based interactive training for the Probationary Police Officers before leaving the academy.*

The IMT further reviewed Training Oversight Committee minutes from December 14, 2021. Item #6 is recorded as "Field Training & Evaluation Program 2021 Annual Review." A presentation is included in the minutes, indicating the Field Training Officer feedback was shared with the Training Oversight Committee, as required by this paragraph. There is no indication that this information was shared with Field Training Officers and Field Training Officer supervisors or that there is CPD policy guidance mandating this ¶315 required process. Accordingly, no level of compliance is achieved.

***

The City and the CPD failed to achieve any level of compliance during this reporting period. Looking forward, Preliminary compliance requires the requirements of this paragraph be written into policy. Several additional data sources are required to demonstrate Secondary compliance, including a sample of quarterly surveys. Substantive questions soliciting feedback on Probationary Police Officer evaluations

are needed. Field Training Officer surveys from each previous and contiguous quarter are needed to demonstrate the quarterly feedback is captured as required. Data reflecting that the Education and Training Division and the Bureau of Patrol have reviewed each quarter's feedback and shared, as appropriate, with the Training Oversight Committee, Field Training Officers and Field Training Officer supervisors are needed.

Full compliance can be demonstrated when the Education and Training Division, the Bureau of Patrol, Field Training Officers, Field Training Officer supervisors, and Training Oversight Committee training or orientation on policy are completed and multiple consecutive full recruit training cycles meeting ¶315 requirements are successfully completed as required.

Paragraph 315 Compliance Progress History

FIRST REPORTING PERIOD	SECOND REPORTING PERIOD	THIRD REPORTING PERIOD
SEPTEMBER 1, 2019 – AUGUST 31, 2019	SEPTEMBER 1, 2019 – FEBRUARY 29, 2020	MARCH 1, 2020 – DECEMBER 31, 2020
COMPLIANCE PROGRESS:	COMPLIANCE PROGRESS:	COMPLIANCE PROGRESS:
Not Applicable	Not Applicable	Status Update
FOURTH REPORTING PERIOD	**FIFTH REPORTING PERIOD**	**SIXTH REPORTING PERIOD**
JANUARY 1, 2021 – JUNE 30, 2021	JULY 1, 2021 – DECEMBER 31, 2021	JANUARY 1, 2022 – JUNE 30, 2022
COMPLIANCE PROGRESS:	COMPLIANCE PROGRESS:	COMPLIANCE PROGRESS:
Preliminary	None	None

Training: ¶316

316. *The TOC will annually review the Field Training and Evaluation Program and consider best practices in this area as well as feedback and recommendations from FTOs and PPOs. Additionally, the TOC will review referrals and recommendations by the Field Training and Evaluation Review Board to the Bureau of Patrol. Based on this information, the TOC will recommend to the Superintendent the implementation of any appropriate changes to policies or procedures related to the Field Training and Evaluation Program.*

Compliance Progress

(Reporting Period: January 1, 2022, through June 30, 2022)

Recurring Schedule: Annually ☑ **Met** ☐ **Missed**

Preliminary: ***In Compliance*** **(NEW)**
Secondary: ***Not in Compliance***
Full: ***Not Yet Assessed***

The City and CPD achieved Preliminary compliance with the requirements of ¶316 during this reporting period.

To evaluate Preliminary compliance with ¶316, we reviewed the City's and the CPD's relevant policies and documents following the process described in the Consent Decree (¶¶626–41), which outlines applicable consultation, resolution, workout, and public comment periods. To evaluate Secondary compliance with this paragraph, we reviewed data to determine if the requirements of this paragraph are written into policy. Specifically, the IMT reviewed policy, data, and training sources, including Training Oversight Committee meeting notes, special orders, Field Training Evaluation Program documentation, and other documents including annual reviews and recommendations provided to the Superintendent, to determine if the Field Training Evaluation Program Review Board, Education and Training Division, Bureau of Patrol, Field Training Officers, Field Training Officer supervisors, and Training Oversight Committee training or orientation on policy is completed and a full annual training cycle completed. Such data must demonstrate that the CPD has established a reliable process for documenting the referrals and recommendations received from these sources. The IMT also sought to verify sufficient attendance records (*i.e.*, 95% of relevant personnel), including hours attended.

Progress before the Sixth Reporting Period

During the previous reporting period, the IMT assessed Preliminary compliance achieved during the fourth reporting period. The City and the CPD did not provide any documents or data during the previous reporting period to substantiate

maintenance of Preliminary compliance or efforts made towards Secondary compliance. The IMT reviewed CPD Training Directive S11-11 (*Training Oversight Committee*) for evidence of Preliminary compliance, but S11-11 does not meet the requirements of ¶316. We noted that Secondary compliance may be achieved through evidence from annual reviews and recommendations provided to the Superintendent, documentation that training was provided in accordance with the policy, and a full annual training cycle compliant with ¶316 and documentation substantiating the referrals and recommendations received.

Progress in the Sixth Reporting Period

To demonstrate compliance with ¶316, this reporting period the CPD submitted meeting materials from Training Oversight Committee meetings occurring in December of 2021 and January of 2022. The Training Oversight Committee meeting materials produced include minutes and agendas for the meetings occurring in December 2021 and January 2022, as well as virtual votes on the following: (i) the *2022 Training Plan*; (ii) the *2022 Detention Facility Annual Review*; and (iii) the *2022 Peer Support 8-Hour Refresher Course*. The Training Oversight Committee meeting materials produced also included a Field Training and Evaluation Program Recommendation Memorandum (January 2022). Additionally, the IMT reviewed S11-11 (*Training Oversight Committee*), although it was not submitted as documentation of compliance during this reporting period.

The *Field Training and Evaluation Program Recommendation Memorandum*, dated January 19, 2022, from the First Deputy to the Superintendent is regarding the 2021 Annual Field Training and Evaluation Review. That document states "Paragraph 316 requires the establishment of the annual review by the Training Oversight Committee of the Field Training Officer program and consideration of best practices for the program. This annual review was presented to the Training Oversight Committee on December 14, 2021, by a representative from the Field Training and Evaluation Section. Finally, ¶316 requires the Training Oversight Committee to recommend to the Superintendent the implementation of any appropriate changes to the policies or procedures related to the Field Training and Evaluation Program. There are no recommendations at this time."

The IMT further reviewed Training Oversight Committee minutes from December 14, 2021. Item #6 is recorded as "Field Training & Evaluation Program 2021 Annual Review." A presentation is included in the minutes, indicating the Probationary Police Officer and Field Training Officer feedback was shared with the Training Oversight Committee, as required by this paragraph.

These documents are important components of the compliance requirement for ¶316. The ¶316 requirements are enshrined in CPD policy contained in S11-11 (*Training Oversight Committee*) § III.A.13. Accordingly, Preliminary compliance is achieved.

***

The City and CPD achieved Preliminary compliance during this reporting period. Secondary compliance may be demonstrated through Training Oversight Committee meeting notes, special orders, Field Training Evaluation Program documentation, and other documents including annual reviews and recommendations provided to the Superintendent. Additionally, Secondary compliance requires that Field Training Evaluation Program Review Board, Education and Training Division, Bureau of Patrol, Field Training Officers, Field Training Officer supervisors, and Training Oversight Committee training or orientation on policy to be completed and for a full annual training cycle completed. The CPD must have established a reliable process to document the referrals and recommendations received from these sources.

Paragraph 316 Compliance Progress History

FIRST REPORTING PERIOD	SECOND REPORTING PERIOD	THIRD REPORTING PERIOD
SEPTEMBER 1, 2019 – AUGUST 31, 2019	SEPTEMBER 1, 2019 – FEBRUARY 29, 2020	MARCH 1, 2020 – DECEMBER 31, 2020
COMPLIANCE PROGRESS:	COMPLIANCE PROGRESS:	COMPLIANCE PROGRESS:
Not Applicable	None	Preliminary
FOURTH REPORTING PERIOD	**FIFTH REPORTING PERIOD**	**SIXTH REPORTING PERIOD**
JANUARY 1, 2021 – JUNE 30, 2021	JULY 1, 2021 – DECEMBER 31, 2021	JANUARY 1, 2022 – JUNE 30, 2022
COMPLIANCE PROGRESS:	COMPLIANCE PROGRESS:	COMPLIANCE PROGRESS:
Preliminary	None	Preliminary

Training: ¶317

317. *Regular in-service training is critical to ensure that CPD officers continue to hone important policing skills and remain up-to-date on changes in the law, CPD policy, technology, community expectations, and developments in best practices. In-service training should, as appropriate, reinforce CPD's commitment to procedural justice, de-escalation, impartial policing, and community policing.*

Compliance Progress (Reporting Period: January 1, 2022, through June 30, 2022)

Preliminary:	***In Compliance*** **(THIRD REPORTING PERIOD)**
Secondary:	***Not in Compliance***
Full:	***Not Yet Assessed***

The City and the CPD maintained Preliminary compliance with these requirements during this reporting period.

To evaluate Preliminary compliance with ¶317, we reviewed the City's and the CPD's relevant policies and documents following the process described in the Consent Decree (¶¶626–41), which outlines applicable consultation, resolution, workout, and public comment periods. To evaluate Secondary compliance with this paragraph, we reviewed data to determine whether the City and the CPD have developed reliable procedures to demonstrate that training, lesson plans, and curricula across all appropriate in-service training and evaluations demonstrate the requirements of this paragraph. The IMT also sought to verify sufficient attendance records (*i.e.*, 95% of relevant personnel), including hours attended.

Progress before the Sixth Reporting Period

During the previous reporting period, the IMT assessed compliance with this paragraph and found that the City and the CPD maintained Preliminary compliance. We reviewed the Special Order 11-10-03, *In-Service Training*, which went out for public comment on December 10, 2021. It was finalized and issued before the end of the fifth reporting period, meeting the requirements of Preliminary compliance. We noted that Secondary compliance may be achieved by submitting data reflecting that training lesson plans and curricula across all appropriate in-service training and evaluations fulfill the requirements of this paragraph.

Progress in the Sixth Reporting Period

To demonstrate compliance with ¶317, this reporting period the City and the CPD submitted Bureau of Internal Affairs (BIA) eLearning materials (April 2022), including a draft of the BIA eLearning materials and Pre- and Post-tests.

The City and the CPD did not submit data that training lesson plans and curricula across all appropriate in-service training and evaluations fulfill the requirements of this paragraph. Therefore, Secondary compliance is not achieved.

***

The City and the CPD has maintained Preliminary compliance during this reporting period. Looking forward, to achieve Secondary compliance the CPD must demonstrate that training, lesson plans, and curricula across all appropriate in-service training and evaluations demonstrate the requirements of this paragraph. Full compliance may be demonstrated when training lesson plans and curricula across all in-service training demonstrate the requirements of this paragraph and training delivery and evaluations reflect those requirements.

Paragraph 317 Compliance Progress History

FIRST REPORTING PERIOD	SECOND REPORTING PERIOD	THIRD REPORTING PERIOD
SEPTEMBER 1, 2019 – AUGUST 31, 2019	SEPTEMBER 1, 2019 – FEBRUARY 29, 2020	MARCH 1, 2020 – DECEMBER 31, 2020
COMPLIANCE PROGRESS:	COMPLIANCE PROGRESS:	COMPLIANCE PROGRESS:
Not Applicable	Not Applicable	Preliminary
FOURTH REPORTING PERIOD	**FIFTH REPORTING PERIOD**	**SIXTH REPORTING PERIOD**
JANUARY 1, 2021 – JUNE 30, 2021	JULY 1, 2021 – DECEMBER 31, 2021	JANUARY 1, 2022 – JUNE 30, 2022
COMPLIANCE PROGRESS:	COMPLIANCE PROGRESS:	COMPLIANCE PROGRESS:
Preliminary	Preliminary	Preliminary

Training: ¶318

318. *The Parties recognize that CPD has begun to develop and implement an In-Service Training Program for its officers. The Parties acknowledge that CPD has developed a project plan establishing development and implementation of the In-Service Training Program from 2018 through 2019 that includes the following components: a. a list of planned courses, including the status of the development and approval of any new course curricula; b. the dates that CPD officers collectively will start and complete the planned courses; c. the identification of any need for additional instructors, equipment, and training facilities and a schedule for addressing the needs; and d. a list of CPD personnel responsible for overseeing each project plan task.*

Compliance Progress

(Reporting Period: January 1, 2022, through June 30, 2022)

Preliminary:	***Not in Compliance***
Secondary:	***Not Yet Assessed***
Full:	***Not Yet Assessed***

This is the first reporting period that we assessed the City's and the CPD's compliance with ¶318. The City and CPD did not achieve any level of compliance during this reporting period.

To evaluate Preliminary compliance with ¶318, we reviewed the City's and the CPD's relevant policies and documents following the process described in the Consent Decree (¶¶626–41), which outlines applicable consultation, resolution, workout, and public comment periods. To evaluate Secondary compliance with this paragraph, we will need to review data to determine whether the City and the CPD have developed acceptable policies, procedures, and plans to transition from a project plan to develop and fully implement the In-Service Training Program according to the requirements of this paragraph. The IMT will also seek to verify sufficient attendance records (*i.e.*, 95% of relevant personnel), including hours attended. Where applicable, we will assess whether the City and the CPD have created the requisite positions and staffed those positions with qualified personnel in order to achieve the requirements of this paragraph.

No documents were submitted or reviewed that substantiate any compliance level.

The City and the CPD did not achieve any level of compliance during this reporting period. Looking forward, Preliminary compliance requires the City and the CPD to have developed acceptable policies, procedures, and plans to transition from a

project plan to develop and fully implement the In-Service Training Program according to the requirements of this paragraph. Secondary compliance requires the City and the CPD to have fully developed, implemented, and institutionalized the In-Service Training Program according to the requirements of this paragraph.

Paragraph 318 Compliance Progress History

FIRST REPORTING PERIOD	SECOND REPORTING PERIOD	THIRD REPORTING PERIOD
SEPTEMBER 1, 2019 – AUGUST 31, 2019	SEPTEMBER 1, 2019 – FEBRUARY 29, 2020	MARCH 1, 2020 – DECEMBER 31, 2020
COMPLIANCE PROGRESS:	COMPLIANCE PROGRESS:	COMPLIANCE PROGRESS:
Not Applicable	Not Applicable	Not Applicable
FOURTH REPORTING PERIOD	**FIFTH REPORTING PERIOD**	**SIXTH REPORTING PERIOD**
JANUARY 1, 2021 – JUNE 30, 2021	JULY 1, 2021 – DECEMBER 31, 2021	JANUARY 1, 2022 – JUNE 30, 2022
COMPLIANCE PROGRESS:	COMPLIANCE PROGRESS:	COMPLIANCE PROGRESS:
Not Applicable	Not Applicable	None

Training: ¶319

319. *CPD will implement the In-Service Training Program to comport with the Training Plan and the requirements and goals of this Agreement.*

Compliance Progress

(Reporting Period: January 1, 2022, through June 30, 2022)

Preliminary: ***In Compliance*** **(THIRD REPORTING PERIOD)**
Secondary: ***Not in Compliance***
Full: ***Not Yet Assessed***

The City and the CPD maintained Preliminary compliance with the requirements of ¶319 during this reporting period.

To evaluate Preliminary compliance with ¶319, we reviewed the City's and the CPD's relevant policies and documents following the process described in the Consent Decree (¶¶626–41), which outlines applicable consultation, resolution, workout, and public comment periods. To evaluate Secondary compliance with this paragraph, we reviewed data to determine if the CPD has implemented an In-Service Training Program that comports with the annual training plan and with all other applicable Consent Decree requirements.

Progress before the Sixth Reporting Period

During the previous reporting period, the IMT reviewed policies that require implementation of In-Service Training that is consistent with the applicable *Annual Training Plan* and Consent Decree requirements. We reviewed the *2022 Training Needs Assessment* and the *2022 Training Plan* and found that Preliminary compliance requirements were met in each relevant paragraph. Compliance ratings for each paragraph included the following:

¶	Section	Compliance Rating in the Fifth Reporting Period
272	Training	Preliminary
317	Training	Preliminary
318	Training	N/A
320	Training	Preliminary
321	Training	Preliminary
322	Training	Secondary
323	Training	Preliminary
324	Training	Preliminary
326	Training	Preliminary
327	Training	Preliminary
328	Training	Preliminary
329	Training	Preliminary

Progress in the Sixth Reporting Period

The City and the CPD did not submit any data to establish any level of compliance during this reporting period. However, consistent with our methodology applied during the previous reporting period, we have applied the results of the following related paragraphs to assign a rating here.

¶	Section	Compliance Rating in the Fifth Reporting Period
272	Training	Preliminary
317	Training	Preliminary
318	Training	None
320	Training	Preliminary
321	Training	Preliminary
322	Training	Secondary
323	Training	Preliminary
324	Training	Preliminary
326	Training	Preliminary
327	Training	Preliminary
328	Training	Preliminary
329	Training	Preliminary

***

The City and the CPD maintained Preliminary compliance during this reporting period. Looking forward, Secondary compliance requires actually implementing and operating the In-Service Training program in a manner that complies with the requirements of ¶¶317–29 and consistent with ¶272(e), (f), (g), (i), (k), (l), and (m)

requirements. Secondary compliance in all of these paragraphs and subparagraphs is *prima facie* evidence of Secondary compliance in this paragraph.

Paragraph 319 Compliance Progress History

FIRST REPORTING PERIOD SEPTEMBER 1, 2019 – AUGUST 31, 2019	SECOND REPORTING PERIOD SEPTEMBER 1, 2019 – FEBRUARY 29, 2020	THIRD REPORTING PERIOD MARCH 1, 2020 – DECEMBER 31, 2020
COMPLIANCE PROGRESS: Not Applicable	COMPLIANCE PROGRESS: Not Applicable	COMPLIANCE PROGRESS: Preliminary
FOURTH REPORTING PERIOD **JANUARY 1, 2021 – JUNE 30, 2021**	**FIFTH REPORTING PERIOD** **JULY 1, 2021 – DECEMBER 31, 2021**	**SIXTH REPORTING PERIOD** **JANUARY 1, 2022 – JUNE 30, 2022**
COMPLIANCE PROGRESS: **Preliminary**	**COMPLIANCE PROGRESS:** **Preliminary**	**COMPLIANCE PROGRESS:** **Preliminary**

Training: ¶320

320. The In-Service Training Program will require that all non-probationary police officers who are active duty and available for assignment, including supervisors and command staff, receive, at a minimum, the following amount of in-service training each year: a. 16 hours by the end of 2018; b. 24 hours by the end of 2019; c. 32 hours by the end of 2020; and d. 40 hours by the end of 2021, and in each subsequent year.

Compliance Progress

(Reporting Period: January 1, 2022, through June 30, 2022)

Deadline:	March 5, 2022*	✓ **Met**	☐ **Missed**
	*Extended from December 31, 2021, due to COVID-19		
Preliminary:	***In Compliance* (THIRD REPORTING PERIOD)**		
Secondary:	***Not in Compliance***		
Full:	***Not Yet Assessed***		

The City and the CPD maintained Preliminary compliance with the requirements of ¶320 during this reporting period.

To evaluate Preliminary compliance with ¶320, we reviewed the City's and the CPD's relevant policies and documents following the process described in the Consent Decree (¶¶626–41), which outlines applicable consultation, resolution, workout, and public comment periods. To evaluate Secondary compliance with this paragraph, we reviewed data to determine whether CPD documentation demonstrates that 95% of eligible personnel received the training required by this paragraph.

Progress before the Sixth Reporting Period

During the previous reporting period, the IMT assessed compliance and determined that the City and the CPD maintained Preliminary compliance. We reviewed the *2022 Training Plan*, Training Directive S11-10 (*Department Training Records Maintenance*) and a memorandum regarding the 95% completion of in-service training. These indicated Preliminary compliance with the requirements of this paragraph. However, we were unable to assess Secondary compliance due to the extended deadline across multiple reporting periods and a pending document submission for evidence of in-service training compliance.

Progress in the Sixth Reporting Period

To demonstrate compliance with ¶320, this reporting period the CPD submitted the following training materials:

- *De-Escalation, Response to Resistance, and Use of Force Training* materials (January 2022), including a Lesson Plan, a PowerPoint, Test Questions, Agenda materials and an Equipment Checklist, a Participant Guide, a Task File, and a Comment Matrix showing changes from a prior version of the training materials.

- *Active Bystandership for Law Enforcement (ABLE) Training* materials (January 2022), including an ABLE Facilitator Guide and an ABLE PowerPoint. The CPD also submitted additional ABLE Training materials (June 2022), including ABLE Content Knowledge Test Question Bank with Answers, a Comment Matrix showing changes from the prior version of the training materials, and a To-From Subject Report (April 2022) describing plans to certify Training and Support Group personnel as trainers for the ABLE Training program.

- *Gender-Based Violence In-Service Training* materials (February 2022), including a Comprehensive Response to Gender-Based Violence Training Modules, a Training Curriculum, a Training Activity Handbook, a Training Workbook, and Notes regarding Module Videos. The CPD also submitted additional Gender-Based Violence In-Service Training materials (June 2022), including Gender-Based Violence Modules (Modules 1-9, March 2022), Gender-Based Violence Scenario Sheets, Gender-Based Violence Training Evaluation Recommendations, Gender-Based Violence Training Workbook, Gender-Based Violence Pre- and Post-Test Questions, Questions for Survivor Videos, a Technical Report, and Survivor Testimony DV Modules and Survivor Testimony for Intro Module.

- In-Service CIT Training materials (March 2022), including a PowerPoint, a Lesson Plan, a Facilitator Guide, a Participant Guide, a Detailed Agenda, a Pre- and Post-Test, a Training Community Advisory Committee Comments and Response Matrix, and In-Service Crisis Intervention Videos. The CPD also submitted additional In-Service CIT Training materials (June 2022), including revised training materials, fifteen different CPD Policies addressing crisis intervention, a Comment Matrix showing changes from the prior version of the training materials, and a Crisis Intervention Resource Guide.

- Constitutional Policing Course materials, including the 2022 Constitutional Policing Course materials, a Lesson Plan, a PowerPoint, a Module Overview, a Participant Guide, an Instructor Pre-Course Checklist, and a Pre- and Post-Test. The course materials provided also included a set of 2022 Constitutional Policing Course Feedback, including the March 2022 Training Community Advisory Committee meeting notes discussing in part the 2022 Constitutional Policing Course materials and written feedback from the Civilian Office of Police Accountability (March 2022).

- Evidence of Community Policing In-Service Training Completion (May 2022), including a Community Policing – Screenshot of Tableau Dashboard, Community Policing – Roster of Department members completed training, an Audit of In-Service Training Records, and a Memorandum from the Deputy Chief of the Training Division.

- Evidence of Use of Force In-Service Training Completion (May 2022), including Use of Force: Communications – Screenshot of Tableau Dashboard, Use of Force: Procedures – Screenshot Tableau Dashboard, Use of Force: Communications – Roster of Department members completed training, Audit of In-Service Training Records, and a Data Validation Memorandum.

- Evidence of Officer Wellness In-Service Training Completion (June 2022), including Officer Wellness – Screenshot of Tableau Dashboard Officer Wellness, Officer Wellness – Roster of members completed training, and Audit of In-Service Training Records.

- A cover letter (2022 May 5) seeking to clarify the CPD's position that the Training Directives S11-10 (*Department Training Records Maintenance*), S11-01 (*Recruit Training*), S11-10-02 (*Pre-Service Training*), and S11-10-03 (*In-Service Training*) previously produced on December 29, 2021 support Preliminary compliance with the requirements of this paragraph.

The cover letter clarifying S11-10-03 (*In-Service Training*) allows maintenance of Preliminary compliance. Documentation establishing 95% or higher attendance in each 2021 In-Service Training class is required to substantiate Secondary compliance. Some, but not all, are provided. Full compliance requires sustainment of Secondary compliance for at least two consecutive reporting periods.

***

The City and the CPD maintained Preliminary compliance during this reporting period. Looking forward, data establishing 95% or higher attendance in each 2021 In-Service Training class is required to substantiate Secondary compliance. Some, but not all, were provided this reporting period. Full compliance requires sustainment of Secondary compliance for at least two consecutive reporting periods.

Paragraph 320 Compliance Progress History

FIRST REPORTING PERIOD	SECOND REPORTING PERIOD	THIRD REPORTING PERIOD
SEPTEMBER 1, 2019 – AUGUST 31, 2019	SEPTEMBER 1, 2019 – FEBRUARY 29, 2020	MARCH 1, 2020 – DECEMBER 31, 2020
COMPLIANCE PROGRESS:	COMPLIANCE PROGRESS:	COMPLIANCE PROGRESS:
Preliminary	Preliminary	Preliminary
FOURTH REPORTING PERIOD	**FIFTH REPORTING PERIOD**	**SIXTH REPORTING PERIOD**
JANUARY 1, 2021 – JUNE 30, 2021	JULY 1, 2021 – DECEMBER 31, 2021	JANUARY 1, 2022 – JUNE 30, 2022
COMPLIANCE PROGRESS:	COMPLIANCE PROGRESS:	COMPLIANCE PROGRESS:
Secondary	Preliminary	Preliminary

Training: ¶321

***321**. CPD's In-Service Training Program will include specific courses that will be mandatory for every officer in that training year.*

Compliance Progress

(Reporting Period: January 1, 2022, through June 30, 2022)

Recurring Schedule:	March 5, 2022*	☑ **Met**	☐ **Missed**
	*Extended from December 31, 2021, due to COVID-19		
Preliminary:	***In Compliance*** **(THIRD REPORTING PERIOD)**		
Secondary:	***Not in Compliance***		
Full:	***Not Yet Assessed***		

The City and the CPD maintained Preliminary compliance with ¶321 during this reporting period.

To evaluate Preliminary compliance with ¶321, we reviewed the City's and the CPD's relevant policies and documents following the process described in the Consent Decree (¶¶626–41), which outlines applicable consultation, resolution, workout, and public comment periods. To evaluate Secondary compliance with this paragraph, we reviewed data to determine whether CPD's In-Service Training Program includes the courses required by this paragraph and that CPD documentation demonstrates that 95% of eligible personnel received the training required under this paragraph.

Progress before the Sixth Reporting Period

During the previous reporting period, the IMT assessed compliance and determined that the City and the CPD maintained Preliminary compliance. We reviewed the *2022 Training Plan*, Training Directive S11-10 (*Department Training Records Maintenance*), and a memo regarding the 95% completion of in-service training. These indicated Preliminary compliance with the requirements of this paragraph. However, we were unable to assess Secondary compliance due to the extended deadline across multiple reporting periods and a pending document submission for evidence of in-service training compliance. The CPD noted that a document would be produced in the sixth reporting period satisfying this requirement. We noted that Secondary compliance may be achieved by submitting training records for the 2021 course list, including lesson plans and attendance records.

Progress in the Sixth Reporting Period

Preliminary compliance requires affirming that the requirements of this paragraph are written into policy and has previously been established. Secondary compliance

requires CPD documentation demonstrating that 95% of eligible personnel received the training required by this paragraph.

Mandatory 2022 courses are established in the *Training Plan*, and include De-escalation, Response to Resistance and Use of Force, Crisis Intervention, Constitutional Policing, Gender-Based Violence, and Active Bystandership for Law Enforcement. To demonstrate compliance with ¶321 this reporting period, the CPD submitted the following training materials:

- *De-Escalation, Response to Resistance, and Use of Force Training* materials (January 2022), including a Lesson Plan, a PowerPoint, Test Questions, Agenda materials and an Equipment Checklist, a Participant Guide, a Task File, and a Comment Matrix showing changes from a prior version of the training materials.

- *Active Bystandership for Law Enforcement (ABLE) Training* materials (January 2022), including an ABLE Facilitator Guide and an ABLE PowerPoint. The CPD also submitted additional ABLE Training materials (June 2022), including ABLE Content Knowledge Test Question Bank with Answers, a Comment Matrix showing changes from the prior version of the training materials, and a To-From Subject Report (April 2022) describing plans to certify Training and Support Group personnel as trainers for the ABLE Training program.

- *Gender-Based Violence In-Service Training* materials (February 2022), including a Comprehensive Response to Gender-Based Violence Training Modules, a Training Curriculum, a Training Activity Handbook, a Training Workbook, and Notes regarding Module Videos. The CPD also submitted additional Gender-Based Violence In-Service Training materials (June 2022), including Gender-Based Violence Modules (Modules 1-9, March 2022), Gender-Based Violence Scenario Sheets, Gender-Based Violence Training Evaluation Recommendations, Gender-Based Violence Training Workbook, Gender-Based Violence Pre- and Post-Test Questions, Questions for Survivor Videos, a Technical Report, and Survivor Testimony DV Modules and Survivor Testimony for Intro Module.

- *In-Service Crisis Intervention Team Training* materials (March 2022), including a PowerPoint, a Lesson Plan, a Facilitator Guide, a Participant Guide, a Detailed Agenda, a Pre- and Post-Test, a Training Community Advisory Committee Comments and Response Matrix, and In-Service Crisis Intervention Videos. The CPD also submitted additional In-Service CIT Training materials (June 2022), including revised training materials, fifteen different CPD Policies addressing crisis intervention, a Comment Matrix showing changes from the prior version of the training materials, and a Crisis Intervention Resource Guide.

- *Constitutional Policing Course* materials, including the 2022 Constitutional Policing Course materials, a Lesson Plan, a PowerPoint, a Module Overview, a Participant Guide, an Instructor Pre-Course Checklist, and a Pre- and Post-Test. The course materials provided also included a set of 2022 Constitutional Policing Course Feedback, including the March 2022 Training Community Advisory Committee meeting notes discussing in part the 2022 Constitutional Policing Course materials and written feedback from the Civilian Office of Police Accountability (March 2022).

- Evidence of Community Policing In-Service Training Completion (May 2022), including a Community Policing – Screenshot of Tableau Dashboard, Community Policing – Roster of Department members completed training, an Audit of In-Service Training Records, and a Memorandum from the Deputy Chief of the Training Division.

- Evidence of Use of Force In-Service Training Completion (May 2022), including Use of Force: Communications – Screenshot of Tableau Dashboard, Use of Force: Procedures – Screenshot Tableau Dashboard, Use of Force: Communications – Roster of Department members completed training, Audit of In-Service Training Records, and a Data Validation Memorandum.

- Evidence of Officer Wellness In-Service Training Completion (June 2022), including Officer Wellness – Screenshot of Tableau Dashboard Officer Wellness, Officer Wellness – Roster of members completed training, and Audit of In-Service Training Records.

The IMT appreciates the volume of documents submitted as data to support compliance. However, attendance records for each course are also required for Secondary compliance, which were not provided this reporting period.

***

The City and the CPD maintained Preliminary compliance during this reporting period. Looking forward, Secondary compliance requires CPD documentation demonstrating that 95% of eligible personnel received the training required by this paragraph. The CPD will need to submit training attendance records to demonstrate that at least 95% of all eligible personnel attended each required training to establish Secondary compliance. Full compliance requires sustained Secondary compliance.

Paragraph 321 Compliance Progress History

FIRST REPORTING PERIOD
SEPTEMBER 1, 2019 – AUGUST 31, 2019
COMPLIANCE PROGRESS:
Not Applicable

SECOND REPORTING PERIOD
SEPTEMBER 1, 2019 – FEBRUARY 29, 2020
COMPLIANCE PROGRESS:
Not Applicable

THIRD REPORTING PERIOD
MARCH 1, 2020 – DECEMBER 31, 2020
COMPLIANCE PROGRESS:
Preliminary

FOURTH REPORTING PERIOD
JANUARY 1, 2021 – JUNE 30, 2021
COMPLIANCE PROGRESS:
Preliminary

FIFTH REPORTING PERIOD
JULY 1, 2021 – DECEMBER 31, 2021
COMPLIANCE PROGRESS:
Preliminary

SIXTH REPORTING PERIOD
JANUARY 1, 2022 – JUNE 30, 2022
COMPLIANCE PROGRESS:
Preliminary

Training: ¶322

> ***322.*** *CPD's In-Service Training Program may also offer specific courses as elective subjects. The elective subjects will be selected and approved by the TOC in accordance with the Training Plan. The TOC will solicit and consider officer requests and will rely on the Education and Training Division's needs assessments when selecting and evaluating elective subjects.*

Compliance Progress

(Reporting Period: January 1, 2022, through June 30, 2022)

Preliminary:	***In Compliance*** **(THIRD REPORTING PERIOD)**
Secondary:	***In Compliance*** **(FOURTH REPORTING PERIOD)**
Full:	***Not in Compliance***

The City and the CPD maintained Secondary compliance with the requirements of ¶322 during this reporting period.

To evaluate Preliminary compliance with ¶322, we reviewed the City's and the CPD's relevant policies and documents following the process described in the Consent Decree (¶¶626–41), which outlines applicable consultation, resolution, workout, and public comment periods. To evaluate Secondary compliance with this paragraph, we reviewed data to demonstrate that elective and mandatory subjects of the CPD's In-Service Training Program are approved by the Training Oversight Committee and that the Training Oversight Committee has solicited and considered officer requests and relied on the *Needs Assessment* when selecting and evaluating elective subjects.

Progress before the Sixth Reporting Period

During the previous reporting period, the IMT determined that the City and the CPD maintained Preliminary and Secondary compliance with this paragraph. We reviewed the *2022 Training Needs Assessment*, the *2022 Training Plan*, a memorandum regarding the 95% completion of in-service training, and Training Oversight Committee meeting materials. The IMT also reviewed Training Directive S11-11 (*Training Oversight Committee*).

Progress in the Sixth Reporting Period

Meeting minutes from the December 2021 and January 2022 Training Oversight Committee meetings were submitted as additional data to establish compliance this reporting period. Additionally, the data submitted during the previous reporting period are still valid and continue to support Preliminary and Secondary compliance for this reporting period.

***

The City and the CPD maintained Secondary compliance during this reporting period. Looking forward, to demonstrate Full compliance, CPD must further demonstrate they have fully implemented and established a full process that aligns with requirements of ¶322. That includes providing data that courses listed as elective were actually offered. This may be established in the Training Summary Report and with attendance data for each elective topic.

Paragraph 322 Compliance Progress History

FIRST REPORTING PERIOD SEPTEMBER 1, 2019 – AUGUST 31, 2019	SECOND REPORTING PERIOD SEPTEMBER 1, 2019 – FEBRUARY 29, 2020	THIRD REPORTING PERIOD MARCH 1, 2020 – DECEMBER 31, 2020
COMPLIANCE PROGRESS: Not Applicable	COMPLIANCE PROGRESS: Not Applicable	COMPLIANCE PROGRESS: Preliminary
FOURTH REPORTING PERIOD JANUARY 1, 2021 – JUNE 30, 2021	**FIFTH REPORTING PERIOD** JULY 1, 2021 – DECEMBER 31, 2021	**SIXTH REPORTING PERIOD** JANUARY 1, 2022 – JUNE 30, 2022
COMPLIANCE PROGRESS: Secondary	COMPLIANCE PROGRESS: Secondary	COMPLIANCE PROGRESS: Secondary

Training: ¶323

323. *As part of the In-Service Training Program, mandatory and elective courses will be apportioned as follows: a. in 2018, CPD will require that each officer receive at least 16 hours of in person mandatory courses; b. in 2019, CPD will require that each officer receive at least 16 hours of in person mandatory courses, with the remaining 8 hours to be provided either as mandatory or elective courses, as determined by the TOC; c. in 2020, CPD will require that each officer receive at least 24 hours of in-person mandatory courses, with the remaining 8 hours to be provided either as mandatory or elective courses, as determined by the TOC; d. starting in 2021, and every year thereafter, CPD will require that each officer receive at least 24 hours of in-person mandatory courses with the remaining 16 hours to be provided either as mandatory or elective courses, as determined by the TOC; and e. this Agreement does not require CPD to provide more than 40 hours of annual department-wide in-service training.*

Compliance Progress (Reporting Period: January 1, 2022, through June 30, 2022)

Deadline:	March 5, 2022*	✓ **Met**	☐ **Missed**
	*Extended from December 31, 2021, due to COVID-19		
Preliminary:	***In Compliance*** **(THIRD REPORTING PERIOD)**		
Secondary:	***Not in Compliance***		
Full:	***Not Yet Assessed***		

The City and the CPD maintained Preliminary compliance with ¶323 during this reporting period.

To evaluate Preliminary compliance with ¶323, we reviewed the City's and the CPD's relevant policies and documents following the process described in the Consent Decree (¶¶626–41), which outlines applicable consultation, resolution, workout, and public comment periods. To evaluate Secondary compliance with this paragraph, we reviewed data to determine whether course attendance for each course required under ¶323(d) meets or exceeds 95% of eligible personnel required to receive the training required by this paragraph.

Progress before the Sixth Reporting Period

During the previous reporting period, the IMT assessed compliance and found the City and the CPD maintained Preliminary compliance with this paragraph. We noted that Secondary compliance could be achieved by demonstrating that at least

95% of officers received the required mix of training. The CPD noted that a document would be produced in the sixth reporting period satisfying this requirement.

Progress in the Sixth Reporting Period

To demonstrate compliance with ¶323, this reporting period the CPD submitted the following training materials:

- *De-Escalation, Response to Resistance, and Use of Force Training* materials (January 2022), including a Lesson Plan, a PowerPoint, Test Questions, Agenda materials and an Equipment Checklist, a Participant Guide, a Task File, and a Comment Matrix showing changes from a prior version of the training materials.

- *Active Bystandership for Law Enforcement (ABLE) Training* materials (January 2022), including an ABLE Facilitator Guide and an ABLE PowerPoint. The CPD also submitted additional ABLE Training materials (June 2022), including ABLE Content Knowledge Test Question Bank with Answers, a Comment Matrix showing changes from the prior version of the training materials, and a To-From Subject Report (April 2022) describing plans to certify Training and Support Group personnel as trainers for the ABLE Training program.

- *Gender-Based Violence In-Service Training* materials (February 2022), including a Comprehensive Response to Gender-Based Violence Training Modules, a Training Curriculum, a Training Activity Handbook, a Training Workbook, and Notes regarding Module Videos. The CPD also submitted additional Gender-Based Violence In-Service Training materials (June 2022), including Gender-Based Violence Modules (Modules 1-9, March 2022), Gender-Based Violence Scenario Sheets, Gender-Based Violence Training Evaluation Recommendations, Gender-Based Violence Training Workbook, Gender-Based Violence Pre- and Post-Test Questions, Questions for Survivor Videos, a Technical Report, and Survivor Testimony DV Modules and Survivor Testimony for Intro Module.

- *In-Service Crisis Intervention Team Training* materials (March 2022), including a PowerPoint, a Lesson Plan, a Facilitator Guide, a Participant Guide, a Detailed Agenda, a Pre- and Post-Test, a Training Community Advisory Committee Comments and Response Matrix, and In-Service Crisis Intervention Videos. The CPD also submitted additional In-Service CIT Training materials (June 2022), including revised training materials, fifteen different CPD Policies addressing crisis intervention, a Comment Matrix showing changes from the prior version of the training materials, and a Crisis Intervention Resource Guide.

- *Constitutional Policing Course* materials, including the 2022 Constitutional Policing Course materials, a Lesson Plan, a PowerPoint, a Module Overview, a Participant Guide, an Instructor Pre-Course Checklist, and a Pre- and Post-Test. The

course materials provided also included a set of 2022 Constitutional Policing Course Feedback, including the March 2022 Training Community Advisory Committee meeting notes discussing in part the 2022 Constitutional Policing Course materials and written feedback from the Civilian Office of Police Accountability (March 2022).

- Evidence of Community Policing In-Service Training Completion (May 2022), including a Community Policing – Screenshot of Tableau Dashboard, Community Policing – Roster of Department members completed training, an Audit of In-Service Training Records, and a Memorandum from the Deputy Chief of the Training Division.

- Evidence of Use of Force In-Service Training Completion (May 2022), including Use of Force: Communications – Screenshot of Tableau Dashboard, Use of Force: Procedures – Screenshot Tableau Dashboard, Use of Force: Communications – Roster of Department members completed training, Audit of In-Service Training Records, and a Data Validation Memorandum.

- Evidence of Officer Wellness In-Service Training Completion (June 2022), including Officer Wellness – Screenshot of Tableau Dashboard Officer Wellness, Officer Wellness – Roster of members completed training, and Audit of In-Service Training Records.

S11-03 § III(A) states:

> *all non-probationary police officers who are active duty and available for assignment, including sworn supervisors and command staff, will receive, at a minimum, 40 hours training which includes 24 hours mandatory courses and 16 hours of either mandatory or elective courses, as determined by the Training Oversight Committee and the training requirements established by the Illinois Enforcement Training and Standards Board.*

The *2022 Training Plan* establishes that "In 2022, mandatory and elective training courses will be delivered as part of the following CPD training programs: Annual In-Service Training Program; Crisis Intervention Team Program, Domestic Preparedness Program, Tactical Training Program, Law Enforcement Medical and Rescue Training Program, Weapons Discipline and De-escalation Program, Peak Performance Driving Program, eLearning Training Program, Video Services Training Program, Career Development Program, and Investigative Development Program." Mandatory courses include De-escalation, Response to Resistance and Use of Force, Crisis Intervention, Constitutional Policing, Gender-Based Violence, and Active Bystandership for Law Enforcement.

Collectively, these documents prove Preliminary compliance during this reporting period. Secondary compliance requires the CPD to demonstrate that at least 95% of officers received the ¶323 required mix of training. Although some of the training documents produced include snapshots of the Tableau Dashboard that affirms that at least 95% of eligible attendees received the training, that verification was not submitted for each ¶323(d) course. As a result, Secondary compliance requirements are not met.

***

The City and the CPD maintained Preliminary compliance during this reporting period. Looking forward, Secondary compliance may be achieved if evidence is provided demonstrating that course attendance for each course required under ¶323(d) meets or exceeds 95%. Full and sustained implementation of ¶323 requirements as demonstrated by training records, training attendance records, and lesson plans, may result in Full compliance with this paragraph.

Paragraph 323 Compliance Progress History

FIRST REPORTING PERIOD	SECOND REPORTING PERIOD	THIRD REPORTING PERIOD
SEPTEMBER 1, 2019 – AUGUST 31, 2019	SEPTEMBER 1, 2019 – FEBRUARY 29, 2020	MARCH 1, 2020 – DECEMBER 31, 2020
COMPLIANCE PROGRESS:	COMPLIANCE PROGRESS:	COMPLIANCE PROGRESS:
None	None	Preliminary
FOURTH REPORTING PERIOD	**FIFTH REPORTING PERIOD**	**SIXTH REPORTING PERIOD**
JANUARY 1, 2021 – JUNE 30, 2021	JULY 1, 2021 – DECEMBER 31, 2021	JANUARY 1, 2022 – JUNE 30, 2022
COMPLIANCE PROGRESS:	COMPLIANCE PROGRESS:	COMPLIANCE PROGRESS:
Preliminary	Preliminary	Preliminary

Training: ¶324

324. *Various sections of this Agreement contain in-service training requirements which require CPD to provide some or all of its members with training on specific topics. CPD retains the discretion to determine the sequencing, scheduling, and location of such training, unless otherwise specified by this Agreement, provided that: all in-service training identified herein will begin no later than the 2021 calendar year; is adequate in quantity, quality, type, and scope; and is consistent with the terms of this Agreement.*

Compliance Progress

(Reporting Period: January 1, 2022, through June 30, 2022)

Preliminary:	***In Compliance*** **(FIFTH REPORTING PERIOD)**
Secondary:	***Not in Compliance***
Full:	***Not Yet Assessed***

The City and the CPD maintained Preliminary compliance with the requirements of ¶324 during this reporting period.

To evaluate Preliminary compliance with ¶324, we reviewed the City's and the CPD's relevant policies and documents following the process described in the Consent Decree (¶¶626–41), which outlines applicable consultation, resolution, workout, and public comment periods. To evaluate Secondary compliance with this paragraph, we reviewed data to ascertain if the CPD's training lesson plans, instructor selections, training schedules, and curricula across all in-service training demonstrate compliance with the requirements of this paragraph**.** Such data must also demonstrate that the CPD has fully implemented the requirements of this paragraph and that training delivery has been initiated within the specified timeline and conditions. The IMT also sought to verify sufficient attendance records (*i.e*., 95% of relevant personnel), including hours attended.

Progress before the Sixth Reporting Period

During the previous reporting period, the IMT assessed compliance with this paragraph by reviewing the *2022 Training Plan* and Training Directive S11-10-03 (*In-Service Training*). We determined that the City and the CPD achieved Preliminary compliance. The CPD indicated that additional documentation reflecting "evidence documenting 95% completion of training" would be submitted in the sixth reporting period to demonstrate Secondary compliance.

Progress in the Sixth Reporting Period

Sections of this Agreement that require officers to receive in-service training on specific topics including the following:

Consent Decree Section	Consent Decree Reference Paragraph(s)
Community Policing	37
Impartial Policing	72–5
Crisis Intervention	126
Use of Force	243–46
Officer Wellness and Support	414
Accountability and Transparency	527–28

To demonstrate compliance with ¶324, this reporting period the CPD submitted the following training materials:

- *De-Escalation, Response to Resistance, and Use of Force Training* materials (January 2022), including a Lesson Plan, a PowerPoint, Test Questions, Agenda materials and an Equipment Checklist, a Participant Guide, a Task File, and a Comment Matrix showing changes from a prior version of the training materials.

- *Active Bystandership for Law Enforcement (ABLE) Training* materials (January 2022), including an ABLE Facilitator Guide and an ABLE PowerPoint. The CPD also submitted additional ABLE Training materials (June 2022), including ABLE Content Knowledge Test Question Bank with Answers, a Comment Matrix showing changes from the prior version of the training materials, and a To-From Subject Report (April 2022) describing plans to certify Training and Support Group personnel as trainers for the ABLE Training program.

- *Gender-Based Violence In-Service Training* materials (February 2022), including a Comprehensive Response to Gender-Based Violence Training Modules, a Training Curriculum, a Training Activity Handbook, a Training Workbook, and Notes regarding Module Videos. The CPD also submitted additional Gender-Based Violence In-Service Training materials (June 2022), including Gender-Based Violence Modules (Modules 1-9, March 2022), Gender-Based Violence Scenario Sheets, Gender-Based Violence Training Evaluation Recommendations, Gender-Based Violence Training Workbook, Gender-Based Violence Pre- and Post-Test Questions, Questions for Survivor Videos, a Technical Report, and Survivor Testimony DV Modules and Survivor Testimony for Intro Module.

- *In-Service Crisis Intervention Team Training* materials (March 2022), including a PowerPoint, a Lesson Plan, a Facilitator Guide, a Participant Guide, a Detailed Agenda, a Pre- and Post-Test, a Training Community Advisory Committee Comments and Response Matrix, and In-Service Crisis Intervention Videos. The CPD also submitted additional In-Service CIT Training materials (June 2022), including revised training materials, fifteen different CPD Policies addressing crisis

intervention, a Comment Matrix showing changes from the prior version of the training materials, and a Crisis Intervention Resource Guide.

- *Constitutional Policing Course* materials, including the 2022 Constitutional Policing Course materials, a Lesson Plan, a PowerPoint, a Module Overview, a Participant Guide, an Instructor Pre-Course Checklist, and a Pre- and Post-Test. The course materials provided also included a set of 2022 Constitutional Policing Course Feedback, including the March 2022 Training Community Advisory Committee meeting notes discussing in part the 2022 Constitutional Policing Course materials and written feedback from the Civilian Office of Police Accountability (March 2022).

- Evidence of Community Policing In-Service Training Completion (May 2022), including a Community Policing – Screenshot of Tableau Dashboard, Community Policing – Roster of Department members completed training, an Audit of In-Service Training Records, and a Memorandum from the Deputy Chief of the Training Division.

- Evidence of Use of Force In-Service Training Completion (May 2022), including Use of Force: Communications – Screenshot of Tableau Dashboard, Use of Force: Procedures – Screenshot Tableau Dashboard, Use of Force: Communications – Roster of Department members completed training, Audit of In-Service Training Records, and a Data Validation Memorandum.

- Evidence of Officer Wellness In-Service Training Completion (June 2022), including Officer Wellness – Screenshot of Tableau Dashboard Officer Wellness, Officer Wellness – Roster of members completed training, and Audit of In-Service Training Records.

The submitted documents are essential components for establishing Secondary compliance. However, the City and the CPD must also demonstrate that all required training has commenced, and course attendance met or exceeded the 95% threshold for those assigned and required to take the course. Data depicting the percentage attendance in each ¶324 area will help substantiate Secondary compliance.

***

The City and the CPD maintained Preliminary compliance during this reporting period. Looking forward, achieving Secondary compliance requires the CPD to demonstrate that all required training has commenced and training plans, lesson plans, training schedules, course curriculum, and evaluations demonstrate that the training is "adequate in quantity, quality, type, and scope." Data depicting the percentage attendance in each ¶324 area will help to substantiate Secondary compliance.

Secondary compliance also requires training lesson plans, instructor selections, training schedules, and curricula across all in-service training to demonstrate compliance with the requirements of this paragraph. Full compliance may be achieved when the CPD has fully implemented the requirements of this paragraph and training delivery has been initiated within the specified timeline and conditions.

Paragraph 324 Compliance Progress History

FIRST REPORTING PERIOD	SECOND REPORTING PERIOD	THIRD REPORTING PERIOD
SEPTEMBER 1, 2019 – AUGUST 31, 2019	SEPTEMBER 1, 2019 – FEBRUARY 29, 2020	MARCH 1, 2020 – DECEMBER 31, 2020
COMPLIANCE PROGRESS:	COMPLIANCE PROGRESS:	COMPLIANCE PROGRESS:
Not Applicable	Not Applicable	Not Applicable
FOURTH REPORTING PERIOD	**FIFTH REPORTING PERIOD**	**SIXTH REPORTING PERIOD**
JANUARY 1, 2021 – JUNE 30, 2021	JULY 1, 2021 – DECEMBER 31, 2021	JANUARY 1, 2022 – JUNE 30, 2022
COMPLIANCE PROGRESS:	COMPLIANCE PROGRESS:	COMPLIANCE PROGRESS:
None	Preliminary	Preliminary

Training: ¶326

326. *Training provided through the In-Service Training Program may take place at the Academy or in a decentralized manner, including at the district or unit level, so long as the training is: a. developed by the Education and Training Division; b. reviewed by the TOC and approved by the Education and Training Division before training is delivered; and c. taught by instructors pursuant to the requirements provided above Part D of this section.*

Compliance Progress

(Reporting Period: January 1, 2022, through June 30, 2022)

Preliminary:	***In Compliance*** **(FIFTH REPORTING PERIOD)**
Secondary:	***Not in Compliance***
Full:	***Not Yet Assessed***

The City and the CPD maintained Preliminary compliance with these requirements during this reporting period.

To evaluate Preliminary compliance with ¶326, we reviewed the City's and the CPD's relevant policies and documents following the process described in the Consent Decree (¶¶626–41), which outlines applicable consultation, resolution, workout, and public comment periods. To evaluate Secondary compliance with this paragraph, we reviewed data to ascertain if the CPD has delivered training following the requirements of ¶326 as demonstrated through training plans, lesson plans, course curricula, training schedules, and other training and data sources and in accordance with ¶282–85 instructor selection and development requirements.

Progress before the Sixth Reporting Period

During the previous reporting period, the IMT assessed compliance with this paragraph and determined that the City and the CPD achieved Preliminary compliance. We reviewed Training Directive S11-10-03 (*In-Service Training*), which included requirements consistent with this paragraph.

Progress in the Sixth Reporting Period

To demonstrate compliance with ¶326, this reporting period the CPD submitted De-Escalation, Response to Resistance, and Use of Force Training materials (January 2022), including a Lesson Plan, a PowerPoint, Test Questions, Agenda materials and an Equipment Checklist, a Participant Guide, a Task File, and a Comment Matrix showing changes from a prior version of the training materials. The CPD also submitted Active Bystandership for Law Enforcement (ABLE) Training materials (June 2022), including ABLE Content Knowledge Test Question Bank with Answers,

a Comment Matrix showing changes from the prior version of the training materials, and a To-From Subject Report (April 2022) describing plans to certify Training and Support Group personnel as trainers for the ABLE Training program.

The IMT also reviewed the Annual Training Report – 2021. That report, while not containing all the ¶326 required information, does establish whether training was done at the Academy or was decentralized. It appears the "In-Service Classroom" section of this report may be further customizable to indicate alignment with ¶326(a–d) requirements. That information will further assist the City and the CPD in attaining Secondary compliance requirements.

***

The City and the CPD maintained Preliminary compliance during this reporting period. Looking forward, Secondary compliance requires the CPD to deliver training following the requirements of ¶326, as demonstrated through training plans, lesson plans, course curricula, training schedules, and other training and data sources and in accordance with ¶¶282–85 instructor selection and development requirements. Full compliance can be achieved when the CPD has fully implemented the requirements of this paragraph and training delivery has been initiated within the specified timeline and conditions.

Paragraph 326 Compliance Progress History

FIRST REPORTING PERIOD	SECOND REPORTING PERIOD	THIRD REPORTING PERIOD
SEPTEMBER 1, 2019 – AUGUST 31, 2019	SEPTEMBER 1, 2019 – FEBRUARY 29, 2020	MARCH 1, 2020 – DECEMBER 31, 2020
COMPLIANCE PROGRESS:	COMPLIANCE PROGRESS:	COMPLIANCE PROGRESS:
Not Applicable	Not Applicable	Not Applicable
FOURTH REPORTING PERIOD	**FIFTH REPORTING PERIOD**	**SIXTH REPORTING PERIOD**
JANUARY 1, 2021 – JUNE 30, 2021	JULY 1, 2021 – DECEMBER 31, 2021	JANUARY 1, 2022 – JUNE 30, 2022
COMPLIANCE PROGRESS:	COMPLIANCE PROGRESS:	COMPLIANCE PROGRESS:
None	Preliminary	Preliminary

Training: ¶327

327. *Courses offered by CPD to fulfill the portion of the In-Service Training Program not required to be delivered in person may be provided through e-learning or other electronic means, so long as they are reviewed and approved by the TOC and are consistent with this Agreement. In considering e-learning courses for approval, the TOC will ensure that instructional objectives can be sufficiently achieved through e-learning. Following the completion of any e-learning course provided as part of the In-Service Training Program, CPD will test participants on their comprehension of the underlying subject matter.*

Compliance Progress

(Reporting Period: January 1, 2022, through June 30, 2022)

Preliminary:	***In Compliance*** **(FIFTH REPORTING PERIOD)**
Secondary:	***Not in Compliance***
Full:	***Not Yet Assessed***

The City and the CPD maintained Preliminary compliance during this reporting period.

To evaluate Preliminary compliance with ¶327, we reviewed the City's and the CPD's relevant policies and documents following the process described in the Consent Decree (¶¶626–41), which outlines applicable consultation, resolution, workout, and public comment periods. To evaluate Secondary compliance with this paragraph, we reviewed data to determine if the CPD's applicable policies, lesson plans, attendance records, training plans, and other training and data sources demonstrate that it has established and implemented e-learning course development and delivery in accordance with the requirements of this paragraph, including evidence of appropriate Training Oversight Committee review and approval of e-learning courses and appropriate post-course evaluations.. The IMT also sought to verify sufficient attendance records (*i.e.*, 95% of relevant personnel), including hours attended.

Progress before the Sixth Reporting Period

During the previous reporting period, the IMT assessed compliance with this paragraph and determined that the City and the CPD achieved Preliminary compliance. We reviewed Training Directive S11-10-03 (*In-Service Training*), Training Oversight Committee meeting materials, and the Psychology of Domestic Violence eLearning. The CPD advised that an additional document, "Evidence documenting 95% completion of training," would be produced during the sixth reporting period. We found that S11-10-03 incorporated the ¶327 requirements into policy, meeting Preliminary compliance. We noted that data demonstrating Secondary compliance

had not been submitted and may include documentation from the Training Oversight Committee as specified in this paragraph, attendance records, evaluation results following the delivery of a course, or other training and data sources, as appropriate.

Progress in the Sixth Reporting Period

The City and the CPD established Preliminary compliance in the previous reporting period.

To demonstrate compliance with ¶327, this reporting period the CPD submitted BIA eLearning materials (April 2022), including draft eLearning materials and a pre- and post-test.

The following information and documents are required to demonstrate Secondary compliance.

¶327 requirements written into policy	S11-10-03
Full list of courses offered by CPD to fulfill the portion of the In-Service Training Program not required to be delivered in person	Not Provided
Reviewed and approved by the Training Oversight Committee (Training Oversight Committee minutes)	Not provided
Consistent with Consent Decree requirements (No objection notices on eLearning course)	Not provided
Training Oversight Committee ensures that instructional objectives can be sufficiently achieved (Training Oversight Committee minutes)	Not provided
Following the completion of any e-learning course provided as part of the In-Service Training Program, CPD will test participants on their comprehension of the underlying subject matter. (Curriculum or actual exams)	Only BIA eLearning test provided

As a result, the City and the CPD maintained Preliminary compliance during this reporting period, but failed to achieve Secondary compliance.

***

The City and the CPD maintained Preliminary compliance during this reporting period. Looking forward, Secondary compliance may be achieved when the CPD's policies, lesson plans, attendance records, training plans, and other training and

data sources demonstrate that CPD has established and implemented eLearning course development and delivery in accordance with the requirements of this paragraph, including evidence of appropriate Training Oversight Committee review and approval of e-learning courses and appropriate post-course evaluations.

Paragraph 327 Compliance Progress History

FIRST REPORTING PERIOD SEPTEMBER 1, 2019 – AUGUST 31, 2019	SECOND REPORTING PERIOD SEPTEMBER 1, 2019 – FEBRUARY 29, 2020	THIRD REPORTING PERIOD MARCH 1, 2020 – DECEMBER 31, 2020
COMPLIANCE PROGRESS: Not Applicable	COMPLIANCE PROGRESS: Not Applicable	COMPLIANCE PROGRESS: Not Applicable
FOURTH REPORTING PERIOD JANUARY 1, 2021 – JUNE 30, 2021	**FIFTH REPORTING PERIOD** JULY 1, 2021 – DECEMBER 31, 2021	**SIXTH REPORTING PERIOD** JANUARY 1, 2022 – JUNE 30, 2022
COMPLIANCE PROGRESS: None	COMPLIANCE PROGRESS: Preliminary	COMPLIANCE PROGRESS: Preliminary

Training: ¶328

328. *CPD will develop and implement a process for addressing non-compliance with training requirements to ensure that all officers who are active duty and available for assignment, including supervisors and command staff, successfully complete all required training programs within the time frames set out in this Agreement.*

Compliance Progress

(Reporting Period: January 1, 2022, through June 30, 2022)

Preliminary:	***In Compliance*** **(FOURTH REPORTING PERIOD)**
Secondary:	***Not in Compliance***
Full:	***Not Yet Assessed***

The City and the CPD maintained Preliminary compliance with the requirements of ¶328 during this reporting period.

To evaluate Preliminary compliance with ¶328 we reviewed the City's and the CPD's relevant policies and documents following the process described in the Consent Decree (¶¶626–41), which outlines applicable consultation, resolution, workout, and public comment periods. To evaluate Secondary compliance with this paragraph, we reviewed data to determine if the CPD has established a process to require officers returning to active duty to meet the training requirements specified in this paragraph.

Progress before the Sixth Reporting Period

During the previous reporting period, the IMT assessed compliance and determined that the City and the CPD maintained Preliminary compliance. We reviewed the finalized Training Directive S11-10 (*Department Training*), which substantiated Preliminary compliance. No documents were produced to demonstrate Secondary compliance. We noted that Secondary compliance may be demonstrated with documentation that each step of the process is functional and operates as described in policy.

Progress in the Sixth Reporting Period

The City and the CPD established Preliminary compliance in the previous reporting period. To demonstrate compliance with ¶328, this reporting period the CPD submitted Training Deviation materials, including a Screenshot of an In-Service Training Deviation Dashboard and a Deviation Spreadsheet and the 2021 Annual Training Report. These materials do advance the CPD toward Secondary compliance, but it has not yet been met.

In the previous reporting period, the IMT advised that to substantiate that the Training Deviation process is fully implemented in order to meet Secondary and eventually Full compliance, the CPD must submit additional documents demonstrating that each step of the process is functional and operates as described in policy. The number of training deviation investigations should approximate the number of personnel who did not attend required trainings. Each step enumerated in policy S11-10 (*Department Training Records Maintenance Program*) § XII is not demonstrated in the data submitted during this reporting period. Secondary compliance is therefore not achieved.

***

The City and the CPD maintained Preliminary compliance during this reporting period. Looking forward, to further substantiate that this process is fully implemented to meet Secondary and eventually Full compliance, the CPD must submit additional documents demonstrating that each step of the process required by this paragraph is functional and operates as described in policy. The number of training deviation investigations should approximate the number of personnel who did not attend required trainings.

Paragraph 328 Compliance Progress History

FIRST REPORTING PERIOD	SECOND REPORTING PERIOD	THIRD REPORTING PERIOD
SEPTEMBER 1, 2019 – AUGUST 31, 2019	SEPTEMBER 1, 2019 – FEBRUARY 29, 2020	MARCH 1, 2020 – DECEMBER 31, 2020
COMPLIANCE PROGRESS:	COMPLIANCE PROGRESS:	COMPLIANCE PROGRESS:
Not Applicable	Not Applicable	Status Update

FOURTH REPORTING PERIOD	FIFTH REPORTING PERIOD	SIXTH REPORTING PERIOD
JANUARY 1, 2021 – JUNE 30, 2021	JULY 1, 2021 – DECEMBER 31, 2021	JANUARY 1, 2022 – JUNE 30, 2022
COMPLIANCE PROGRESS:	COMPLIANCE PROGRESS:	COMPLIANCE PROGRESS:
Preliminary	Preliminary	Preliminary

Training: ¶329

329. *Officers, including supervisors and command staff, returning to active duty after taking a leave of absence of a year or more must complete all mandatory training content required as part of the In-Service Training Program that was missed during the previous three years, in addition to the mandatory courses required in the current year. a. At a minimum: i. officers must complete training on the content required in Part F of the Use of Force section of this Agreement before returning to assignment; and ii. officers must complete training on all other mandatory content required during the previous three years within the first full year of resumed active duty. b. Where the same mandatory content has been updated or required multiple times during the period of inactivity, officers are only required to take the most recent offering. The training required in this paragraph will count towards the total amount of training required by the In-Service Training Program.*

Compliance Progress

(Reporting Period: January 1, 2022, through June 30, 2022)

Preliminary:	***In Compliance*** **(FIFTH REPORTING PERIOD)**
Secondary:	***Not Yet Assessed***
Full:	***Not Yet Assessed***

The City and the CPD maintained Preliminary compliance during this reporting period.

To evaluate Preliminary compliance with ¶329, we reviewed the City's and the CPD's relevant policies and documents following the process described in the Consent Decree (¶¶626–41), which outlines applicable consultation, resolution, workout, and public comment periods. To evaluate Secondary compliance with this paragraph, we will need to review data to determine whether the requirements of this paragraph are written into policy and reflect that specified obligations and trainings align with the requirements of this paragraph. Such data must substantiate that the training processes enumerated in S11-10-03 (*In-Service Training*) and E04-05 (*Returning Service*) have been implemented. The IMT also sought to verify sufficient attendance records (*i.e.*, 95% of relevant personnel), including hours attended.

Progress before the Sixth Reporting Period

During the previous reporting period, the IMT assessed compliance and determined that the City and the CPD achieved Preliminary compliance for the first time. We reviewed the finalized S11-10-03 (*In-Service Training*) and finalized E04-

05 (*Returning Service*) policy documents as evidence of compliance. No additional data were produced for further compliance.

Progress in the Sixth Reporting Period

The City and the CPD established Preliminary compliance during the previous reporting period. The City and the CPD did not submit any data to establish Secondary compliance during this reporting period.

***

The City and the CPD maintained Preliminary compliance during this reporting period. Looking forward, Secondary compliance can be achieved by substantiating that the processes enumerated in S11-10-03 (*In-Service Training*) and E04-05 (*Returning Service*) have been implemented.

Paragraph 329 Compliance Progress History

FIRST REPORTING PERIOD	SECOND REPORTING PERIOD	THIRD REPORTING PERIOD
SEPTEMBER 1, 2019 – AUGUST 31, 2019	SEPTEMBER 1, 2019 – FEBRUARY 29, 2020	MARCH 1, 2020 – DECEMBER 31, 2020
COMPLIANCE PROGRESS:	COMPLIANCE PROGRESS:	COMPLIANCE PROGRESS:
Not Applicable	Not Applicable	Not Applicable
FOURTH REPORTING PERIOD	**FIFTH REPORTING PERIOD**	**SIXTH REPORTING PERIOD**
JANUARY 1, 2021 – JUNE 30, 2021	JULY 1, 2021 – DECEMBER 31, 2021	JANUARY 1, 2022 – JUNE 30, 2022
COMPLIANCE PROGRESS:	COMPLIANCE PROGRESS:	COMPLIANCE PROGRESS:
None	Preliminary	Preliminary

Training: ¶331

331. *CPD will require that every newly promoted supervisor, except those promoted to the rank of Commander and above, receives mandatory supervisory, management, leadership, and command accountability training, tailored to each level of supervision and command before assignment to a supervisory rank or assumption of supervisory responsibilities associated with a particular supervisory rank.*

Compliance Progress

(Reporting Period: January 1, 2022, through June 30, 2022)

Preliminary:	***In Compliance*** **(FOURTH REPORTING PERIOD)**
Secondary:	***Not in Compliance***
Full:	***Not Yet Assessed***

The City and CPD maintained Preliminary compliance with these requirements during this reporting period.

To evaluate Preliminary compliance with ¶331, we reviewed the City's and the CPD's relevant policies and documents following the process described in the Consent Decree (¶¶626–41), which outlines applicable consultation, resolution, workout, and public comment periods. To evaluate Secondary compliance with this paragraph, we reviewed data demonstrating that every newly promoted supervisor received the training required by this paragraph before assignment to a supervisory rank or assumption of supervisory responsibilities associated with a particular supervisory rank.

Progress before the Sixth Reporting Period

During the previous reporting period, the IMT assessed compliance related to this paragraph and determined that the City and the CPD maintained Preliminary compliance. We reviewed the finalized S11-10-02 (*Pre-Service Training*) as evidence of Preliminary compliance. No documents were produced to demonstrate Secondary compliance.

Progress in the Sixth Reporting Period

Preliminary compliance was previously established and maintained. The City and the CPD did not submit any data to establish Secondary compliance during this reporting period.

***

The City and the CPD maintained Preliminary compliance during this reporting period. Looking forward, Secondary compliance requires data and training sources

demonstrating that every newly promoted supervisor received the required training before assignment to a supervisory rank or assumption of supervisory responsibilities associated with a particular supervisory rank.

Paragraph 331 Compliance Progress History

FIRST REPORTING PERIOD	SECOND REPORTING PERIOD	THIRD REPORTING PERIOD
SEPTEMBER 1, 2019 – AUGUST 31, 2019	SEPTEMBER 1, 2019 – FEBRUARY 29, 2020	MARCH 1, 2020 – DECEMBER 31, 2020
COMPLIANCE PROGRESS:	COMPLIANCE PROGRESS:	COMPLIANCE PROGRESS:
Not Applicable	Not Applicable	None

FOURTH REPORTING PERIOD	FIFTH REPORTING PERIOD	SIXTH REPORTING PERIOD
JANUARY 1, 2021 – JUNE 30, 2021	JULY 1, 2021 – DECEMBER 31, 2021	JANUARY 1, 2022 – JUNE 30, 2022
COMPLIANCE PROGRESS:	COMPLIANCE PROGRESS:	COMPLIANCE PROGRESS:
Preliminary	Preliminary	Preliminary

Training: ¶332

332. *CPD will require that supervisors, upon their first promotion to the rank of Commander or above, receive mandatory supervisory, management, leadership, and command accountability training, tailored to command staff positions within six months of assignment to or assumption of supervisory responsibilities as a member of CPD's command staff.*

Compliance Progress

(Reporting Period: January 1, 2022, through June 30, 2022)

Preliminary:	***In Compliance*** **(FOURTH REPORTING PERIOD)**
Secondary:	***Not in Compliance***
Full:	***Not Yet Assessed***

The City and the CPD maintained Preliminary compliance with ¶332 during this reporting period.

To evaluate Preliminary compliance with ¶332, we reviewed the City's and the CPD's relevant policies and documents following the process described in the Consent Decree (¶¶626–41), which outlines applicable consultation, resolution, workout, and public comment periods. To evaluate Secondary compliance with this paragraph, we reviewed data to determine if the CPD has taken sufficient steps to deliver the training required by this paragraph according to the conditions specified in this paragraph, including that every newly promoted supervisor received the required training before assignment to a supervisory rank or assumption of supervisory responsibilities associated with a particular supervisory rank.

Progress before the Sixth Reporting Period

During the previous reporting period, the IMT assessed compliance and found the City and the CPD maintained Preliminary compliance with this paragraph. We reviewed the updated *2021 Training Plan* and three Training Directives: (i) S11-10 (*Department Training Records Maintenance*); (ii) S11-10-01 (*Training Notification and Attendance Responsibilities*); and (iii) S11-11 (*Training Oversight Committee*). We found these directives met the requirements of this paragraph. No documents were provided to support Secondary compliance.

Progress in the Sixth Reporting Period

To demonstrate compliance with ¶332, this reporting period the City and the CPD submitted E05-05 (*Promotional Process for Commander*) (February 2022). E05-05-05 § IX(B) has the requisite ¶332 language to support Preliminary compliance.

No submitted documents demonstrate that CPD has taken sufficient steps to deliver the training according to the conditions specified in this paragraph to support Secondary compliance.

***

The City and the CPD maintained Preliminary compliance during this reporting period. Looking forward, Secondary compliance requires data and training sources demonstrating that every newly promoted supervisor received the required training before assignment to a supervisory rank or assumption of supervisory responsibilities associated with a particular supervisory rank.

Paragraph 332 Compliance Progress History

FIRST REPORTING PERIOD	SECOND REPORTING PERIOD	THIRD REPORTING PERIOD
SEPTEMBER 1, 2019 – AUGUST 31, 2019	SEPTEMBER 1, 2019 – FEBRUARY 29, 2020	MARCH 1, 2020 – DECEMBER 31, 2020
COMPLIANCE PROGRESS:	COMPLIANCE PROGRESS:	COMPLIANCE PROGRESS:
Not Applicable	Not Applicable	None

FOURTH REPORTING PERIOD	FIFTH REPORTING PERIOD	SIXTH REPORTING PERIOD
JANUARY 1, 2021 – JUNE 30, 2021	JULY 1, 2021 – DECEMBER 31, 2021	JANUARY 1, 2022 – JUNE 30, 2022
COMPLIANCE PROGRESS:	COMPLIANCE PROGRESS:	COMPLIANCE PROGRESS:
Preliminary	Preliminary	Preliminary

Training: ¶333

333. *The amount of pre-service promotional training may differ according to rank and command, but all pre-service promotional training will be adequate in quality, quantity, type, and scope and will cover topics appropriate to the specific rank and command.*

Compliance Progress

(Reporting Period: January 1, 2022, through June 30, 2022)

Preliminary:	***In Compliance*** **(FIFTH REPORTING PERIOD)**
Secondary:	***Not in Compliance***
Full:	***Not Yet Assessed***

The City and the CPD maintained Preliminary compliance with ¶333 during this reporting period.

To evaluate Preliminary compliance with ¶333, we reviewed the City's and the CPD's relevant policies and documents following the process described in the Consent Decree (¶¶626–41), which outlines applicable consultation, resolution, workout, and public comment periods. To evaluate Secondary compliance with this paragraph, we reviewed data to determine whether the CPD's training is tailored to rank and follows the requirements of this paragraph and that the CPD has taken steps to deliver training in accordance with the requirements of this paragraph, the *2022 Training Plan*, and approved curricula. Such data, including training plans, lesson plans, and attendance records, must demonstrate the CPD's adherence to ¶333 requirements and also must demonstrate that training has been conducted and that CPD achieved 95% attendance by eligible personnel.

Progress before the Sixth Reporting Period

During the previous reporting period, the IMT assessed compliance with this paragraph and determined that the City and the CPD achieved Preliminary compliance. We reviewed the finalized S11-10-02 (*Pre-Service Training*) which incorporated the requirements of ¶¶331–34. We suggested that the City and the CPD memorialize the requirements of this process and document the steps taken to determine that the "quality, quantity, type, and scope" specifications of this paragraph are satisfied to demonstrate further levels of compliance.

Progress in the Sixth Reporting Period

The requirements established in ¶¶331–34 are contained in S11-10-02 (*Pre-Service Training*) § III(A)(1–5), establishing Preliminary compliance for each paragraph. To demonstrate further compliance with ¶333, this reporting period the CPD submitted CPD E05-05-04 (*Promotional Process for Captain*) (February 2022)

and E05-05 (*Promotional Process for Commander*) (February 2022). Section X of each policy outlines training requirements for each promotional rank.

In the previous reporting period, the IMT stated that Secondary compliance will require the CPD to demonstrate that it has taken significant steps to deliver training in accordance with this paragraph and the *2022 Training Plan*, curriculum, and curriculum development process. The training plans, attendance records, and lesson plans will all have to demonstrate CPD adherence to ¶333 requirements. Records must additionally demonstrate training has been conducted and that CPD achieved 95% attendance by eligible candidates.

***

The City and the CPD maintained Preliminary compliance during this reporting period. Looking forward, Secondary compliance requires CPD to demonstrate that it has taken significant steps to deliver training in accordance with this paragraph and the *2022 Training Plan*, curriculum, and curriculum development process. The training plans, attendance records, and lesson plans will all have to demonstrate CPD adherence to ¶333 requirements. Records must also demonstrate that training has been conducted and that the CPD achieved 95% attendance by eligible candidates.

Paragraph 333 Compliance Progress History

FIRST REPORTING PERIOD	SECOND REPORTING PERIOD	THIRD REPORTING PERIOD
SEPTEMBER 1, 2019 – AUGUST 31, 2019	SEPTEMBER 1, 2019 – FEBRUARY 29, 2020	MARCH 1, 2020 – DECEMBER 31, 2020
COMPLIANCE PROGRESS:	COMPLIANCE PROGRESS:	COMPLIANCE PROGRESS:
Not Applicable	Not Applicable	Status Update

FOURTH REPORTING PERIOD	FIFTH REPORTING PERIOD	SIXTH REPORTING PERIOD
JANUARY 1, 2021 – JUNE 30, 2021	JULY 1, 2021 – DECEMBER 31, 2021	JANUARY 1, 2022 – JUNE 30, 2022
COMPLIANCE PROGRESS:	COMPLIANCE PROGRESS:	COMPLIANCE PROGRESS:
None	Preliminary	Preliminary

Training: ¶334

334. *By January 1, 2020, as appropriate and tailored to the specific rank and command, pre-service promotional training will include, but not be limited to: a. an overview of CPD's department-wide crime reduction strategies; b. specific methods for developing district-level crime reduction strategies that are consistent with the principles of community policing, and tools and techniques on how best to communicate with officers on how to incorporate principles of community policing in implementing those crime reduction strategies; c. techniques for effectively guiding and directing officers and promoting effective and ethical police practices, including detecting and addressing bias-based profiling and other forms of discriminatory policing; d. de-escalation strategies and the principles of force mitigation; e. intervening on a subject's behalf when observing a use of force that is excessive or otherwise in violation of policy; f. evaluating the completeness, correctness, and sufficiency of written reports; g. monitoring, reviewing, and investigating uses of force to ensure consistency with CPD policies; h. understanding the function and proper use of supervisory tools, such as Early Intervention System ("EIS") and body-worn cameras, at each rank; i. evaluating officer performance, informally and formally as part of CPD's annual performance evaluation process; j. CPD and COPA's disciplinary system requirements and available non-punitive corrective action; k. mentoring officers and fostering career development; l. responding to allegations of officer misconduct, including, but not limited to, excessive force and racial discrimination, for purposes of documenting the complaint and reporting it to COPA; m. building community partnerships and guiding officers on how to implement this requirement; and n. CPD policy and legal updates.*

Compliance Progress

(Reporting Period: January 1, 2022, through June 30, 2022)

Preliminary:	***In Compliance*** **(FIFTH REPORTING PERIOD)**
Secondary:	***Not in Compliance***
Full:	***Not Yet Assessed***

The City and the CPD maintained Preliminary compliance with ¶334 during this reporting period.

To evaluate Preliminary compliance with ¶334, we reviewed the City's and the CPD's relevant policies and documents following the process described in the Consent Decree (¶¶626–41), which outlines applicable consultation, resolution,

workout, and public comment periods. To evaluate Secondary compliance with this paragraph, we reviewed data to determine if the CPD has implemented processes to fulfill the pre-service promotional training requirements of this paragraph, including by conducting the pre-service promotional training courses and demonstrating implementation of processes to fulfill the other requirements of this paragraph.

Progress before the Sixth Reporting Period

During the previous reporting period, the IMT assessed compliance and found that the City and the CPD achieved Preliminary compliance. We reviewed the finalized S11-10-02 (*Pre-Service Training*), which incorporated the requirements of ¶¶331–34. We noted that Secondary compliance may be achieved by conducting the pre-service supervisory training course and achieving 95% or higher attendance by eligible candidates.

Progress in the Sixth Reporting Period

The requirements established in ¶¶331–34 are contained in S11-10-02 (*Pre-Service Training*) § III(A)(1–5), maintaining Preliminary compliance for each paragraph. The City and the CPD did not submit any data to establish Secondary compliance during this reporting period.

***

The City and the CPD maintained Preliminary compliance during this reporting period. Looking forward, the CPD may achieve Secondary compliance by conducting the pre-service promotional training courses and demonstrating implementation of processes to fulfill the requirements of this paragraph. Full compliance may be demonstrated when the CPD has fully implemented and has established a full process that aligns with the requirements of this paragraph.

Paragraph 333 Compliance Progress History

FIRST REPORTING PERIOD	SECOND REPORTING PERIOD	THIRD REPORTING PERIOD
SEPTEMBER 1, 2019 – AUGUST 31, 2019	SEPTEMBER 1, 2019 – FEBRUARY 29, 2020	MARCH 1, 2020 – DECEMBER 31, 2020
COMPLIANCE PROGRESS:	COMPLIANCE PROGRESS:	COMPLIANCE PROGRESS:
Not Applicable	Not Applicable	Status Update
FOURTH REPORTING PERIOD	**FIFTH REPORTING PERIOD**	**SIXTH REPORTING PERIOD**
JANUARY 1, 2021 – JUNE 30, 2021	JULY 1, 2021 – DECEMBER 31, 2021	JANUARY 1, 2022 – JUNE 30, 2022
COMPLIANCE PROGRESS:	COMPLIANCE PROGRESS:	COMPLIANCE PROGRESS:
None	Preliminary	Preliminary

Training: ¶335

335. *The pre-service promotional training for new Sergeants and Lieutenants will include a field training component to provide newly promoted supervisors with a better understanding of the requirements of the position to which they have been promoted. a. The field training component for new Sergeants will consist of two days of shadowing current Sergeants in districts: one day observing the activities of a District Station Supervisor and one day observing the activities of a Field Sergeant. b. The field training component for new Lieutenants will consist of one day of shadowing a current Lieutenant in a district and observing the activities of a Watch Operations Lieutenant.*

Compliance Progress

(Reporting Period: January 1, 2022, through June 30, 2022)

Preliminary:	***In Compliance*** **(FOURTH REPORTING PERIOD)**
Secondary:	***Not in Compliance***
Full:	***Not Yet Assessed***

The City and the CPD has maintained Preliminary compliance with the requirements of ¶335 during this reporting period.

To evaluate Preliminary compliance with ¶335, we reviewed the City's and the CPD's relevant policies and documents following the process described in the Consent Decree (¶¶626–41), which outlines applicable consultation, resolution, workout, and public comment periods. To evaluate Secondary compliance with this paragraph, we reviewed data to determine if the CPD has developed a formalized structure for the field training component of this paragraph and if the CPD has implemented processes to fulfill the pre-service promotional training requirements of this paragraph.

Progress before the Sixth Reporting Period

During the previous reporting period, the IMT assessed compliance with this paragraph and determined the City and the CPD maintained Preliminary compliance. We reviewed the finalized S11-10-02 (*Pre-Service Training*), the *2022 Training Plan*, and the Draft Pre-Service Promotional Training Field Observation, and these documents met the requirements of this paragraph. The City and the CPD sought Secondary compliance by producing a curricula and policies meeting the requirements of this paragraph, but the IMT noted that Secondary compliance requires verification that the CPD has begun implementation.

Progress in the Sixth Reporting Period

Preliminary compliance was established in a previous reporting period and is maintained during this period. The City and the CPD did not submit any data to establish Secondary compliance during this reporting period.

***

The City and the CPD has maintained Preliminary compliance during this reporting period. Looking forward, to achieve Secondary compliance the CPD must implement and establish processes to fulfill the pre-service promotional training requirements of this paragraph.

Paragraph 334 Compliance Progress History

FIRST REPORTING PERIOD	SECOND REPORTING PERIOD	THIRD REPORTING PERIOD
SEPTEMBER 1, 2019 – AUGUST 31, 2019	SEPTEMBER 1, 2019 – FEBRUARY 29, 2020	MARCH 1, 2020 – DECEMBER 31, 2020
COMPLIANCE PROGRESS:	COMPLIANCE PROGRESS:	COMPLIANCE PROGRESS:
Not Applicable	None	Under Assessment

FOURTH REPORTING PERIOD	FIFTH REPORTING PERIOD	SIXTH REPORTING PERIOD
JANUARY 1, 2021 – JUNE 30, 2021	JULY 1, 2021 – DECEMBER 31, 2021	JANUARY 1, 2022 – JUNE 30, 2022
COMPLIANCE PROGRESS:	COMPLIANCE PROGRESS:	COMPLIANCE PROGRESS:
None	Preliminary	Preliminary

Training: ¶336

336. *Within 30 days of the Effective Date, CPD will develop a formalized structure for the field training component to ensure consistency across districts. This structure will include a process for selecting which supervisors will be shadowed and guidance materials to ensure that the topics and information regarding supervisor responsibilities covered during the field training component are consistent with CPD policy and this Agreement.*

Compliance Progress

(Reporting Period: January 1, 2022, through June 30, 2022)

Preliminary:	***Not in Compliance***
Secondary:	***Not in Compliance***
Full:	***Not Yet Assessed***

The City and the CPD did not reach any level of compliance with the requirements of ¶336 during this reporting period.

To evaluate Preliminary compliance with ¶336, we reviewed the City's and the CPD's relevant policies and documents following the process described in the Consent Decree (¶¶626–41), which outlines applicable consultation, resolution, workout, and public comment periods. To evaluate Secondary compliance with this paragraph, we reviewed data to ascertain whether the CPD has developed a formalized structure for the field training component to ensure consistency across districts, including a process for selecting which supervisors will be shadowed and creation of guidance materials to ensure that the topics and information regarding supervisor responsibilities covered during the field training component are consistent with CPD policy and Consent Decree requirements. Such data should also demonstrate that training has been delivered in accordance with the requirements of this paragraph.

Progress before the Sixth Reporting Period

During the previous reporting period, the IMT assessed compliance and determined that the City and the CPD did not maintain Preliminary compliance with this paragraph. We reviewed the following produced documents: Draft Pre-Service Promotional Training Field Observation, an 8-hour Pre-Service Lieutenant lesson plan, Watch Operations Lieutenant Guide, Watch Operations Lieutenant Field Day Debrief, District Field Sergeant Observation Guide, District Station Supervisor Work Queue Action Items Visual Guide, District Station Supervisor Observation Guide, Field Sergeant Observation Day Debriefing, District Station Supervisor Responsibilities lesson plan, District Station Supervisor Observation Day lesson plan, District Station Supervisor Observation Day Debriefing lesson plan, District Field

Supervisor Responsibilities lesson plan, and the District Field Supervisor Observation Day lesson plan. While S11-10-02 (*Pre-Service Training*) addresses many aspects of the Pre-Service Training Program, it does not create a formalized structure for the field training component to ensure consistency across districts or a process by which supervisors will be shadowed. We noted that the City was working towards Secondary compliance with the Pre-Service Promotional Training Field Observation training, which was going through a ¶641 review process at the conclusion of the fifth reporting period.

Progress in the Sixth Reporting Period

The City and the CPD did not submit any data to establish Preliminary compliance during this reporting period. Therefore, no level of compliance has been demonstrated. To assess Secondary compliance, the IMT reviewed the Pre-Service Promotional Training Field Observation training that were going through a ¶641 review process at the conclusion of the fifth reporting period.

***

The City and the CPD did not reach any level of compliance during this reporting period. Looking forward, Preliminary compliance requires a formalized structure for the field training component to be written into CPD policy. To achieve Secondary compliance, the CPD must submit data demonstrating that training has been delivered and that the training requirements of this paragraph are met.

Paragraph 336 Compliance Progress History

FIRST REPORTING PERIOD	SECOND REPORTING PERIOD	THIRD REPORTING PERIOD
SEPTEMBER 1, 2019 – AUGUST 31, 2019	SEPTEMBER 1, 2019 – FEBRUARY 29, 2020	MARCH 1, 2020 – DECEMBER 31, 2020
COMPLIANCE PROGRESS:	COMPLIANCE PROGRESS:	COMPLIANCE PROGRESS:
None	None	None
FOURTH REPORTING PERIOD	**FIFTH REPORTING PERIOD**	**SIXTH REPORTING PERIOD**
JANUARY 1, 2021 – JUNE 30, 2021	JULY 1, 2021 – DECEMBER 31, 2021	JANUARY 1, 2022 – JUNE 30, 2022
COMPLIANCE PROGRESS:	COMPLIANCE PROGRESS:	COMPLIANCE PROGRESS:
Preliminary	None	None

Training: ¶337

337. *CPD will ensure that all supervisors who are active duty and available for assignment also receive in-service training consistent with the requirements of CPD's In-Service Training Program. As part of the In-Service Training Program, supervisors will receive refresher training related to their supervisory duties and training that covers managerial and leadership skills. The in-service training for supervisors may include, but is not limited to, the topics identified above for pre-service promotional training.*

Compliance Progress

(Reporting Period: January 1, 2022, through June 30, 2022)

Preliminary:	***In Compliance*** **(FOURTH REPORTING PERIOD)**
Secondary:	***Not in Compliance***
Full:	***Not Yet Assessed***

The City and the CPD maintained Preliminary compliance with ¶337 during this reporting period.

To evaluate Preliminary compliance with ¶337, we reviewed the City's and the CPD's relevant policies and documents following the process described in the Consent Decree (¶¶626–41), which outlines applicable consultation, resolution, workout, and public comment periods. To evaluate Secondary compliance with this paragraph, we reviewed data to ascertain whether the CPD has taken steps to ensure that supervisors receive the in-service training, including refresher training, required by this paragraph. Data should include attendance records demonstrating that at least 95% of all eligible personnel received the training required by this paragraph.

Progress before the Sixth Reporting Period

During the previous reporting period, the IMT assessed compliance and found that the City and the CPD maintained Preliminary compliance with this paragraph. We reviewed the CPD's finalized policy S11-10-03 (*In-Service Training*) materials and a draft of the planned *2022 In-Service Supervisor Refresher Training*. We noted that this training advanced towards Secondary compliance, but was still under ¶641 review at the close of the reporting period.

Progress in the Sixth Reporting Period

The City reached Preliminary compliance in a prior reporting period and maintains it through this reporting period. The City and the CPD did not submit any data to establish Secondary compliance during this reporting period. To assess Secondary compliance, the IMT reviewed the finalized policy S11-10-03 (*In-Service Training*) materials and a draft of the planned *2022 In-Service Supervisor Refresher Training*

that was still under ¶641 review at the close of the fifth reporting period. The IMT attended a site visit of Annual In-Service Supervisor Training during the week of April 11, 2022. Attendance records for these trainings were not submitted.

***

The City and the CPD maintained Preliminary compliance during this reporting period. Looking forward, to attain Secondary compliance the CPD must demonstrate that it has taken sufficient steps to deliver the training according to the conditions specified in this paragraph as it relates to other relevant paragraphs in the Consent Decree. Full compliance requires that the CPD has fully implemented and established a full process that aligns with ¶337 requirements.

Paragraph 337 Compliance Progress History

FIRST REPORTING PERIOD	SECOND REPORTING PERIOD	THIRD REPORTING PERIOD
SEPTEMBER 1, 2019 – AUGUST 31, 2019	SEPTEMBER 1, 2019 – FEBRUARY 29, 2020	MARCH 1, 2020 – DECEMBER 31, 2020
COMPLIANCE PROGRESS:	COMPLIANCE PROGRESS:	COMPLIANCE PROGRESS:
Not Applicable	Not Applicable	None

FOURTH REPORTING PERIOD	FIFTH REPORTING PERIOD	SIXTH REPORTING PERIOD
JANUARY 1, 2021 – JUNE 30, 2021	JULY 1, 2021 – DECEMBER 31, 2021	JANUARY 1, 2022 – JUNE 30, 2022
COMPLIANCE PROGRESS:	COMPLIANCE PROGRESS:	COMPLIANCE PROGRESS:
Preliminary	Preliminary	Preliminary

Training: ¶338

338. *Any training course offered as part of a pre-service promotional training, which is also a mandatory In-Service Training Program course, satisfies that mandatory In-Service Training Program requirement. Any other training course completed during a pre-service promotional training will count towards the total amount of training required by the In-Service Training Program requirement.*

Compliance Progress

(Reporting Period: January 1, 2022, through June 30, 2022)

Preliminary:	***In Compliance*** **(FOURTH REPORTING PERIOD)**
Secondary:	***Not in Compliance***
Full:	***Not Yet Assessed***

The City and the CPD maintained Preliminary compliance with ¶338 during this reporting period.

To evaluate Preliminary compliance with ¶338, we reviewed the City's and the CPD's relevant policies and documents following the process described in the Consent Decree (¶¶626–41), which outlines applicable consultation, resolution, workout, and public comment periods. To evaluate Secondary compliance with this paragraph, we reviewed data to determine if the requirements of this paragraph are written into policy and reflect specified obligations for pre-service promotional training. Such data must include attendance records demonstrating that at least 95% of all eligible personnel received the training required by this paragraph.

Progress before the Sixth Reporting Period

During the previous reporting period, the IMT assessed compliance by reviewing the CPD's finalized S11-10-02 (*Pre-Service Training*) and determined that it is consistent with the requirements of this paragraph. We noted that Secondary compliance may be achieved by submitting training documents via the CPD's centralized electronic system that schedules and tracks all CPD trainings so that the IMT may determine if the CPD has taken sufficient steps to deliver training in accordance with this paragraph and others in the Consent Decree.

Progress in the Sixth Reporting Period

Preliminary compliance was established in a previous reporting period and is maintained through this reporting period. The City and the CPD did not submit any data to establish Secondary compliance during this reporting period.

***

The City and the CPD maintained Preliminary compliance during this reporting period. Looking forward, Secondary compliance may be achieved when training has been conducted and the CPD has demonstrated that it achieved 95% attendance by eligible candidates. Full compliance may be achieved after the CPD has fully implemented and established a full process that aligns with the requirements of this paragraph.

Paragraph 338 Compliance Progress History

FIRST REPORTING PERIOD	SECOND REPORTING PERIOD	THIRD REPORTING PERIOD
SEPTEMBER 1, 2019 – AUGUST 31, 2019	SEPTEMBER 1, 2019 – FEBRUARY 29, 2020	MARCH 1, 2020 – DECEMBER 31, 2020
COMPLIANCE PROGRESS:	COMPLIANCE PROGRESS:	COMPLIANCE PROGRESS:
Not Applicable	Not Applicable	Status Update
FOURTH REPORTING PERIOD	**FIFTH REPORTING PERIOD**	**SIXTH REPORTING PERIOD**
JANUARY 1, 2021 – JUNE 30, 2021	JULY 1, 2021 – DECEMBER 31, 2021	JANUARY 1, 2022 – JUNE 30, 2022
COMPLIANCE PROGRESS:	COMPLIANCE PROGRESS:	COMPLIANCE PROGRESS:
Preliminary	Preliminary	Preliminary

Training: ¶339

339. *Within 90 days of the Effective Date, CPD will require that all members who are active duty and available for assignment are provided with training on the requirements of this Agreement, together with its goals, implementation process, and timelines.*

Compliance Progress

(Reporting Period: January 1, 2022, through June 30, 2022)

Preliminary:	***Not in Compliance***
Secondary:	***Not in Compliance***
Full:	***Not Yet Assessed***

The City and the CPD did not achieve any level of compliance with the requirements of ¶339 during this reporting period.

To evaluate Preliminary compliance with ¶339, we reviewed the City's and the CPD's relevant policies and documents following the process described in the Consent Decree (¶¶626–41), which outlines applicable consultation, resolution, workout, and public comment periods. To evaluate Secondary compliance with this paragraph, we reviewed data to determine if the requirements of this paragraph are written into policy and reflect specified obligations. Specifically, the IMT needs to review a policy requiring CPD personnel, including new hires, to be trained on Consent Decree requirements, followed by data demonstrating that at least 95% of applicable personnel are trained on this policy, followed by data demonstrating CPD's systematic adherence to the policy and training requirements of this paragraph.

Progress before the Sixth Reporting Period

During the previous reporting period, the IMT found that the City and the CPD did not maintain Preliminary compliance with this paragraph. The City and the CPD did not submit any data but indicated that they intended to submit documents demonstrating Secondary compliance during the sixth reporting period.

Progress in the Sixth Reporting Period

The City and the CPD did not submit any data to establish any level of compliance during this reporting period.

***

The City and the CPD did not achieve any level of compliance during this reporting period. Looking forward, Preliminary compliance may be met when requirements

of this paragraph are written into policy and reflect specified obligations. Secondary compliance requires documentation that at least 95% of eligible personnel are provided with training on the requirements of this paragraph. Full compliance may be achieved when the CPD has fully implemented and institutionalized a full process that aligns with ¶339 requirements.

Paragraph 339 Compliance Progress History

FIRST REPORTING PERIOD	SECOND REPORTING PERIOD	THIRD REPORTING PERIOD
SEPTEMBER 1, 2019 – AUGUST 31, 2019	SEPTEMBER 1, 2019 – FEBRUARY 29, 2020	MARCH 1, 2020 – DECEMBER 31, 2020
COMPLIANCE PROGRESS:	COMPLIANCE PROGRESS:	COMPLIANCE PROGRESS:
None	Secondary	Secondary
FOURTH REPORTING PERIOD	**FIFTH REPORTING PERIOD**	**SIXTH REPORTING PERIOD**
JANUARY 1, 2021 – JUNE 30, 2021	JULY 1, 2021 – DECEMBER 31, 2021	JANUARY 1, 2022 – JUNE 30, 2022
COMPLIANCE PROGRESS:	COMPLIANCE PROGRESS:	COMPLIANCE PROGRESS:
Preliminary	None	None

Training: ¶340

340. *In connection with issuing a policy or procedure pursuant to this Agreement, CPD will ensure that: a. all relevant CPD members review their responsibilities pursuant to the policy or procedure, including the requirements that each member is held accountable for their compliance and is required to report violations of policy; b. supervisors of all ranks are informed that they will be held accountable for identifying and responding to policy or procedure violations by members under their direct command; and c. CPD can document that each relevant CPD officer or other employee has received and reviewed the policy.*

Compliance Progress

(Reporting Period: January 1, 2022, through June 30, 2022)

Preliminary:	***In Compliance*** **(THIRD REPORTING PERIOD)**
Secondary:	***Not in Compliance***
Full:	***Not Yet Assessed***

The City and the CPD maintained Preliminary compliance with the requirements of ¶340 during this reporting period.

To evaluate Preliminary compliance with ¶340, we reviewed the City's and the CPD's relevant policies and documents following the process described in the Consent Decree (¶¶626–41), which outlines applicable consultation, resolution, workout, and public comment periods. To evaluate Secondary compliance with this paragraph, we reviewed documentation to determine if they demonstrate that the requirements of this paragraph are written into policy and reflect specified obligations. Such data must reflect that at least 95% of all eligible personnel review the monthly policy updates.

Progress before the Sixth Reporting Period

During the previous reporting period, the IMT assessed compliance and determined that the City and the CPD maintained Preliminary compliance with this paragraph. The City and the CPD did not submit any data, but indicated that they intended to submit documents demonstrating Secondary compliance during the sixth reporting period.

Progress in the Sixth Reporting Period

The City and the CPD did not submit any data to establish any level of compliance during this reporting period. However, the IMT reviewed General Order G01-03, *Department Directives System* to affirm continued Preliminary compliance with this paragraph.

***

The City and the CPD maintained Preliminary compliance during this reporting period. Looking forward, Secondary compliance requires documentation that at least 95% of eligible personnel review the monthly policy updates. Full compliance may be achieved when the CPD has fully implemented and institutionalized a full process that aligns with ¶340 requirements.

Paragraph 340 Compliance Progress History

FIRST REPORTING PERIOD	SECOND REPORTING PERIOD	THIRD REPORTING PERIOD
SEPTEMBER 1, 2019 – AUGUST 31, 2019	SEPTEMBER 1, 2019 – FEBRUARY 29, 2020	MARCH 1, 2020 – DECEMBER 31, 2020
COMPLIANCE PROGRESS:	COMPLIANCE PROGRESS:	COMPLIANCE PROGRESS:
None	None	Preliminary
FOURTH REPORTING PERIOD	**FIFTH REPORTING PERIOD**	**SIXTH REPORTING PERIOD**
JANUARY 1, 2021 – JUNE 30, 2021	JULY 1, 2021 – DECEMBER 31, 2021	JANUARY 1, 2022 – JUNE 30, 2022
COMPLIANCE PROGRESS:	COMPLIANCE PROGRESS:	COMPLIANCE PROGRESS:
Preliminary	Preliminary	Preliminary

Appendix 7
Supervision
Compliance Assessments, by Paragraph

Appendix 7
Supervision
Compliance Assessments, by Paragraph

¶347 ¶348 ¶349 ¶350 ¶351 ¶352 ¶353 ¶354
¶355 ¶356 ¶357 ¶359 ¶360 ¶361 ¶362 ¶363
¶364 ¶365 ¶366 ¶367 ¶368 ¶369 ¶370 ¶371
¶372 ¶373 ¶374 ¶375 ¶376

Supervision: ¶347

> ***347.*** *CPD will require its supervisors, through policy and auditing, to consistently apply CPD policies and procedures from shift to shift, among all geographic areas of the city, and in all units of the Department.*

Compliance Progress

(Reporting Period: January 1, 2022, through June 30, 2022)

Preliminary:	***In Compliance*** **(NEW)**
Secondary:	***Not Yet Assessed***
Full:	***Not Yet Assessed***

We assessed the requirements of ¶347 for the first time in the sixth reporting period. The City and the CPD reached Preliminary compliance with ¶347.

To evaluate Preliminary compliance with ¶347, we reviewed the CPD's relevant policies and records following the process described in the Consent Decree (¶¶626–41), which outlines applicable consultation, resolution, workout, and public comment periods.

The City and the CPD previously finalized the *Supervisory Responsibilities* policy (G01-09), on May 10, 2021, which the IMT reviewed. This policy sets forth various duties and responsibilities of supervisors. The policy directs supervisors to model appropriate conduct, including abiding by the law and CPD policy and displaying high standards of ethical behavior and integrity. Supervisors are expected to effectively supervise the members under their command to conduct their duties consistent with the established principles of procedural justice, sanctity of life, de-escalation, impartial policing, and community policing.

To evaluate Secondary compliance in future reporting periods, the IMT will focus on areas which demonstrate the requirements within ¶347. The IMT will evaluate whether the CPD has a plan to track, measure, and show compliance with the requirements of this paragraph. An important measure of supervisor efficacy are the supervisory logs, which outline a supervisor's daily activities and tasks. The IMT looks forward to reviewing these and conducting focus groups with officers and supervisors to hear their direct insights.

Paragraph 347 Compliance Progress History

FIRST REPORTING PERIOD SEPTEMBER 1, 2019 – AUGUST 31, 2019	SECOND REPORTING PERIOD SEPTEMBER 1, 2019 – FEBRUARY 29, 2020	THIRD REPORTING PERIOD MARCH 1, 2020 – DECEMBER 31, 2020
COMPLIANCE PROGRESS: Not Applicable	COMPLIANCE PROGRESS: Not Applicable	COMPLIANCE PROGRESS: Not Applicable
FOURTH REPORTING PERIOD JANUARY 1, 2021 – JUNE 30, 2021	**FIFTH REPORTING PERIOD** JULY 1, 2021 – DECEMBER 31, 2021	**SIXTH REPORTING PERIOD** JANUARY 1, 2022 – JUNE 30, 2022
COMPLIANCE PROGRESS: Not Applicable	COMPLIANCE PROGRESS: Not Applicable	COMPLIANCE PROGRESS: Preliminary

Supervision: ¶348

348. *By January 1, 2020, CPD will review and, as necessary, revise its policies for supervision to ensure that such policies set out clear responsibilities for supervisors to comply with the requirements of this Agreement. CPD will inform all supervisors of their specific duties and responsibilities that are required by CPD policies, including this Agreement.*

Compliance Progress

(Reporting Period: January 1, 2022, through June 30, 2022)

Preliminary:	***In Compliance*** **(SECOND REPORTING PERIOD)**
Secondary:	***Not in Compliance***
Full:	***Not Yet Assessed***

In the sixth reporting period, the City and the CPD maintained Preliminary compliance with ¶348, but did not reach Secondary compliance.

To evaluate Preliminary compliance with ¶348, we reviewed the CPD's relevant policies and records following the process described in the Consent Decree (¶¶626–41), which outlines applicable consultation, resolution, workout, and public comment periods. For Secondary compliance with ¶348, we reviewed, among other things, the CPD's corresponding training materials.

Progress before the Sixth Reporting Period

In previous reporting periods, we reviewed iterations of the CPD's *Supervisory Responsibilities* (G01-09) policy, corresponding training documents, and other documents related to the requirements of this paragraph, such as training tracking sheets and the *Supervisory Policy Matrix*.[1] The City and the CPD reached Preliminary compliance in the second reporting period. The City and the CPD maintained Preliminary compliance by carefully revising, improving, and finalizing *Supervisory Responsibilities* policy (G01-09) and finalizing the curriculum for the *2022 In-Service Supervisors Training*. Additionally, the IMT was able to review the CPD's *Performance Evaluation System Pilot Program (PES)* policy (D21-09), and the *Officer Support System (OSS)* policy (D20-04).

We explained in previous reports that, for the CPD to reach subsequent levels of compliance, we would look to see that the CPD has a system for tracking supervisory responsibilities and trainings across all areas of the Consent Decree, and we had hoped to review supervisory logs that capture supervisor's actions that

[1] Early versions of the *Supervisory Responsibilities* General Order were numbered G01-07 and G01-08. The finalized version of the policy, which was submitted this reporting period, is G01-09. For consistency, we refer to the *Supervisory Responsibilities* General Order as G01-09 throughout this report.

demonstrate compliance with the policies that outline expectations and responsibilities of supervisors.

Progress in the Sixth Reporting Period

In April, members of the IMT observed the *2022 In-Service Supervisors Training*, both in person and virtually. The training instructed supervisors on the soft skills necessary to have difficult but crucial conversations with members that they supervise and the value of practicing internal procedural justice as a model for practicing procedural justice in the community. The training also included a "Supervisors Toolbox" to provide a brief overview of the available CPD wellness programs, resources, and supports.

Additionally, the IMT was able to conduct focus groups with officer, supervisors, and command staff within the 6th District during an in-person site visit. These conversations provided additional insight into the realities of supervision and daily operations in the department.

Further, the IMT reviewed the *Performance Evaluation System (PES) Pilot Training* and submitted a no-objection notice in April 2022. The City and the CPD also submitted a revised and updated the *Officer Support System (OSS) Pilot Training* for IMT review in May 2022. The Performance Evaluation System and Officer Support System are to be launched in the 6th District during the seventh reporting period.

***

These efforts have allowed the City and the CPD to maintain Preliminary compliance with ¶348 in the sixth reporting period. However, they are not sufficient to reach Secondary compliance.

In the seventh reporting period, the IMT looks forward to reviewing finalized Performance Evaluation System and Officer Support System curriculums and observing the trainings. While awaiting the training on these two systems, the IMT also looks forward to reviewing the current supervisory logs implemented by the CPD to track supervisors' activities during their shifts. The submission and review of these logs will also help support Secondary compliance.

Paragraph 348 Compliance Progress History

FIRST REPORTING PERIOD SEPTEMBER 1, 2019 – AUGUST 31, 2019	SECOND REPORTING PERIOD SEPTEMBER 1, 2019 – FEBRUARY 29, 2020	THIRD REPORTING PERIOD MARCH 1, 2020 – DECEMBER 31, 2020
COMPLIANCE PROGRESS: Not Applicable	COMPLIANCE PROGRESS: Preliminary	COMPLIANCE PROGRESS: Preliminary
FOURTH REPORTING PERIOD JANUARY 1, 2021 – JUNE 30, 2021	**FIFTH REPORTING PERIOD** JULY 1, 2021 – DECEMBER 31, 2021	**SIXTH REPORTING PERIOD** JANUARY 1, 2022 – JUNE 30, 2022
COMPLIANCE PROGRESS: Preliminary	COMPLIANCE PROGRESS: Preliminary	COMPLIANCE PROGRESS: Preliminary

Supervision: ¶349

349. *CPD will require that all supervisors perform their specific duties and responsibilities in compliance with CPD policy, including the terms of this Agreement.*

Compliance Progress

(Reporting Period: January 1, 2022, through June 30, 2022)

Preliminary: ***In Compliance*** **(NEW)**
Secondary: ***Not Yet Assessed***
Full: ***Not Yet Assessed***

We assessed the requirements of ¶349 for the first time in the sixth reporting period. The City and the CPD reached Preliminary compliance with ¶349.

To evaluate Preliminary compliance with ¶349, we reviewed the CPD's relevant policies and records following the process described in the Consent Decree (¶¶626–41), which outlines applicable consultation, resolution, workout, and public comment periods.

The City and the CPD finalized the *Supervisory Responsibilities* policy (G01-09), on May 10, 2021, which the IMT reviewed. This policy sets forth various duties and responsibilities of supervisors. The policy directs supervisors to model appropriate conduct, including abiding by the law and CPD policy and displaying high standards of ethical behavior and integrity. Supervisors are expected to effectively supervise the members under their command to conduct their duties consistent with the established principles of procedural justice, sanctity of life, de-escalation, impartial policing, and community policing.

To evaluate Secondary compliance in future reporting periods, the IMT will focus on areas which demonstrate the requirements within ¶349. The IMT will evaluate whether the CPD has a plan to track, measure, and show compliance with the requirements of this paragraph. An important measure of supervisor efficacy are the supervisory logs, which outline a supervisor's daily activities and tasks. The submission and review of these logs will also help the IMT evaluate Secondary compliance. The IMT looks forward to reviewing these and to conducting focus groups with officers and supervisors to hear their direct insights.

Paragraph 349 Compliance Progress History

FIRST REPORTING PERIOD SEPTEMBER 1, 2019 – AUGUST 31, 2019	SECOND REPORTING PERIOD SEPTEMBER 1, 2019 – FEBRUARY 29, 2020	THIRD REPORTING PERIOD MARCH 1, 2020 – DECEMBER 31, 2020
COMPLIANCE PROGRESS: Not Applicable	COMPLIANCE PROGRESS: Not Applicable	COMPLIANCE PROGRESS: Not Applicable
FOURTH REPORTING PERIOD JANUARY 1, 2021 – JUNE 30, 2021	**FIFTH REPORTING PERIOD** JULY 1, 2021 – DECEMBER 31, 2021	**SIXTH REPORTING PERIOD** JANUARY 1, 2022 – JUNE 30, 2022
COMPLIANCE PROGRESS: Not Applicable	COMPLIANCE PROGRESS: Not Applicable	COMPLIANCE PROGRESS: Preliminary

Supervision: ¶350

350. *CPD will regularly inform its members, including supervisors, of available training, professional development opportunities, and employee assistance resources.*

Compliance Progress

(Reporting Period: January 1, 2022, through June 30, 2022)

Preliminary:	***In Compliance*** **(FOURTH REPORTING PERIOD)**
Secondary:	***Not in Compliance***
Full:	***Not Yet Assessed***

In the sixth reporting period, the City and the CPD maintained Preliminary compliance with ¶350, but did not reach Secondary compliance.

To assess Preliminary compliance with ¶350, we reviewed the CPD's relevant policies and records following the process described in the Consent Decree (¶¶626–41), which outlines applicable consultation, resolution, workout, and public comment periods. We noted in the fourth reporting period that we expected the CPD to develop an effective channel for informing members of training and professional development opportunities, as well as available employee-assistance resources.

To evaluate Secondary compliance with ¶350, we considered whether (1) the CPD developed an effective channel for communicating these opportunities to members and (2) demonstrated that the notification system is utilized consistently in line with the various directives that touch on notifying members of training, professional development opportunities, and employee assistance resources.

Progress before the Sixth Reporting Period

The IMT reviewed ¶350 for the first time during the fourth reporting period. In the fourth reporting period, the City and the CPD reached Preliminary compliance with this paragraph by submitting several documents regarding ¶350, including the CPD's 2020 Annual Report, an updated draft of S11-10-01, *Training Notification and Attendance Responsibilities*, as well as information about the Performance Evaluations System pilot program. We noted that at least 95% percentage of CPD officers received 32 hours of in-service training, which evidenced a robust communication and notification system that ensured members were aware of their training requirements and additional opportunities for training. The City and the CPD maintained Preliminary compliance with ¶350 in the fifth reporting period by finalizing the curriculum for the *2022 In-Service Supervisors Training*. Additionally, the IMT was able to review the CPD's *Performance Evaluation System Pilot Program (PES)* (D21-09), the *Officer Support System (OSS)* (D20-04), and the *Department Training* (S11-10) policies.

We explained that, in future reporting periods, we hoped to see that notification systems are employed in a manner consistent with the various directives that touch on notifying members of training, professional development opportunities, and employee assistance resources. More specifically, we asked to review data demonstrating how the notification systems work and their effectiveness in disseminating information.

Progress in the Sixth Reporting Period

In April 2022, the IMT conducted an in-person site visit, during which we were able to speak with groups of officers, supervisors, and command staff within the 6th District. These conversations provided additional insight into the realities of supervision and daily operations in the CPD. While we did not specifically observe supervisors notifying members of training opportunities and resources, we do highlight a productive roll-call where sergeants and lieutenants debriefed situations that occurred on previous shifts with a focus on officer safety, community service, and policy clarifications. The IMT notes that these observations are an important step toward assessing additional levels of compliance.

Further, members of the IMT observed the *2022 In-Service Supervisors Training*, both in person and virtually. The training instructed supervisors on the soft skills necessary to have difficult but crucial conversations with members that they supervise and the value of practicing internal procedural justice as a model for practicing procedural justice in the community. The training also included a "Supervisors Toolbox" to provide a brief overview of the available CPD wellness programs, resources, and supports.

The City and the CPD maintained Preliminary compliance with ¶350, but did not achieve Secondary compliance in the fifth reporting period. The IMT believes that the City and the CPD are demonstrating progress toward Secondary compliance. We look forward to seeing that notification systems are employed in a manner consistent with the various directives that touch on notifying members of training, professional development opportunities, and employee assistance resources. We also look forward to observing and reviewing efforts that evaluate the effectiveness of the notification systems.

Paragraph 350 Compliance Progress History

FIRST REPORTING PERIOD SEPTEMBER 1, 2019 – AUGUST 31, 2019 COMPLIANCE PROGRESS: Not Applicable	SECOND REPORTING PERIOD SEPTEMBER 1, 2019 – FEBRUARY 29, 2020 COMPLIANCE PROGRESS: Not Applicable	THIRD REPORTING PERIOD MARCH 1, 2020 – DECEMBER 31, 2020 COMPLIANCE PROGRESS: Not Applicable
FOURTH REPORTING PERIOD JANUARY 1, 2021 – JUNE 30, 2021 COMPLIANCE PROGRESS: Preliminary	FIFTH REPORTING PERIOD JULY 1, 2021 – DECEMBER 31, 2021 COMPLIANCE PROGRESS: Preliminary	SIXTH REPORTING PERIOD JANUARY 1, 2022 – JUNE 30, 2022 COMPLIANCE PROGRESS: Preliminary

Supervision: ¶351

351. *Supervisors of all ranks will effectively supervise the members under their command to ensure accountability across the Department.*

Compliance Progress

(Reporting Period: January 1, 2022, through June 30, 2022)

Preliminary:	***In Compliance*** **(NEW)**
Secondary:	***Not Yet Assessed***
Full:	***Not Yet Assessed***

We assessed the requirements of ¶351 for the first time in the sixth reporting period. The City and the CPD reached Preliminary compliance with ¶351.

To evaluate Preliminary compliance with ¶351, we reviewed the CPD's relevant policies and records following the process described in the Consent Decree (¶¶626–41), which outlines applicable consultation, resolution, workout, and public comment periods. For Secondary compliance, the CPD should develop a plan to ensure supervisors of all ranks will effectively supervise the members under their command to ensure accountability across the CPD, including written guidance, training, tracking, and accountability.

The City and the CPD finalized the *Supervisory Responsibilities* policy (G01-09), on May 10, 2021, which the IMT reviewed. This policy sets forth various duties and responsibilities of supervisors. The policy directs supervisors to model appropriate conduct, including abiding by the law and CPD policy and displaying high standards of ethical behavior and integrity. Supervisors are expected to effectively supervise the members under their command to conduct their duties consistent with the established principles of procedural justice, sanctity of life, de-escalation, impartial policing, and community policing.

To evaluate Secondary compliance in future reporting periods, the IMT will focus on areas which demonstrate the requirements within ¶349. The IMT will evaluate whether the CPD has a plan to track, measure, and show compliance with the requirements of this paragraph. An important measure of supervisor efficacy are the supervisory logs, which outline a supervisor's daily activities and tasks. The submission and review of these logs will also help the IMT assess Secondary compliance. The IMT looks forward to reviewing these, amongst other relevant records, and to conducting focus groups with officers and supervisors to hear their direct insights. We also anticipate reviewing other records.

Paragraph 351 Compliance Progress History

FIRST REPORTING PERIOD SEPTEMBER 1, 2019 – AUGUST 31, 2019	SECOND REPORTING PERIOD SEPTEMBER 1, 2019 – FEBRUARY 29, 2020	THIRD REPORTING PERIOD MARCH 1, 2020 – DECEMBER 31, 2020
COMPLIANCE PROGRESS: Not Applicable	COMPLIANCE PROGRESS: Not Applicable	COMPLIANCE PROGRESS: Not Applicable
FOURTH REPORTING PERIOD JANUARY 1, 2021 – JUNE 30, 2021	**FIFTH REPORTING PERIOD** JULY 1, 2021 – DECEMBER 31, 2021	**SIXTH REPORTING PERIOD** JANUARY 1, 2022 – JUNE 30, 2022
COMPLIANCE PROGRESS: Not Applicable	COMPLIANCE PROGRESS: Not Applicable	COMPLIANCE PROGRESS: Preliminary

Supervision: ¶352

352. *Effective supervision requires that all supervisors, at a minimum, will: a. establish and enforce the expectation that members under their command perform their duties in a manner that complies with federal and state law, CPD policy, this Agreement, and that is consistent with the principles of procedural justice, de-escalation, impartial policing, and community policing; b. provide leadership, guidance, mentoring, direction, and support to members under their command to promote improved performance and professional development; and c. lead efforts to ensure that members under their command are working actively to engage the community and promote public trust and safety.*

Compliance Progress

(Reporting Period: January 1, 2022, through June 30, 2022)

Preliminary:	***In Compliance*** **(FIFTH REPORTING PERIOD)**
Secondary:	***Not in Compliance***
Full:	***Not Yet Assessed***

The City and the CPD maintained Preliminary compliance, but did not reach further levels of compliance with ¶352.

To determine Preliminary compliance with ¶352, we reviewed the CPD's relevant policies and records following the process described in the Consent Decree (¶¶626–41), which outlines applicable consultation, resolution, workout, and public comment periods. To evaluate Secondary compliance, we sought to determine whether the CPD has a plan to track, measure, and show compliance with the requirements of this paragraph. In particular, the IMT focused on the Performance Evaluation System, which identifies many of the requirements in ¶352, including building upon the principles of community policing, de-escalation, procedural justice, and impartial policing.

Progress before the Sixth Reporting Period

We assessed the City and the CPD's compliance with ¶352 for the first time in the fifth reporting period. The City and the CPD reached Preliminary compliance with ¶352 by finalizing the *Supervisory Responsibilities* policy (G01-09). This policy sets forth various duties and responsibilities of supervisors. Supervisors are expected to effectively supervise the members under their command to conduct their duties consistent with the established principles of procedural justice, sanctity of life, de-escalation, impartial policing, and community policing.

We explained that, in the sixth reporting period, we hoped to observe the I*n-Service Supervisors Training*, which instructs supervisors on the soft skills necessary

to have difficult but crucial conversations with members they supervise on the value of practicing internal procedural justice as a model for procedural justice in the community. The IMT will also had hoped to review the Officer Support System Pilot Program and training, which is designed to assist supervisors in proactively supporting sworn members of the CPD and supporting the well-being of members in a non-disciplinary manner.

Progress in the Sixth Reporting Period

During the sixth reporting period, the IMT was able to conduct focus groups with officer, supervisors, and command staff within the 6th District during an in-person site visit. These conversations provided additional insight into the realities of supervision and daily operations in the CPD. While officers we spoke with during these focus groups expressed that supervisors were supportive, they also shared that reduced staffing affected supervisors' ability to engage in proactive coaching on a regular basis. Supervisory mentorship is invaluable to an officer's performance and professional development and is a core component of ¶352.

In April, members of the IMT observed the *2022 In-Service Supervisors Training*, both in person and virtually. The training instructed supervisors on the soft skills necessary to have difficult but crucial conversations with members that they supervise and the value of practicing internal procedural justice as a model for practicing procedural justice in the community. The training also included a "Supervisors Toolbox" to provide a brief overview of the available CPD wellness pro-grams, resources, and supports.

Additionally, the IMT reviewed the Performance Evaluation System (PES) Pilot Training and submitted a no-objection notice in April 2022. The City and the CPD also submitted a revised and updated the Officer Support System (also known as the OSS) Pilot Training for IMT review in May 2022. In virtual meetings with members of the City and the CPD throughout the sixth reporting period, the IMT has been provided with updates on the progress of Officer Support System and Performance Evaluation System implementation plans. On May 19, 2022, the City and the CPD produced the *OSS Evaluation Plan*, which outlines short, medium, and long-term goals and objectives for the Officer Support System. These steps have allowed the City and the CPD to maintain Preliminary compliance with ¶352.

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In future reporting periods, the IMT will evaluate whether the CPD has a plan to track, measure, and show compliance with the requirements of this paragraph. In particular, the IMT will be focused on the Performance Evaluation System, which identifies many of the requirements in ¶352, including building upon the principles of community policing, de-escalation, procedural justice, and impartial policing. The IMT will also focus on assessing unity of command and span of control and

monitoring whether supervisors have the time and appropriate span of control to properly meet the requirements of ¶352.

Paragraph 352 Compliance Progress History

FIRST REPORTING PERIOD	SECOND REPORTING PERIOD	THIRD REPORTING PERIOD
SEPTEMBER 1, 2019 – AUGUST 31, 2019	SEPTEMBER 1, 2019 – FEBRUARY 29, 2020	MARCH 1, 2020 – DECEMBER 31, 2020
COMPLIANCE PROGRESS:	COMPLIANCE PROGRESS:	COMPLIANCE PROGRESS:
Not Applicable	Not Applicable	Not Applicable
FOURTH REPORTING PERIOD	**FIFTH REPORTING PERIOD**	**SIXTH REPORTING PERIOD**
JANUARY 1, 2021 – JUNE 30, 2021	JULY 1, 2021 – DECEMBER 31, 2021	JANUARY 1, 2022 – JUNE 30, 2022
COMPLIANCE PROGRESS:	COMPLIANCE PROGRESS:	COMPLIANCE PROGRESS:
Preliminary	Preliminary	Preliminary

Supervision: ¶353

353. *Additionally, effective supervision requires that immediate supervisors will, for members under their direct command: a. respond to, review, and investigate uses of force and other incidents and conduct as required by CPD policy and this Agreement; b. monitor, manage, and coordinate incident response; c. confirm the correctness, sufficiency, and completeness of written reports submitted for review and approval; d. identify any adverse behavior or misconduct and ensure that it is adequately addressed through corrective action, training, or referral for discipline; e. respond appropriately to each complaint of misconduct received, in accordance with CPD's complaint and disciplinary policies; f. review and act upon information regarding at-risk behavior by the members under their direct command, as required by the Data Collection, Analysis, and Management section of this Agreement; g. advise members under their direct command of available training, professional development opportunities, and employee assistance resources; h. conduct annual performance evaluations and meet with members under their direct command on an ongoing basis as necessary to provide guidance, mentoring, direction, and support to the members regarding their performance and to identify areas for improvement; and i. document the performance of their supervisory duties as required by CPD policy and this Agreement using the appropriate records management system, the Performance Recognition System ("PRS"), and/or the EIS.*

Compliance Progress

(Reporting Period: January 1, 2022, through June 30, 2022)

Preliminary:	***In Compliance*** **(FOURTH REPORTING PERIOD)**
Secondary:	***Not in Compliance***
Full:	***Not Yet Assessed***

In the sixth reporting period, the City and the CPD maintained Preliminary compliance with ¶353, but did not reach Secondary compliance.

To assess Preliminary compliance with ¶353, we reviewed the CPD's relevant policies and records following the process described in the Consent Decree (¶¶626–41), which outlines applicable consultation, resolution, workout, and public comment periods. The CPD's policies should be realistic and explicit to effectively address supervisory responsibilities across its broad spectrum of administration and operations.

To determine Secondary compliance with ¶353, we reviewed the CPD's training development, implementation, and evaluation (¶286); reviewed data sources relevant to the requirements of the paragraph; and considered available data that is necessary or helpful to identify, verify, and sustain compliance and reform efforts. Additionally, we considered whether the relevant policies are effective in addressing the requirements of ¶353, that supervisors are trained effectively to operate in compliance with policies, and that there are sufficient supervisors to perform the functions.

Progress before the Sixth Reporting Period

We provided a status update for ¶353 in the third reporting period and assessed the City and the CPD's compliance with ¶353 for the first time in the fourth reporting period. The City and the CPD reached Preliminary compliance in the fourth reporting period with the implementation of the *Supervisory Responsibilities* policy (G01-09). During the fifth reporting period, the IMT continued to monitor the CPD's efforts to conduct in-service training, which supervisors are required to attend. The CPD submitted a *2022 In-Service Training Plan* that includes an *In-Service Supervisors training* curriculum. We explained that, in future reporting periods, we hoped to see the CPD to acquire and implement technology solutions to help record, collect, and analyze data regarding supervisory responsibilities to achieve further levels of compliance.

Progress in the Sixth Reporting Period

In April, members of the IMT observed the 2022 In-Service Supervisors Training, both in person and virtually. The training consisted of topics related to supervisory duties and managerial and leadership skills. In addition, supervisors are provided instructions on the methods and skills to improve *Tactical Response Reports* (TRRs) to correct a variety of errors and with an emphasis on improved report writing. In addition, the training includes developing soft skills necessary to have difficult but crucial conversations with members they supervise and the value of practicing internal procedural justice as a model for procedural justice in the community.

Further, the IMT reviewed the Performance Evaluation System (also known as the PES) Pilot Training and submitted a no-objection notice in April 2022. This training will help to support ¶353 by aiding supervisors in recognizing and documenting the job performance of department members under their command, such as exceptional job performance or adverse behavior that can be improved by non-disciplinary options. The City and the CPD also submitted a revised and updated the Officer Support System (also known as OSS) Pilot Training for IMT review in May 2022. This training will help to support ¶353 by assisting supervisors in proactively supporting sworn members of the CPD and to support the well-being of members

in a non-disciplinary manner. The Performance Evaluation System and Officer Support System are projected to be launched in the 6th District during the seventh reporting period.

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The City and the CPD maintained Preliminary compliance with ¶353 in the fifth reporting period, but did not reach Secondary compliance. The IMT continues to encourage the CPD to acquire and implement technology solutions to help record, collect, and analyze data regarding supervisory responsibilities to achieve Secondary compliance. With a great deal of focus being placed on the pilot district (the 6th District), the IMT will also focus on assessing unity of command and span of control, and monitoring whether supervisors have the time and appropriate span of control to properly meet the requirements of ¶353. Additionally, we hope to review examples of Supervisor Logs along with paperwork regarding the new Performance Evaluations System pilot.

Paragraph 353 Compliance Progress History

FIRST REPORTING PERIOD SEPTEMBER 1, 2019 – AUGUST 31, 2019 COMPLIANCE PROGRESS: Not Applicable	SECOND REPORTING PERIOD SEPTEMBER 1, 2019 – FEBRUARY 29, 2020 COMPLIANCE PROGRESS: Not Applicable	THIRD REPORTING PERIOD MARCH 1, 2020 – DECEMBER 31, 2020 COMPLIANCE PROGRESS: Status Update
FOURTH REPORTING PERIOD JANUARY 1, 2021 – JUNE 30, 2021 COMPLIANCE PROGRESS: Preliminary	FIFTH REPORTING PERIOD JULY 1, 2021 – DECEMBER 31, 2021 COMPLIANCE PROGRESS: Preliminary	SIXTH REPORTING PERIOD JANUARY 1, 2022 – JUNE 30, 2022 COMPLIANCE PROGRESS: Preliminary

Supervision: ¶354

> ***354.*** *During their tour of duty, immediate supervisors in the Bureau of Patrol will spend time interacting with, observing, and overseeing the members under their direct command, including time in the field, consistent with their duty assignment.*

Compliance Progress

(Reporting Period: January 1, 2022, through June 30, 2022)

Preliminary:	***In Compliance*** **(FOURTH REPORTING PERIOD)**
Secondary:	***Not in Compliance***
Full:	***Not Yet Assessed***

In the sixth reporting period, the City and the CPD maintained Preliminary compliance with ¶354, but did not reach Secondary compliance.

For Preliminary compliance with ¶354, we reviewed the CPD's relevant policies and records following the process described in the Consent Decree (¶¶626–41), which outlines applicable consultation, resolution, workout, and public comment periods. To evaluate Secondary compliance, the IMT reviewed data sources relevant to compliance with the requirements of ¶354 and considered available data that is necessary or helpful to identify, verify, and sustain compliance and reform efforts, including written documentation and interviews with supervisors and officers under their command. The IMT also reviewed records that are sufficient to show that the CPD has qualified personnel fulfilling the responsibilities required by ¶354. We also considered whether the CPD has allocated sufficient resources to create, staff, fill, and maintain positions with qualified personnel to fulfill the requirements of ¶354 and the Consent Decree.

Progress before the Sixth Reporting Period

We provided a status update for ¶354 in the third reporting period and assessed the City and the CPD's compliance with ¶354 for the first time in the fourth reporting period. The City and the CPD reached Preliminary compliance in the fourth reporting period by finalizing the *Supervisory Responsibilities* policy (G01-09). In the fifth reporting period, the City and the CPD maintained Preliminary compliance with ¶354 by issuing G01-09. The CPD also developed and submitted a *2022 In-Service Supervisors Training* plan and curriculum and a revised D20-02, *Unity of Command and Span of Control Schedule – Pilot Program* policy. We noted, in future reporting periods, that we hoped to observe supervisory trainings for supervisors and review logs kept relating to the requirements of this paragraph.

Progress in the Sixth Reporting Period

During the sixth reporting period, the IMT was able to conduct focus groups with officer, supervisors, and command staff within the 6th District during an in-person site visit. These conversations provided additional insight into the realities of supervision and daily operations in the department. While officers we spoke with during these focus groups expressed that supervisors were supportive, they shared that high call volumes and low staffing are preventing sergeants from being able to develop and engage with the officers they supervise on a regular basis. In May 2022, the CPD shared that additional sergeants will be assigned to the 6th District.

Also during the site visit, the IMT observed roll-call and noted that sergeants and lieutenants debriefed situations that occurred on previous shifts with a focus on officer safety, community service, and policy clarifications. The IMT notes that these observations are an important step toward assessing further levels of compliance with ¶354.

The IMT looks forward to reviewing records and logs kept relating to the requirements of this paragraph. We encourage the CPD to maintain efforts aimed to acquire and implement technology systems that will allow for efficient and accurate capture of this information. Additionally, while the IMT recognizes this prioritization of staffing in the pilot district as a step in the right direction, we would like to see a sufficient amount of sergeants maintained over time.

Paragraph 354 Compliance Progress History

FIRST REPORTING PERIOD SEPTEMBER 1, 2019 – AUGUST 31, 2019 COMPLIANCE PROGRESS: Not Applicable	SECOND REPORTING PERIOD SEPTEMBER 1, 2019 – FEBRUARY 29, 2020 COMPLIANCE PROGRESS: Not Applicable	THIRD REPORTING PERIOD MARCH 1, 2020 – DECEMBER 31, 2020 COMPLIANCE PROGRESS: Status Update
FOURTH REPORTING PERIOD JANUARY 1, 2021 – JUNE 30, 2021 COMPLIANCE PROGRESS: Preliminary	FIFTH REPORTING PERIOD JULY 1, 2021 – DECEMBER 31, 2021 COMPLIANCE PROGRESS: Preliminary	SIXTH REPORTING PERIOD JANUARY 1, 2022 – JUNE 30, 2022 COMPLIANCE PROGRESS: Preliminary

Supervision: ¶355

355. *Immediate supervisors will be required to document their actions taken with members under their direct command, pursuant to CPD policy, including, but not limited to: a. non-disciplinary or corrective actions, including, but not limited to, those taken pursuant to any internal or external review of the conduct of CPD officers or taken pursuant to the operation of any existing and future automated electronic systems contemplated by Part D of the Data Collection, Analysis, and Management section of this Agreement; b. disciplinary referrals; c. response to incident scenes as required by CPD policy; d. observations of member conduct, as required by CPD policy; and e. reviews and investigations of reportable uses of force and other reports required by CPD policy and this Agreement.*

Compliance Progress

(Reporting Period: January 1, 2022, through June 30, 2022)

Preliminary:	***In Compliance*** **(FOURTH REPORTING PERIOD)**
Secondary:	***Not in Compliance***
Full:	***Not Yet Assessed***

In the sixth reporting period, the City and the CPD maintained Preliminary compliance with ¶355, but did not reach Secondary compliance.

To evaluate Preliminary compliance with ¶355, we reviewed the CPD's relevant policies following the process described in the Consent Decree (¶¶626–41), which outlines applicable consultation, resolution, workout, and public comment periods. For Secondary compliance, the IMT reviewed the CPD's training development, implementation, and evaluation (¶286). The IMT reviewed records regarding whether the CPD has qualified personnel fulfilling the responsibilities required by ¶355. Additionally, the IMT looked for evidence that the CPD has trained supervisors to comply with relevant portions of G01-09 and reviewed evidence and data sources showing how supervisors will be documenting their engagements with their subordinates, including but not limited to supervisory logs, Performance Evaluation System entries, training materials, and other types of entries and forms the CPD will use to comply with the requirements of ¶355.

Progress before the Sixth Reporting Period

In previous reporting periods, we reviewed draft versions of the *Supervisory Responsibilities* policy. The collaborative process used to review and revise such documents was ongoing at the end of the third reporting period. In the fourth reporting period, after revising, posting for public comment, and finalizing *Supervisory Responsibilities*, G01-09, the City and the CPD reached Preliminary compliance

with ¶355. In the fifth reporting period, the City and the CPD maintained Preliminary compliance by finalizing and issuing two other policies supporting ¶355: the *Officer Support System Pilot Program (OSS)* policy (D20-04) and the *Performance Evaluation System Pilot Program (PES)* policy (D21-09). To further support the requirements of ¶355 the CPD developed and submitted a *2022 In-Service Supervisors Training* plan and curriculum. We explained that, for the CPD to reach subsequent levels of compliance, we will look for evidence that the CPD has trained supervisors to comply with relevant policy, and for data that demonstrates informative engagement with supervisors and those serving under their command. The IMT would also look to review supervisory logs that are used to capture supervisors work during their shifts relating to the requirements of this paragraph.

Progress in the Sixth Reporting Period

In the sixth reporting period, the IMT observed the 2022 In-Service Supervisors Training which included learning objectives in support of ¶355, such as the consequences at the supervisory level regarding the failure of initiating a complaint investigation, turning a complaint into a positive community interaction, and requirements for completing a Tactical Response Report (TRR), along with report writing issues and recent changes to the Use of Force and related policies.

Additionally, the IMT reviewed the *Performance Evaluation System (PES) Pilot Training* and submitted a no-objection notice in April 2022. This training will help to support ¶355 by aiding supervisors in recognizing and documenting the job performance and conduct of department members under their command, such as exceptional job performance or adverse behavior that can be improved by non-disciplinary options. The City and the CPD also submitted a revised and updated the *Officer Support System (OSS) Pilot Training* for IMT review in May 2022. This training will help to support ¶355 by assisting supervisors in proactively supporting sworn members of the CPD and to support the well-being of members in a non-disciplinary manner. The Performance Evaluation System and Officer Support System are projected to be launched in the 6th District during the seventh reporting period.

The IMT looks forward to reviewing Supervisory Logs that are used to capture supervisors work during their shifts relating to the requirements of this paragraph. We encourage the CPD to maintain efforts aimed to acquire and implement technology systems that will allow for efficient and accurate capture of this information. Further, the IMT looks forward to observing the Officer Support and Performance Systems trainings, along with how the systems themselves are implemented, utilized, and tracked.

Paragraph 355 Compliance Progress History

FIRST REPORTING PERIOD SEPTEMBER 1, 2019 – AUGUST 31, 2019	SECOND REPORTING PERIOD SEPTEMBER 1, 2019 – FEBRUARY 29, 2020	THIRD REPORTING PERIOD MARCH 1, 2020 – DECEMBER 31, 2020
COMPLIANCE PROGRESS: Not Applicable	COMPLIANCE PROGRESS: Not Applicable	COMPLIANCE PROGRESS: None
FOURTH REPORTING PERIOD JANUARY 1, 2021 – JUNE 30, 2021	**FIFTH REPORTING PERIOD** JULY 1, 2021 – DECEMBER 31, 2021	**SIXTH REPORTING PERIOD** JANUARY 1, 2022 – JUNE 30, 2022
COMPLIANCE PROGRESS: Preliminary	COMPLIANCE PROGRESS: Preliminary	COMPLIANCE PROGRESS: Preliminary

Supervision: ¶356

356. *As otherwise set out in this Agreement, CPD will ensure that it makes staffing and allocation decisions that provide for: a. the number of patrol field supervisors to ensure span of control and unity of command as required in this Part; b. the number of well-trained, qualified FTOs, as required in Part H of the Training section of this Agreement; c. the number of well-trained, qualified staff to train recruits and officers, as required in Part D of the Training section of this Agreement; d. the number of well-trained, qualified staff to conduct timely misconduct investigations, as required in the Accountability and Transparency section of this Agreement; e. the number of certified CIT Officers, as required in Part D of the Crisis Intervention section of this Agreement; and f. the number of officer assistance and wellness staff as required in the Officer Wellness and Support section of this Agreement.*

Compliance Progress

(Reporting Period: January 1, 2022, through June 30, 2022)

Preliminary:	***Not in Compliance***
Secondary:	***Not Yet Assessed***
Full:	***Not Yet Assessed***

The City and the CPD have not yet reached Preliminary compliance with ¶356.

To evaluate Preliminary compliance with ¶356, we considered, among other things, whether the CPD developed a plan to ensure that staffing and allocation decisions comply with the staffing requirements of this paragraph. We also considered the CPD's relevant policies and materials following the process described in the Consent Decree (¶¶626–41).

Progress before the Sixth Reporting Period

In previous reporting periods, we recognized that the CPD took steps toward compliance with subsections of ¶356. For example, they increased the staffing levels of the Professional Counseling Division to comply with subsection (f). Despite these efforts, the City and the CPD did not reach Preliminary compliance in the fourth reporting period because, by the end of the reporting period, the CPD had not yet demonstrated that it had an actionable plan to meet all staffing requirements set out in ¶356.

Still, in the fourth reporting period, the CPD expanded the Unity of Command and Span of Control pilot program to two additional districts. The program was initially piloted in the 6th District and, in the fourth reporting period, the CPD expanded

the pilot program into the 4th and 7th districts as well. In the fourth reporting period, through virtual site visits conducted with several officers and sergeants from the 4th, 6th, and 7th districts, we learned that unity-of-command and span-of-control efforts had not played out on the ground as D20-02 directs. Many members were supportive of unity-of-command and span-of-control concepts that the pilot program intends to achieve. Many of these officers believed that, if properly staffed, the program could benefit the CPD and Chicago's communities. The CPD has since limited the pilot back to the 6th District.

The CPD made notable progress in the fifth reporting period by revising and finalizing D20-02, *Unity of Command and Span of Control Schedule Pilot Program*. Additionally, the IMT noted the formation of the Unity of Command and Span of Control Program Evaluation Committee. The CPD also made progress toward other ¶356 requirements. For example, the *Field Training and Evaluation Program* policy (S11-02), which requires a one-to-one ratio of Field Training Officers to Probationary Police Officers, was finalized and published.

We explained in previous reports that, for the CPD to reach subsequent levels of compliance, the CPD needed to demonstrate an actionable plan to ensure that all staffing and allocation decisions were made in a manner consistent with all the requirements of ¶356. To do this, we explained that the CPD would need to complete a comprehensive staffing study to inform a realistic and effective staffing plan.

Progress in the Sixth Reporting Period

The IMT provided feedback on staffing issues regarding unity of command/span of control, and the CPD made some adjustments accordingly. The CPD also provided updates on the status of their staffing dashboard, which will enable supervisors to better monitor officers assignments and span of control between sergeants and officers.

The IMT also attended several virtual and in-person site visits and conducted focus groups with officers and sergeants. As in the fifth reporting period, we heard a great deal of frustration expressed about inconsistent supervision and staffing shortages, which made it very difficult to achieve unity of command/span of control throughout the ranks. During meetings with the City, the CPD, and the OAG, the CPD also discussed the staffing dashboard's management tools for making staffing and operational decisions that it believes would enhance unity of command/span of control. The CPD also shared that they plan to assign additional sergeants to the 6th District during this reporting period, which is the primary pilot district.

To meet the requirements of ¶356, it is critical to meet the staffing objectives required to achieve unity of command and span of control throughout all 22 districts.

With staffing challenges related to time off, officer stress, service demands, and increases in violent crime, it is imperative that the CPD conduct a staffing study that is focused as an internal guide to help consistently maintain and manage Unity of Command and Span of Control.

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The City and the CPD did not achieve Preliminary compliance with ¶356 in the sixth reporting period. To reach Preliminary compliance with ¶356, the CPD must demonstrate an actionable plan to ensure that all staffing and allocation decisions are made in a manner consistent with the requirements of ¶356. The CPD will need to complete a comprehensive staffing study to inform a realistic and effective staffing plan. The CPD has shared that they plan to conduct a Workforce Allocation Study to develop a staffing model along with recommendations on transfer procedures in the seventh reporting period. We look forward to receiving this information and continuing to consult with the CPD and the City as they undertake these efforts.

Paragraph 356 Compliance Progress History

FIRST REPORTING PERIOD	SECOND REPORTING PERIOD	THIRD REPORTING PERIOD
SEPTEMBER 1, 2019 – AUGUST 31, 2019	SEPTEMBER 1, 2019 – FEBRUARY 29, 2020	MARCH 1, 2020 – DECEMBER 31, 2020
COMPLIANCE PROGRESS:	COMPLIANCE PROGRESS:	COMPLIANCE PROGRESS:
Not Applicable	None	None
FOURTH REPORTING PERIOD	**FIFTH REPORTING PERIOD**	**SIXTH REPORTING PERIOD**
JANUARY 1, 2021 – JUNE 30, 2021	JULY 1, 2021 – DECEMBER 31, 2021	JANUARY 1, 2022 – JUNE 30, 2022
COMPLIANCE PROGRESS:	COMPLIANCE PROGRESS:	COMPLIANCE PROGRESS:
None	None	None

Supervision: ¶357

357. *The City and the CPD will deploy a sufficient amount of qualified supervisors to provide effective supervision, as outlined in this section.*

Compliance Progress

(Reporting Period: January 1, 2022, through June 30, 2022)

Preliminary:	***Not in Compliance***
Secondary:	***Not Yet Assessed***
Full:	***Not Yet Assessed***

We assessed the requirements of ¶357 for the first time in the sixth reporting period. The City and the CPD have not yet reached Preliminary compliance with ¶357.

To evaluate Preliminary compliance with ¶357, we reviewed the CPD's relevant policies and records following the process described in the Consent Decree (¶¶626–41), which outlines applicable consultation, resolution, workout, and public comment periods.

Progress before the Sixth Reporting Period

In the fifth reporting period, the CPD finalized D20-02, *Unity of Command and Span of Control Schedule Pilot Program*. The policy defines both unity of command and span of control and explains how they are designed to afford consistency within patrol areas and create manageable officer-to-sergeant ratios. D20-02 also identifies a Tableau Dashboard that provides participating districts visual data verification for the fulfilment of the district's required operations with Unity of Command and Span of Control.

Progress in the Sixth Reporting Period

During the sixth reporting period, the IMT attended several virtual and in-person site visits and conducted focus groups with officers and sergeants. As in the fifth reporting period, we heard a great deal of frustration expressed about inconsistent supervision and staffing shortages, which made it very difficult to achieve unity of command/span of control throughout the ranks. During meetings with the City, the CPD, and the OAG, the CPD also discussed the staffing dashboard's management tools for making staffing and operational decisions, such as an electronic watch assignment sheet from the 6th District, which allows the CPD to (at a glance) give supervisors the ability to see span of control and unity of command alignment. The CPD also shared that they plan to assign additional sergeants to the 6th District during this reporting period, which is the primary pilot district.

The City and the CPD did not achieve Preliminary compliance with ¶357 in the sixth reporting period. To reach Preliminary compliance, the CPD must demonstrate an actionable plan to ensure that all staffing and allocation decisions are made in a manner consistent with the requirements of ¶357. The CPD will need to complete a comprehensive staffing study to inform a realistic and effective staffing plan. The CPD has shared that they plan to conduct a Workforce Allocation Study to develop a staffing model along with recommendations on transfer procedures in the seventh reporting period. We look forward to receiving this information and continuing to consult with the CPD and the City as they undertake these efforts. We also look forward to reviewing the contents of the CPD staffing dashboard, assignment sheets, and other records, to include transfer orders. Additionally, we hope to conduct further interviews and focus groups with members of the pilot district.

Paragraph 357 Compliance Progress History

FIRST REPORTING PERIOD	SECOND REPORTING PERIOD	THIRD REPORTING PERIOD
SEPTEMBER 1, 2019 – AUGUST 31, 2019	SEPTEMBER 1, 2019 – FEBRUARY 29, 2020	MARCH 1, 2020 – DECEMBER 31, 2020
COMPLIANCE PROGRESS:	COMPLIANCE PROGRESS:	COMPLIANCE PROGRESS:
Not Applicable	Not Applicable	Not Applicable
FOURTH REPORTING PERIOD	**FIFTH REPORTING PERIOD**	**SIXTH REPORTING PERIOD**
JANUARY 1, 2021 – JUNE 30, 2021	JULY 1, 2021 – DECEMBER 31, 2021	JANUARY 1, 2022 – JUNE 30, 2022
COMPLIANCE PROGRESS:	COMPLIANCE PROGRESS:	COMPLIANCE PROGRESS:
Not Applicable	Not Applicable	None

Supervision: ¶359

359. *CPD will ensure that the principles of unity of command and span of control are realized for watch personnel assigned to field units within district law enforcement.*

Compliance Progress

(Reporting Period: January 1, 2022, through June 30, 2022)

Preliminary:	***In Compliance*** **(NEW)**
Secondary:	***Not Yet Assessed***
Full:	***Not Yet Assessed***

We assessed the requirements of ¶359 for the first time in the sixth reporting period. The City and the CPD have achieved Preliminary compliance with ¶359.

To evaluate Preliminary compliance with ¶359, we reviewed the CPD's relevant policies and records following the process described in the Consent Decree (¶¶626–41), which outlines applicable consultation, resolution, workout, and public comment periods.

Progress before the Sixth Reporting Period

In the fifth reporting period, the CPD finalized D20-02, *Unity of Command and Span of Control Schedule Pilot Program*. The policy defines both unity of command and span of control and explains how they are designed to afford consistency within patrol areas and create manageable officer-to-sergeant ratios. D20-02 also identifies a Tableau Dashboard that provides participating districts visual data verification for the fulfilment of the district's required operations with Unity of Command and Span of Control.

Progress in the Sixth Reporting Period

During the sixth reporting period, the City and the CPD produced BOP #22-0049 *Unity of Command Span of Control Briefing for Newly Assigned Members*. This is a brief training conducted by a commander with new members and supervisors of the 6th District, which outlines the core principles of Unity of Command and Span of Control along with their importance.

The CPD has requested technical assistance from the IMT regarding the Unity of Command and Span of Control Pilot Programs, which the IMT has agreed to provide. We look forward to reviewing the contents of the CPD dashboard, assignment sheets, transfer orders, and other relevant records. Additionally, we hope to conduct further interviews and focus groups with members of the pilot district. The IMT anticipates observing training related to the Unity of Command and Span of Control Pilot Programs along with evaluations of that training. While the pilot

programs are only currently active in the 6th District, the IMT looks forward to its expansion in future reporting periods.

Paragraph 359 Compliance Progress History

FIRST REPORTING PERIOD SEPTEMBER 1, 2019 – AUGUST 31, 2019 COMPLIANCE PROGRESS: Not Applicable	SECOND REPORTING PERIOD SEPTEMBER 1, 2019 – FEBRUARY 29, 2020 COMPLIANCE PROGRESS: Not Applicable	THIRD REPORTING PERIOD MARCH 1, 2020 – DECEMBER 31, 2020 COMPLIANCE PROGRESS: Not Applicable
FOURTH REPORTING PERIOD JANUARY 1, 2021 – JUNE 30, 2021 COMPLIANCE PROGRESS: Not Applicable	FIFTH REPORTING PERIOD JULY 1, 2021 – DECEMBER 31, 2021 COMPLIANCE PROGRESS: Not Applicable	SIXTH REPORTING PERIOD JANUARY 1, 2022 – JUNE 30, 2022 COMPLIANCE PROGRESS: Preliminary

Supervision: ¶360

360. *By January 1, 2020, CPD will develop a staffing model to achieve the principles of unity of command and span of control. CPD's staffing model will identify methods to implement unity of command and a span of control ratio of no more than ten officers to one Sergeant for all field units on each watch in each of CPD's patrol districts. To achieve this objective, CPD will maintain, at a minimum, one Sergeant for each sector.*

Compliance Progress

(Reporting Period: January 1, 2022, through June 30, 2022)

Preliminary:	***In Compliance*** **(SECOND REPORTING PERIOD)**
Secondary:	***Not in Compliance***
Full:	***Not Yet Assessed***

The City and the CPD maintained Preliminary compliance, but did not reach Secondary compliance with ¶360.

To evaluate Preliminary compliance with ¶360, the IMT reviewed the CPD's relevant policies and documents following the process described in the Consent Decree (¶¶626–41), which outlines applicable consultation, resolution, workout, and public comment periods. The IMT also reviewed data sources relevant to compliance with the requirements of the paragraph and considered available data that is necessary or helpful to identify, verify, and sustain compliance and reform efforts.

For Secondary compliance, we reviewed whether the City and the CPD assessed the Unity of Command and Span of Control pilot program, made adjustments to ensure successful implementation of the program's requirements in the pilot districts, and established an Evaluation Committee to oversee the pilot program. We also reviewed data sources, including systems for tracking and auditing to monitor staffing assignments and levels; training development, implementation, and evaluation (¶286). We also reviewed records that are sufficient to show that the CPD has qualified personnel fulfilling the responsibilities required by ¶360, including the development and implementation of an optimal staffing model to allow for more consistent staffing of the pilot districts.

Progress before the Sixth Reporting Period

The City and the CPD reached Preliminary compliance with ¶360 in the second reporting period by launching the Unity of Command and Span of Control pilot program in the 6th District. In the third reporting period, we recognized that the CPD faced unanticipated challenges during the third reporting period—including the COVID-19 pandemic—that limited the CPD's ability to allocate sufficient attention toward the pilot program. We also emphasized that the staffing model would

need to be critically reviewed to appropriately adjust the model to address the unique needs of the districts into which the pilot program had not yet been expanded. Despite this, we commended the efforts of the CPD's Audit Division, which conducted an assessment, identified areas of improvement, and expressed a continued optimism for the pilot program moving forward.

During the fourth reporting period, the CPD expanded the Unity of Command and Span of Control pilot program from the 6th District into the 4th and 7th districts. We noted that, since beginning the pilot in the second reporting period, the CPD had struggled to identify a sustainable path toward full, department-wide compliance with ¶360 in three critical areas that posed a challenge to the CPD's maintaining Preliminary compliance and achieving Secondary compliance:

(1) the CPD must continue developing and instituting an optimal staffing model to allow for a more consistent staffing of the pilot districts;

(2) the CPD must enhance their tracking, data, and auditing systems to monitor staffing assignments and levels; and

(3) the CPD must establish the Evaluation Committee, which the IMT believes is central to providing the oversight the Unity of Command and Span of Control pilot program needs to effectively expand.

A variety of factors appeared to be causing this inconsistent staffing, such as a near-weekly detailing of officers and sergeants to other assignments, both within their districts and outside of their districts. Additionally, we noted that these continued staff shortages demonstrated that the Unity of Command and Span of Control pilot program was not working as planned. As we explained: "While creating a plan or policy that requires the staffing model outlined by ¶360 is necessary, the plan or policy must allow the CPD to '*achieve* the principle of unity of command and span of control.'"

The Unity of Command and Span of Control program had been in place for two reporting periods and in multiple districts, yet none of those districts have reached or maintained the staffing levels required by ¶360. This suggested that the plan or policy was either not realistic or was not being properly supported by necessary resources. We encouraged the CPD to dedicate attention and resources to either ensuring that the pilot districts are properly staffed or adjusting the pilot program so that it is realistic and provides guidance to allow for future compliance with ¶360 and other related paragraphs. We explained that, if issues identified with the pilot program were not addressed, the City and the CPD could lose Preliminary compliance with this paragraph.

In the fifth reporting period, the City and the CPD maintained Preliminary compliance with ¶360 by revising *Unity of Command and Span of Control – Pilot Program* (D20-02). The revised D20-02 directive incorporated feedback from IMT and OAG.

The IMT also reviewed the Sergeant's District Deployment Initiative, which was issued via an Administrative Message on August 3, 2021. In addition to the Sergeants Initiative, the CPD produced an Agreement signed in December 2020 between the CPD's Labor Relations Division and the Fraternal Order of Police, which settled a conflict about regular days off with the creation of an overtime initiative for police officers. We shared our hopes to have further conversations about the Unity of Command/Span of Control staffing models and to observe future Evaluation Committee meetings in the sixth reporting period.

Progress in the Sixth Reporting Period

In the sixth reporting period, the City and the CPD produced BOP #22-0049 *Unity of Command Span of Control Briefing for Newly Assigned Members*. This is a brief training conducted by a commander with new members and supervisors of the 6th District, which outlines the core principles of Unity of Command and Span of Control along with their importance.

During the sixth reporting period, the IMT attended several virtual and in-person site visits and conducted focus groups with officers and sergeants. As in the fifth reporting period, we heard a great deal of frustration expressed about inconsistent supervision and staffing shortages, which made it very difficult to achieve unity of command/span of control throughout the ranks. During meetings with the City, the CPD, and the OAG, the CPD also discussed the staffing dashboard's management tools for making staffing and operational decisions, such as an electronic watch assignment sheet from the 6th District which allows the CPD to (at a glance) give supervisors the ability to see span of control and unity of command alignment. The CPD also shared that they plan to assign additional sergeants to the 6th District during this reporting period, which is the primary pilot district.

The City and the CPD implemented a new pod supervision structure (primary, secondary, and tertiary role for supervisors). However, during the IMT's conversations with command staff, officers, and supervisors, the results of the pod supervision structure did not consistently result in unity of command. In April, the City and the CPD requested technical assistance from the IMT regarding the Unity of Command and Span of Control Pilot Programs. In late June, during the first technical assistance meeting, the City and the CPD shared their plans to develop a new staffing model to address a number of the shortcomings of the pod model. This new model will focus on three tenets: geographic familiarity, high-quality supervision, and resource flexibility.

The IMT recognizes that the CPD has convened a Unity of Command and Span of Control Pilot Program Evaluation Committee, which is to meet at least quarterly to discuss implementation progress and share feedback from department members. The IMT observed one evaluation committee meeting on June 2, 2022. It is the hope of the IMT that the committee will be able to anticipate and address some of the possible challenges in order to ensure a smoother implementation process for when the pilot programs are expanded into other districts.

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The City and the CPD maintained Preliminary compliance with ¶360 in the sixth reporting period, but did not reach Secondary compliance. In the seventh reporting period, the IMT will meet regularly with the City and the CPD to provide technical assistance concerning an appropriate staffing model to accomplish unity of command/span of control. We look forward to reviewing data relevant to the program such as the contents of the staffing dashboard, assignment sheets, transfer orders, and other relevant records. Additionally, we hope to conduct further interviews and focus groups with members of the pilot district. We look forward to reviewing how additional assigned supervisors to the 6th District have impacted the pilot programs. The IMT also anticipates observing training related to the Unity of Command and Span of Control Pilot Programs along with evaluations of that training. Further, we plan to observe further evaluation committee meetings and hope to see a shift from a briefing model to more collaborative and conversational structure.

Paragraph 360 Compliance Progress History

FIRST REPORTING PERIOD	SECOND REPORTING PERIOD	THIRD REPORTING PERIOD
SEPTEMBER 1, 2019 – AUGUST 31, 2019	SEPTEMBER 1, 2019 – FEBRUARY 29, 2020	MARCH 1, 2020 – DECEMBER 31, 2020
COMPLIANCE PROGRESS:	COMPLIANCE PROGRESS:	COMPLIANCE PROGRESS:
Not Applicable	Preliminary	Preliminary
FOURTH REPORTING PERIOD	**FIFTH REPORTING PERIOD**	**SIXTH REPORTING PERIOD**
JANUARY 1, 2021 – JUNE 30, 2021	JULY 1, 2021 – DECEMBER 31, 2021	JANUARY 1, 2022 – JUNE 30, 2022
COMPLIANCE PROGRESS:	COMPLIANCE PROGRESS:	COMPLIANCE PROGRESS:
Preliminary	Preliminary	Preliminary

Supervision: ¶361

361. *In order to achieve unity of command and a span of control of no more than ten officers to one Sergeant in the field units on each watch in each patrol district, the staffing model may consider: a. staffing requirements for watch operations, including, but not limited to, watch personnel assigned to field duties and watch administration functions; b. staffing requirements for all other district law enforcement functions, including, but not limited to, district administration, community policing, and tactical teams; c. data-driven resource allocation methods incorporating district-specific factors, including, but not limited to, calls for service, public violence, and property crime; and d. any other considerations CPD deems relevant to achieving unity of command and a span of control ratio of no more than ten officers to one Sergeant in all field units on each watch of the City's patrol districts.*

Compliance Progress

(Reporting Period: January 1, 2022, through June 30, 2022)

Preliminary:	***In Compliance*** **(FIFTH REPORTING PERIOD)**
Secondary:	***Not in Compliance***
Full:	***Not Yet Assessed***

The City and the CPD maintained Preliminary compliance with ¶361 in the sixth reporting period, but did not reach Secondary compliance.

To evaluate Preliminary compliance with ¶361, the IMT reviewed the CPD's relevant policies and documents following the process described in the Consent Decree (¶¶626–41), which outlines applicable consultation, resolution, workout, and public comment periods. The IMT reviewed data sources relevant to compliance with the requirements of the paragraph and considered available data that is necessary or helpful to identify, verify, and sustain compliance and reform efforts. The IMT also reviewed records that are sufficient to show that the CPD has qualified personnel fulfilling the responsibilities required by ¶361.

For Secondary compliance, the IMT looked for the development of additional permanent solutions to address staffing, the redeployment of additional resources in patrol districts, and further conversation about a staffing model that will sustain the unity of command and span of control requirements within this paragraph. The CPD should also continue the development of technology, such as staffing dashboards, that can timely track compliance.

Progress before the Sixth Reporting Period

The IMT assessed ¶361 for the first time during the fifth reporting period. In the fifth reporting period, the City and the CPD obtained Preliminary compliance with ¶361 by revising the *Unity of Command and Span of Control – Pilot Program* (D20-02). The policy was finalized and issued in December 2021. The policy addresses various requirements of ¶361, such as clearly defining unity of command and span of control. The policy also addresses staffing requirements for other district personnel and their role in supporting unity of command and span of control. Further, policy D20-02 identifies a data dashboard that provides participating districts visual data verification for the fulfilment of the district's required operations with span of control and unity of command.

The IMT also reviewed the Sergeant's District Deployment Initiative, which was issued via an Administrative Message on August 3, 2021. In addition to the Sergeants Initiative, the CPD produced an Agreement signed in December 2020 between CPD's Labor Relations Division and the Fraternal Order of Police, which settled a conflict about regular days off with the creation of an overtime initiative for police officers.

We shared that, in future reporting periods, the IMT would look forward to the development of additional permanent solutions to address staffing, the redeployment of additional resources in patrol districts, and further conversation about a staffing model that will sustain the unity of command and span of control requirements within this paragraph.

Progress in the Sixth Reporting Period

The IMT attended several virtual and in-person site visits and conducted focus groups with officers and sergeants. As in the fifth reporting period, we heard a great deal of frustration expressed about inconsistent supervision and staffing shortages, which made it very difficult to achieve unity of command/span of control throughout the ranks. During meetings with the City, the CPD, and the OAG, the CPD also discussed the staffing dashboard's management tools for making staffing and operational decisions that it believes would enhance unity of command/span of control. The CPD also shared that they plan to assign additional sergeants to the 6th District during this reporting period, which is the primary pilot district.

The City and the CPD implemented a new pod supervision structure (primary, secondary, and tertiary role for supervisors) in the fifth reporting period. However, during the IMT's conversations with command staff, officers, and supervisors, the results of the pod supervision structure did not consistently result in Unity of Command. In April 2022, the City and the CPD requested technical assistance from the IMT regarding the Unity of Command/Span of Control Pilot Programs. In late June,

during the first technical assistance meeting, the City and the CPD shared their plans to develop a new staffing model to address a number of the shortcomings of the pod model. This new model will focus on three tenets: geographic familiarity, high quality supervision, and resource flexibility.

The IMT recognizes that the CPD has convened a Unity of Command and Span of Control Pilot Program Evaluation Committee, which is to meet at least quarterly to discuss implementation progress and share feedback from department members. The IMT observed one evaluation committee meeting on June 2, 2022. It is the hope of the IMT that the committee will be able to anticipate and address some of the possible challenges in order to ensure a smoother implementation process when expanding into other districts.

The IMT looks forward to the development of additional permanent solutions to address staffing, the redeployment of additional resources in patrol districts, and further conversation about a staffing model that will sustain the unity of command and span of control requirements within this paragraph. The CPD has shared that they plan to conduct a Workforce Allocation Study to aid in the development of an effective staffing model, along with recommendations on transfer procedures in the seventh reporting period. We look forward to receiving this information and continuing to consult with the CPD and the City as they undertake these efforts.

The IMT would also like to see the continued development of technology, such as staffing dashboards, that can timely track compliance. Additionally, IMT anticipates observing training related to the Unity of Command and Span of Control Pilot Programs along with evaluations of that training. Further, we plan to observe further evaluation committee meetings and hope to see a shift from a briefing model to more collaborative and conversational structure.

Paragraph 361 Compliance Progress History

FIRST REPORTING PERIOD	SECOND REPORTING PERIOD	THIRD REPORTING PERIOD
SEPTEMBER 1, 2019 – AUGUST 31, 2019	SEPTEMBER 1, 2019 – FEBRUARY 29, 2020	MARCH 1, 2020 – DECEMBER 31, 2020
COMPLIANCE PROGRESS:	COMPLIANCE PROGRESS:	COMPLIANCE PROGRESS:
Not Applicable	Not Applicable	Not Applicable
FOURTH REPORTING PERIOD	**FIFTH REPORTING PERIOD**	**SIXTH REPORTING PERIOD**
JANUARY 1, 2021 – JUNE 30, 2021	JULY 1, 2021 – DECEMBER 31, 2021	JANUARY 1, 2022 – JUNE 30, 2022
COMPLIANCE PROGRESS:	COMPLIANCE PROGRESS:	COMPLIANCE PROGRESS:
Not Applicable	Preliminary	Preliminary

Supervision: ¶362

362. *By January 1, 2020, CPD will develop a system and protocols to allow the Department to assess, both long-term and on a day-to-day basis, whether field units on each watch in each patrol district meet the requirements for unity of command and span of control.*

Compliance Progress

(Reporting Period: January 1, 2022, through June 30, 2022)

Preliminary:	***In Compliance*** **(FIFTH REPORTING PERIOD)**
Secondary:	***Not in Compliance***
Full:	***Not Yet Assessed***

The City and the CPD maintained Preliminary compliance with ¶362 in the sixth reporting period, but did not reach Secondary compliance.

To evaluate Preliminary compliance with ¶362, we reviewed the CPD's relevant policies following the process described in the Consent Decree (¶¶626–41), which outlines applicable consultation, resolution, workout, and public comment periods. We also considered data sources, such as information and insights of officers gathered during virtual site visits and audit results, which was necessary or helpful to identify, verify, and sustain compliance with review. To assess Secondary compliance, the IMT reviewed, among other things, the CPD's training development, implementation, and evaluation.

Progress before the Sixth Reporting Period

The City and the CPD did not reach any level of compliance with ¶362 until the fifth reporting period. As with ¶360, compliance with ¶362 was likely slowed by unanticipated challenges that the City and the CPD faced during the third reporting period. Despite this, the CPD implemented a dashboard intended to display data regarding compliance with unity of command and span of control requirements. By the end of the third reporting period, more work was still needed to ensure data reliability.

In the fourth reporting period, we conducted virtual site visits with officers in the three districts with the Unity of Command and Span of Control pilot program (4th, 6th, and 7th) to hear their thoughts and observations concerning the implementation and management of the pilot program.

Officers expressed that the pilot program concepts allowed for building strong teams that work consistently with one another, better support one another, and better leverage each other's strengths. Many sergeants expressed a belief that the

pilot program concepts provide the benefit of working with the same team members on a regular basis, which allow them to better engage, guide, and set expectations for their officers and full team. However, the pilot program was not being implemented on the ground in accordance with the program policy or its concepts. We noted that the CPD's own audit—along with the feedback we received during site visits—demonstrated that field units on each watch, in each district, were not meeting the requirements for unity of command and span of control.[2]

In our report for the third reporting period, we noted that the CPD implemented a dashboard intended to display data regarding compliance with the unity of command and span of control requirements. In the fourth reporting period, however, the CPD did not provide us additional information regarding this dashboard or data coming out of this dashboard. Therefore, the City and the CPD did not reach Preliminary compliance in the fourth reporting period. In the third and fourth reporting periods, we suggested that the CPD should work to ensure that data underlying the dashboard was up to date and reliable.

In the fifth reporting period, the City and the CPD obtained Preliminary compliance with ¶362 by revising the *Unity of Command and Span of Control – Pilot Program* policy (D20-02). The policy was finalized and issued in December 2021. In section III-G of D20-02, the CPD sets forth the requirements for a dashboard to be displayed in four separate tabs: (1) Unity of Command Tab, (2) Unity of Command by Employee Tab, (3) Span of Control Ratio Tab, and (4) Report Export Tab. Each tab of the dashboard was designed to allow data verification of the district's required operations for span of control and unity of command such as total number of officers who worked in their assigned squad and the total number of officers and sergeants who worked on a daily basis per watch.

Progress in the Sixth Reporting Period

During the sixth reporting period, the City and the CPD produced BOP #22-0049 *Unity of Command Span of Control Briefing for Newly Assigned Members*. This is a brief training conducted by a commander with new members and supervisors of the 6th District which outlines the core principles of Unity of Command and Span of Control along with their importance.

Policy D20-02, which was finalized in the fifth reporting period, identifies a data dashboard that provides participating districts visual data verification for the fulfilment of the district's required operations with span of control and unity of command. During monthly meetings and site visit, the CPD provided brief updates on

[2] We understand that an additional audit was completed related to the Unity of Command and Span of Control pilot program during the fourth reporting period. The City and the CPD did not, however, produce this audit before the close of the reporting period. Therefore, our assessment did not reflect any findings of that audit.

the status of their staffing dashboard, which will enable supervisors to better monitor officers assignments and span of control between sergeants and officers. However, the IMT has yet to receive comprehensive information about the tracking mechanism.

The IMT recognizes that the CPD has convened a Unity of Command and Span of Control Pilot Program Evaluation Committee, which is to meet at least quarterly to discuss implementation progress and share feedback from department members. The IMT observed one evaluation committee meeting on June 2, 2022. It is the hope of the IMT that the committee will be able to anticipate and address a number of the possible challenges in order to ensure a smoother implementation process.

The IMT looks forward to reviewing the dashboard and the CPD's ability to track the requirements of the Unity of Command and Span of Control programs. For the City and the CPD to reach Secondary compliance, the IMT looks forward to observing training on D20-02, as well as utilization of the CPD's data dashboard. Further, we plan to observe further evaluation committee meetings and hope to see a shift from a briefing model to more collaborative and conversational structure.

Paragraph 362 Compliance Progress History

FIRST REPORTING PERIOD	SECOND REPORTING PERIOD	THIRD REPORTING PERIOD
SEPTEMBER 1, 2019 – AUGUST 31, 2019	SEPTEMBER 1, 2019 – FEBRUARY 29, 2020	MARCH 1, 2020 – DECEMBER 31, 2020
COMPLIANCE PROGRESS:	COMPLIANCE PROGRESS:	COMPLIANCE PROGRESS:
Not Applicable	None	None

FOURTH REPORTING PERIOD	FIFTH REPORTING PERIOD	SIXTH REPORTING PERIOD
JANUARY 1, 2021 – JUNE 30, 2021	JULY 1, 2021 – DECEMBER 31, 2021	JANUARY 1, 2022 – JUNE 30, 2022
COMPLIANCE PROGRESS:	COMPLIANCE PROGRESS:	COMPLIANCE PROGRESS:
None	Preliminary	Preliminary

Supervision: ¶363

363. *When calculating the span of control ratios for field units, CPD may not use department-wide averages or factor in span of control ratios for Bureau of Patrol units or functions that are not included in the definition of field units above.*

Compliance Progress

(Reporting Period: January 1, 2022, through June 30, 2022)

Preliminary:	***In Compliance*** **(FIFTH REPORTING PERIOD)**
Secondary:	***Not in Compliance***
Full:	***Not Yet Assessed***

The City and the CPD maintained Preliminary compliance with ¶363 in the sixth reporting period, but did not reach Secondary compliance.

To determine Preliminary compliance with ¶363, the IMT reviewed the CPD's relevant policies and documents following the process described in the Consent Decree (¶¶626–41), which outlines applicable consultation, resolution, workout, and public comment periods. For Secondary compliance, the IMT sought to review data sources necessary or helpful to demonstrate how the CPD is calculating span of control ratios for field units and whether the CPD's method is consistent with the requirements of this paragraph.

Progress before the Sixth Reporting Period

We assessed the City and the CPD's compliance with ¶363 for the first time in the fifth reporting period. In the fifth reporting period, the City and the CPD obtained Preliminary compliance with ¶361 by revising the *Unity of Command and Span of Control – Pilot Program* policy (D20-02). The policy was finalized and issued in December 2021. D20-02 delineates between field units versus specialized units and does not calculate Span of Control based on department-wide averages.

Progress in the Sixth Reporting Period

The IMT conducted site visits and attended monthly meetings where the City and the CPD shared documentation which shows progress about the pilot programs broadly. Such meetings included updates about a pod supervision structure (primary, secondary, and tertiary role for supervisors) implemented in the fifth reporting period. The CPD and city shared that the model was calculated using field units, as directed by the Consent Decree. However, during the IMT's conversations with command staff, officers, and supervisors, the results of the pod supervision structure did not consistently result in unity of command.

In April 2022, the City and the CPD requested technical assistance from the IMT regarding the Unity of Command and Span of Control pilot programs. In late June,

during the first technical assistance meeting, the City and the CPD shared their plans to develop a new staffing model to address a number of the shortcomings of the pod model. This new model will focus on three tenets: geographic familiarity, high quality supervision, and resource flexibility. It is the belief of the IMT that the City and the CPD are working toward compliance in earnest. However, we have not yet received additional formal productions or data that would allow us to assess further compliance levels with the requirements of ¶363.

The City and the CPD maintained Preliminary compliance with ¶363 in the sixth reporting period, but did not reach Secondary compliance. In the next reporting period, the IMT will look for data which shows compliance with the requirements of the paragraph.

Paragraph 363 Compliance Progress History

FIRST REPORTING PERIOD SEPTEMBER 1, 2019 – AUGUST 31, 2019 COMPLIANCE PROGRESS: Not Applicable	SECOND REPORTING PERIOD SEPTEMBER 1, 2019 – FEBRUARY 29, 2020 COMPLIANCE PROGRESS: Not Applicable	THIRD REPORTING PERIOD MARCH 1, 2020 – DECEMBER 31, 2020 COMPLIANCE PROGRESS: Not Applicable
FOURTH REPORTING PERIOD JANUARY 1, 2021 – JUNE 30, 2021 COMPLIANCE PROGRESS: Not Applicable	FIFTH REPORTING PERIOD JULY 1, 2021 – DECEMBER 31, 2021 COMPLIANCE PROGRESS: Preliminary	SIXTH REPORTING PERIOD JANUARY 1, 2022 – JUNE 30, 2022 COMPLIANCE PROGRESS: Preliminary

Supervision: ¶364

364. *Beginning no later than January 31, 2020, CPD will begin to implement a staffing model to achieve unity of command and a span of control ratio of no more than ten officers to one Sergeant assigned to field units on each watch in each patrol district.*

Compliance Progress

(Reporting Period: January 1, 2022, through June 30, 2022)

Preliminary:	***In Compliance*** **(SECOND REPORTING PERIOD)**
Secondary:	***Not in Compliance***
Full:	***Not Yet Assessed***

The City and the CPD maintained Preliminary compliance with ¶364 in the sixth reporting period, but did not reach Secondary compliance.

To determine Preliminary compliance with ¶364, the IMT reviewed the CPD's relevant policies and documents following the process described in the Consent Decree (¶¶626–41), which outlines applicable consultation, resolution, workout, and public comment periods. The IMT also assessed the creation and development of the Unity of Command and Span of Control pilot program.

To evaluate Secondary compliance with ¶364, we reviewed the CPD's relevant training development, implementation, expansion, and evaluation of the CPD's Unity of Command and Span of Control pilot program, which the CPD launched in the 6th District in early 2020. As the CPD expands the pilot program into additional districts, we are looking for effective and consistent implementation of the staffing model, ensuring that the staffing levels comport with the 10 to 1 requirements from ¶364.

Progress before the Sixth Reporting Period

In previous reporting periods, we followed the creation and implementation of the Unity of Command and Span of Control pilot program, which seeks to achieve a ratio of no more than 10 officers to 1 sergeant. Based on the creation and launch of the pilot program in the 6th District, which occurred during the second reporting period, we granted Preliminary compliance with ¶364. We cautioned in the third reporting period that maintenance of Preliminary compliance required careful monitoring, evaluating, and refining of the staffing model to effectively expand the pilot program in all districts.

During the fourth reporting period, the CPD conducted a survey with the officers and sergeants assigned to the pilot districts. This survey showed limited staffing to be among officers' top concerns related to the Unity of Command and Span of

Control pilot program.[3] This was consistent with what we learned during the virtual site visit we conducted at the time. During that visit, officers expressed major concerns with staffing. Many officers stated they have the same sergeant only about half of the time—which runs contrary to the consistent staffing envisioned by the program.

It had become evident in the fourth reporting period that the CPD was either not committed to following the program as outlined or did not have the resources to follow through with the program, as outlined. We suggested that the difficulties the pilot districts had faced in following the pilot program, as written, suggests that the pilot program may not be an effective roadmap for compliance with ¶364. We noted that the City and the CPD must address these issues to maintain Preliminary compliance and eventually reach Secondary compliance. We urged the City and the CPD to focus necessary resources to address issues related to the Unity of Command and Span of Control pilot program so that the program could eventually be responsibly expanded to other districts.

In the fifth reporting period, the City and the CPD maintained Preliminary compliance by finalizing the *Unity of Command and Span of Control – Pilot Program* (D20-02). The policy was finalized and issued in December 2021. During a site visit in the fifth reporting period, it was again noted that while both officers and sergeants supported the Unity of Command and Span of Control program, they were very discouraged with the lack of personnel commitments.

In October 2021, the CPD transferred seven additional sergeants to the 6th District to help supplement supervisory staffing. During the December 13, 2021 bi-weekly Supervision call, the CPD presented a "Pod Staffing Model" currently deployed within the 6th District. The IMT also noted the establishment of the Unity of Command and Span of Control Program Evaluation Committee.

As noted in Independent Monitoring Report 5, an additional audit was completed related to the Unity of Command and Span of Control pilot program during the fourth reporting period and reviewed during the fifth reporting period. This audit revealed several areas of great concern.

Progress in the Sixth Reporting Period

During the sixth reporting period, the IMT conducted site visits and attended monthly meetings where the City and the CPD shared documentation which shows progress about the pilot programs broadly. Such meetings included updates about

[3] We understand that an additional audit was completed related to the Unity of Command and Span of Control pilot program during the fourth reporting period. The City and the CPD did not, however, produce this audit before the close of the reporting period. Therefore, our assessment did not reflect any findings of that audit.

a pod supervision structure (primary, secondary, and tertiary role for supervisors) implemented in the fifth reporting period. However, during the IMT's conversations with command staff, officers, and supervisors, the results of the pod supervision structure did not consistently result in Unity of Command.

In April 2022, the City and the CPD requested technical assistance from the IMT regarding the Unity of Command/Span of Control pilot programs. In late June, during the first technical assistance meeting, the City and the CPD shared their plans to develop a new staffing model to address a number of the shortcomings of the pod model. This new model will focus on 3 tenets: geographic familiarity, high quality supervision, and resource flexibility.

Additionally, the CPD has convened a Unity of Command and Span of Control Pilot Program Evaluation Committee, which is to meet at least quarterly to discuss implementation progress and share feedback from CPD personnel. The IMT observed one evaluation committee meeting on June 2, 2022. It is the hope of the IMT that the committee will be able to anticipate and address a number of the possible challenges in order to ensure a smoother implementation process.

Further, the City and the CPD produced BOP #22-0049 *Unity of Command Span of Control Briefing for Newly Assigned Members*. This is a brief training conducted by a commander with new members and supervisors of the 6th District, which outlines the core principles of Unity of Command and Span of Control along with their importance.

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The City and the CPD maintained Preliminary compliance with ¶364 in the sixth reporting period, but did not reach Secondary compliance. In the seventh reporting period, the IMT will meet regularly with the City and the CPD to provide technical assistance concerning an appropriate staffing model to accomplish Unity of Command/Span of Control. We look forward to reviewing data relevant to the program such as the contents of the staffing dashboard, assignment sheets, transfer records, and other relevant records. The IMT also hopes to observe the briefings for new members to ensure it sufficiently familiarizes the newly assigned members to the 6th District with the program. Further, we anticipate observing further evaluation committee meetings and hope to see a shift from a briefing model to more collaborative and conversational structure.

Paragraph 364 Compliance Progress History

FIRST REPORTING PERIOD SEPTEMBER 1, 2019 – AUGUST 31, 2019	SECOND REPORTING PERIOD SEPTEMBER 1, 2019 – FEBRUARY 29, 2020	THIRD REPORTING PERIOD MARCH 1, 2020 – DECEMBER 31, 2020
COMPLIANCE PROGRESS: Not Applicable	COMPLIANCE PROGRESS: Preliminary	COMPLIANCE PROGRESS: Preliminary
FOURTH REPORTING PERIOD JANUARY 1, 2021 – JUNE 30, 2021	**FIFTH REPORTING PERIOD** JULY 1, 2021 – DECEMBER 31, 2021	**SIXTH REPORTING PERIOD** JANUARY 1, 2022 – JUNE 30, 2022
COMPLIANCE PROGRESS: Preliminary	COMPLIANCE PROGRESS: Preliminary	COMPLIANCE PROGRESS: Preliminary

Supervision: ¶365

365. *By January 31, 2022, CPD will fully implement and maintain a staffing model that achieves unity of command and a span of control ratio of no more than ten officers to one Sergeant for all field units on each watch in each of CPD's patrol districts. To achieve this objective, CPD will maintain, at a minimum, one Sergeant for each sector.*

Compliance Progress

(Reporting Period: January 1, 2022, through June 30, 2022)

Preliminary:	***Not in Compliance***
Secondary:	***Not Yet Assessed***
Full:	***Not Yet Assessed***

We assessed the requirements of ¶365 for the first time in the sixth reporting period. The City and the CPD did not achieve Preliminary compliance with ¶365 in the sixth reporting period.

To evaluate Preliminary compliance with ¶365, we reviewed the CPD's relevant policies and records following the process described in the Consent Decree (¶¶626–41), which outlines applicable consultation, resolution, workout, and public comment periods. We also sought to review relevant data sources necessary or helpful to demonstrate the City and the CPD's ability to develop and maintain an efficient staffing model consistent with this paragraph.

In the sixth reporting period, D20-02, *Unity of Command and Span of Control Schedule Pilot Program*, was produced as proof of compliance with this paragraph. This policy, approved by the IMT and OAG in the fifth reporting period, defines both unity of command and span of control and explains how they are designed to afford consistency within patrol areas and create manageable officer-to-sergeant ratios. However, discussion of a staffing model is limited to section VII-C-2 which states, "The Audit Section will work with the Bureau of Patrol and Field Technology and Innovation Section to develop statistical models that will assist the Bureau of Patrol in expanding this program to all district law enforcement." This does not sufficiently address the full requirements of this paragraph.

The IMT conducted site visits and attended monthly meetings where the City and the CPD shared documentation which shows progress about the pilot programs broadly. Such meetings included updates about a pod supervision structure (primary, secondary, and tertiary role for supervisors) implemented in the fifth reporting period. However, during the IMT's conversations with command staff, officers, and supervisors, the results of the pod supervision structure did not consistently result in Unity of Command.

In April 2022, the City and the CPD requested technical assistance from the IMT regarding the Unity of Command/Span of Control pilot programs. In late June, during the first technical assistance meeting, the City and the CPD shared their plans to develop a new staffing model to address a number of the shortcomings of the pod model. This new model will focus on 3 tenets: geographic familiarity, high quality supervision, and resource flexibility. The CPD also shared that they plan to conduct a Workforce Allocation Study to aid in the development of an effective staffing model, along with recommendations on transfer procedures in the seventh reporting period. It is the belief of the IMT that the City and the CPD are working toward compliance in earnest. However, we have not yet received additional formal productions or data that would allow us to assess further compliance levels with the requirements of ¶365.

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The City and the CPD did not achieve Preliminary compliance with ¶365 in the sixth reporting period. The IMT looks forward to the City's and the CPD's ability to develop and maintain an efficient staffing model in the pilot district for a sustained period.

Paragraph 365 Compliance Progress History

FIRST REPORTING PERIOD SEPTEMBER 1, 2019 – AUGUST 31, 2019 COMPLIANCE PROGRESS: Not Applicable	SECOND REPORTING PERIOD SEPTEMBER 1, 2019 – FEBRUARY 29, 2020 COMPLIANCE PROGRESS: Not Applicable	THIRD REPORTING PERIOD MARCH 1, 2020 – DECEMBER 31, 2020 COMPLIANCE PROGRESS: Not Applicable
FOURTH REPORTING PERIOD JANUARY 1, 2021 – JUNE 30, 2021 COMPLIANCE PROGRESS: Not Applicable	FIFTH REPORTING PERIOD JULY 1, 2021 – DECEMBER 31, 2021 COMPLIANCE PROGRESS: Not Applicable	SIXTH REPORTING PERIOD JANUARY 1, 2022 – JUNE 30, 2022 COMPLIANCE PROGRESS: None

Supervision: ¶366

366. *CPD will continue to maintain unity of command and a span of control ratio of no more than ten officers to one Sergeant for district tactical teams and area saturation teams.*

Compliance Progress

(Reporting Period: January 1, 2022, through June 30, 2022)

Preliminary:	***Not in Compliance***
Secondary:	***Not Yet Assessed***
Full:	***Not Yet Assessed***

We assessed the requirements of ¶366 for the first time in the sixth reporting period. The City and the CPD did not achieve Preliminary compliance with ¶365 in the sixth reporting period.

To evaluate Preliminary compliance with ¶366, we reviewed the CPD's relevant policies and records following the process described in the Consent Decree (¶¶626–41), which outlines applicable consultation, resolution, workout, and public comment periods. We also sought to review relevant data sources necessary or helpful to demonstrate the City and the CPD's ability to develop and maintain an efficient staffing model consistent with this paragraph.

During the sixth reporting period, the CPD produced D20-02, Unity of Command and Span of Control Schedule Pilot Program, under this paragraph. This policy, approved by the IMT and OAG in the fifth reporting period, defines both unity of command and span of control and explains how they are designed to afford consistency within patrol areas and create manageable officer-to-sergeant ratios. However, discussion of specialized units is limited to section II-B which states, "The Unity of Command and Span of Control Schedule Pilot Program will not include watch personnel assigned to tactical teams or district administration." Therefore, the City and the CPD did not provide data to sufficiently address the full requirements of this paragraph.

The IMT conducted site visits and attended monthly meetings where the City and the CPD shared documentation which shows progress about the pilot programs broadly. Such meetings included updates about a pod supervision structure (primary, secondary, and tertiary role for supervisors) implemented in the fifth reporting period. In April 2022, the City and the CPD requested technical assistance from the IMT regarding the Unity of Command/Span of Control pilot programs. In late June, during the first technical assistance meeting, the City and the CPD shared their plans to develop a new staffing model to address a number of the shortcomings of the pod model. This new model will focus on 3 tenets: geographic familiarity, high quality supervision, and resource flexibility. The CPD also shared that they

plan to conduct a Workforce Allocation Study to aid in the development of an effective staffing model, along with recommendations on transfer procedures in the seventh reporting period.

The City and the CPD have shared that the inherently smaller nature of specialized units, such as tactical teams allowed them to achieve a 10:1 ratio on a more regular basis. It is the belief of the IMT that the City and the CPD are working toward compliance in earnest. However, we have not yet received additional formal productions or data that would allow us to assess further compliance levels with the requirements of ¶366.

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The City and the CPD did not achieve Preliminary compliance with ¶366 in the sixth reporting period. The IMT looks forward to the City and the CPD's ability to develop and maintain an efficient staffing model in the pilot district for a sustained period. We also anticipate reviewing information about how these staffing models will allow the CPD to achieve Unity of Command and Span of Control, as required by the Consent Decree, both in field units and in specialized units.

Paragraph 366 Compliance Progress History

FIRST REPORTING PERIOD	SECOND REPORTING PERIOD	THIRD REPORTING PERIOD
SEPTEMBER 1, 2019 – AUGUST 31, 2019	SEPTEMBER 1, 2019 – FEBRUARY 29, 2020	MARCH 1, 2020 – DECEMBER 31, 2020
COMPLIANCE PROGRESS:	COMPLIANCE PROGRESS:	COMPLIANCE PROGRESS:
Not Applicable	Not Applicable	Not Applicable
FOURTH REPORTING PERIOD	**FIFTH REPORTING PERIOD**	**SIXTH REPORTING PERIOD**
JANUARY 1, 2021 – JUNE 30, 2021	JULY 1, 2021 – DECEMBER 31, 2021	JANUARY 1, 2022 – JUNE 30, 2022
COMPLIANCE PROGRESS:	COMPLIANCE PROGRESS:	COMPLIANCE PROGRESS:
Not Applicable	Not Applicable	None

Supervision: ¶367

367. *CPD may review and revise its staffing model as necessary to ensure that all field units on each watch in each patrol district achieve unity of command and a span of control ratio of no more than ten officers to one Sergeant.*

Compliance Progress

(Reporting Period: January 1, 2022, through June 30, 2022)

Preliminary: ***In Compliance*** **(NEW)**
Secondary: ***Not Yet Assessed***
Full: ***Not Yet Assessed***

We assessed the requirements of ¶367 for the first time in the sixth reporting period. The City and the CPD achieved Preliminary compliance with ¶367 in the sixth reporting period.

To evaluate Preliminary compliance with ¶367, we reviewed the CPD's relevant policies and records following the process described in the Consent Decree (¶¶626–41), which outlines applicable consultation, resolution, workout, and public comment periods. We also sought to review relevant data sources necessary or helpful to demonstrate the City and the CPD's ability to develop and maintain an efficient staffing model consistent with this paragraph.

During the sixth reporting period, the CPD produced D20-02, Unity of Command and Span of Control Schedule Pilot Program, under this paragraph. This policy, approved by the IMT and OAG in the fifth reporting period, defines both unity of command and span of control and explains how they are designed to afford consistency within patrol areas and create manageable officer-to-sergeant ratios. The policy specifically discusses evaluation of the pilot programs such as in section VIII-B-5 which states, "Responsibilities of the Unity of Command and Span of Control Schedule Program Evaluation Committee include assessing the unity of command in the program and determine if it should be modified in any of its operations." The policy also encourages the participation of the Strategic Initiatives Division and Professional Standards and Compliance Division in assessing the effectives of the program. The IMT believes that the flexibility of D20-02 addresses the requirements of ¶367.

Further, the City and the CPD have shown their willingness to shift practices when current operations are ineffective. The IMT conducted site visits and attended monthly meetings where the City and the CPD provided updates about a pod supervision structure (primary, secondary, and tertiary role for supervisors) implemented in the fifth reporting period. In April 2022, the City and the CPD requested technical assistance from the IMT regarding the Unity of Command/Span of Control pilot programs. In late June, during the first technical assistance meeting, the

City and the CPD shared their plans to develop a new staffing model to address a number of the shortcomings of the pod model. This new model will focus on 3 tenets: geographic familiarity, high quality supervision, and resource flexibility. The CPD also shared that they plan to conduct a Workforce Allocation Study to aid in the development of an effective staffing model, along with recommendations on transfer procedures in the seventh reporting period.

The City and the CPD achieved Preliminary compliance with ¶367 in the sixth reporting period. The IMT looks forward to the City's and the CPD's ability to develop and maintain an efficient staffing model in the pilot district for a sustained period. We also anticipate reviewing information about how these staffing models will allow the CPD to achieve Unity of Command and Span of Control as required by the Consent Decree.

Paragraph 367 Compliance Progress History

FIRST REPORTING PERIOD	SECOND REPORTING PERIOD	THIRD REPORTING PERIOD
SEPTEMBER 1, 2019 – AUGUST 31, 2019	SEPTEMBER 1, 2019 – FEBRUARY 29, 2020	MARCH 1, 2020 – DECEMBER 31, 2020
COMPLIANCE PROGRESS:	COMPLIANCE PROGRESS:	COMPLIANCE PROGRESS:
Not Applicable	Not Applicable	Not Applicable
FOURTH REPORTING PERIOD	**FIFTH REPORTING PERIOD**	**SIXTH REPORTING PERIOD**
JANUARY 1, 2021 – JUNE 30, 2021	JULY 1, 2021 – DECEMBER 31, 2021	JANUARY 1, 2022 – JUNE 30, 2022
COMPLIANCE PROGRESS:	COMPLIANCE PROGRESS:	COMPLIANCE PROGRESS:
Not Applicable	Not Applicable	Preliminary

Supervision: ¶368

368. *Beginning 365 days after the Effective Date, and annually thereafter, the Monitor will review and assess CPD's progress toward achieving unity of command and a span of control ratio of no more than ten officers to one Sergeant.*

Compliance Progress

(Reporting Period: January 1, 2022, through June 30, 2022)

Recurring Schedule: May 3, 2022 ☐ **Met** ☑ **Missed**

Preliminary: ***In Compliance*** **(SECOND REPORTING PERIOD)**
Secondary: ***Not in Compliance***
Full: ***Not Yet Assessed***

The City and the CPD maintained Preliminary compliance with ¶368 in the sixth reporting period, but did not reach Secondary compliance. The City and the CPD missed the corresponding deadline because they failed to provide the IMT with data from the dashboard implemented to track compliance with the unity of command and span of control principles. Without this data, we cannot not fully assess the extent to which the CPD is or is not achieving the unity of command and span of control staffing ratio in the pilot district (although anecdotal evidence suggests the CPD is not achieving this ratio).

To evaluate Secondary compliance with ¶368, we reviewed the CPD's relevant policies, as well as records regarding the expansion of the CPD's Unity of Command and Span of Control pilot program. Also, to determine whether the CPD met the annual requirement of this paragraph, we considered whether the City and the CPD demonstrated with sufficient data that the unity of command and span of control ratio of ten officers to one sergeant.

Progress before the Sixth Reporting Period

The City and the CPD reached Preliminary compliance with ¶368 in the second reporting period by launching the Unity of Command and Span of Control pilot program. In the fourth reporting period, we noted that the information provided demonstrated that the City and the CPD had a long way to go to achieve the unity of command and span of control ratio of no more than 10 officers to one sergeant. During a site visit in the fourth reporting period, we heard that the staffing ratio called for by these paragraphs was not being met. We noted that there seemed to be a staffing shortage caused by various factors that prevented the CPD from complying with this ratio. As we reported, these shortages were not only causing frustrations among officers in the districts in which the Unity of Command and Span of Control pilot program was being piloted (4th, 6th, and 7th), but seemed to have also caused unsafe situations for officers in those districts. The Audit Division's

Summary of challenges facing the expanded Unity of Command and Span of Control Pilot project reiterated the frustrations and concerns we heard from officers.

We also noted in the fourth reporting period that, in order to reach Secondary compliance and maintain Preliminary compliance in upcoming reporting periods, the CPD would need to provide us with various data sources so that we could assess, using quantitative data, the CPD's compliance with this paragraph. These data sources included dispatch activity reports, rosters, sergeant staffing reports, CPD budgets and forecasts, and other similar data.

In the fifth reporting period, the IMT's virtual site visit again revealed that the staffing ratio called for by these paragraphs is not being met. The staffing shortage continues, preventing the CPD from complying with this ratio. These shortages are causing frustrations among officers and sergeants in the districts in which the Unity of Command and Span of Control pilot program is being piloted.

The CPD produced a Unity of Command/Span of Control Data Analysis on December 30, 2021, which outlined a staffing pod model for assessing the supervisor to officer ratio. The goal of the model is for a member to be assigned to a primary sergeant 75% of their time, a secondary sergeant 20% of their time, and a tertiary sergeant 5% of their time. The CPD also produced D20-02, *Unity of Command and Span of Control – Pilot Program*, which was finalized and issued in December 2021. The policy specifically identifies in Section III. G. 1-4 that a data dashboard is designed to capture data to support the district's required operations with span of control and unity of command.

We shared that, in the next reporting period, and to achieve Secondary compliance, the IMT looks forward to reviewing additional data associated with the pod staffing model over a longer period of time. Additionally, we would look to review records regarding the expansion of the CPD's Unity of Command and Span of Control pilot program.

Progress in the Sixth Reporting Period

During the sixth reporting period, the IMT attended several virtual and in-person site visits and conducted focus groups with officers and sergeants. As in the fifth reporting period, we heard a great deal of frustration expressed about inconsistent supervision and staffing shortages, which made it very difficult to achieve unity of command/span of control throughout the ranks. During meetings with the City, the CPD, and the OAG, the CPD also discussed the staffing dashboard's management tools for making staffing and operational decisions, such as an electronic watch assignment sheet from the 6th District which allows the CPD to (at a glance) give supervisors the ability to see span of control and unity of command alignment. Additionally, the CPD shared that they plan to assign additional sergeants to the 6th District during this reporting period, which is the primary pilot district.

The City and the CPD implemented a new pod supervision structure (primary, secondary, and tertiary role for supervisors) in the fifth reporting period. However, during the IMT's conversations with command staff, officers, and supervisors, the results of the pod supervision structure did not consistently result in Unity of Command. In April 2022, the City and the CPD requested technical assistance from the IMT regarding the Unity of Command/Span of Control pilot programs. In late June, during the first technical assistance meeting, the City and the CPD shared their plans to develop a new staffing model to address a number of the shortcomings of the pod model. This new model will focus on 3 tenets: geographic familiarity, high quality supervision, and resource flexibility.

Additionally, the IMT recognizes that the CPD has convened a Unity of Command and Span of Control Pilot Program Evaluation Committee, which is to meet at least quarterly to discuss implementation progress and share feedback from department members. The IMT observed one evaluation committee meeting on June 2, 2022. It is the hope of the IMT that the committee will be able to anticipate and address a number of the possible challenges in order to ensure a smoother implementation process.

In the next reporting period, and to achieve Secondary compliance, the IMT looks forward to reviewing additional data associated with the newly developed staffing model over a longer period of time. Additionally, we will look to review records regarding the expansion of the CPD's Unity of Command and Span of Control pilot program. The IMT would also like to see the continued development of technology, such as staffing dashboards, that can timely track compliance. Additionally, we plan to observe further evaluation committee meetings and hope to see a shift from a briefing model to more collaborative and conversational structure.

Paragraph 368 Compliance Progress History

FIRST REPORTING PERIOD	SECOND REPORTING PERIOD	THIRD REPORTING PERIOD
SEPTEMBER 1, 2019 – AUGUST 31, 2019	SEPTEMBER 1, 2019 – FEBRUARY 29, 2020	MARCH 1, 2020 – DECEMBER 31, 2020
COMPLIANCE PROGRESS:	COMPLIANCE PROGRESS:	COMPLIANCE PROGRESS:
Not Applicable	Preliminary	Preliminary
FOURTH REPORTING PERIOD	**FIFTH REPORTING PERIOD**	**SIXTH REPORTING PERIOD**
JANUARY 1, 2021 – JUNE 30, 2021	JULY 1, 2021 – DECEMBER 31, 2021	JANUARY 1, 2022 – JUNE 30, 2022
COMPLIANCE PROGRESS:	COMPLIANCE PROGRESS:	COMPLIANCE PROGRESS:
Preliminary	Preliminary	Preliminary

Supervision: ¶369

369. *A performance evaluation process will enable CPD to identify, support, and recognize members who perform their duties lawfully, safely, and effectively, as well as to identify and respond to members who perform poorly, demonstrate adverse behaviors, or engage in inappropriate conduct or conduct that otherwise undermines member or public safety and community trust.*

Compliance Progress

(Reporting Period: January 1, 2022, through June 30, 2022)

Preliminary:	***In Compliance*** **(NEW)**
Secondary:	***Not Yet Assessed***
Full:	***Not Yet Assessed***

We assessed the requirements of ¶369 for the first time in the sixth reporting period. In the sixth reporting period, the City and the CPD achieved Preliminary compliance with ¶369.

To evaluate Preliminary compliance with ¶369, we reviewed the CPD's relevant policies and records following the process described in the Consent Decree (¶¶626–41), which outlines applicable consultation, resolution, workout, and public comment periods.

D21-09, Performance Evaluation System - Pilot Program Policy (PES) policy was finalized in the fifth reporting period. Section III-E of the policy assigns supervisors to evaluate members and assist in setting goals under the Performance Evaluation System. Further, supervisors will use the Performance Evaluation System to effectively assess and document job performance of members under their command. Supervisors are also required to record notable observations of members in the Portfolio Notes section of the Performance Evaluation System every police period, as well as provide continual feedback and coaching.

Policy D21-09 identifies five performance dimension categories to evaluate the job performance for all sworn members: Conduct and Professionalism, Respect for People and Public Trust, Adaptability and Situational Skills, Problem Solving, and Job Knowledge and Professional Development. Supervisors will consider various components under each dimension, depending upon the duties and responsibilities of the member being evaluated.

Section VII of the policy affords members an opportunity to set personal goals and requires supervisors to support and recognize members who perform their duties lawfully, safely, and effectively, as well as to identify and respond to members who perform poorly, engage in inappropriate conduct, or in conduct that otherwise undermines members, public safety, or community trust.

During this reporting period, the IMT reviewed several Performance Evaluation training materials for sworn members. The materials include the *Performance Evaluation System Handbook*, Guide Book, Evaluation Survey, Test, Training Video, and Instructors Guide.

The IMT recognizes that the CPD has convened a Unity of Command and Span of Control Pilot Program Evaluation Committee, which is to meet at least quarterly to discuss implementation progress and share feedback from department members. This evaluation committee has been expanded to provide feedback on other pilot programs, including the Performance Evaluation System pilot. The IMT observed one evaluation committee meeting on June 2, 2022. It is the hope of the IMT that the committee will be able to anticipate and address a number of the possible challenges in order to ensure a smoother implementation process.

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In the sixth reporting period, the City and the CPD achieved Preliminary compliance with ¶369. We look forward to observing the delivery of Performance Evaluation System training to members of the 6th District in the seventh reporting period. We also look forward to future site visits and focus groups to gather direct input regarding the Performance Evaluation System. Further, we plan to observe further evaluation committee meetings and hope to see a shift from a briefing model to more collaborative and conversational structure.

Paragraph 369 Compliance Progress History

FIRST REPORTING PERIOD	SECOND REPORTING PERIOD	THIRD REPORTING PERIOD
SEPTEMBER 1, 2019 – AUGUST 31, 2019	SEPTEMBER 1, 2019 – FEBRUARY 29, 2020	MARCH 1, 2020 – DECEMBER 31, 2020
COMPLIANCE PROGRESS:	COMPLIANCE PROGRESS:	COMPLIANCE PROGRESS:
Not Applicable	Not Applicable	Not Applicable
FOURTH REPORTING PERIOD	**FIFTH REPORTING PERIOD**	**SIXTH REPORTING PERIOD**
JANUARY 1, 2021 – JUNE 30, 2021	JULY 1, 2021 – DECEMBER 31, 2021	JANUARY 1, 2022 – JUNE 30, 2022
COMPLIANCE PROGRESS:	COMPLIANCE PROGRESS:	COMPLIANCE PROGRESS:
Not Applicable	Not Applicable	Preliminary

Supervision: ¶370

370. *CPD's performance evaluation process will identify, support, and recognize members' activity, performance, and conduct through an assessment of specific quantitative and qualitative performance dimensions, which will address, among other things, constitutional policing, community policing, problem-solving, and the effective use of de-escalation or specialized training. Although CPD may use quantitative measures in evaluating members to ensure that members are performing their required duties, CPD will not require members to achieve specific numerical thresholds, such as the number of arrests, investigatory stops, or citations. CPD will ensure that its performance evaluation process is consistent with the law and best practices. Within 18 months of the Effective Date, CPD will revise its performance evaluation policies and practices as necessary to meet the requirements of this Agreement.*

Compliance Progress (Reporting Period: January 1, 2022, through June 30, 2022)

Preliminary:	***In Compliance*** **(FIFTH REPORTING PERIOD)**
Secondary:	***Not in Compliance***
Full:	***Not Yet Assessed***

The City and the CPD maintained Preliminary compliance with ¶370 in the sixth reporting period, but did not reach Secondary compliance.

To assess Preliminary compliance with ¶370, we reviewed the CPD's relevant policies (D21-09) and records following the process described in the Consent Decree (¶¶626–41), which outlines applicable consultation, resolution, workout, and public comment periods.[4] For Secondary compliance, we reviewed the CPD's training development, implementation, and evaluation.

Progress before the Sixth Reporting Period

We assessed compliance with ¶370 for the first time during the fifth reporting period. In the fifth reporting period, the City and the CPD achieved Preliminary compliance with ¶370 by finalizing the updated *Performance Evaluations System - Pilot Program Policy*, D21-09. D21-09 incorporates specific quantitative and qualitative

[4] Early versions of the *Performance Evaluation System – Pilot Program* Directive were numbered D21-03 and D02-09. The finalized version of the policy, which was submitted this reporting period, is D21-09. For consistency, we refer to the *Performance Evaluation System – Pilot Program* Directive as D21-09 throughout this report.

performance dimensions, allowing for the capture of members' activities associated with constitutional policing, community policing, problem-solving, and the effective use of de-escalation.

The CPD also finalized and issued the *Performance Recognition System Policy* (E05-02) during the fifth reporting period. This policy helps to support ¶370 by aiding supervisors in recognizing and documenting the job performance of department members under their command, such as exceptional job performance or adverse behavior that can be improved by non-disciplinary options. During this reporting period, the City and the CPD also produced several *Performance Evaluation* training materials for sworn members.

We noted that, in future reporting periods, we look forward to the CPD's finalization of training documents associated with the Performance Evaluation System Pilot Program. We also look forward to observing these trainings in the pilot districts and reviewing evaluation.

Progress in the Sixth Reporting Period

During this reporting period, the IMT reviewed training materials for sworn members associated with the Performance Evaluation System (PES) Pilot Program, consisting of the Performance Evaluation System Handbook, Guide Book, Evaluation Survey, Test, Training Video, and Instructors Guide. The training materials capture specific quantitative and qualitative performance dimensions which address constitutional policing, community policing, problem-solving, and the effective use of de-escalation or specialized training.

The City and the CPD maintained Preliminary compliance with ¶370 in the sixth reporting period, but did not reach Secondary compliance. The IMT looks forward to observing trainings related to the PES in the pilot district. We hope to see these formal trainings reinforced through informal instruction, such as rollcall training. We also look forward to reviewing evaluation effort the Performance Evaluation System in practice. Additionally, we anticipate opportunities to observe how sergeants are documenting officer performance to better understand the outcomes and outputs that are valued by the CPD.

Paragraph 370 Compliance Progress History

FIRST REPORTING PERIOD	SECOND REPORTING PERIOD	THIRD REPORTING PERIOD
SEPTEMBER 1, 2019 – AUGUST 31, 2019	SEPTEMBER 1, 2019 – FEBRUARY 29, 2020	MARCH 1, 2020 – DECEMBER 31, 2020
COMPLIANCE PROGRESS:	COMPLIANCE PROGRESS:	COMPLIANCE PROGRESS:
Not Applicable	Not Applicable	None
FOURTH REPORTING PERIOD	**FIFTH REPORTING PERIOD**	**SIXTH REPORTING PERIOD**
JANUARY 1, 2021 – JUNE 30, 2021	JULY 1, 2021 – DECEMBER 31, 2021	JANUARY 1, 2022 – JUNE 30, 2022
COMPLIANCE PROGRESS:	COMPLIANCE PROGRESS:	COMPLIANCE PROGRESS:
None	Preliminary	Preliminary

Supervision: ¶371

371. *Annual performance evaluations for members of all ranks, excluding the Superintendent, will be based upon work performance completed during a specific rating period and will include a written description of performance dimension expectations; the member's proficiency in fulfilling the specific duties and responsibilities of the assigned position, unit, or team; any areas of particular growth and achievement; and areas where the member requires further support and/or supervision. The evaluation process will provide for support, feedback, communication of expectations, and, when appropriate, corrective actions.*

Compliance Progress

(Reporting Period: January 1, 2022, through June 30, 2022)

Recurring Schedule: December 31, 2022 ✓ **Not Yet Applicable**

Preliminary: ***In Compliance*** **(FIFTH REPORTING PERIOD)**
Secondary: ***Not in Compliance***
Full: ***Not Yet Assessed***

The City and the CPD maintained Preliminary compliance with ¶371 in the sixth reporting period, but did not reach Secondary compliance.

To assess Preliminary compliance with ¶371, we reviewed, among other things, the CPD's relevant policies and records following the process described in the Consent Decree (¶¶626–41), which outlines applicable consultation, resolution, workout, and public comment periods. For Secondary compliance, we reviewed the CPD's training development, implementation, and evaluation.

Progress before the Sixth Reporting Period

We assessed compliance with ¶371 for the first time during the fifth reporting period. In the fifth reporting period, the City and the CPD achieved Preliminary compliance with ¶371 by finalizing the updated *Performance Evaluation System - Pilot Program Policy (PES)* policy (D21-09). Section III-E of the policy assigns supervisors to evaluate members and assist in setting goals under the Performance Evaluation System. Further, supervisors will use the Performance Evaluation System to effectively assess and document job performance of members under their command. Supervisors are also required to record notable observations of members in the Portfolio Notes section of the Performance Evaluation System every police period, as well as provide continual feedback and coaching.

Policy D21-09 identifies five performance dimension categories to evaluate the job performance for all sworn members: Conduct and Professionalism, Respect for

People and Public Trust, Adaptability and Situational Skills, Problem Solving, and Job Knowledge and Professional Development. Supervisors will consider various components under each dimension, depending upon the duties and responsibilities of the member being evaluated.

Section VII of the policy affords members an opportunity to set personal goals and requires supervisors to support and recognize members who perform their duties lawfully, safely, and effectively, as well as to identify and respond to members who perform poorly, engage in inappropriate conduct, or in conduct that otherwise undermines members, public safety, or community trust.

However, the IMT acknowledged that D21-09 is only being used in the pilot districts, whereas E05-01, *Performance Evaluations of all Sworn Department Members Below the Rank of Superintendent* policy, is used for all other officers. We shared that, in future reporting periods, the IMT would like to see this program expanded, where D21-09 will ultimately replace E05-01.

Progress in the Sixth Reporting Period

During this reporting period, the IMT reviewed training materials for sworn members associated with the Performance Evaluation System (PES) Pilot Program, consisting of the Performance Evaluation System Handbook, Guide Book, Evaluation Survey, Test, Training Video, and Instructors Guide. The training materials capture specific quantitative and qualitative performance dimensions which address constitutional policing, community policing, problem-solving, and the effective use of de-escalation or specialized training. The training materials also clearly set forth examples of how members and supervisors set performance expectations and professional goals for members. Further, they include an "Officer Transfer Procedure" for when members transfer into a Performance Evaluation System pilot district during the course of a rating year.

The City and the CPD maintained Preliminary compliance with ¶371 in the sixth reporting period, but did not reach Secondary compliance. The IMT looks forward to observing trainings related to the Performance Evaluation System in the pilot district. We hope to see these formal trainings reinforced through informal instruction, such as rollcall training. We also look forward to reviewing evaluation efforts of the Performance Evaluation System in practice. Additionally, we anticipate opportunities to observe how sergeants are documenting officer performance to better understand the outcomes and outputs that are valued by the CPD.

Looking forward, the IMT would like to see this program expanded, as it incorporates specific quantitative and qualitative performance dimensions allowing for the capture of members activities associated with constitutional policing, community policing, problem-solving, and the effective use of de-escalation. It will also be important for the CPD to recognize the interconnectedness of all pilot programs

(Unity of Command, Span of Control, Performance Evaluation System, and Officer Support System) as they move toward expansion.

Paragraph 371 Compliance Progress History

FIRST REPORTING PERIOD	SECOND REPORTING PERIOD	THIRD REPORTING PERIOD
SEPTEMBER 1, 2019 – AUGUST 31, 2019	SEPTEMBER 1, 2019 – FEBRUARY 29, 2020	MARCH 1, 2020 – DECEMBER 31, 2020
COMPLIANCE PROGRESS:	COMPLIANCE PROGRESS:	COMPLIANCE PROGRESS:
Not Applicable	Not Applicable	None
FOURTH REPORTING PERIOD	**FIFTH REPORTING PERIOD**	**SIXTH REPORTING PERIOD**
JANUARY 1, 2021 – JUNE 30, 2021	JULY 1, 2021 – DECEMBER 31, 2021	JANUARY 1, 2022 – JUNE 30, 2022
COMPLIANCE PROGRESS:	COMPLIANCE PROGRESS:	COMPLIANCE PROGRESS:
None	Preliminary	Preliminary

Supervision: ¶372

372. *CPD will require supervisors of all ranks to conduct timely, accurate, and complete performance evaluations.*

Compliance Progress

(Reporting Period: January 1, 2022, through June 30, 2022)

Preliminary:	***In Compliance* (FIFTH REPORTING PERIOD)**
Secondary:	***Not in Compliance***
Full:	***Not Yet Assessed***

The City and the CPD maintained Preliminary compliance with ¶372 in the sixth reporting period, but did not reach Secondary compliance.

To evaluate Preliminary compliance with ¶372, we reviewed among other things, the CPD's relevant policies and records following the process described in the Consent Decree (¶¶626–41), which outlines applicable consultation, resolution, workout, and public comment periods.

Progress before the Sixth Reporting Period

We assessed compliance with ¶372 for the first time during the fifth reporting period. In the fifth reporting period, the City and the CPD achieved Preliminary compliance with ¶372 by finalizing the updated *Performance Evaluation System - Pilot Program Policy*, D21-09. The policy incorporates specific quantitative and qualitative performance dimensions allowing for the capture of members' activities associated with constitutional policing, community policing, problem-solving, and the effective use of de-escalation. The policy clearly outlines the timeline for the completion of the performance evaluation on an annual basis. In addition, the policy sets out requirements for when a member must be assigned to an evaluating supervisor. All performance evaluations for members will be documented on the Performance Evaluation System, located within the Talent Management System.

We shared that, in future reporting periods, and to obtain Secondary compliance, the IMT looks forward to reviewing the data sources which demonstrate performance evaluations that have occurred and the frequency and quality of those evaluations. In addition, the IMT will be monitoring the training for both supervisors and members as the Performance Evaluation System rolls out during the sixth reporting period.

Progress in the Sixth Reporting Period

During this reporting period, the IMT reviewed training materials for sworn members associated with the Performance Evaluation System (PES) Pilot Program, consisting of the Performance Evaluation System Handbook, Guide Book, Evaluation Survey, Test, Training Video, and Instructors Guide. The training materials capture

specific quantitative and qualitative performance dimensions which address constitutional policing, community policing, problem-solving, and the effective use of de-escalation or specialized training.

The IMT recognizes that the CPD has convened a Unity of Command and Span of Control Pilot Program Evaluation Committee, which is to meet at least quarterly to discuss implementation progress and share feedback from department members. This evaluation committee has been expanded to provide feedback on other pilot programs, to include the Performance Evaluation System pilot. The IMT observed one evaluation committee meeting on June 2, 2022. It is the hope of the IMT that the committee will be able to anticipate and address a number of the possible challenges in order to ensure a smoother implementation process.

The City and the CPD maintained Preliminary compliance with ¶372 in the sixth reporting period, but did not reach Secondary compliance. In the next reporting period, and to obtain Secondary compliance, the IMT looks forward to reviewing the data sources which demonstrate performance evaluations that have occurred and the frequency and quality of those evaluations. In addition, the IMT will be monitoring the training for both supervisors and members as the Performance Evaluation System rolls out during the seventh reporting period. We hope to see these formal trainings reinforced through informal instruction, such as rollcall training.

Paragraph 372 Compliance Progress History

FIRST REPORTING PERIOD	SECOND REPORTING PERIOD	THIRD REPORTING PERIOD
SEPTEMBER 1, 2019 – AUGUST 31, 2019	SEPTEMBER 1, 2019 – FEBRUARY 29, 2020	MARCH 1, 2020 – DECEMBER 31, 2020
COMPLIANCE PROGRESS:	COMPLIANCE PROGRESS:	COMPLIANCE PROGRESS:
Not Applicable	Not Applicable	None
FOURTH REPORTING PERIOD	**FIFTH REPORTING PERIOD**	**SIXTH REPORTING PERIOD**
JANUARY 1, 2021 – JUNE 30, 2021	JULY 1, 2021 – DECEMBER 31, 2021	JANUARY 1, 2022 – JUNE 30, 2022
COMPLIANCE PROGRESS:	COMPLIANCE PROGRESS:	COMPLIANCE PROGRESS:
None	Preliminary	Preliminary

Supervision: ¶373

373. *Supervisors may only conduct a performance evaluation of members they have directly supervised and observed during the specific rating period.*

Compliance Progress (Reporting Period: January 1, 2022, through June 30, 2022)

Preliminary:	***In Compliance* (FIFTH REPORTING PERIOD)**
Secondary:	***Not in Compliance***
Full:	***Not Yet Assessed***

The City and the CPD maintained Preliminary compliance with ¶373 in the sixth reporting period, but did not reach Secondary compliance.

To evaluate Preliminary compliance with ¶373, we reviewed among other things, the CPD's relevant policies and materials following the process described in the Consent Decree (¶¶626–41). For Secondary compliance, we sought to review the Performance Evaluation System training for supervisors in addition to data sources which demonstrate methods for ensuring that evaluations are completed by supervisors who have observed and actively supervised the members being evaluated.

Progress before the Sixth Reporting Period

We assessed compliance with ¶373 for the first time during the third reporting period. In the third reporting period, we assessed the City and the CPD's compliance with ¶373 for the first time. The CPD's Performance Evaluation System pilot program and materials remained under review at the close of the period. Therefore, the CPD did not reach Preliminary compliance. We emphasized that the integrity of the Performance Evaluations System depended upon the successful implementation of the Unity of Command and Span of Control staffing structure, as ¶373 requires that Supervisors completing performance evaluations have first-hand knowledge of the members being evaluated.

In the fourth reporting period, the CPD submitted a revised *Performance Evaluation System – Pilot Program* policy (D21-09), and we submitted a no-objection notice to this revised draft policy.[5] We noted that this policy clearly requires that supervisors limit their review to sworn members who have been assigned under their command for at least 30 days before the evaluation, which differed from the current E05-01 policy. For example, under Section IV.J of E05-01, where a unit

[5] Early versions of the *Performance Evaluation System – Pilot Program* Directive were numbered D21-03 and D02-09. The finalized version of the policy, which was submitted this reporting period, is D21-09. For consistency, we refer to the *Performance Evaluation System – Pilot Program* Directive as D21-09 throughout this report.

member has been supervised by several different supervisors, the supervisors are able to confer with each other in evaluating that member, and there is no specified length of time for which supervisors must have overseen the officer they are evaluating.

In the fourth reporting period, we commended the CPD's efforts in rethinking, upgrading, and revising their performance evaluations programs, as demonstrated by D21-09. However, because D21-09 had not been submitted for public comment and finalized by the end of the reporting period, the CPD did not reach Preliminary compliance in the fourth reporting period.[6]

In the fifth reporting period, the City and the CPD achieved Preliminary compliance with ¶373 by finalizing the updated *Performance Evaluation System - Pilot Program Policy* (D21-09). Section III-D4 of the policy requires supervisors to complete evaluations only for members who have been assigned under their command for at least thirty days prior to the evaluation.

We shared, that in the next reporting period, and to achieve Secondary compliance, the IMT looks forward to reviewing the Performance Evaluation System training for supervisors in addition to data sources which demonstrate methods for ensuring that evaluations are completed by supervisors who have observed and actively supervised the members being evaluated.

Progress in the Sixth Reporting Period

During this reporting period, the IMT reviewed training materials for sworn members associated with the Performance Evaluation System (PES) Pilot Program, consisting of the Performance Evaluation System Handbook, Guide Book, Evaluation Survey, Test, Training Video, and Instructors Guide. The training materials capture specific quantitative and qualitative performance dimensions which address constitutional policing, community policing, problem-solving, and the effective use of de-escalation or specialized training. The Performance Evaluation System Handbook and Guidebook provide clear directions that supervisors may only conduct a performance evaluation of members they have directly supervised and observed during the specific rating period.

In the next reporting period, and to achieve Secondary compliance, the IMT looks forward to reviewing the Performance Evaluation System training for supervisors in addition to data sources which demonstrate methods for ensuring that evaluations are completed by supervisors who have observed and actively supervised the members being evaluated. Additionally, we anticipate opportunities to observe

[6] On July 9, 2021, after the close of the fourth reporting, the CPD posted D21-03 for public comment.

how sergeants are documenting officer performance to better understand the outcomes and outputs that are valued by the CPD.

Paragraph 374 Compliance Progress History

FIRST REPORTING PERIOD SEPTEMBER 1, 2019 – AUGUST 31, 2019 COMPLIANCE PROGRESS:	SECOND REPORTING PERIOD SEPTEMBER 1, 2019 – FEBRUARY 29, 2020 COMPLIANCE PROGRESS:	THIRD REPORTING PERIOD MARCH 1, 2020 – DECEMBER 31, 2020 COMPLIANCE PROGRESS:
Not Applicable	Not Applicable	None
FOURTH REPORTING PERIOD JANUARY 1, 2021 – JUNE 30, 2021 COMPLIANCE PROGRESS:	**FIFTH REPORTING PERIOD** JULY 1, 2021 – DECEMBER 31, 2021 COMPLIANCE PROGRESS:	**SIXTH REPORTING PERIOD** JANUARY 1, 2022 – JUNE 30, 2022 COMPLIANCE PROGRESS:
None	Preliminary	Preliminary

Supervision: ¶374

374. *In addition to the formal annual performance evaluation, supervisors will meet with members under their direct command on an ongoing basis as necessary to provide guidance, mentoring, direction, and support to the members regarding their performance and to identify opportunities for improvement.*

Compliance Progress

(Reporting Period: January 1, 2022, through June 30, 2022)

Preliminary:	***In Compliance*** **(FIFTH REPORTING PERIOD)**
Secondary:	***Not in Compliance***
Full:	***Not Yet Assessed***

The City and the CPD maintained Preliminary compliance with ¶374 in the sixth reporting period, but did not reach Secondary compliance.

To assess Preliminary compliance with ¶374, we reviewed, among other things, the CPD's relevant policies and records following the process described in the Consent Decree (¶¶626–41), which outlines applicable consultation, resolution, workout, and public comment periods. For Secondary compliance, we reviewed the CPD's training development, implementation, and evaluation. We sought to review the Performance Evaluation System training in addition to data sources, including written documentation and interviews with supervisors and those under their command.

Progress before the Sixth Reporting Period

In previous reporting periods, we reviewed drafts of the *Unity of Command and Span of Control—Pilot Program* policy (D20-02), and the *Performance Evaluation System Directive* and *Handbook*. These materials marked progress toward compliance with ¶374. However, because the materials remained in the collaborative revision process and had not been finalized or implemented, the City and the CPD did not reach Preliminary compliance with this paragraph.

We noted in the fourth reporting period that the previous policies provided by the CPD demonstrated that D21-09 would be a great improvement. For example, we explained that *Performance Evaluations of all Sworn Department Members Below the Rank of Superintendent* (E05-01) only required the evaluator to provide job-performance feedback to members at the conclusion of an evaluation period. We commended the CPD's efforts to codify the requirement that supervisors provide informal and ongoing feedback to members under their command.

In the fifth reporting period, the City and the CPD achieved Preliminary compliance with ¶374 by finalizing the updated *Performance Evaluation System - Pilot Program Policy* (D21-09). Section V-B of this policy states that supervisors are responsible for ongoing job performance evaluation of the department members they supervise, beyond the annual performance evaluations.

We shared that, in the next reporting period, and to obtain Secondary compliance, the IMT looks forward to reviewing Performance Evaluation System training in addition to data sources, including written documentation and interviews with supervisors and those under their command.

Progress in the Sixth Reporting Period

During this reporting period, the IMT reviewed training materials for sworn members associated with the Performance Evaluation System (PES) Pilot Program, consisting of the Performance Evaluation System Handbook, Guide Book, Evaluation Survey, Test, Training Video, and Instructors Guide. The training materials provide guidance to supervisors on how to assist in setting professional goals for members and their responsibility to provide ongoing mentoring and coaching.

Additionally, in April 2022, the IMT conducted an in-person site visit, during which we were able to speak with groups of officers, supervisors, and command staff within the 6th District. These conversations provided additional insight into the realities of supervision and daily operations in the department. During this site visit, we also had to opportunity to observe a productive roll-call where sergeants and lieutenants debriefed situations that occurred on previous shifts with a focus on officer safety, community service, and policy clarifications. This was an effective example of guidance, mentoring, and direction outside of formal performance evaluations as required by the Consent Decree. The IMT notes that these observations are an important step toward assessing further levels of compliance.

In the next reporting period, and to obtain Secondary compliance, the IMT looks forward to reviewing Performance Evaluation System training in addition to data sources, including written documentation and interviews with supervisors and those under their command. An important measure of supervisor efficacy are the supervisory logs which outline a supervisor's daily activities and tasks. The IMT looks forward to reviewing these and conducting focus groups with officers and supervisors to hear their direct insights.

Paragraph 374 Compliance Progress History

FIRST REPORTING PERIOD	SECOND REPORTING PERIOD	THIRD REPORTING PERIOD
SEPTEMBER 1, 2019 – AUGUST 31, 2019	SEPTEMBER 1, 2019 – FEBRUARY 29, 2020	MARCH 1, 2020 – DECEMBER 31, 2020
COMPLIANCE PROGRESS:	COMPLIANCE PROGRESS:	COMPLIANCE PROGRESS:
Not Applicable	Not Applicable	None

FOURTH REPORTING PERIOD	FIFTH REPORTING PERIOD	SIXTH REPORTING PERIOD
JANUARY 1, 2021 – JUNE 30, 2021	JULY 1, 2021 – DECEMBER 31, 2021	JANUARY 1, 2022 – JUNE 30, 2022
COMPLIANCE PROGRESS:	COMPLIANCE PROGRESS:	COMPLIANCE PROGRESS:
None	Preliminary	Preliminary

Supervision: ¶375

375. *Supervisors will recognize, when appropriate, formally (e.g., recommendation for commendation) and/or informally (e.g., public and private praise) subordinate members who demonstrate a commitment to procedural justice, de-escalation, impartial policing, and/or community policing.*

Compliance Progress

(Reporting Period: January 1, 2022, through June 30, 2022)

Preliminary:	***In Compliance*** **(FIFTH REPORTING PERIOD)**
Secondary:	***Not in Compliance***
Full:	***Not Yet Assessed***

The City and the CPD maintained Preliminary compliance with ¶374 in the sixth reporting period, but did not reach Secondary compliance.

To evaluate Preliminary compliance with ¶375, we reviewed, among other things, the CPD's relevant policies and records following the process described in the Consent Decree (¶¶626–41). For Secondary compliance, we reviewed the CPD's training development, implementation, and evaluation. We also sought to review the Performance Evaluation System and Performance Recognition System trainings along with qualitative and quantitative data from both systems to support compliance with ¶375.

Progress before the Sixth Reporting Period

In prior reporting periods, the CPD revised and produced the *Performance Evaluations System – Pilot Program* (D21-09) and the *Performance Evaluations of All Sworn Department Members Below the Rank of Superintendent* (E05-01). E05-01 remained in place for members who are not in the Performance Evaluations System pilot program, which was and is being piloted in the 4th, 6th, and 7th Districts only.

We noted in the fourth reporting period that D21-09 demonstrated a marked improvement over E05-01 regarding the requirement in ¶375: supervisors recognizing subordinate members who demonstrate a commitment to procedural justice, de-escalation, impartial policing, or community policing. We noted that while E05-01 referenced recognizing exceptional performance by members and rewarding the same with commendations and other forms of recognition, D21-09 specifically outlined the requisite dimensions on which officers will be assessed, one of which was "Respect for People and Public Trust," which included such core competencies as respect, community policing, procedural justice, and impartial policing. We noted that these specified dimensions not only provided guidance to supervisors

conducting evaluations but also helped solidify that the CPD valued these various dimensions.

In the fifth reporting period, the City and the CPD achieved Preliminary compliance with ¶375 by finalizing the updated *Performance Evaluation System - Pilot Program Policy*, D21-09 and the *Performance Recognition System Policy*, E05-02. Section III-B of D21-09 and Section IV-C of E05-02 outline the responsibility of supervisors to recognize the achievements of department members under their command.

We shared that, in the next reporting period, and to achieve Secondary compliance, the IMT looks forward to reviewing the Performance Evaluation System and PRS training along with qualitative and quantitative data from both systems to support ¶375.

Progress in the Sixth Reporting Period

During this reporting period, the IMT reviewed training materials for sworn members associated with the Performance Evaluation System (PES) Pilot Program, consisting of the Performance Evaluation System Handbook, Guide Book, Evaluation Survey, Test, Training Video, and Instructors Guide. The training materials provide guidance to supervisors on how to assist in setting professional goals for members and their responsibility to provide ongoing mentoring and coaching.

Additionally, in April 2022, the IMT conducted an in-person site visit, during which we were able to speak with groups of officers, supervisors, and command staff within the 6th District. These conversations provided additional insight into the realities of supervision and daily operations in the department. During this site visit, we also had to opportunity to observe a productive roll-call where sergeants and lieutenants debriefed situations that occurred on previous shifts and shared general praise and appreciation for how officers were effectively handling high call volumes. The IMT notes that these observations are an important step toward assessing further levels of compliance.

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In the next reporting period, and to achieve Secondary compliance, the IMT looks forward to reviewing the Performance Evaluation System and Performance Recognition System trainings along with qualitative and quantitative data from both systems to support ¶375. Additionally, we anticipate opportunities to observe how supervisors are documenting officer performance and providing feedback, both formally and informally.

Paragraph 375 Compliance Progress History

FIRST REPORTING PERIOD SEPTEMBER 1, 2019 – AUGUST 31, 2019	SECOND REPORTING PERIOD SEPTEMBER 1, 2019 – FEBRUARY 29, 2020	THIRD REPORTING PERIOD MARCH 1, 2020 – DECEMBER 31, 2020
COMPLIANCE PROGRESS: Not Applicable	COMPLIANCE PROGRESS: Not Applicable	COMPLIANCE PROGRESS: None
FOURTH REPORTING PERIOD JANUARY 1, 2021 – JUNE 30, 2021	**FIFTH REPORTING PERIOD** JULY 1, 2021 – DECEMBER 31, 2021	**SIXTH REPORTING PERIOD** JANUARY 1, 2022 – JUNE 30, 2022
COMPLIANCE PROGRESS: None	COMPLIANCE PROGRESS: Preliminary	COMPLIANCE PROGRESS: Preliminary

Supervision: ¶376

376. *CPD will maintain records of performance evaluations in the appropriate electronic data tracking system.*

Compliance Progress

(Reporting Period: January 1, 2022, through June 30, 2022)

Preliminary:	***In Compliance*** **(FIFTH REPORTING PERIOD)**
Secondary:	***Not in Compliance***
Full:	***Not Yet Assessed***

The City and the CPD maintained Preliminary compliance with ¶376 in the sixth reporting period, but did not reach Secondary compliance.

To evaluate Preliminary compliance with ¶376, we reviewed, among other things, the CPD's relevant records and submitted information to determine whether the CPD had acquired and implemented an appropriate computer system to track data required by the paragraph. We also looked to review any related policies, following the process described in the Consent Decree (¶¶626–41). To assess Secondary compliance, the IMT relevant data sources to determine whether the CPD sufficiently maintains records in the electronic tracking system that reflect data integrity, efficiency, and analytical sophistication.

Progress before the Sixth Reporting Period

The IMT assessed compliance with ¶376 for the first time during the third reporting period. In the third reporting period, the City and the CPD made steps toward compliance with ¶376 requirements. The CPD's Performance Evaluation System—a program that remained in the review and revision process at the close of the third reporting period—addressed the requirements set out in this paragraph. However, we noted that beyond the development and implementation of the Performance Evaluation System, the CPD must also focus on the acquisition or implementation of appropriate technology for compliance with ¶376's record-maintenance requirements.

During the fourth reporting period, the CPD provided the IMT and the OAG with live demonstrations of the Performance Evaluations Electronic System, which is used to create and store performance evaluations. Because the Performance Evaluation Electronic System was not yet fully implemented by the end of the reporting period, the CPD did not reach Preliminary compliance with ¶376 in the fourth reporting period.

In the fifth reporting period, the City and the CPD achieved Preliminary compliance with ¶376 by finalizing the updated *Performance Evaluation System - Pilot Program Policy* (D21-09). The IMT has observed live demonstrations of the Performance Evaluation Electronic System during previous reporting periods.

We shared that, in future reporting periods, the IMT looks forward to receiving actual demonstrations of the live Performance Evaluation System platform being utilized in the Performance Evaluation System pilot program, in addition to the training on the system with pilot district supervisors.

Progress in the Sixth Reporting Period

During this reporting period, the IMT reviewed training materials for sworn members associated with the Performance Evaluation System (PES) Pilot Program, consisting of the Performance Evaluation System Handbook, Guide Book, Evaluation Survey, Test, Training Video, and Instructors Guide. The training materials clearly outline how department supervisors will maintain records of performance evaluations in the appropriate electronic data tracking system.

The IMT recognizes that the CPD has convened a Unity of Command and Span of Control Pilot Program Evaluation Committee, which is to meet at least quarterly to discuss implementation progress and share feedback from department members. This evaluation committee has been expanded to provide feedback on other pilot programs, to include the Performance Evaluation System pilot along with its' tracking system. The IMT observed one evaluation committee meeting on June 2, 2022. It is the hope of the IMT that the committee will be able to anticipate and address a number of the possible challenges in order to ensure a smoother implementation process.

The City and the CPD achieved Preliminary compliance with ¶376 in the fifth reporting period. The IMT looks forward to observing trainings related to the Performance Evaluation System in the pilot district. We hope to see these formal trainings reinforced through informal instruction, such as rollcall training. We also look forward to reviewing evaluation effort the Performance Evaluation System in practice. The IMT anticipates receiving actual demonstrations of the live Performance Evaluation System platform being utilized in the Performance Evaluation System pilot program. We also look forward to future site visits and focus groups to gather direct input regarding the Performance Evaluation System. Further, we plan to observe further evaluation committee meetings and hope to see a shift from a briefing model to more collaborative and conversational structure.

Paragraph 376 Compliance Progress History

FIRST REPORTING PERIOD	SECOND REPORTING PERIOD	THIRD REPORTING PERIOD
SEPTEMBER 1, 2019 – AUGUST 31, 2019	SEPTEMBER 1, 2019 – FEBRUARY 29, 2020	MARCH 1, 2020 – DECEMBER 31, 2020
COMPLIANCE PROGRESS:	COMPLIANCE PROGRESS:	COMPLIANCE PROGRESS:
Not Applicable	Not Applicable	None

FOURTH REPORTING PERIOD	FIFTH REPORTING PERIOD	SIXTH REPORTING PERIOD
JANUARY 1, 2021 – JUNE 30, 2021	JULY 1, 2021 – DECEMBER 31, 2021	JANUARY 1, 2022 – JUNE 30, 2022
COMPLIANCE PROGRESS:	COMPLIANCE PROGRESS:	COMPLIANCE PROGRESS:
None	Preliminary	Preliminary

Appendix 8
Officer Wellness and Support Compliance Assessments, by Paragraph

Appendix 8
Officer Wellness and Support Compliance Assessments, by Paragraph

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Officer Wellness and Support: ¶381

381. *CPD will provide its members with a range of support services that comport with mental health professional standards and that seek to minimize the risk of harm from stress, trauma, alcohol and substance abuse, and mental illness. These support services will include: readily accessible confidential counseling services with both internal and external referrals; peer support; traumatic incident debriefings and crisis counseling; and stress management and officer wellness training.*

Compliance Progress (Reporting Period: January 1, 2022, through June 30, 2022)

Preliminary:	***In Compliance*** **(FOURTH REPORTING PERIOD)**
Secondary:	***In Compliance*** **(FOURTH REPORTING PERIOD)**
Full:	***Not In Compliance***

During the sixth reporting period, the City and the CPD maintained Preliminary and Secondary compliance with ¶381.

To assess Preliminary compliance with ¶381, we reviewed the CPD's relevant policies and records following the process described in the Consent Decree (¶¶626–41), which outlines applicable consultation, resolution, workout, and public comment periods.

For Secondary compliance, we reviewed records that are sufficient to show that the CPD has qualified personnel fulfilling the responsibilities required by ¶381. We also considered whether the staff is sufficiently trained to provide the services required by the paragraph.

To evaluate Full compliance with ¶381, we considered data sources necessary or helpful to identify and verify sustained compliance and reform efforts relevant to the requirements of the paragraph. Specifically, we determined whether the CPD has sufficient methods for tracking, analyzing, and responding to various data points regarding officer-wellness services.

Progress before the Sixth Reporting Period

In the fourth reporting period, the City and the CPD achieved Preliminary compliance with ¶381 by submitting the *Professional Counseling Division (PCD)* Policy (E06-01), the CPD's *Officer Wellness Support Plan*, and the CPD's Standard Operating Procedure (SOP) 19-01. The combination of E06-01, the Officer Wellness Support Plan, and SOP 19-01 establish a robust foundation for providing CPD members with a range of services contemplated in ¶381.

The City and the CPD then achieved Secondary compliance with ¶381 by providing record of the clinicians' certifications and evidence the staff have necessary training and credentials as well as a breadth of experience providing the services contemplated by E06-01 and ¶381.

During the fifth reporting period, the City and the CPD maintained Preliminary and Secondary compliance with ¶381, but did not reach Full compliance. The IMT noted that we anticipated the CPD to implement a technology solution to adequately track and evaluate services offered, including data that reflects the efficiencies of tracking programs and services to all CPD personnel, and we specified the type of data we would expect to see tracked. We further explained that we did not see proof that reflects a corporate outreach effort for the civilian staff members via training and other means to ensure accessibility to Professional Counseling Division (also known as the PCD) services.

Progress in the Sixth Reporting Period

During the sixth reporting period, as well as previous reporting periods, the IMT and members of the Professional Counseling Division have engaged in conversations, virtual site visits, and classroom observations that address the delivery of support services to the CPD membership. The virtual site visits have allowed for meetings with various units of the Professional Counseling Division who hold a specific role in providing confidential services, as stipulated in ¶381, SOP 19-01, and E06–01. These conversations specifically addressed the timeliness of the counseling sessions upon request, client follow-up, and caseloads. However, the IMT has not received specific data regarding client caseload and the non-identifying demographics that were requested in the fifth reporting period.

As noted in the fifth reporting period, the CPD obtained budgetary approval for an additional 11 clinician positions to aid in the delivery of these confidential services. During the sixth reporting period, the City's Department of Human Resources has posted for the positions to fill the new allocations. The CPD produced evidence that the City was (and still is) seeking to fill these positions by producing the notifications of job opportunities that were posted for the open mental health clinician positions.

During this reporting period, the City and the CPD produced three trainings for compliance under ¶381: the Peer Support Refresher training, the Traumatic Incident Stress Management Program (or TISMP) eLearning, and the Active Bystandardship for Law-Enforcement (ABLE) training. The IMT observed a portion of the Peer Support Refresher training, which refers to the available support services provided by the Professional Counseling Division and to the services specifically provided by the peer support team members. The Traumatic Incident Stress Management Program eLearning curriculum also provided information on

the available support services. The ABLE training is a nationally recognized curriculum developed by Georgetown University Law Center and addresses several of the Consent Decree paragraphs in addition to ¶381 (¶¶176, 320, 321, 323, and 386). The IMT looks forward to receiving the data reflective of the curriculum delivery.

As noted in the previous reporting period and discussed during several visits and meetings with members of the Professional Counseling Division, anonymous data can show the impact of the counseling services. It is critical to collect and produce this data to support the efficiency, effectiveness, and the planning for and forecasting of additional resources. During these discussions, the Professional Counseling Division informed the IMT of the development of iCarol, a software system which should provide the necessary data and related information. This technology further affords the Professional Counseling Division to document the case information and notes appropriately. According to a recent site visit with the Director of the Professional Counseling Division, the full launch of the iCarol system was originally scheduled for June 15 through June 30, 2022, but has been delayed and did not launch during this reporting period.

Also during the sixth period, the IMT received the Professional Counseling Division's 2022 Communication Strategy. In response to this production, we noted that the strategy was a great start to increase in mental health awareness for CPD personnel, but lacks other facets of wellness (i.e., financial, physical, and spiritual) as referenced in the strategy. The Professional Counseling Division should also provide details relating to how the non-sworn members of the CPD gain access to the same information about the available services because they do not attend roll calls or in-service trainings like the sworn personnel.

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Therefore, the City and the CPD maintained Preliminary and Secondary compliance, but have not yet reached Full compliance. To reach Full compliance, the City and the CPD should provide specific outputs requested and other data from the various analytics, which range from external and internal referrals, peer support, deep breathing, crisis counseling, stress management, and wellness training, as articulated specifically in ¶381.

Paragraph 381 Compliance Progress History

FIRST REPORTING PERIOD SEPTEMBER 1, 2019 – AUGUST 31, 2019	SECOND REPORTING PERIOD SEPTEMBER 1, 2019 – FEBRUARY 29, 2020	THIRD REPORTING PERIOD MARCH 1, 2020 – DECEMBER 31, 2020
COMPLIANCE PROGRESS: Not Applicable	COMPLIANCE PROGRESS: Not Applicable	COMPLIANCE PROGRESS: Not Applicable
FOURTH REPORTING PERIOD JANUARY 1, 2021 – JUNE 30, 2021	**FIFTH REPORTING PERIOD** JULY 1, 2021 – DECEMBER 31, 2021	**SIXTH REPORTING PERIOD** JANUARY 1, 2022 – JUNE 30, 2022
COMPLIANCE PROGRESS: Secondary	COMPLIANCE PROGRESS: Secondary	COMPLIANCE PROGRESS: Secondary

Officer Wellness and Support: ¶382

382. *CPD currently offers clinical counseling services, programs regarding alcoholism and other addictions, and a peer support program to help CPD members cope with the psychological and personal toll their jobs can impose. By September 1, 2019, CPD will complete a needs assessment to determine what additional resources are necessary to ensure the support services available to CPD members comport with best practices and mental health professional standards.*

Compliance Progress (Reporting Period: January 1, 2022, through June 30, 2022)

Preliminary:	***In Compliance*** **(THIRD REPORTING PERIOD)**
Secondary:	***In Compliance*** **(THIRD REPORTING PERIOD)**
Full:	***Not in Compliance***

During the sixth reporting period, the City and the CPD maintained Preliminary and Secondary compliance with ¶382.

To assess Preliminary compliance with ¶382, we reviewed the CPD's relevant policies and records following the process described in the Consent Decree (¶¶626-641), which outlines applicable consultation, resolution, workout, and public comment periods.

Progress before the Sixth Reporting Period

In previous reporting periods, the City and the CPD achieved Preliminary and Secondary compliance with ¶382 by completing the required needs assessment and addressing additional concerns via the CPD's *Officer Wellness Support Plan.* However, we found the CPD had not yet provided enough evidence demonstrating Full compliance because the CPD had not yet shown the IMT that the *Officer Wellness Support Plan* robustly supplements the initially conducted needs assessment and is a living document. Further, the CPD must implement a system to track the provision and use of wellness services and provide updated timelines for plans to address the member needs identified by these sources accurately and efficiently. As noted in the fourth reporting period, an updated timeline will allow the Professional Counseling Division (also known as the PCD) to establish a definitive timeframe as the goals and needs of both the division and the CPD members continue to evolve.

Progress in the Sixth Reporting Period

Although the Professional Counseling Division submitted the 2022 Communication Strategy, it has not yet been fully implemented. The CPD provided tentative timelines in the 2022 Communications Strategy that referenced various milestones to be reached. However, because six months into the current year has passed, some of the benchmarks will not be reached as the strategy has not yet launched in its entirety.

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During the previous reporting period, the IMT explained that the Communication Strategy should robustly supplement the initially conducted needs assessment as a living document. It is imperative for the collective implementation of the plan and the strategy, both of which were referenced in the *2021 Annual Report* to the Superintendent.

Full compliance cannot be reached with ¶382 without implementation of a data collection mechanism to show that these services and provisions are tracked because the needs assessment serves as an indicator of what resources are needed for the services to be delivered and provided. The IMT hopes to see these data trends and results revealed with the iCarol system in the upcoming reporting periods.

Paragraph 382 Compliance Progress History

FIRST REPORTING PERIOD	SECOND REPORTING PERIOD	THIRD REPORTING PERIOD
SEPTEMBER 1, 2019 – AUGUST 31, 2019	SEPTEMBER 1, 2019 – FEBRUARY 29, 2020	MARCH 1, 2020 – DECEMBER 31, 2020
COMPLIANCE PROGRESS:	COMPLIANCE PROGRESS:	COMPLIANCE PROGRESS:
Not Applicable	None	Secondary

FOURTH REPORTING PERIOD	FIFTH REPORTING PERIOD	SIXTH REPORTING PERIOD
JANUARY 1, 2021 – JUNE 30, 2021	JULY 1, 2021 – DECEMBER 31, 2021	JANUARY 1, 2022 – JUNE 30, 2022
COMPLIANCE PROGRESS:	COMPLIANCE PROGRESS:	COMPLIANCE PROGRESS:
Secondary	Secondary	Secondary

Officer Wellness and Support: ¶383

383. *The needs assessment should analyze, at a minimum: a. staffing levels in CPD's Professional Counseling Division; b. the current workload of the licensed mental health professionals and drug and alcohol counselors employed by CPD; c. how long it takes CPD members requesting counseling services to be seen by a licensed mental health professional or drug and alcohol counselor; d. the professional specialties of CPD's licensed mental health professionals; e. the frequency and reasons for referrals of CPD members to clinical service providers external to CPD and the quality of those services; f. CPD member feedback, through statistically valid surveys that ensure anonymity to participants consistent with established Professional Counseling Division guidelines, regarding the scope and nature of the support services needs of CPD members and the quality and availability of services and programs currently provided through the Employee Assistance Program; g. similar mental health services offered in other large departments, including the ratio of licensed mental health professionals to sworn officers and the number of counseling hours provided per counselor per week; h. guidance available from law enforcement professional associations; i. the frequency and adequacy of CPD's communications to CPD members regarding the support services available to them; j. the frequency, quality, and demand for in-service trainings related to stress management, officer wellness, and related topics; and k. the quality of recruit training related to stress management, officer wellness, and related topics.*

Compliance Progress

(Reporting Period: January 1, 2022, through June 30, 2022)

Preliminary:	***In Compliance*** **(THIRD REPORTING PERIOD)**
Secondary:	***In Compliance*** **(THIRD REPORTING PERIOD)**
Full:	***Not in Compliance***

During the sixth reporting period, the City and the CPD maintained Preliminary and Secondary compliance with ¶383.

To evaluate Preliminary compliance with ¶383, we determined whether the CPD has allocated sufficient resources to conduct a needs assessment as required by this paragraph. For Secondary compliance, we determined whether the CPD has conducted the corresponding needs assessment. To assess Full compliance with ¶383, we considered whether at least each subparagraph of ¶383 has been sufficiently assessed, and whether the CPD has the technology necessary to accurately collect and report data regarding the Professional Counseling Division's

(also known as the PCD) services, staffing, and consumption of those services. The CPD should be striving to reach a point at which they are able to continually assess and adapt the services the Professional Counseling Division provides to better meet the needs of CPD members.

Progress before the Sixth Reporting Period

In previous reporting periods, the City and the CPD achieved Preliminary and Secondary compliance with ¶383 by developing the *Officer Wellness Support Plan*, which built upon the needs assessment. The *Officer Wellness Support Plan* created a framework for future assessments of the CPD's wellness-related needs. Additionally, we found the Professional Counseling Division continued to utilize stopgap measures to track use and provision of services, compiled, and submitted the *2021 Report to the Superintendent* based on anecdotal evidence.

During the fifth reporting period, it was important to note that the Professional Counseling Division demonstrated its efforts to increase staffing. The Professional Counseling Division anticipated starting the hiring process for 11 additional counselors who were approved in the most recent budget process in early 2022.

Per sub-paragraph (b), the workload as of the fifth reporting period was significant for the combined Professional Counseling Division staff. Though fully staffed, it was evident that at least 11 counselors were needed. In our virtual site visits, the Professional Counseling Division conveyed that some improvements and form revisions have been made to collect data. With historical data not imported, the IMT noted that the CPD would need to establish the necessary benchmarks to determine what its true capacity for providing services is to further determine where and when future resources may be needed. This is true for several sub-paragraphs (c, e, f, g, i, and k).

For subparagraph (f), the CPD still needed to determine the frequency of surveys necessary to identify the needs of personnel; the quality of services, equipment, and personnel; as well as other resources needed to provide efficient and effective services. Beyond the needs assessment, the Professional Counseling Division had not produced any evidence for subparagraphs (g) and (h) that indicates it has sought available guidance from other law-enforcement professional agencies. The CPD has access to resources for benchmarking data to help determine additional resources and services because of its membership in organizations such as IACP, MCCA, CALEA, IACPnet, and sister agencies.

With the introduction of some technological tools during the fifth reporting period, the CPD had made some progress toward, but did not meet Full compliance with ¶383. However, the IMT noted these efforts were not sufficient means to reliably collect and analyze data on services provided. Because the CPD

remained limited by technological capabilities, we found the CPD had not yet provided evidence demonstrating compliance with subsections (b), (c), and (e) of ¶383. We explained that the CPD would need to acquire or implement technology that could digitally track and assess wellness services to allow for proper analysis, benchmarking, and strategic forecasting as noted in the subparagraphs. To achieve Full compliance with ¶383, the IMT must review each subparagraph for its merited compliance. With the collective application of both the *Officer Wellness Support Plan* and the needs assessment, some areas are progressively shifting but attainable data had not yet been presented to the IMT.

Progress in the Sixth Reporting Period

During the sixth reporting period, the IMT met with various units of the Professional Counseling Division. The various topics of discussion were centered specifically on the subparagraphs of ¶383. The current staffing levels and the decision to increase mental health connections has been preliminarily addressed via the approval of 11 allocated positions in the previous budget cycle. The City's Department of Human Resources has released the notification for job opportunities to begin filling the new positions.

The Professional Counseling Division has an allotment of 13 clinicians, while currently only employing 11. The IMT continues to inquire of the hiring status during the various meetings throughout this reporting period. During the most recent site visit with the clinicians, there was some brief discussion of difficulty in hiring qualified candidates at this time. The IMT encourages the CPD to discuss strategic efforts to hire for those positions as a priority. The Professional Counseling Division did hire a Communications Director and begun onboarding this position in this reporting period. The Communications Director will be responsible for both the frequency and adequacy of providing relevant information to the CPD members.

The current workload (subparagraph (b)) has remained a question of the IMT during this reporting period in order to understand whether the units are adequately providing the most effective and efficient services they can to the CPD membership. The IMT has yet to obtain data that represents the active or closed caseloads by any of the service units within the Professional Counseling Division. While it was further noted during multiple site visits and monthly meetings that the Professional Counseling Division has begun to transition from paper records to importing the data into the iCarol system, the IMT is hesitant, as it is difficult to understand how this may be possible if the system has not yet been implemented. The IMT will continue to look forward to receiving the anonymized data for compliance with subparagraphs (b), (c), and (e). The Professional Counseling Division has indicated that the length of time between the request for services and

the appointment (subparagraph (c)) has been reduced but the IMT has not received any data regarding same.

During this reporting period, the CPD also introduced the eLearning curriculum on the Traumatic Incident Stress Management Program (TISMP) (subparagraph (j)). The IMT commended the Professional Counseling Division for the quality of this training and requested to review the pre- and post-tests for this particular training. The CPD also produced the Suicide Prevention Initiative and the Active Bystandership for Law-Enforcement (ABLE) training under this paragraph.

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The Professional Counseling Division has taken great steps to ensure information is timely, accurate, and relevant during the sixth reporting period. However, the subparagraphs of ¶383 cannot currently be sufficiently assessed due to the data not being available to conduct output measures that fully assess outcomes in the delivery of the PCD's services. These analyses may afford the Professional Counseling Division opportunities to integrate or introduce other preventive and intervention measures that may address issues with different impacts on various groups within the CPD. Taking these necessary steps moves to CPD closer to full compliance. Meanwhile, the IMT looks forward to seeing the applications relevant to ¶383.

Paragraph 383 Compliance Progress History

FIRST REPORTING PERIOD	SECOND REPORTING PERIOD	THIRD REPORTING PERIOD
SEPTEMBER 1, 2019 – AUGUST 31, 2019	SEPTEMBER 1, 2019 – FEBRUARY 29, 2020	MARCH 1, 2020 – DECEMBER 31, 2020
COMPLIANCE PROGRESS:	COMPLIANCE PROGRESS:	COMPLIANCE PROGRESS:
Not Yet Applicable	None	Secondary

FOURTH REPORTING PERIOD	FIFTH REPORTING PERIOD	SIXTH REPORTING PERIOD
JANUARY 1, 2021 – JUNE 30, 2021	JULY 1, 2021 – DECEMBER 31, 2021	JANUARY 1, 2022 – JUNE 30, 2022
COMPLIANCE PROGRESS:	COMPLIANCE PROGRESS:	COMPLIANCE PROGRESS:
Secondary	Secondary	Secondary

Officer Wellness and Support: ¶384

384. *Within 60 days of the completion of the needs assessment, CPD will develop a plan, including a timeline for implementation, to prioritize and address the needs identified through the needs assessment required by the immediately preceding paragraph ("Officer Support Systems Plan"). CPD will implement the Officer Support Systems Plan in accordance with the specified timeline for implementation.*

Compliance Progress

(Reporting Period: January 1, 2022, through June 30, 2022)

Preliminary:	***In Compliance*** **(THIRD REPORTING PERIOD)**
Secondary:	***In Compliance*** **(THIRD REPORTING PERIOD)**
Full:	***Not in Compliance***

During the sixth reporting period, the City and the CPD maintained Preliminary and Secondary compliance with ¶384.

To assess Preliminary compliance with ¶384, we determined whether the CPD developed a sufficient *Officer Wellness Support Plan* to prioritize and address the needs assessment. For Secondary compliance, we determined whether the *Officer Wellness Support Plan* was sufficient and meets the requirement of this paragraph.

To evaluate Full compliance with ¶384, we reviewed data relevant to determining whether the CPD has implemented the *Officer Wellness Support Plan*. We further reviewed whether the CPD is adequately and appropriately using technology to sustainably and accurately track Professional Counseling Division (also known as the PCD) services. This would also include tracking the use of those services, and identifying trends and emerging wellness needs of personnel, which would allow the CPD to determine if they are allocating resources appropriately.

Progress before the Sixth Reporting Period

In previous reporting periods, the City and the CPD achieved Preliminary and Secondary compliance with ¶384 by finalizing the *Officer Wellness Support Plan*, which provides a framework for iterative review and assessment of the CPD's ability to meet the wellness needs of its members. However, the Professional Counseling Division did not reach Full compliance due to the technological limitations preventing them from scheduling, tracking, and reporting on the Professional Counseling Division's activities more efficiently and accurately. We previously explained that the City and the CPD would need to provide updated timelines with clear expectations for the CPD, which would allow the IMT to monitor their progress against their department-set expectations.

While the *Officer Wellness Support Plan* clearly specific areas that offer a comprehensive approach to long-term solutions, the timeline, as noted in ¶384 and in the *Officer Wellness Support Plan*, is too broad as it references specific paragraphs with the timeline for project completion. There are aspects of the *Officer Wellness Support Plan* that indicate implementation phases but do not create substantive and definitive steps to support the priorities, nor demonstrate the processes to address the needs delivered in the *Officer Wellness Support Plan* and the needs assessment. Additionally, as mentioned in Independent Monitoring Report 4 and Independent Monitoring Report 5, the CPD needs to implement technological solutions to conduct the necessary comprehensive data analysis.

Progress in the Sixth Reporting Period

The *Officer Support Systems Plan* was presented to the IMT in an earlier reporting period. During the fifth reporting period, the IMT suggested that the Professional Counseling Division consider using a project management timeline solution tool to set tangible dates for implementation and delivery of the benchmarking milestones set in such a broad reaching plan. This was not completed during this reporting period.

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Again, to reach Full compliance in ¶384, the CPD will need to implement the technological advances that have been previously mentioned in prior reporting periods. Therefore, the IMT will continue to look to see if the technology tools via iCarol can also aid in this aspect of wellness.

Paragraph 384 Compliance Progress History

FIRST REPORTING PERIOD SEPTEMBER 1, 2019 – AUGUST 31, 2019 COMPLIANCE PROGRESS: Not Applicable	SECOND REPORTING PERIOD SEPTEMBER 1, 2019 – FEBRUARY 29, 2020 COMPLIANCE PROGRESS: None	THIRD REPORTING PERIOD MARCH 1, 2020 – DECEMBER 31, 2020 COMPLIANCE PROGRESS: Secondary
FOURTH REPORTING PERIOD JANUARY 1, 2021 – JUNE 30, 2021 COMPLIANCE PROGRESS: Secondary	FIFTH REPORTING PERIOD JULY 1, 2021 – DECEMBER 31, 2021 COMPLIANCE PROGRESS: Secondary	SIXTH REPORTING PERIOD JANUARY 1, 2022 – JUNE 30, 2022 COMPLIANCE PROGRESS: Secondary

Officer Wellness and Support: ¶385

> ***385.*** *As a component of CPD's Officer Support Systems Plan, CPD will develop and implement a communications strategy. The objectives of this communications strategy will be: a. to inform CPD members of the support services available to them; b. to address stigmas, misinformation, or other potential barriers to members using these services; and c. to emphasize that supporting officer wellness is an integral part of CPD's operations.*

Compliance Progress (Reporting Period: January 1, 2022, through June 30, 2022)

Preliminary:	***In Compliance*** **(THIRD REPORTING PERIOD)**
Secondary:	***In Compliance*** **(THIRD REPORTING PERIOD)**
Full:	***Not in Compliance***

During the sixth reporting period, the City and the CPD maintained Preliminary and Secondary compliance with ¶385.

To evaluate Preliminary compliance, we reviewed whether the CPD had a sufficient plan to develop and implement a communications strategy per ¶385. For Secondary compliance, we reviewed data and gathered information to determine whether the communications strategy, when put into practice, would be sufficient to meet the objectives of ¶385. To evaluate Full compliance with ¶385, we considered whether the CPD has implemented and sustained implementation of a communications strategy to effectively disseminate information, dispel misinformation, and emphasize the CPD's commitment to wellness. We also considered the extent to which the CPD is continuously assessing its communications strategy and making appropriate adjustments.

Progress before the Sixth Reporting Period

During the third reporting period, the City and the CPD achieved Preliminary and Secondary compliance by submitting the *Officer Wellness Support Plan* to develop and implement a communication strategy that would fulfill all requirements of ¶385. The *Officer Wellness Support Plan* includes sufficient communications strategies for both general dissemination of information regarding Professional Counseling Division (also known as the PCD) services and targeted outreach.

The CPD also submitted evidence of varied, extensive, and continued efforts to disseminate information that emphasizes member wellness, works to dispel misinformation, and informs members of wellness services available to them. However, because Full compliance requires demonstration of sustained efforts

under the communications strategy, we explained that the CPD must submit evidence that the CPD is assessing the effectiveness of the communications strategy and adjusting as needed. Additionally, we explained that, to reach Full compliance, the CPD must submit evidence that the communications are addressing stigmas and misinformation and expressing the CPD's continued commitment to supporting officer wellness.

In the fifth reporting period, the Professional Counseling Division made significant progress toward Full compliance with ¶385 by demonstrating dissemination of materials to promote several aspects of effective communication, including in various training curricula. However, the IMT had not seen the CPD's communication strategy sustained where documents are routinely updated, and where data is collected, analyzed, and addressed. The communications strategy, like the *Officer Wellness Support Plan*, should be utilized as a living document to ensure that relevant and current material is posted, pushed, and instructed.

Additionally, during the fifth reporting period, the IMT observed an Officer Wellness in-service training. Some participants were familiar with the Professional Counseling Division's services, and other participants were not. The Professional Counseling Division should strive to ensure all CPD personnel are aware of the available services. While the sworn staff receive information in various formats, the civilian staff were not as strategically reached through outreach efforts such as training and roll calls. The IMT stated the importance of the inclusion of civilian staff in those efforts as well to ensure education and awareness are equitably conveyed.

Progress in the Sixth Reporting Period

During the sixth reporting period, the Professional Counseling Division submitted the 2022 Communications strategy for review and comment. The 2022 Communication Strategy had also been discussed in the wellness monthly meetings. The IMT provided comments earlier during this reporting on this production, resulting in the CPD submitting a revised version. However, the communications strategy had not been fully implemented. The IMT looks forward to receiving continued evidence of materials demonstrating the implementation of the communication strategy through 2022 toward full compliance, which includes showing efforts to collect, analyze and address concerns raised by data.

As noted in a previous paragraph, the IMT did further stress the importance of the Professional Counseling Division providing details on how the non-sworn members gain access to the same information regarding services as they do not attend rollcall or in-service training like sworn personnel.

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Overall, the Professional Counseling Division Communications Strategy is a robust and living document and stands to be very broad reaching in depth. However, at this time, the IMT cannot recommend further compliance until the aforementioned areas and issues have been addressed.

Paragraph 385 Compliance Progress History

FIRST REPORTING PERIOD	SECOND REPORTING PERIOD	THIRD REPORTING PERIOD
SEPTEMBER 1, 2019 – AUGUST 31, 2019	SEPTEMBER 1, 2019 – FEBRUARY 29, 2020	MARCH 1, 2020 – DECEMBER 31, 2020
COMPLIANCE PROGRESS:	COMPLIANCE PROGRESS:	COMPLIANCE PROGRESS:
Not Applicable	None	Secondary
FOURTH REPORTING PERIOD	**FIFTH REPORTING PERIOD**	**SIXTH REPORTING PERIOD**
JANUARY 1, 2021 – JUNE 30, 2021	JULY 1, 2021 – DECEMBER 31, 2021	JANUARY 1, 2022 – JUNE 30, 2022
COMPLIANCE PROGRESS:	COMPLIANCE PROGRESS:	COMPLIANCE PROGRESS:
Secondary	Secondary	Secondary

Officer Wellness and Support: ¶386

386. *As part of this communications strategy, CPD will, at a minimum: a. make information about the support services available, on a continuing basis, to members on its internal websites; b. post information, including pamphlets and posters, in each CPD facility in areas frequented by officers; c. issue wallet-sized cards to every CPD member with contact information for the CPD support services available; d. inform and remind members about the CPD support services offered, including providing handouts with contact information, at the annual use of force training required by this Agreement, during Academy training of new recruits, and at in-service trainings relating to stress management and officer wellness; e. provide training to supervisory personnel regarding available CPD officer support services and strategies for communicating with officers about these services in a manner that minimizes any perceived stigma; and f. seek to identify and correct misperceptions among CPD members about receiving counseling services.*

Compliance Progress

(Reporting Period: January 1, 2022, through June 30, 2022)

Preliminary:	***In Compliance*** **(THIRD REPORTING PERIOD)**
Secondary:	***In Compliance*** **(THIRD REPORTING PERIOD)**
Full:	***Not in Compliance***

During the sixth reporting period, the City and the CPD maintained Preliminary and Secondary compliance with ¶386.

To evaluate Preliminary and Secondary compliance with ¶386, we reviewed the CPD's relevant policies and documents following the process described in the Consent Decree (¶¶626–41), which outlines applicable consultation, resolution, workout, and public comment periods. We also considered the CPD's training development, implementation, and evaluation. We looked at whether the CPD developed a plan to comply with ¶386 and whether the plan would be effective, when implemented.

To assess Full compliance with ¶386, we looked for evidence of continued outreach and communications related to wellness services. The communications should increase and maintain personnel awareness of services provided by the Professional Counseling Division (also known as the PCD). We also looked for qualitative and quantitative data necessary to assess personnel of all rank's awareness of Professional Counseling Division services and determine whether members are aware of how to access desired information regarding these services.

Progress before the Sixth Reporting Period

In previous reporting periods, the City and the CPD achieved Preliminary and Secondary compliance with ¶386 by submitting the CPD's communications strategy set out in the *Officer Wellness Support Plan*. We also reviewed materials produced pursuant to the communications strategy. While the communication materials reflected an earnest commitment to disseminating robust and accurate information regarding the CPD's wellness services, we stressed the importance of keeping posted information updated and replenished on a regular basis.

During the fifth reporting period, the CPD took significant steps to increase the awareness of the Professional Counseling Division (also known as the PCD) services and how to access those services. The *Officer Wellness Support Plan* and the communication strategy contain a strong foundation for ensuring that accessibility occurs, and the CPD continued to make information about the support services more available.

Furthermore, several forms of information were revised and disseminated to both internal and external members during the fourth and fifth reporting periods. The revised entities ranged from posted materials to numerous productions consisting of training materials, including the Officer Wellness in-service training, the supervisors training, and the Employees Assistance Program (EAP) training.

Last reporting period, the IMT encouraged the City and the CPD to evaluate the benefits of a technology specifically designed for CPD personnel and their families. This technology would place counseling information and employee wellness resources at the fingertips of CPD personnel. We also previously noted that, to achieve Full compliance with ¶386, the IMT would need to see evidence of adaptations of the communications strategy when needed; evidence that the CPD's efforts under this paragraph are effective in providing the information to members; and evidence of ongoing efforts to identify and address the topics and issues pertinent to CPD members' stigma and misperceptions related to seeking counseling services.

Progress in the Sixth Reporting Period

During this reporting period, the City and the CPD provided a draft of the Professional Counseling Division 2022 Communication Strategy for review. The IMT provided feedback and further iterated that the communication strategy was a great start to increase mental health awareness for CPD personnel. However, the IMT continues to seek confirmation on how the CPD and the Professional Counseling Division demonstrate their efforts to reach the non-sworn staff throughout the organization. While it has been clearly articulated that the Professional Counseling Division attends roll calls and conducts other trainings

where sworn personnel are the recipients of the information promoting wellness and support, the Professional Counseling Division has not yet demonstrated via evidence or process how it reaches or specifically targets its civilian/non-sworn personnel. Additionally, the IMT looks forward to seeing evidence of same as this communication strategy is a means of demonstrating a comprehensive effort to inform the entire membership of CPD. It has been articulated during the monthly meetings and virtual site visits that the roll call visits and various facets of training are ongoing and serve as a vehicle by which to inform the sworn membership. In future reporting periods, the IMT would like to see the schedule of roll calls, attendance, and receipts and records of other appearances that offer such a means to identify and correct misperceptions among all CPD members about receiving counseling services.

The communications strategy further references the dissemination of printed material in the various district locations and other facilities. It was noted during the virtual site visit that this material was printed in significant quantity. The IMT encourages the Professional Counseling Division to ensure the information is comprehensive enough, but not so specific that the materials would require updated changes before the volume of materials could be disseminated or depleted as members of the Professional Counseling Division referenced the costs associated with a high volume of print material.

With the implementation of iCarol, and continued discussions of technology needs, the IMT encourages the Professional Counseling Division and the CPD to evaluate possible considerations of an app that puts the information at the officer's fingertips. With the addition of the Communications Director in the Professional Counseling Division, this app would possibly ensure that the new pushes of information released in these periodic updates would be routinely released and pushed throughout the app as well, with the ability to add new material and to remove material that is no longer relevant with greater ease and less material costs. The wallet size card would become the comprehensive app on any smart device in this digital age.

As trainings address several areas regarding the dissemination of information and support services, the IMT looks forward to receipt of continued classroom and training attendance data.

The IMT has inquired about the Professional Counseling Division's ability to determine the effectiveness of print materials versus digital material in this digital environment. The ability to determine if its efforts are cost-effective could further inform the Professional Counseling Division where and how to deploy its information and resources.

During this reporting period, the Professional Counseling Division did submit the *Employees Assistance Program Recruit Training* curriculum for comment and

review. Specific to ¶¶412 and 414 of the Consent Decree, the curriculum does address the provision of information and services "during Academy training of new recruits." Having been an original submission in 2020, the Office of the Illinois Attorney General further commented that it appreciated the CPD's efforts to incorporate the Office of the Illinois Attorney General's comments into the training curriculum and found the training to be very well done.

Additionally, the CPD also submitted evidence of the 95% completion of the in-service training for Use of Force to demonstrate secondary compliance with many paragraphs of the Consent Decree, including ¶386.

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The 2022 Communication Strategy is not fully implemented, and we are over halfway through the 2022 calendar year. The Communication Strategy includes a communications calendar by month that provides a virtual representation of the year, but some potential resources remain unutilized, such as digital, videos, and email. Utilizing these resources may also allow for creative opportunities to further reach the greater CPD membership.

The IMT cannot begin to consider Full compliance for ¶386 without evidence of the implementation of the comprehensive wellness plan and strategy produced to show outreach that can be quantitatively and qualitatively measured.

Paragraph 386 Compliance Progress History

FIRST REPORTING PERIOD	SECOND REPORTING PERIOD	THIRD REPORTING PERIOD
SEPTEMBER 1, 2019 – AUGUST 31, 2019	SEPTEMBER 1, 2019 – FEBRUARY 29, 2020	MARCH 1, 2020 – DECEMBER 31, 2020
COMPLIANCE PROGRESS:	COMPLIANCE PROGRESS:	COMPLIANCE PROGRESS:
Not Applicable	None	Secondary

FOURTH REPORTING PERIOD	FIFTH REPORTING PERIOD	SIXTH REPORTING PERIOD
JANUARY 1, 2021 – JUNE 30, 2021	JULY 1, 2021 – DECEMBER 31, 2021	JANUARY 1, 2022 – JUNE 30, 2022
COMPLIANCE PROGRESS:	COMPLIANCE PROGRESS:	COMPLIANCE PROGRESS:
Secondary	Secondary	Secondary

Officer Wellness and Support: ¶387

387. *Within 180 days of the Effective Date, CPD will develop and implement a roll call training to explain and address the effects on Firearm Owners Identification ("FOID") card eligibility, if any, when a CPD member seeks or receives CPD support services, including, but not limited to, counseling and mental health treatment.*

Compliance Progress

(Reporting Period: January 1, 2022, through June 30, 2022)

Preliminary:	***In Compliance*** **(SECOND REPORTING PERIOD)**
Secondary:	***In Compliance*** **(THIRD REPORTING PERIOD)**
Full:	***Not in Compliance***

During the sixth reporting period, the City and the CPD maintained Preliminary and Secondary compliance with ¶387.

To assess Preliminary and Secondary compliance, we reviewed information to determine whether the roll-call training was sufficient to explain and address the effects per ¶387. To evaluate Full compliance with ¶387, we sought to review a variety of data sources to determine whether the CPD continued to provide the FOID card training as necessary to ensure members and recruits are aware of the effects support services has on FOID card eligibility.

Progress before the Sixth Reporting Period

In previous reporting periods, the City and the CPD achieved Preliminary and Secondary compliance with ¶387 by developing a FOID card roll-call training, providing documentation showing that 99% of eligible employees had received the training and providing post-training survey data indicating the CPD members found the training helpful. At the close of the third reporting period, we expressed that the CPD should provide evidence that the training continues to be implemented. While the communication strategy submitted under other paragraphs lists FOID-related messaging, no evidence of this plan being implemented was provided to the IMT. We explained that to reach Full compliance, the CPD would need to provide evidence of consistent communications with CPD members regarding FOID eligibility.

During the fifth reporting period, the IMT reviewed several productions that explained and addressed the effects of the FOID card eligibility when CPD members are seeking counseling and mental health treatment. This was evidenced in several topics of training.

We explained that to reach Full compliance, however, the FOID card information should be presented in the appropriate lesson plans. The IMT advised the CPD to establish a procedure to ensure that the messages are pushed in a manner that provides regular and routine messaging. The IMT would remind CPD that the FOID card should be compiled with other beneficial counseling and mental health services information to ensure that the desire to seek services is not deterred.

Progress in the Sixth Reporting Period

The CPD and Professional Counseling Division (also known as the PCD) have produced several trainings during this reporting period that address the phone card eligibility and the effects when members seek and receive CPD support services. Several of these trainings have ranged from the document/curriculum revision stage to currently being instructed. The IMT received evidence of attendance of completed instruction in these areas. As mentioned in ¶386, the IMT would like to see data that mirrors roll call training as well. Furthermore, as noted in the previous reporting period, the critical nature of this topic necessitates that it is not only referenced but the evidence supports the ongoing training and prescribe presentations.

Additionally, the CPD produced the 2022 CIT In-Service Training, which includes a module that is specific to officer wellness. Module #6 in this curriculum addresses the issue of FOID card revocation, reinstatement and the circumstances that impact an officer's possession of the FOID card for both voluntary and involuntary mental health treatment.

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The IMT awaits the continuous output of information showing when the roll call training is taught and the various topics from instruction to completion indicating the attendance for related courses.

Paragraph 387 Compliance Progress History

FIRST REPORTING PERIOD	SECOND REPORTING PERIOD	THIRD REPORTING PERIOD
SEPTEMBER 1, 2019 – AUGUST 31, 2019	SEPTEMBER 1, 2019 – FEBRUARY 29, 2020	MARCH 1, 2020 – DECEMBER 31, 2020
COMPLIANCE PROGRESS:	COMPLIANCE PROGRESS:	COMPLIANCE PROGRESS:
None	Preliminary	Secondary
FOURTH REPORTING PERIOD	**FIFTH REPORTING PERIOD**	**SIXTH REPORTING PERIOD**
JANUARY 1, 2021 – JUNE 30, 2021	JULY 1, 2021 – DECEMBER 31, 2021	JANUARY 1, 2022 – JUNE 30, 2022
COMPLIANCE PROGRESS:	COMPLIANCE PROGRESS:	COMPLIANCE PROGRESS:
Secondary	Secondary	Secondary

Officer Wellness and Support: ¶388

388. *As a component of the Officer Support Systems Plan, by January 1, 2020, CPD will develop and implement a comprehensive suicide prevention initiative ("Suicide Prevention Initiative"). In designing the Suicide Prevention Initiative, CPD will examine similar initiatives implemented in other large departments and incorporate guidance available from law enforcement professional associations. The Suicide Prevention Initiative will be overseen by a licensed mental health professional working in conjunction with a command staff member.*

Compliance Progress

(Reporting Period: January 1, 2022, through June 30, 2022)

Preliminary:	***In Compliance*** **(THIRD REPORTING PERIOD)**
Secondary:	***Not in Compliance***
Full:	***Not Yet Assessed***

During the sixth reporting period, the City and the CPD maintained Preliminary compliance with ¶388.

To evaluate Preliminary compliance with ¶388, we reviewed the *Officer Wellness Support Plan* to determine whether that effectively addressed and implemented a suicide prevention initiative. For Secondary compliance with ¶388, we reviewed data sources and considered, among other things, feedback from clinicians and the CPD members to determine whether the services provided by the CPD are proactively and reactively meeting the wellness needs of members.

Progress in the Sixth Reporting Period

In previous reporting periods, the City and the CPD achieved Preliminary compliance with ¶388 by submitting a variety of CPD documents, including the *Officer Wellness Support Plan*, communications regarding expanded Employee Assistance Program services, and drafts of the Traumatic Incident Stress Management Plan directive. The IMT has acknowledged that there is currently no "best practice" approach to use as a benchmark to measure the CPD's efforts related to suicide prevention. Recognizing this, the CPD worked to create a holistic wellness program to address the underlying concerns of ¶388. This holistic approach takes the place of a stand-alone suicide prevention initiative, which is appropriate because death by suicide is a complicated outcome rooted in factors still poorly understood.

The CPD submitted the Professional Counseling Division's *2021 Report to the Superintendent* in the fourth reporting period. However, given the unavailability of other data regarding the consumption and provision of services, we explained that the City and the CPD had not yet reached Secondary compliance. We hoped to continue to see feedback loops between CPD members and the Professional Counseling Division (also known as the PCD); to learn more about the CPD's post-mortem assessment process in the horrific incident of officer death by suicide; to see evidence of efforts to address the information the Professional Counseling Division is receiving from these sources; and to see the implementation of a technology solution that will allow the CPD to empirically assess the provision and consumption of services.

During the fifth reporting period, the CPD further promoted overall member health and wellness by submitting a lesson plan and policies for review, and we noted we also looked forward to reviewing the anticipated Communications Plan with push alerts in 2022.

Additionally, during a virtual site visit with the Director of the Professional Counseling Division, he discussed the process of conducting a forensic analysis when incidences of suicide occur. However, the CPD had not shared any data to indicate evidence of an analytical assessment for aiding in the determination of causes related to suicide.

The lack of technology solutions also created a barrier to collecting and empirically analyzing the data that is needed to properly assess the critical nature of suicide prevention and intervention. While prevention awareness is a significant facet, having a holistic, data-based approach would allow the CPD to develop a strategy aligned with best practices, preventive measures, and wellness solutions to address a growing issue among law enforcement agencies throughout the United States.

The IMT noted we looked forward to receiving additional materials pertaining to the wellness initiatives in the sixth reporting period, and that to reach Full compliance, we would look for the implementation of critical technology solutions to allow for data collection pertinent to Officer Wellness and Support.

Progress in the Sixth Reporting Period

During this reporting period, the CPD and the Professional Counseling Division submitted productions on the Suicide Prevention Initiative as well as the CIT In-Service training for review. The Office of the Illinois Attorney General commended the CPD for its effort and development of the Suicide Prevention Initiative. Several comments for areas of improvement were made by both the Office of the Illinois Attorney General and the IMT. The Suicide Prevention Initiative will be overseen

by the Director of the Professional Counseling Division. As a component of the officer wellness support plan, the Suicide Prevention Initiative introduced a number of national resources the Professional Counseling Division identified as best practices in an effort to create a model that supports and sustains the CPD's framework to care for its personnel. Ranging from the Office of Bureau of Justice Assistance to the US Department of Defense, the Professional Counseling Division addressed topics that included Traumatic Incident Stress Management Program training, programming, and pre- and post-vention. Additionally, they addressed expansion of the internal resources, which includes the additional appropriated 11 clinician positions.

Additionally, the CPD also submitted the CIT (40-hour) training as well. During the Sixth Reporting Period, the CPD submitted the 2022 CIT In-Service Training. The 6 module curriculum clearly offers the platform of the national overview of CIT. Module 6 offers additional information that is specific to officer wellness thus, recognizing the importance of mental health and wellness for the employee who may be impacted by the experience or life experiences in general. As such, it walks through the Traumatic Incident Stress Management Program, the FOID card and circumstantial expectations while placing emphasis on getting the confidential help that is needed and availing internal and external resources.

During this reporting period, it was further clarified during a virtual site visit with the Director of the Professional Counseling Division on the extent and role the unit has when conducting a forensic analysis when incidence of suicide occurs. The efforts of the Professional Counseling Division are in very rudimentary stages—though referenced in smaller circles, no efforts have been made to approach this analytical, yet delicate process from a broader stance, which would include other key participants such as detectives and other key subject matter experts. With the significance of officer suicides throughout the national law-enforcement community, the IMT appreciates the Professional Counseling Division's acknowledgment of the need for a detailed and comprehensive and inclusive approach to addressing this very critical issue. During this reporting period, the IACP addressed this critical topic and offered a brief roadmap of how to proceed and who should be involved in same.[1] Additionally, the IMT looks forward to reviewing and discussing the preliminary findings of this post-vention endeavor.

The IMT awaits the review of the refined Suicide Prevention Initiative and looks forward to the advanced implementation of same. The Suicide Prevention Initiative includes a broad spectrum of components targeted to address the issue surrounding this pivotal topic of suicide to include training, policy, communications, programming, procedures, memorial consideration, and

[1] *Thompson, J. Focus on Officer Wellness: Investigating Police Suicide*. POLICE CHIEF MAGAZINE, IACP, https://www.policechiefmagazine.org/focus-on-officer-wellness-investigating-police-suicide/.

reporting amid the continuity of operations (as noted in the initiative). The Initiative was inclusive of the various units that make up the Professional Counseling Division and identifies their value and roles along with other partners, support groups, mental health providers, command, and training staff.

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The data reports as noted in the previous reporting periods will be an essential component to the forensic analyses, pre-and post-vention analyses and will aid in building a framework to establish a model platform derived from what the Professional Counseling Division has identified in the Department of Defense's robust suicide prevention model. The IMT has not seen sufficient evidence, coupled with the Office of the Illinois Attorney General's comments dated on May 19, 2022 to support secondary compliance at this time.

Paragraph 388 Compliance Progress History

FIRST REPORTING PERIOD	SECOND REPORTING PERIOD	THIRD REPORTING PERIOD
SEPTEMBER 1, 2019 – AUGUST 31, 2019	SEPTEMBER 1, 2019 – FEBRUARY 29, 2020	MARCH 1, 2020 – DECEMBER 31, 2020
COMPLIANCE PROGRESS:	COMPLIANCE PROGRESS:	COMPLIANCE PROGRESS:
Not Applicable	None	Preliminary
FOURTH REPORTING PERIOD	**FIFTH REPORTING PERIOD**	**SIXTH REPORTING PERIOD**
JANUARY 1, 2021 – JUNE 30, 2021	JULY 1, 2021 – DECEMBER 31, 2021	JANUARY 1, 2022 – JUNE 30, 2022
COMPLIANCE PROGRESS:	COMPLIANCE PROGRESS:	COMPLIANCE PROGRESS:
Preliminary	Preliminary	Preliminary

Officer Wellness and Support: ¶389

389. *At least annually, the Director of the Professional Counseling Division will provide a written report to the Superintendent, through his or her chain of command, that includes anonymized data regarding support services provided to CPD members, how long it takes CPD members requesting counseling services to receive them, and other metrics related to the quality and availability of these services. This report will also contain resource, training, and policy recommendations necessary to ensure that the support services available to CPD members reasonably address their identified needs and comply with the Officer Support Systems Plan.*

Compliance Progress

(Reporting Period: January 1, 2022, through June 30, 2022)

Recurring Schedule: At Least Annually ☐ **Met** ☑ **Missed**

Preliminary: ***Not in Compliance***
Secondary: ***Not in Compliance***
Full: ***Not Yet Assessed***

During the fourth reporting period, the City and the CPD fell out of Preliminary compliance with ¶389 and remained out of compliance during the sixth reporting period.

To assess Preliminary compliance with ¶389, we determined whether the Director of the Professional Counseling Division (also known as the PCD) provided a written report to the Superintendent, which incorporates the data outlined in this paragraph.

Progress before the Sixth Reporting Period

In previous reporting periods, the City and the CPD achieved Preliminary compliance with ¶389, largely due to the Professional Counseling Division's manual efforts to create weekly reports. However, the IMT had stressed the importance of a technology solution to enable the Professional Counseling Division to create reports so that accurate data on all points required by the paragraph could be obtained. In the fourth reporting period, the City and the CPD had not acquired, implemented, or provided evidence of significant progress toward obtaining any such technology, and thus, they fell out of Preliminary compliance with ¶389.

The CPD previously provided the Professional Counseling Division's *2021 Report to the Superintendent* that details the current state of Professional Counseling Division's officer-wellness initiatives. However, the report did not provide data regarding support services provided to CPD members, how long it takes CPD members requesting counseling services to receive them, and other metrics related to the quality and availability of these services.

Maintaining Preliminary compliance with ¶389 requires a written report with anonymized data to be provided annually to the Superintendent, which incorporates all the data outlined by ¶389. These metrics include a basic efficiency measure to assess the time between a service request and the service rendered.

During the fifth reporting period, the Professional Counseling Division (also known as the PCD) took many efforts to identify resources, partners, and revise policies. However, the IMT continued to emphasize the priority of ensuring that the benefits of those resources can be measured. We noted the importance of the pillars of wellness, building resilience, and shifting culture, as presented in the working session with the IMT—*Roadmap to Operational Wellness*. In the summary conclusion, the CPD acknowledged its general commitment but indicated that implementation had been lacking as they have not gained enough traction to drive its desired outcomes.

Progress in the Sixth Reporting Period

There has been tremendous work by the Professional Counseling Division regarding wellness in support for the members of the CPD. Pending the *2022 Report to the Superintendent*, the IMT reviewed and re-evaluated the 2021 Report to the Superintendent – Wellness Strategy Presentation that was presented during the fifth reporting period.

The 2021 report articulates that the Wellness Counsel of America (WELCOA) Benchmark evaluates its current performance in various workplace wellness areas. Ranging from work environment to leadership needs, empowerment, family engagement, and more, the benchmark yielded seven areas of benchmarking wellness. The benchmarking analysis emphasized the need to collect specific data points that captured the collective roll-out and implementation of a strategy that supports additional key areas that impact employee wellness and the correlation to vision and purpose in the values of the employees.

This benchmarking effort and the focus groups sessions that included members of the ranks of police officers, sergeants, lieutenants, and captains yielded several key recommendations as noted in the 2021 Report to the Superintendent, yet concluded with a notation that, "implementation has been lacking and adherence to strategic priorities had not yet gained enough traction to drive design

outcomes." The conclusion of that report further articulated that, "the CPD must ensure that the strategic plan is clear, actionable and reinforces values of wellness." The next steps noted "were prioritizing projects and initiatives outlined in that report to support implementation of a formal wellness strategy."

The benchmarking efforts, wellness support plan, the Report to the Superintendent, Communications Strategy, and Roadmap to Operational Compliance each identify the goals, objectives, and steps to achieve the optimal targets for overall organizational wellness. However, each area noted is premised on those data points produced through a technological means that supports the mission, vision, and the desired outcomes needed to truly benchmark success efficiencies and effectiveness of these noted initiatives, strategies roadmaps and reports.

Collectively, these platforms of wellness are certainly a robust approach to employee wellness and the IMT looks forward to seeing these carried out in a way that could truly reflect best practices for the greater law enforcement community.

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The City and the CPD did not reach Preliminary compliance, however, because they have yet to complete the *2022 Report to the Superintendent*. The IMT looks forward to reviewing the *2022 Report* in the next reporting period.

Paragraph 389 Compliance Progress History

FIRST REPORTING PERIOD	SECOND REPORTING PERIOD	THIRD REPORTING PERIOD
SEPTEMBER 1, 2019 – AUGUST 31, 2019	SEPTEMBER 1, 2019 – FEBRUARY 29, 2020	MARCH 1, 2020 – DECEMBER 31, 2020
COMPLIANCE PROGRESS:	COMPLIANCE PROGRESS:	COMPLIANCE PROGRESS:
Not Applicable	None	Preliminary

FOURTH REPORTING PERIOD	FIFTH REPORTING PERIOD	SIXTH REPORTING PERIOD
JANUARY 1, 2021 – JUNE 30, 2021	JULY 1, 2021 – DECEMBER 31, 2021	JANUARY 1, 2022 – JUNE 30, 2022
COMPLIANCE PROGRESS:	COMPLIANCE PROGRESS:	COMPLIANCE PROGRESS:
None	None	None

Officer Wellness and Support: ¶390

390. *CPD currently employs three licensed mental health professionals and a supervising psychologist who serves as the Director of CPD's Professional Counseling Division. CPD offers free counseling services to CPD members through the Professional Counseling Division and through external referrals in certain circumstances. CPD will expand its capacity to provide the counseling services to CPD members as set forth in this Agreement.*

Compliance Progress

(Reporting Period: January 1, 2022, through June 30, 2022)

Preliminary:	***In Compliance*** **(FOURTH REPORTING PERIOD)**
Secondary:	***In Compliance*** **(FOURTH REPORTING PERIOD)**
Full:	***Not in Compliance***

During the sixth reporting period, the City and the CPD maintained Preliminary and Secondary compliance with ¶390.

To assess Preliminary compliance with ¶390, we reviewed the CPD's relevant policies and documents following the process described in the Consent Decree (¶¶626–41), which outlines applicable consultation, resolution, workout, and public comment periods. For Secondary compliance with ¶390, we reviewed records sufficient to show that the CPD has qualified personnel fulfilling the responsibilities required by ¶390. To evaluate Full compliance, we considered whether the CPD has allocated sufficient resources to create, staff, fill, and maintain positions with qualified personnel as necessary to fulfill the requirements of the paragraph and the Consent Decree.

Progress before the Sixth Reporting Period

In previous reporting periods, the City and the CPD achieved Preliminary compliance with ¶390 by submitting the *Officer Wellness Support Plan*, the Professional Counseling Division (also known as the PCD) Standard Operating Procedure (SOP) 19-01, and directive E06-01. Together, these outline the Professional Counseling Division's staffing and resource needs and demonstrate efforts to ensure those resources are utilized appropriately.

The City and the CPD achieved Secondary compliance with ¶390 in the fourth reporting period by hiring additional, qualified clinicians to better address the needs of CPD members. To achieve Full compliance, however, the IMT explained that the City and the CPD will not only need to implement data solutions to track

and assess member's wellness needs and use of Professional Counseling Division professional services, but they will also need to respond to the data appropriately.

During the fifth reporting period, the CPD provided the IMT with a status update. At the time, the CPD employed a total of 13 clinicians, including the Director and the Assistant Director. During a recent budget process, the CPD received approval to hire 11 additional counselors in the Professional Counseling Division. The IMT was informed of a budgetary approval to increase the mental-health practitioners with the desire to decentralize the counseling staff and designate districts for the individual counselors in the future, where they will be housed as well. The Professional Counseling Division informed the IMT of their goal to begin the hiring process in early 2022.

Additionally, the IMT was advised that the clinicians are currently visiting designated district stations and roll calls to build trust, familiarity, and a greater rapport with the members at those locations. The Professional Counseling Division counselors provided the IMT with anecdotal examples and references to their efforts to building trust with the members of the CPD during district visits and roll calls.

As noted in earlier paragraphs and mentioned in the needs assessment, there is no specific formula or best-practice framework that addresses ratio of counselors per member. The IMT stressed the importance of the CPD and the City to evaluate the benefits of a working model or conduct a staffing study to determine the optimal number of licensed practitioners needed to meet the organizational needs considering the size of the agency; the external resources and services provided; and the efficiencies that are noted in the Officer Wellness Support Plan; the Report to the Superintendent, and the communications strategy. These factors will strongly contribute to the IMT re-evaluating the CPD's compliance with ¶390.

Progress in the Sixth Reporting Period

During the fifth reporting period, the City had approved the hiring of 11 additional mental health clinicians for the Professional Counseling Division. During the various virtual site visits in this reporting period, the IMT has been apprised of the constant evolution of the employment of the newly allocated positions. The Professional Counseling Division indicated the challenges it was facing in order to fill the new allocations. Though anecdotal, the potential factors referenced did mirror some of the similar concerns other agencies are facing with regard to hiring in general—the national climate and the current sentiment around law-enforcement along with pay issues. The IMT does encourage the Professional Counseling Division and the City to consider a strategic approach to addressing this issue through a collaborative process that includes the Professional Counseling Division and the City's Department of Human Resources. The IMT does see the

value in having the Director engaged in that process or providing input from some members of the Employee Assistance Program as this is a specific and specialized need that requires certain certifications and other criteria prior to employment considerations. Additionally, it may benefit the City to review benchmarking options regarding a salary and related benefits analysis as these positions may be competing with the current market value and other current market conditions for similar professions.

During the recent virtual site visit with the Director of the Professional Counseling Division, the IMT was informed that three conditional offers were being made and that the Southside District Station was open and fully functional, which allowed for clinicians, peer support, alcohol and drug counselors, and chaplains to have greater access to meet with staff and those in need of services. Thus, removing several barriers that may have existed earlier to include accessibility, location, and travel. The IMT was informed that the Northwest District is in the proposal phase to be presented during the proposed budget process with anticipation and hopes for approval to move forward in the upcoming budget year. During this reporting period, the Professional Counseling Division did present productions of the Notification for job Opportunities (NOJO) for compliance records.

The IMT continues to applaud the CPD's efforts to expand and employ personnel with needed skills and talents necessary to provide adequate counseling services to the CPD membership. The IMT will continue to seek the evidence that announces the clinicians as they are onboarded with the Professional Counseling Division. During this reporting period, the City and the CPD have maintained both Preliminary and Secondary compliance.

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During the most recent site visit, the discussion of being able to produce records that support the various services that are provided to the membership is viable. The implementation of the iCarol system should capture some of the information necessary to produce the evidence needed for several data-critical paragraphs. It was also discussed with the IMT that prior restrictions for not adequately reporting via notes and other records on counseling services provided no longer exist. Since the Professional Counseling Division has the ability to record and maintain the records without Health Insurance Portability and Accountability Act (HIPPA) or software concerns the IMT will look forward to this collective anonymous data that helps to demonstrate the totality of services that are provided there either free or via external referrals. This will enable the Professional Counseling Division to have a greater understanding of caseload and workload realities as well.

The City and the CPD maintain Secondary compliance as the implementation of iCarol, data collection and piloting have been delayed.

Paragraph 390 Compliance Progress History

FIRST REPORTING PERIOD	SECOND REPORTING PERIOD	THIRD REPORTING PERIOD
SEPTEMBER 1, 2019 – AUGUST 31, 2019	SEPTEMBER 1, 2019 – FEBRUARY 29, 2020	MARCH 1, 2020 – DECEMBER 31, 2020
COMPLIANCE PROGRESS:	COMPLIANCE PROGRESS:	COMPLIANCE PROGRESS:
Not Applicable	Not Applicable	Status Update

FOURTH REPORTING PERIOD	FIFTH REPORTING PERIOD	SIXTH REPORTING PERIOD
JANUARY 1, 2021 – JUNE 30, 2021	JULY 1, 2021 – DECEMBER 31, 2021	JANUARY 1, 2022 – JUNE 30, 2022
COMPLIANCE PROGRESS:	COMPLIANCE PROGRESS:	COMPLIANCE PROGRESS:
Secondary	Secondary	Secondary

Officer Wellness and Support: ¶391

391. *CPD will initially increase the staffing level in its Professional Counseling Division to at least ten full-time licensed mental health professionals (or a combination of full- and part-time licensed mental health professionals capable of providing an equivalent amount of weekly clinical therapy hours) by January 1, 2020. CPD may contract with licensed mental health professionals external to CPD on an interim basis while CPD completes the process for creating these new positions and hiring individuals to fill them. Additional changes to staffing levels will be made consistent with the results of the needs assessment and Officer Support Systems Plan.*

Compliance Progress

(Reporting Period: January 1, 2022, through June 30, 2022)

Preliminary:	***In Compliance*** **(SECOND REPORTING PERIOD)**
Secondary:	***In Compliance*** **(THIRD REPORTING PERIOD)**
Full:	***Not in Compliance***

During the sixth reporting period, the City and the CPD maintained Preliminary and Secondary compliance with 391.

To evaluate Preliminary and Secondary compliance with ¶391, we considered the staffing levels of the Professional Counseling Division (also known as the PCD), the demand for services, and the types of services provided by the Professional Counseling Division. While the CPD can contract with mental-health professionals under the paragraph, we considered whether the CPD had sustainably staffed and developed the Professional Counseling Division, without the need for contractors.

For Full compliance with this paragraph, the CPD must maintain appropriate staffing levels, and demonstrate a continued ability to assess and address staffing and resources needs, as informed by a fully implemented software solution that adequately tracks necessary data. The long-term objective for the CPD is to be able to evaluate the wellness needs of members to ensure that the supply of services is efficiently and effectively addressing those needs.

Progress before the Sixth Reporting Period

In previous reporting periods, the City and the CPD achieved Preliminary and Secondary compliance with ¶391 by hiring additional clinicians, expanding the resources of the Professional Counseling Division, maintaining staff levels, and strategically assigning its clinical workforce. Additionally, the Professional Counseling Division submitted evidence of 187 peer support members, five drug

and alcohol counselors, and six chaplains providing wellness services to CPD personnel.

During the fifth reporting period, the IMT stressed the importance of the CPD to be able to determine what steps, personnel, and tools will create a proper span of control over the entire wellness unit in the future. This assessment will ensure that all resources and services are efficiently and effectively managed. To effectively achieve this, the CPD needed to transition from manually tracking data to a more technologically sound approach to analyzing the data to help align the appropriate application of staffing resources pending the decentralization of the clinical staff. This will allow for the Professional Counseling Division to determine if greater resources are needed at some district locations compared to other locations. Once the applicable technological solutions are in place, the City and the CPD will be able to determine if additional resources are needed and further appreciate the work being done by the Professional Counseling Division.

While the City and the CPD had maintained Preliminary and Secondary compliance with this paragraph in previous reporting periods, the IMT explained we would continue to look for data-driven technological advancements to obtain Full compliance. The CPD did not reach Full compliance, as it had not obtained and implemented technology necessary to capture data regarding support services provided to CPD members; how long it takes CPD members requesting counseling services to receive them; and other metrics related to the quality and availability of these services.

Progress in the Sixth Reporting Period

As mentioned in ¶390, the IMT appreciates to continue the efforts to employ and expand the CPD in order to meet the growing demands for counseling services of the members of the CPD. Currently, 13 members of the counseling unit has been reduced to 11 due to attrition. This also includes the Director of the Professional Counseling Division. The additional 11 are currently being actively recruited. However, the challenges previously noted in ¶390 do and will require a more strategic approach to employing additional clinicians. This may be an opportunity for the CPD and the Professional Counseling Division to reimagine what potential services could look like to include possible partnerships with the external resource providers for part-time assistance as the need arises should the candidate pool continue to decrease. The IMT does encourage the CPD to seek opportunities to have the Director or other designees in strategic planning discussions regarding recruitment efforts for the specifically skilled individuals they are seeking.

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Additionally, because of the unique skill set desired in this talent search, the IMT encourages the CPD to look for possible incentives to meet the growing demands for such needed services as well. As noted in the previous reporting period, staffing, data, workload, caseload, services, capacity etc., will be key going forward to ensure that not only are efficiency and effectiveness of the services provided, but to also ensure that there is the adequate span of control given the allocation of 11 additional positions that will be more decentralized than they had been in the past. Some of these issues will be addressed via technological solutions afforded via iCarol. However, the IMT encourages the Professional Counseling Division and the CPD to intentionally focus on what is being measured in terms of both output and outcomes. Both efficiencies and effectiveness will matter while managing 11 additional employees.

Again, the IMT will continue to look for the advancement of the data driven technology to reach for compliance.

Paragraph 391 Compliance Progress History

FIRST REPORTING PERIOD	SECOND REPORTING PERIOD	THIRD REPORTING PERIOD
SEPTEMBER 1, 2019 – AUGUST 31, 2019	SEPTEMBER 1, 2019 – FEBRUARY 29, 2020	MARCH 1, 2020 – DECEMBER 31, 2020
COMPLIANCE PROGRESS:	COMPLIANCE PROGRESS:	COMPLIANCE PROGRESS:
Not Applicable	Preliminary	Secondary
FOURTH REPORTING PERIOD	**FIFTH REPORTING PERIOD**	**SIXTH REPORTING PERIOD**
JANUARY 1, 2021 – JUNE 30, 2021	JULY 1, 2021 – DECEMBER 31, 2021	JANUARY 1, 2022 – JUNE 30, 2022
COMPLIANCE PROGRESS:	COMPLIANCE PROGRESS:	COMPLIANCE PROGRESS:
Secondary	Secondary	Secondary

Officer Wellness and Support: ¶392

392. *CPD will ensure that its staff of licensed mental health professionals includes individuals with specialized training in one or more of each of the following subjects: posttraumatic stress disorder, domestic violence, alcohol and substance abuse, anger management, depression, and anxiety.*

Compliance Progress

(Reporting Period: January 1, 2022, through June 30, 2022)

Preliminary:	***In Compliance*** **(FOURTH REPORTING PERIOD)**
Secondary:	***In Compliance*** **(FOURTH REPORTING PERIOD)**
Full:	***Not in Compliance***

During the sixth reporting period, the City and the CPD maintained Preliminary and Secondary compliance with ¶392.

To assess Preliminary compliance with ¶392, we reviewed the CPD's relevant policies and documents following the process described in the Consent Decree (¶¶626–41), which outlines applicable consultation, resolution, workout, and public comment periods. For Secondary compliance, we reviewed records that are sufficient to show that the CPD has qualified personnel fulfilling the responsibilities required by ¶392. We also considered whether the CPD has allocated sufficient resources to create, staff, fill, and maintain positions with qualified personnel as necessary to fulfill the requirements of the paragraph and Consent Decree.

To determine Full compliance with ¶392, we sought to determine whether CPD's licensed mental health professionals have the requisite specialized training required by this paragraph.

Progress before the Sixth Reporting Period

In previous reporting periods, the City and the CPD achieved Preliminary and Secondary compliance with ¶392 by submitting the *Officer Wellness Support Plan* and the CPD's Standard Operating Procedure (SOP) 19-01, which include the requirements of this paragraph.

At the end of the fifth reporting period, the Professional Counseling Division (the PCD) had 13 licensed mental-health professionals, including the Director and Assistant Director, employed during this reporting period. The credentials of the clinicians as presented during the virtual site visit reflect the diverse skill sets needed for the demands of the CPD members seeking related services.

During a virtual site visit during the fifth reporting period, the Director of the Professional Counseling Division also shared that while one-on-one in-person sessions are preferred, the Professional Counseling Division can also provide some basic tele-health services when applicable. During this discussion, other clinicians in the Professional Counseling Division offered the top three areas in which CPD members require services, and stated the staff had expertise in those areas, as they were not outside the scope articulated in ¶392.

The credentials of these clinicians are presented in their respective bios with specialized training. This is further conveyed in the CPD's wellness page of its website. The IMT recommended that the CPD seek opportunities via professional associations and law-enforcement membership organizations to ensure professional training beyond the minimum requirements necessary to maintain certification are afforded to the members of the Professional Counseling Division.

The City and the CPD had made progress toward but did not reach Full compliance in the fifth reporting period, as the IMT expects to review the areas of continuing education, training, and continued certification and the employment of the allotted positions.

Progress in the Sixth Reporting Period

Due to the diverse needs of the members of the CPD, it is critically important that the CPD has qualified counselors with credentials that reflect specialized training in the areas stipulated, but not limited to ¶392. During this reporting period, the Professional Counseling Division has lost two of the licensed clinicians due to retirements. They are working to fill those vacancies in the near future.

During several of the monthly meetings in the previous reporting period, there was some specific conversation that recognized that there are service needs that do sometimes require a level of specific certification(s) or specialized training that may be beyond the level of service that the clinicians could or should provide due to the intensity of circumstance or complexity of treatment. The example provided pertained to food addictions. The specialized training regarding addictions may be afford it but the critical nature and specificity of this particular level of treatment requires the need for a referral to ensure the CPD member is getting the best possible service providers available, which extends beyond a level of service that should be provided by the Professional Counseling Division.

Paragraph 392 Compliance Progress History

FIRST REPORTING PERIOD
SEPTEMBER 1, 2019 – AUGUST 31, 2019
COMPLIANCE PROGRESS:
Not Applicable

SECOND REPORTING PERIOD
SEPTEMBER 1, 2019 – FEBRUARY 29, 2020
COMPLIANCE PROGRESS:
Not Applicable

THIRD REPORTING PERIOD
MARCH 1, 2020 – DECEMBER 31, 2020
COMPLIANCE PROGRESS:
Not Applicable

FOURTH REPORTING PERIOD
JANUARY 1, 2021 – JUNE 30, 2021
COMPLIANCE PROGRESS:
Secondary

FIFTH REPORTING PERIOD
JULY 1, 2021 – DECEMBER 31, 2021
COMPLIANCE PROGRESS:
Secondary

SIXTH REPORTING PERIOD
JANUARY 1, 2022 – JUNE 30, 2022
COMPLIANCE PROGRESS:
Secondary

Officer Wellness and Support: ¶393

393. *In order to provide support services that are culturally appropriate, sensitive to differing circumstances, and attentive to the issues facing all CPD members, including, but not limited to, women, people of color, religious minorities, and LGBTQI individuals, CPD will ensure that: a. the licensed mental health professionals and counselors employed by CPD are trained and equipped to provide services in a manner respectful of these diverse experiences and perspectives; b. CPD members receiving services have the opportunity to provide feedback regarding whether such services are culturally appropriate and adapted to diverse experiences and perspectives; and c. appropriate corrective action is taken to the extent necessary based on feedback received.*

Compliance Progress

(Reporting Period: January 1, 2022, through June 30, 2022)

Preliminary: ***In Compliance*** **(FOURTH REPORTING PERIOD)**
Secondary: ***In Compliance*** **(FOURTH REPORTING PERIOD)**
Full: ***Not in Compliance***

During the sixth reporting period, the City and the CPD maintained Preliminary and Secondary compliance with ¶393.

To assess Preliminary compliance with ¶393, we reviewed the CPD's relevant policies and documents following the process described in the Consent Decree (¶¶626–41), which outlines applicable consultation, resolution, workout, and public comment periods. We also reviewed various data, such as Professional Counseling Division (also known as the PCD) clinicians' biographies, which is relevant to compliance with the requirements of this paragraph. To assess Secondary compliance, we considered whether the CPD has qualified and diverse personnel who are trained to address the wellness needs and concerns of a diverse population. To determine Full compliance with ¶393, we sought to determine whether the CPD has sufficient services in place to provide diverse support to all members.

Progress before the Sixth Reporting Period

In previous reporting periods, the City and the CPD achieved Preliminary compliance with ¶393 by submitting the *Officer Wellness Support Plan*, which sets out expectations that promote the training and development of officer wellness initiatives that are sensitive to the diversity found within the CPD and the community at large.

The City and the CPD achieved Secondary compliance with ¶393 by submitting the biographies of Professional Counseling Division clinicians, as well as evidence that they receive feedback regarding support services by conducting various focus groups. These focus groups touched on topics of diversity within Professional Counseling Division services as shown in the *2021 Report to the Superintendent*.

During the fifth reporting period, the IMT learned that the Professional Counseling Division Director and staff receive feedback through executive sessions with CPD leaders and at roll calls. However, the IMT recommended a more analytical approach to determine the effectiveness of the Professional Counseling Division and its efficiencies.

However, during the fifth reporting period, the IMT did not receive any evidence of feedback regarding the appropriateness of providing culturally sensitive services to the members of the CPD. To achieve Full compliance, the IMT stated the Professional Counseling Division would need to develop a formal method to assess feedback to determine whether the Professional Counseling Division is perceived by the broader CPD membership as being culturally sensitive. If they are perceived otherwise, they would also need to determine how to address those issues.

Progress in the Sixth Reporting Period

As noted in the fifth reporting period, the Professional Counseling Division identified the areas of specialization and noted the information and credentials in the counselors' bios. Due to the diverse nature of the counseling services provided by the Professional Counseling Division, it is necessary to employ members who are diverse in both unique experiences and the perspectives they offer.

During this current reporting period, the IMT met with the clinicians during a virtual site visit. Several of the clinicians specifically addressed their credentials and their specializations, which ranged from advance certifications in couples and family counseling to include intensive trauma and stress therapy, music therapy, substance use disorder (SUD), cognitive behavioral therapy, and mindfulness. The clinicians on the virtual call also had tenured careers that ranged from 12 to 22 years of experience.

The IMT applauds the CPD for their broad reaching array of certifications of clinicians as it does serve as a force multiplier by having the diversity of credentials available to address the variety of needs presented by the members of the CPD. However, as noted in the previous reporting period, the Professional Counseling Division has not provided any evidence of subparagraph (b). The Professional Counseling Division should solicit feedback from members receiving services

regarding the appropriateness of those services as it relates to culture and the adaptation of diverse experiences and perspectives.

Throughout several meetings with the Professional Counseling Division, it was evident that there are very few notes that are captured during the counseling services. The IMT was advised that in years past, they were HIPAA concerns but processes were revised to allow for notetaking on personnel receiving services. However, the IMT received no evidence indicating that such documentation was later instituted even though the counseling staff can now do so.

The IMT inquired about the caseloads of the mental health clinicians. It was reported to the IMT that although it varies, the clinicians stated that their caseloads average between 25 and 30 clients a week, which was approximately 5 to 8 personnel a day. The caseloads admittedly seemed high from their perspective. However, without case management tools, auditing practices, and procedures in place along with a formal case review, it is difficult to determine how to adequately measure what a workable caseload should look like. The technique shared at the virtual meeting used to manage caseloads did not seem to be the most ideal method to capture the essence of circumstances, needs, assessments, referrals, and routine counseling sessions when meeting with 30 people a week. The one suggestion offered was the use of a genogram for memorization. The IMT appreciates a multi-dimensional platform to establish the process of connecting the circumstances, relationships, and needs of a client to aid in the overall treatment of individuals seeking services. However, as shared in the meeting, it seems somewhat redundant for a client to repeat the various facets of one's circumstances in lieu of being able to recap from where one left off during a previous meeting. Going back to earlier discussions if necessary, seems appropriate, but to have to recap because there aren't any notes available or the counselor is relying on memory since the last visit seems inefficient in the delivery of counseling services in both application of services and the respective use of time.

With the use of iCarol, it is imperative that the Professional Counseling Division look at how best to capture some important information, provision of services, and updates in a real time manner. During the discussion surrounding the iCarol System, the Professional Counseling Division can build this system out to meet its needs. The IMT encourages the Professional Counseling Division to determine the best means of capturing this critical information. The technology is an opportunity to take some of this recollection, memory, and redundancy burden off the clinician. As the counselors discussed the workload and capacity, the stressor should not be the cognitive recall of the clinician. The lack of efficiencies in measuring case/workloads can lead to the burn-out of the clinicians whose purpose is to aid in the pre- and post-ventive measures that ensure clinician burn-out does not occur.

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The City and CPD remain at Secondary compliance as several of the subparagraphs of ¶393 have not been demonstrated with the evidence necessary to achieve Full compliance. A formal method to obtain and assess client feedback affords the Professional Counseling Division to capture the clients' perception of being culturally sensitive. This information is not yet available for review. Additionally, there has been no evidence of any method or foundation put in address those issues that would otherwise suggest cultural insensitivity.

Paragraph 393 Compliance Progress History

FIRST REPORTING PERIOD	SECOND REPORTING PERIOD	THIRD REPORTING PERIOD
SEPTEMBER 1, 2019 – AUGUST 31, 2019	SEPTEMBER 1, 2019 – FEBRUARY 29, 2020	MARCH 1, 2020 – DECEMBER 31, 2020
COMPLIANCE PROGRESS:	COMPLIANCE PROGRESS:	COMPLIANCE PROGRESS:
Not Applicable	Not Applicable	Not Applicable
FOURTH REPORTING PERIOD	**FIFTH REPORTING PERIOD**	**SIXTH REPORTING PERIOD**
JANUARY 1, 2021 – JUNE 30, 2021	JULY 1, 2021 – DECEMBER 31, 2021	JANUARY 1, 2022 – JUNE 30, 2022
COMPLIANCE PROGRESS:	COMPLIANCE PROGRESS:	COMPLIANCE PROGRESS:
Secondary	Secondary	Secondary

Officer Wellness and Support: ¶394

394. *CPD will offer members referrals for counseling services by external clinical service providers, including, but not limited to, private therapists, specialists, outside agencies, or hospitals, when a member requires specialized counseling that is beyond the training and expertise of CPD's licensed mental health professionals or certified counselors.*

Compliance Progress (Reporting Period: January 1, 2022, through June 30, 2022)

Preliminary:	***In Compliance* (FOURTH REPORTING PERIOD)**
Secondary:	***Not in Compliance***
Full:	***Not Yet Assessed***

During the sixth reporting period, the City and the CPD maintained Preliminary compliance with ¶394.

To assess Preliminary compliance with ¶394, we reviewed the CPD's relevant policies and documents following the process described in the Consent Decree (¶¶626–41), which outlines applicable consultation, resolution, workout, and public comment periods. For Secondary compliance, we interviewed the CPD counselors about external referrals and sought to review data measuring the frequency and efficacy of outside referrals that is necessary or helpful to identify, verify, and sustain compliance and reform efforts.

Progress before the Sixth Reporting Period

In previous reporting periods, the City and the CPD reached Preliminary compliance with ¶394 by addressing referral to third-party vendors in the *Officer Wellness Support Plan*, the *2021 Report to the Superintendent*, and Standard Operating Procedure (SOP) 19-01.

During the fifth reporting period, the CPD discussed with the IMT representatives the various forms of referrals, the scope of work, workload, accessibility of the Professional Counseling Division (also known as the PCD), in addition to the types of conditions, counseling, and services that are beyond the scope of the Professional Counseling Division's ability to provide the necessary counseling services and treatment.

The IMT explained that to reach additional levels of compliance, the Professional Counseling Division would need technology to adequately collect anonymized data reflecting the requirements of this paragraph and would look forward to seeing samples of anonymized treatment plans that reflect in-house services and those

outside referrals that require needs to be met beyond the scope of the Professional Counseling Division.

Progress in the Sixth Reporting Period

As noted in ¶393, the clinicians met with the IMT during the virtual site visit with some discussion of the referral process. It is during the Professional Counseling Division scheduled weekly meetings when they discuss the clients' status and recommendations for referrals. In this weekly discussion, they indicated that treatment plans may be considered and developed for the CPD members needed additional services. It was noted during the virtual meeting that some members are sometimes referred to offsite treatment facilities that are located throughout the United States, as close as Chicago and as far away as Florida, depending on the needs of the CPD member and the service provided by the service provider.

The additional discussion referenced the internal process for mandatory referrals regarding the officer's exposure to trauma-related incidents. Those referrals are entered into the CLEAR System with documentation of follow-up entered at the time of the call and when debriefings occur.

Undoubtedly, the Professional Counseling Division has done some tremendous work during what seems to be a challenging time for law-enforcement agencies throughout the United States and the impact of the national climate, nationwide recruiting issues, demand for police services, and the residual impact of the limited police resources hash human, fiscal, and operational. However, it remains even more difficult to capture the essence of the work being done when tools are not in place to provide the analytical assessment needed to identify where the critical counseling services can best be utilized. Establishing enhanced benchmarking tools can allow for the Professional Counseling Division to enhance its efforts by promoting and exploring additional external resources and identifying the best possible practices to ensuring effective and efficient internal counseling.

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Again, allowing the technology to aid in capturing the necessary anonymized data to demonstrate/show where, what facilities are referred, the duration of service, as well as client feedback experiences at those referred facilities/providers.

The IMT would like to see how the Professional Counseling Division determines when and why a determination is made to include or exclude a resource from its referral list. Currently, the data to simply show basic referrals has not been presented as evidence to the IMT during this reporting period nor was any data presented in the fifth reporting period. Therefore, the City and the CPD remains at the current level of Primary compliance.

Paragraph 394 Compliance Progress History

FIRST REPORTING PERIOD	SECOND REPORTING PERIOD	THIRD REPORTING PERIOD
SEPTEMBER 1, 2019 – AUGUST 31, 2019	SEPTEMBER 1, 2019 – FEBRUARY 29, 2020	MARCH 1, 2020 – DECEMBER 31, 2020
COMPLIANCE PROGRESS:	COMPLIANCE PROGRESS:	COMPLIANCE PROGRESS:
Not Applicable	Not Applicable	Not Applicable
FOURTH REPORTING PERIOD	**FIFTH REPORTING PERIOD**	**SIXTH REPORTING PERIOD**
JANUARY 1, 2021 – JUNE 30, 2021	JULY 1, 2021 – DECEMBER 31, 2021	JANUARY 1, 2022 – JUNE 30, 2022
COMPLIANCE PROGRESS:	COMPLIANCE PROGRESS:	COMPLIANCE PROGRESS:
Preliminary	Preliminary	Preliminary

Officer Wellness and Support: ¶395

395. *CPD will ensure that CPD members have access to: a. non-emergency, generalized counseling sessions with CPD's licensed mental health professionals within two weeks of a member's request; and b. generalized emergency counseling by CPD's licensed mental health professionals within 24 hours of a member's request.*

Compliance Progress

(Reporting Period: January 1, 2022, through June 30, 2022)

Preliminary:	***In Compliance*** **(FOURTH REPORTING PERIOD)**
Secondary:	***Not In Compliance***
Full:	***Not Yet Assessed***

During the sixth reporting period, the City and the CPD maintained Preliminary compliance with ¶395.

To assess Preliminary compliance with ¶395, we reviewed the CPD's relevant policies and documents following the process described in the Consent Decree (¶¶626–41), which outlines applicable consultation, resolution, workout, and public comment periods.

For Secondary compliance, we interviewed the CPD counselors about the requirements of this paragraph and considered available data that is necessary or helpful to identify, verify, and sustain compliance and reform efforts.

Progress before the Sixth Reporting Period

In previous reporting periods, the City and the CPD achieved Preliminary compliance with ¶395 by finalizing Directive E06-01 and Standard Operating Procedure (SOP) 19-01. Collectively, these policies establish an on-call system whereby a licensed clinician will be available 24 hours a day to respond to all crises and traumatic incidents and that emergency counseling sessions will be conducted within 24 hours of the request.

For non-emergency situations, both policies note that general counseling sessions with the Employee Assistance Program (EAP) licensed mental-health professionals will be held within two weeks of a member's request. The IMT explained that to achieve additional levels of compliance, the IMT would need to review various forms of documentation supporting timely efforts to accommodate members' need for services.

Although the requirements of this paragraph are reflected in policy, the IMT has not received documentation to indicate that the span of time between request

and rendering of support services adequately reflect the times stipulated within ¶395.

During a virtual site visit in the fifth reporting period, the Professional Counseling Division (also known as the PCD) indicated that the required turnaround times are occasionally challenged by the officers' schedules and various other demands. The Professional Counseling Division conveyed, however, that they have seen significant improvement in this area and have been intentional about connecting with CPD members as soon as possible. These concerns were also noted in the *2021 Report to the Superintendent*. The discussion also addressed the clinical workload of six to eight sessions a day, which warranted the need to determine what is optimal staffing for the Professional Counseling Division and its related workload. This concern is relative to ensuring the Professional Counseling Division prevents "burn out" experience for those trying to counsel on similar issues with the CPD members.

The IMT stressed that technological advances were necessary to remedy staffing matters and help to determine what optimal workloads and other efficiencies look like. We stated additional data would be needed to move to Full compliance, such as anonymized data that shows the movement towards these greater efficiencies in meeting the needs of CPD personnel who require the Professional Counseling Division's services.

Progress in the Sixth Reporting Period

During this reporting period, the Professional Counseling Division noted that it was occasionally challenging to meet the 24-hour meeting request in subparagraph (b). The Professional Counseling Division, however, did state that they had seen significant improvement in addressing the turn-around time for providing generalized emergency counseling within the 24-hour period. Though clearly articulated in E06–03 and discussed in various trainings to include Supervisor In-Service (2022), Traumatic Incident Stress Management Program training, and *Employees Assistance Program Recruit Training*, there was no indication during the virtual site visit that the quality assurance is being measured to ensure that the Professional Counseling Division is meeting the 24-hour requirement.

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Faithfully attempting to ensure this occurs unfortunately does not provide the necessary evidence that the City and CPD need to adequately reach Secondary compliance at this time. Therefore, the IMT will continue to look forward to reviewing the related data, but also to see whether the data offers an opportunity to benchmark the Professional Counseling Division's performance in this regard.

Paragraph 395 Compliance Progress History

FIRST REPORTING PERIOD	SECOND REPORTING PERIOD	THIRD REPORTING PERIOD
SEPTEMBER 1, 2019 – AUGUST 31, 2019	SEPTEMBER 1, 2019 – FEBRUARY 29, 2020	MARCH 1, 2020 – DECEMBER 31, 2020
COMPLIANCE PROGRESS:	COMPLIANCE PROGRESS:	COMPLIANCE PROGRESS:
Not Applicable	Not Applicable	Not Applicable
FOURTH REPORTING PERIOD	**FIFTH REPORTING PERIOD**	**SIXTH REPORTING PERIOD**
JANUARY 1, 2021 – JUNE 30, 2021	JULY 1, 2021 – DECEMBER 31, 2021	JANUARY 1, 2022 – JUNE 30, 2022
COMPLIANCE PROGRESS:	COMPLIANCE PROGRESS:	COMPLIANCE PROGRESS:
Preliminary	Preliminary	Preliminary

Officer Wellness and Support: ¶396

> ***396.*** *CPD will continue to ensure that any mental health counseling services provided to CPD members remain confidential in accordance with state law, federal law, and current CPD policy.*

Compliance Progress (Reporting Period: January 1, 2022, through June 30, 2022)

Preliminary:	***In Compliance*** **(FOURTH REPORTING PERIOD)**
Secondary:	***Not in Compliance***
Full:	***Not Yet Assessed***

During the sixth reporting period, the City and the CPD maintained Preliminary compliance with ¶396.

To assess Preliminary compliance with ¶396, we reviewed the CPD's relevant policies and documents following the process described in the Consent Decree (¶¶626–41), which outlines applicable consultation, resolution, workout, and public comment periods. To determine Secondary compliance with ¶396, we sought to review the CPD's training development, implementation, and evaluation.

Progress before the Sixth Reporting Period

In previous reporting periods, the City and the CPD achieved Preliminary compliance by submitting Directive E06-01 and Standard Operating Procedure (SOP) 19-01. Both policies stress privacy and confidentiality.

During the fifth reporting period, the CPD submitted lesson plans to include Employee Assistance Program (EAP), Peer Support, Peer Support Refresher, Supervisor In-Service Training, and Officer In-Service Training.

During virtual site visits conducted during the fifth reporting period, the Professional Counseling Division (also known as the PCD) articulated the importance of confidentiality and privacy, which included the meeting locations to ensure that the CPD members felt a sense of privacy during their visits. The importance of confidentiality and privacy extends to visits with chaplains, peer support members, and drug and alcohol counselors as well. We explained we would look forward to seeing instruction and other evidence that conveys the significance of confidentiality and privacy, and that to achieve additional levels of compliance, the IMT would need to review training and systems designed to ensure confidentiality as outlined by E06-01 and SOP 19-01, paying particular attention to how the Professional Counseling Division communicates the confidentiality requirement to staff and members.

Progress in the Sixth Reporting Period

During the fifth reporting period, the IMT noted that various productions were under some level of review. Several of those productions will serve as conduits of the information on confidentiality of counseling services provided by the Professional Counseling Division clinicians and other member units providing Professional Counseling Division services as well. Both policies-SOP 19–01 and a 06–01, mandate privacy and confidentiality.

During this reporting period the IMT did observe the Peer Support Refresher Training and noted the emphasis on confidentiality and its importance as it related to the expectations of those providing counseling services and those receiving the services.

In this current reporting period, the CPD submitted the *Employees Assistance Program Recruit Training* curriculum for review. The lesson plan introduces the Professional Counseling Division, its member components providing counseling services along with an emphasis on the Professional Counseling Division providing free and confidential programs for all active and retired department CPD and their families. The IMT also received the submission of the CIT In-Service training for review. The last module is designed for Officer Wellness, which does specify the importance of confidentiality, to include those exceptions of confidentiality as designated by law.

As referenced in earlier paragraphs on wellness and support, the technology may offer an opportunity to determine the clients' sense of confidentiality in the form of their efforts to attain feedback as noted in ¶393. A question of whether the client feels a sense of privacy further reflects the cultural sensitivity perceived by the clients. Considering a survey question that offers an opportunity to gauge the CPD members' sense of privacy and thus, determine where there may be room for improvement.

The City and the CPD remain in Preliminary compliance. The IMT looks forward to the additional instruction and a means to demonstrate that it does ensure confidential.

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As referenced in earlier paragraphs on wellness and support, the technology may offer an opportunity to determine the clients' sense of confidentiality in the form of their efforts to attain feedback as noted in ¶393. A question of whether the client feels a sense of privacy further reflects the cultural sensitivity perceived by the clients. Considering a survey question that offers an opportunity to gauge the CPD members' sense of privacy and thus, determine where there may be room for improvement.

The City and the CPD remain in Preliminary compliance the IMT Looks forward to the additional instruction and a means to demonstrate that it does ensure confidential.

Paragraph 396 Compliance Progress History

FIRST REPORTING PERIOD	SECOND REPORTING PERIOD	THIRD REPORTING PERIOD
SEPTEMBER 1, 2019 – AUGUST 31, 2019	SEPTEMBER 1, 2019 – FEBRUARY 29, 2020	MARCH 1, 2020 – DECEMBER 31, 2020
COMPLIANCE PROGRESS:	COMPLIANCE PROGRESS:	COMPLIANCE PROGRESS:
Not Applicable	Not Applicable	Not Applicable
FOURTH REPORTING PERIOD	**FIFTH REPORTING PERIOD**	**SIXTH REPORTING PERIOD**
JANUARY 1, 2021 – JUNE 30, 2021	JULY 1, 2021 – DECEMBER 31, 2021	JANUARY 1, 2022 – JUNE 30, 2022
COMPLIANCE PROGRESS:	COMPLIANCE PROGRESS:	COMPLIANCE PROGRESS:
Preliminary	Preliminary	Preliminary

Officer Wellness and Support: ¶397

397. *CPD will continue to ensure that licensed mental health professionals employed by the Professional Counseling Division do not participate in fitness for duty evaluations, which will be conducted exclusively by third-party licensed mental health professionals.*

Compliance Progress

(Reporting Period: January 1, 2022, through June 30, 2022)

Preliminary:	***In Compliance*** **(FOURTH REPORTING PERIOD)**
Secondary:	***Not in Compliance***
Full:	***Not Yet Assessed***

During the sixth reporting period, the City and the CPD remained in Preliminary compliance with ¶397.

To assess Preliminary compliance with ¶397, we reviewed the CPD's relevant policies and documents following the process described in the Consent Decree (¶¶626–41), which outlines applicable consultation, resolution, workout, and public comment periods. For Secondary compliance, we interviewed the CPD counselors about the requirements of this paragraph and sought to review data that is necessary or helpful to identify, verify, and sustain compliance and reform efforts.

Progress before the Sixth Reporting Period

In previous reporting periods, the City and the CPD achieved Preliminary compliance with ¶397 by submitting Directive E06-01, *Professional Counseling Division (PCD)* Policy, which prohibits the Professional Counseling Division from participating in fitness-for-duty evaluations.

The requirements stipulated in E06–01 are clearly articulated that the "licensed mental health professionals employed by the Employees Assistance Program will not participate in the fitness for duty evaluations."

During a virtual site visit during the fifth reporting period, the Professional Counseling Division discussion reflected a resounding affirmation that the Professional Counseling Division does not participate in fitness for duty evaluations and discussed the importance of not being involved in same as they are providing counseling to the various members of the CPD. The CPD, however, had not submitted data to support the Professional Counseling Division's affirmations. For future levels of compliance, the CPD would need to submit data that shows that the Professional Counseling Division is, in fact, not involved in fitness for duty evaluations.

The IMT looks forward to anonymized data reflective of the fitness for duty information, which should identify no involvement of the Professional Counseling Division. To provide this data, the City and the CPD will need to ensure that the Professional Counseling Division has an adequate technological solution in place to collect such data.

Progress in the Sixth Reporting Period

During the fifth reporting period, the IMT noted the Professional Counseling Division presented a resounding affirmation that the Professional Counseling Division does not participate in the fitness for duty evaluations. The professional counseling policy E06-01 clearly states that, "the licensed mental health professionals employed by the Employees Assistance Program will not participate in the fitness for duty evaluations."

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However, the IMT continues to look for anonymized data reflective of this affirmation. Therefore, the City and the CPD remain in Preliminary compliance.

Paragraph 397 Compliance Progress History

FIRST REPORTING PERIOD	SECOND REPORTING PERIOD	THIRD REPORTING PERIOD
SEPTEMBER 1, 2019 – AUGUST 31, 2019	SEPTEMBER 1, 2019 – FEBRUARY 29, 2020	MARCH 1, 2020 – DECEMBER 31, 2020
COMPLIANCE PROGRESS:	COMPLIANCE PROGRESS:	COMPLIANCE PROGRESS:
Not Applicable	Not Applicable	Not Applicable
FOURTH REPORTING PERIOD	**FIFTH REPORTING PERIOD**	**SIXTH REPORTING PERIOD**
JANUARY 1, 2021 – JUNE 30, 2021	JULY 1, 2021 – DECEMBER 31, 2021	JANUARY 1, 2022 – JUNE 30, 2022
COMPLIANCE PROGRESS:	COMPLIANCE PROGRESS:	COMPLIANCE PROGRESS:
Preliminary	Preliminary	Preliminary

Officer Wellness and Support: ¶398

398. *CPD currently employs five drug and alcohol counselors, all of whom are sworn CPD officers operating under the supervision of the Director of the Professional Counseling Division. These counselors provide free counseling for alcohol and substance abuse. CPD will continue to offer counseling services to CPD members for alcohol and substance abuse.*

Compliance Progress (Reporting Period: January 1, 2022, through June 30, 2022)

Preliminary:	***In Compliance*** **(FOURTH REPORTING PERIOD)**
Secondary:	***Not in Compliance***
Full:	***Not Yet Assessed***

During the sixth reporting period, the City and the CPD maintained Preliminary compliance with ¶398.

To assess Preliminary compliance with ¶398, we reviewed the CPD's relevant policies and documents following the process described in the Consent Decree (¶¶626–41), which outlines applicable consultation, resolution, workout, and public comment periods. For Secondary compliance[2] with ¶398, we interviewed the CPD counselors about the requirements of this paragraph and sought to review anonymized data of the drug and alcohol services provided to include the various ranks, civilian and sworn classifications, any non-CPD departments seeking services, and all other tracking-related data.

Progress before the Sixth Reporting Period

In previous reporting periods, the City and the CPD achieved Preliminary compliance with ¶398 by including this paragraph's requirements in Standard Operating Procedure (SOP) 19-01 and Directive E06-01. Furthermore, SOP 19-01 supports ¶398 compliance by requiring that all drug and alcohol counselors will be certified by the State of Illinois.

During the fourth reporting period, three of the five counselors had received their certifications, and the other two counselors were in the process of receiving their certifications. The IMT explained that we would monitor the progress of the two remaining Professional Counseling Division members who were in the process of obtaining their drug and alcohol counseling certifications. More generally, the IMT

[2] In their response to an earlier draft of this report, the City asserts that the review of data is necessary for Full compliance but not Secondary compliance. We disagree. Consistent with our methodologies, the IMT cannot assess Secondary compliance with this paragraph without this anonymized data. We require data to understand the counselors' caseloads.

would look for continual training of clinicians in areas related to substance and alcohol use disorders.

During the fifth reporting period, the CPD had five drug and alcohol counselors on staff. As in the fourth reporting period, two of the drug and alcohol counselors were still awaiting their certifications. During a virtual site visit in the fifth reporting period, the drug and alcohol counselors indicated there was an alcohol and drug supervisor position in the budget allocation that had not been filled since 2013. The IMT recommended that the Director of the Professional Counseling Division, CPD's Human Resources Department, and budget personnel evaluate the reason why such a vacancy existed for eight years, and to reconsider the need for that position.

Furthermore, the IMT stressed that with the anticipated hire of 11 more mental health counselors in 2022, the reach of this unit to provide services will be broadened, and this vacant position could afford the director a position with some greater management oversight of the drug and alcohol counselors unit. It is concerning to see a position vacant with the current demand for available services and resources for such an extended period and the IMT further recommended this evaluation as an opportunity for asset management and review.

The City and the CPD maintained Preliminary compliance with this paragraph but have not yet met Secondary compliance. We continue to seek anonymized data of the drug and alcohol services provided to include the various ranks, civilian and sworn classifications, any non-CPD departments seeking services, and all other tracking-related data.

Progress in the Sixth Reporting Period

The Professional Counseling Division currently has 4/6 full-time drug and alcohol counselors on staff. During the current reporting period, the IMT met with the drug and alcohol counselors during a virtual site visit. At the time of the visit, five CPD officers have been interviewed in an effort to fill the remaining two vacancies caused by retirements. The Professional Counseling Division does anticipate that the positions could be filled by the close of the current reporting period. As part of the counseling services provided by the Professional Counseling Division, there is no cost for these services. The IMT did inquire about the number of CPD members that are currently being served by the drug and alcohol counselors. There was no empirical or raw data presented to confirm the estimates provided during the site visit. During the fifth reporting period, it was noted that the drug and alcohol unit had manually tracked information via paper forms. However, with the iCarol system currently under development, the drug and alcohol counselors are currently still inputting information manually on these forms. As such, they

could only provide anecdotal information regarding the number of CPD members they were seeing at the present time.

The paper forms from the previous years are not going to be imported into the iCarol system. The IMT further inquired about the fields that will be created to assess key information about the client population. The IMT further inquired about a field that would indicate whether the referral source is via self-reporting or by a third-party (*i.e.*, coworker, family, supervisor, etc.). This field at the time of this virtual visit had not been considered. Again, the data would help the Professional Counseling Division to determine not only who is being seen, but it would be key to analyze how the referrals are getting to the Professional Counseling Division. This further provides an opportunity for additional resources, assessments as well as future opportunities to further educate and inform particular audiences. For instance, if a considerable number of referral issues are family-based but the referrals are not requested via family, there may be an opportunity to provide additional information about the available services, assurances of confidentiality and resources that are available beyond the scope of the Professional Counseling Division to potential family members.

During the reporting period, the CPD did submit productions of the certifications of the drug and alcohol counselors. Currently, three of the four are fully certified, and the fourth is awaiting the scheduled test date and site location for the state exam. The drug and alcohol counselors must also meet a 40-hour continuing education requirement every two years.

Additionally, there was some discussion about the caseload and other resource needs. The counselors referenced the AA meetings were self-supported by attendees would hope the CPD could offer coffee at those locations for those in attendance. Additional resources needs included to advertise the AA meetings along with offering anniversary coins as a way of rewarding and celebrating the incremental milestones accomplished towards sobriety.

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Like other units in the Professional Counseling Division, this group of professionals could also benefit from some feedback assessment to help determine a more definitive measure of efficiency. At the present time, the CPD will remain a problem Preliminary compliance. The data is a supporting entity and necessary component to move forward for further compliance.

The IMT continues to look forward to data analysis that can support the phenomenal work of the drug and alcohol counselors. The lack of data does pose some concerns with the IMT as it stifles opportunities to assess efficiencies, effectiveness, workload capacities, and understanding where/how to deploy its limited, yet vital resources. More specifically, it's human resources.

Paragraph 398 Compliance Progress History

FIRST REPORTING PERIOD SEPTEMBER 1, 2019 – AUGUST 31, 2019	SECOND REPORTING PERIOD SEPTEMBER 1, 2019 – FEBRUARY 29, 2020	THIRD REPORTING PERIOD MARCH 1, 2020 – DECEMBER 31, 2020
COMPLIANCE PROGRESS: Not Applicable	COMPLIANCE PROGRESS: Not Applicable	COMPLIANCE PROGRESS: Not Applicable
FOURTH REPORTING PERIOD JANUARY 1, 2021 – JUNE 30, 2021	**FIFTH REPORTING PERIOD** JULY 1, 2021 – DECEMBER 31, 2021	**SIXTH REPORTING PERIOD** JANUARY 1, 2022 – JUNE 30, 2022
COMPLIANCE PROGRESS: Preliminary	COMPLIANCE PROGRESS: Preliminary	COMPLIANCE PROGRESS: Preliminary

Officer Wellness and Support: ¶399

> ***399.*** *CPD will ensure the number of drug and alcohol counselors available, either on staff or through referrals, meets the needs of CPD members consistent with the needs assessment and the Officer Support System Plan.*

Compliance Progress (Reporting Period: January 1, 2022, through June 30, 2022)

Preliminary:	***In Compliance*** **(FOURTH REPORTING PERIOD)**
Secondary:	***Not in Compliance***
Full:	***Not Yet Assessed***

During the sixth reporting period, the City and the CPD maintained Preliminary compliance with ¶399.

To assess Preliminary compliance with ¶399, we reviewed the CPD's relevant policies and documents following the process described in the Consent Decree (¶¶626–41), which outlines applicable consultation, resolution, workout, and public comment periods. We also reviewed records that show whether the CPD has qualified personnel fulfilling the responsibilities required by ¶399. We considered whether the CPD has allocated sufficient resources to create, staff, fill, and maintain positions with qualified personnel as required by this paragraph.

For Secondary compliance with ¶399, we interviewed the CPD counselors about the requirements of this paragraph and considered available data that is necessary or helpful to identify, verify, and sustain compliance and reform efforts.

Progress before the Sixth Reporting Period

In previous reporting periods, the City and the CPD achieved Preliminary compliance with ¶399 by creating guidance through Directive E06-01 and the *Officer Wellness Support Plan* for frequent provision of alcohol and substance use-related services, as well as guidance for tracking activities. However, to collect sufficient and reliable data that can be used to assess the extent to which services are meeting the needs of members, the City and the CPD must focus efforts on obtaining and implementing a technology solution. Additionally, we need to see evidence of data analyses related to the demand and available resources for substance and alcohol use counseling.

During a virtual site visit in the fifth reporting period, the IMT and the CPD counselors discussed the range of services offered, including individual and group counseling sessions, which are specific to certain demographics like the women's group sessions, No Cop Outs, co-ed, and other sessions. Additionally, the CPD counselors also refer services when needed, which have included, for example,

intensive outpatient services and partial hospitalization programs where appropriate based on the CPD member's needs.

Also, during the virtual site visit, the IMT inquired about the three primary sources of referrals that initiate the process for counseling services within the Professional Counseling Division (also known as the PCD). That information consisted of (1) direct calls to the Professional Counseling Division office from supervisors, (2) direct calls to the Professional Counseling Division office from family members, and (3) the individual CPD personnel reaching out for assistance.

The IMT did not receive specific data for ¶399 during the fifth reporting period, and thus, the City and the CPD maintained Preliminary compliance, but did not achieve Secondary compliance. To reach Secondary compliance, the IMT stated we would look for data analyses regarding the primary source of referral for Professional Counseling Division services and regarding referrals to outside sources. Data analyses regarding duration of treatment would also be helpful for the Professional Counseling Division to evaluate its caseload and workflow efficiencies.

Progress in the Sixth Reporting Period

The CPD in the City continue to maintain the preliminary compliance with the creation and continued existence of Directive E06-01 and the Officer Wellness Support Plan. However, the data collection is currently not being measured or analyzed. The available data is manually captured on paper forms but it's not being utilized to determine the numbers of referrals or to help determine if the Professional Counseling Division is meeting the needs of the CPD membership.

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During the fifth reporting period, the IMT did inquire about the three primary sources of referral. They were provided at that time. However, without sufficient data analysis, the Professional Counseling Division would not know which of the referral sources is the greatest source of its referrals. Therefore again, as noted in ¶398, the Professional Counseling Division would not be able to determine where or how to pivot available resources, information, or training. As noted in the fifth reporting period, the IMT will continue to look forward to future data analysis

In this reporting period, the City and the CPD cannot meet Secondary compliance. The technology solution – iCarol is currently under development, which has been delayed for implementation and pilot roll-out per a discussion during the most recent virtual site visit.

Paragraph 399 Compliance Progress History

FIRST REPORTING PERIOD
SEPTEMBER 1, 2019 – AUGUST 31, 2019
COMPLIANCE PROGRESS:
Not Applicable

SECOND REPORTING PERIOD
SEPTEMBER 1, 2019 – FEBRUARY 29, 2020
COMPLIANCE PROGRESS:
Not Applicable

THIRD REPORTING PERIOD
MARCH 1, 2020 – DECEMBER 31, 2020
COMPLIANCE PROGRESS:
Not Applicable

FOURTH REPORTING PERIOD
JANUARY 1, 2021 – JUNE 30, 2021
COMPLIANCE PROGRESS:
Preliminary

FIFTH REPORTING PERIOD
JULY 1, 2021 – DECEMBER 31, 2021
COMPLIANCE PROGRESS:
Preliminary

SIXTH REPORTING PERIOD
JANUARY 1, 2022 – JUNE 30, 2022
COMPLIANCE PROGRESS:
Preliminary

Officer Wellness and Support: ¶400

400. *CPD will ensure that its drug and alcohol counselors are certified in Illinois as Certified Alcohol and Other Drug Abuse Counselors.*

Compliance Progress

(Reporting Period: January 1, 2022, through June 30, 2022)

Preliminary:	***In Compliance*** **(FOURTH REPORTING PERIOD)**
Secondary:	***Not in Compliance***
Full:	***Not Yet Assessed***

During the sixth reporting period, the City and the CPD maintained Preliminary compliance with ¶400.

To assess Preliminary compliance with ¶400, we reviewed the CPD's relevant policies and documents following the process described in the Consent Decree (¶¶626–41), which outlines applicable consultation, resolution, workout, and public comment periods.

Progress before the Sixth Reporting Period

In previous reporting periods, the City and the CPD achieved Preliminary compliance by submitting Directive E06-01, which addresses the requirements of ¶400. However, in the fourth reporting period, the CPD only produced certifications for three of the five drug and alcohol counselors. By the end of the fifth reporting period, the remaining two counselors had yet to receive their certifications. Also, there was a pending vacancy for a drug and alcohol counselor in January 2022.

Given certification statuses, with the pending vacancy forthcoming in January 2022, the IMT recommended that the Professional Counseling Division (also known as the PCD) consider an immediate posting for the vacancy to fill the position as soon as possible. Additionally, the IMT further encouraged the Professional Counseling Division to attempt to coordinate the certification process more tightly. The time between selection for the drug and alcohol counselor position and the counselor receiving their certification should be significantly narrowed and expedited.

To reach Secondary compliance, the IMT stated we would look forward to seeing the certifications completed for the drug and alcohol counselors and future vacancies filled expeditiously.

Progress in the Sixth Reporting Period

During the fifth reporting period, there were five drug and alcohol counselors. Three of the five were certified. Today, there are six positions, but two are vacant and three of the four are certified. As noted in ¶398, the fourth counselor is awaiting notification of date, time, and location to take the state exam.

As noted in ¶398, the two vacancies are soon to be filled as there have been five interviews of potential candidates at the time of the filing. The Professional Counseling Division anticipate the positions to be filled within the next 30 days. The certifications are directed by E06–0 1 the requirements stipulated in ¶400.

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During this reporting period, the CPD submitted the drug and alcohol counselor certifications for compliance records. The IMT does appreciate the submission of the certifications for those three counselors and looks forward to a fully staffed unit and their continued efforts towards Full compliance as well.

Paragraph 400 Compliance Progress History

FIRST REPORTING PERIOD	SECOND REPORTING PERIOD	THIRD REPORTING PERIOD
SEPTEMBER 1, 2019 – AUGUST 31, 2019	SEPTEMBER 1, 2019 – FEBRUARY 29, 2020	MARCH 1, 2020 – DECEMBER 31, 2020
COMPLIANCE PROGRESS:	COMPLIANCE PROGRESS:	COMPLIANCE PROGRESS:
Not Applicable	Not Applicable	Not Applicable
FOURTH REPORTING PERIOD	**FIFTH REPORTING PERIOD**	**SIXTH REPORTING PERIOD**
JANUARY 1, 2021 – JUNE 30, 2021	JULY 1, 2021 – DECEMBER 31, 2021	JANUARY 1, 2022 – JUNE 30, 2022
COMPLIANCE PROGRESS:	COMPLIANCE PROGRESS:	COMPLIANCE PROGRESS:
Preliminary	Preliminary	Preliminary

Officer Wellness and Support: ¶401

401. *CPD currently offers anonymous support groups and programs for alcoholism and other addictions. CPD will ensure that a licensed mental health professional assigned to the Professional Counseling Division oversees any such programs offered by CPD, that the programs adhere to generally accepted practices in the field of addiction treatment (e.g., 12-step addiction treatment program), and that each program is reviewed at least annually by the Director of the Professional Counseling Division.*

Compliance Progress

(Reporting Period: January 1, 2022, through June 30, 2022)

Recurring Schedule: Annually ☐ **Met** ☑ **Missed**

Preliminary: ***In Compliance*** **(SECOND REPORTING PERIOD)**
Secondary: ***In Compliance*** **(THIRD REPORTING PERIOD)**
Full: ***Not in Compliance***

During the sixth reporting period, the City and the CPD maintained Preliminary and Secondary compliance with ¶401.

To determine Preliminary and Secondary compliance with ¶401, we determined whether the CPD has a licensed health professional and whether the CPD's programs adhere to generally accepted practices as required by this paragraph.

To assess Full compliance with ¶401, we sought to determine whether the Professional Counseling Division (also known as the PCD) Director is completing annual reviews of substance-use-disorder services as called for by the paragraph. To make this determination we reviewed a variety of information relevant to compliance, including document submissions of the City and the CPD, and communications with members and Professional Counseling Division clinicians and staff.

Progress before the Sixth Reporting Period

In previous reporting periods, the City and the CPD achieved Preliminary and Secondary compliance with ¶401 by increasing staffing of the Employee Assistance Program with several substance-use-disorder-treatment counselors and demonstrating the organization and supervision of the services, clinicians, and number of members utilizing the services. However, the IMT had not yet received an annual review of the services conducted by the Director of the Professional Counseling Division. This annual review should include an assessment of each

program to ensure they are adhering to generally accepted practices in the field of addiction treatment.

During a virtual site visit in the fifth reporting period, the IMT met with the Professional Counseling Division Director and the drug and alcohol counselors. During the time of the virtual site visit, there were five drug and alcohol counselors, but there was an expected vacancy occurring at the beginning of 2022. By the end of the reporting period, two of the counselors were still not certified. The IMT strongly encouraged the Professional Counseling Division Director to evaluate the process for certification with urgency to ensure that all necessary steps can be taken within their control to ensure the counselors are positioned to receive the certifications as soon as possible.

To achieve additional levels of compliance, the IMT noted that a technology solution would be critical to allow the Professional Counseling Division to reliably and efficiently collect and review data, as well as providing evidence of the annual review of alcohol and substance use disorder programs. The CPD needed to provide various records and data, including meeting schedules, attendance data, and outside referrals. Additionally, the CPD should collect and analyze aggregate data to compare services for different types of addictions.

Progress in the Sixth Reporting Period

The Director of the Professional Counseling Division overseas the programs and the staff. During the tenure of the Director, additional staff has been added to the Professional Counseling Division to include one (1) additional drug and alcohol counselor position and eleven (11) mental health clinician positions. Interviews are currently underway to fill these vacancies. During the virtual site visit, there was further discussion about the expansion of office space as well. The recently open Southside station house provides additional space for (4) license clinicians, (2) drug and alcohol counselors, peer support and chaplains. Placing them closer to the officers in proximity and being physically located in the building allows for greater access to counseling services with consideration to travel time to the site as well as overall distance traveled. Location had been a part of the discussion of barriers to service during the fifth reporting period. The new location will provide greater access to those available Professional Counseling Division services the noted in the previous reporting period, which related to navigating through traffic to one location with designated appointment times. It previously noted that appointments were sometimes missed because traffic was impeding their ability to get across the City with adequate time to keep their appointments. Currently, the Northwest Side station house is pending for review, and counsel approval as part of the proposed budget. The timing for this facility to come online is uncertain as the building would require some construction, retrofitting, and furnishings. The IMT looks forward to hearing future updates regarding the renovation of the

building and bringing it online. The emergency response and callouts by the Professional Counseling Division staff is also overseen by the Director. During this reporting period, the chaplains planned and scheduled for a couples retreat in February 2022. It appeared this event proved to be a success.

Several units within the Professional Counseling Division discussed the need to ensure that equipment and basic office supplies were funded by the CPD as there are occasions where the membership of the Professional Counseling Division had purchased some office supplies themselves. The IMT offers a suggestion for the Professional Counseling Division to remedy a process to prevent employees from having to purchase routine office supplies. In place and functional equipment, tools, and office supplies are necessary for day to day operations. Should expenses occur out of pocket and with authority, the IMT would suggest as noted in the fifth reporting period, that there be some mechanism put in place to either cover or reimburse such necessary expenses.

The IMT suggests that the Director of the Professional Counseling Division continue to seek opportunities to advance programming, expand personnel, and enhance technology while placing priorities on assessing both efficiencies and the overall effectiveness of the work that the Professional Counseling Division is currently engaged in to deliver services to the CPD membership. The IMT applauds the Professional Counseling Division on the additional positions and facilities in their efforts to deliver quality services to the membership. The implementation of a technology solution affords an accurate accounting of the work and services provided by units within the Professional Counseling Division. This will enable the Professional Counseling Division to help determine if additional resources are needed to most efficiently carry out the work and services mandated by policy, strategy, reports, and necessity. Currently, the various Professional Counseling Division units continue to use tracking logs, the IMT has not received any evidence of the collected data on these forms. With the iCarol system, it will be extremely beneficial to determine how the data will be routed as it moves from entry (albeit a form or digital input) to become the delivered analytical reports and associated metrics. During the various site visits, the IMT has inquired about both the input and output of data and collected information with iCarol and responses seemed relatively uncertain on who or where the responsibility will rest with importing the data; administrative access to the data; and report retrieval access of the data. It could remain difficult to determine what resources are needed without sufficient data to support or identify what needs exists – within the Professional Counseling Division or within the membership seeking the services.

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The IMT does have concerns on efficiencies based on the lack of note keeping. It seems uncertain as to why notes are still not kept since the Employees Assistance

Program afforded the Professional Counseling Division to do so. The caseloads and overall workloads and delivery of quality services may be impacted by such relative data.

¶400 also requires that the Director provide a list of programs overseen by the Professional Counseling Division. The IMT has not received a detailed comprehensive list of all the various programs overseen by the Director of Professional Counseling Division. It should be noted that different programs are addressed via policy, training materials, communications strategy, training schedules, etc. However, no detailed list has been submitted to the IMT. Therefore, the City and the CPD cannot reach for compliance without a list of programs and data.

Paragraph 401 Compliance Progress History

FIRST REPORTING PERIOD	SECOND REPORTING PERIOD	THIRD REPORTING PERIOD
SEPTEMBER 1, 2019 – AUGUST 31, 2019	SEPTEMBER 1, 2019 – FEBRUARY 29, 2020	MARCH 1, 2020 – DECEMBER 31, 2020
COMPLIANCE PROGRESS:	COMPLIANCE PROGRESS:	COMPLIANCE PROGRESS:
Not Applicable	Preliminary	Secondary

FOURTH REPORTING PERIOD	FIFTH REPORTING PERIOD	SIXTH REPORTING PERIOD
JANUARY 1, 2021 – JUNE 30, 2021	JULY 1, 2021 – DECEMBER 31, 2021	JANUARY 1, 2022 – JUNE 30, 2022
COMPLIANCE PROGRESS:	COMPLIANCE PROGRESS:	COMPLIANCE PROGRESS:
Secondary	Secondary	Secondary

Officer Wellness and Support: ¶402

402. *CPD will train all supervisors regarding recognizing signs and symptoms of alcoholism and substance abuse, how to recommend available support services to CPD members experiencing alcoholism and substance abuse issues, and their obligations under CPD policy to report members exhibiting signs of alcohol or drug impairment.*

Compliance Progress

(Reporting Period: January 1, 2022, through June 30, 2022)

Preliminary:	***In Compliance*** **(FOURTH REPORTING PERIOD)**
Secondary:	***Not in Compliance***
Full:	***Not Yet Assessed***

During the sixth reporting period, the City and the CPD maintained Preliminary compliance with ¶402.

To assess Preliminary compliance with ¶402, we reviewed the CPD's relevant policies and documents following the process described in the Consent Decree (¶¶626–41), which outlines applicable consultation, resolution, workout, and public comment periods. To determine Secondary compliance with ¶402, we reviewed the CPD's training development, implementation, and evaluation.

Progress before the Sixth Reporting Period

In previous reporting periods, the City and the CPD achieved Preliminary compliance with ¶402 by submitting Standard Operating Procedure (SOP) 19-01 and Directive E06-01. These policies include provisions requiring supervisors to be trained on the signs and symptoms of alcohol use disorder, as well as be trained on recommending support services and reporting members exhibiting signs of impairment.

During the fifth reporting period, we reviewed the *Employee Assistance Program Pre-Service Promotional* training. This training addresses ¶402's requirements and has received no objection notices from both the IMT and the Attorney General's Office. With the development of this training, the City and the CPD have made good progress toward Secondary compliance with this paragraph. However, this training will need to be provided before they reach Secondary compliance. For Full compliance, the CPD would need to provide evidence of training completion and a plan for continued training on these topics.

Progress in the Sixth Reporting Period

During the fifth reporting period, the City and the CPD submitted revised Annual Supervisor In-Service training for year 2022. The IMT and the Office of the Illinois Attorney General have responded with comments. The lesson plan definitively outlined the role and expectations of the supervisor per the requirements outlined in ¶402, SOP 19-01, and Directive E06–01. Additionally, the Employees Assistance Program Pre-Service Promotional training was submitted as well followed by no-objection notices from the IMT in the Office of the Illinois Attorney General.

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The developed trainings were reviewed. However, we await the evidence that these trainings have been delivered before the City and the CPD can reach Secondary compliance.

The IMT looks forward to the implementation of the training and the attendance records reflecting same.

Paragraph 402 Compliance Progress History

FIRST REPORTING PERIOD	SECOND REPORTING PERIOD	THIRD REPORTING PERIOD
SEPTEMBER 1, 2019 – AUGUST 31, 2019	SEPTEMBER 1, 2019 – FEBRUARY 29, 2020	MARCH 1, 2020 – DECEMBER 31, 2020
COMPLIANCE PROGRESS:	COMPLIANCE PROGRESS:	COMPLIANCE PROGRESS:
Not Applicable	Not Applicable	Not Applicable
FOURTH REPORTING PERIOD	**FIFTH REPORTING PERIOD**	**SIXTH REPORTING PERIOD**
JANUARY 1, 2021 – JUNE 30, 2021	JULY 1, 2021 – DECEMBER 31, 2021	JANUARY 1, 2022 – JUNE 30, 2022
COMPLIANCE PROGRESS:	COMPLIANCE PROGRESS:	COMPLIANCE PROGRESS:
Preliminary	Preliminary	Preliminary

Officer Wellness and Support: ¶404

404. *CPD will maintain a peer support program, ensuring that: a. a licensed mental health professional assigned to the Professional Counseling Division oversees and adequately manages the program; b. Peer Support Officers receive initial training in stress management, grief management, officer wellness, obligations and limitations regarding confidentiality and privacy, communication skills, common psychological symptoms and conditions, suicide assessment and prevention, dependency and abuse, and support services available to CPD members; c. Peer Support Officers are trained to recommend the services offered by the Professional Counseling Division in situations that are beyond the scope of their training; d. CPD offers Peer Support Officers the opportunity to meet at least annually to share successful strategies and identify ways to enhance the program; e. Peer Support Officers receive and comply with a written procedures manual approved by a licensed mental health professional assigned to the Professional Counseling Division; f. Peer Support Officers are offered sufficient non-monetary incentives and recognition to ensure broad recruitment of volunteers and widespread access to peer support services; and g. the scope and quantity of peer support services provided to CPD members are identified in a manner that facilitates effective management of the program and that preserves the anonymity and confidentiality of members receiving peer support services.*

Compliance Progress

(Reporting Period: January 1, 2022, through June 30, 2022)

Recurring Schedule: May 3, 2022 ☑ **Met** ☐ **Missed**

Preliminary: ***In Compliance*** **(FOURTH REPORTING PERIOD)**
Secondary: ***Not in Compliance***
Full: ***Not in Compliance***

During the sixth reporting period, the City and the CPD remained in Preliminary compliance with ¶404.

To evaluate Preliminary compliance with ¶404, we considered whether the CPD has allocated sufficient resources to maintain the peer support program and whether the CPD offers peer support officers the opportunity to meet at least annually to share strategies and enhance the program. We reviewed all accessible data relevant to ¶404 efforts, including records of meetings, and considered other

sources of data, such as communications with CPD members, and any policies developed regarding the peer support program.

To assess Secondary compliance, we considered the CPD's training development, implementation, and evaluation relevant to the various requirements of this paragraph, as well as other data sources showing implementation of programs or actions specified in relevant policies that direct compliance with the various subsections of this paragraph.

Progress before the Sixth Reporting Period

In previous reporting periods, the City and the CPD reached Preliminary compliance with ¶404 by submitting Directive E06-01 and Standard Operating Procedure (SOP) 19-01, which created a framework under which the CPD can reach compliance with all subsections. The IMT reviewed documentation during the fourth reporting period showing that CPD approved an award for peer support leadership and held meetings with peer support members in 2020 and 2021. These documents demonstrate efforts in accord with the requirements of ¶404 (f) and (d).

Related specifically to the requirements of ¶404 (b) and (c), the CPD submitted revised *Peer Support Training* materials in February 2021 to which the IMT submitted a no-objection notice. The IMT explained to reach Secondary compliance, the City and the CPD will need to provide the *Peer Support Training* and submit documents showing the provision and completion of that training. Additionally, to comply with the requirements of subsection (g), the City and the CPD will need to implement a technology solution to track and assess scope and quantity of the peer support services provided to CPD members while also ensuring anonymity and confidentiality of members utilizing those services.

In the fifth reporting period, the IMT reviewed the *Peer Support (8 Hour) Refresher Training* and provided feedback on the training materials. Also, in this reporting period, the IMT participated in a virtual site visit with the Professional Counseling Division and peer support officers. During the visit, we discussed the importance of management attending some version of training services that address various topics to include the Employee Assistance Program, supervisors training, Officer Support System, etc. We stressed that one unified message is critical, and training information must be shared with the leadership as well.

During the virtual site visit, it was noted by the IMT that, as counselors responded to events, they often provide sustenance, refreshments, and nourishments for people they are responding to various incidents, via callouts and other officer-involved events. The IMT encourages the Professional Counseling Division to review, during its next annual assessment process, Directive E06-01, and best

practices regarding future budgetary allocations for the reimbursement of provisions (*i.e.*, coffee, donuts, pizza, tissue, etc.) purchased by the members of the Professional Counseling Division units while delivering counseling services.

The Peer Support Unit's annual meeting occurred during a previous reporting period. The IMT recommended a regularly scheduled time for its annual meeting to determine next steps and best practices to include revisions in practice and policy.

With the development of the *Peer Support Training* and the *Peer Support Refresher Training*, the City and the CPD made great progress toward Secondary compliance. To achieve Secondary compliance, however, the CPD needed to provide evidence that the trainings have been provided. We also needed to be provided with proper and detailed data assessments, which were unavailable due to the delay of technological advances.

Progress in the Sixth Reporting Period

During this reporting period, the IMT met with the members of the Peer Support program on a virtual site visit. As noted in ¶401, the Director of Professional Counseling Division oversees all entities within the division including the Peer Support program. During the fifth reporting period, the Professional Counseling Division submitted the Peer Support Refresher Training (8 hours). Comments and revisions were made with no objections at that time.

During the current reporting period, the IMT and the Office of the Illinois Attorney General observed the refresher training both virtually and in person respectively. The training curriculum and the classroom instruction did follow the written instruction and provided the necessary indications that subsection (c) of ¶404 were met via training, which included open discussion, experiential learning, policy review, scenarios and role-plays along with a clear expectation of the role of the peer support member. The observed instruction also revealed commentary of the peer support retired members who were attending the class. Their comments expressed gratitude for the training with emphasis on training being a "long time coming," necessary, and appreciated.

The IMT met with several peer support members during the virtual site visit. The services provided by the peer support members ranges from meeting with CPD members in retirement to real-time response to critical incidents. They further discussed the importance of being able to reach the veteran personnel while reaching the recruits and conveying the expectations of on and off-duty conduct and the importance of career survival. Additionally, they emphasized the importance of their compassion and volunteering in the peer support role, which

also serves as an informal mechanism for recruiting others with an interest while modeling the role in the variety of circumstances they are called to assist.

The non-monetary incentives were not discussed in detail during the site visit. However, it was indicated that there is one car available for the unit. They are having to respond to events via their personally owned vehicle. The response occurs frequently. There is an average of 10 members on call at a time along with one lead peer member. At times, depending on how many callouts occur at the same time or due to the complexity of the circumstances - members are responding to various locations. This also, includes at times, picking up family members in their personal vehicles and transporting them to hospitals and other specific locations. The IMT suggests that the CPD further evaluate this process, logistically and with consideration to any liability created by the use of personally owned vehicles.

An additional non-monetary issue was presented as an offering for the greater CPD membership. With regard to wellness, the suggestion of a Zen space, Zen room, also quiet called a quiet room was suggested to give personnel an opportunity to take a mindfulness break throughout the facilities. During this period, the superintendent it also indicated during a recent meeting that the CPD was coordinating some of the cooling centers and a centralized location out of Saint Michael's house with coffee and water for officers needing to use the restroom or simply take a break. The announcement was formally made via Reference Number: 281791-EAP Meeting and Cooling Station for June 18 and June 19 with additional wellness resources, which included the peer support members as well. With consideration for the meeting a cooling stations that offer some respite during the extended hour service days, the IMT would suggest there be further consideration for more opportunities throughout the facilities that further promote mindfulness and employee wellness. As such these facilities should be available for civilian employees also and they should know this as well.

Currently, the peer members manually enter their peer support engagement and service encounters on paper forms. It was referenced in the virtual site visit that the Professional Counseling Division is currently trying to establish workflow with regard to the implementation and inputting of information with iCarol. Currently, the peer support members complete the forms, which are passed off to three coordinators. The IMT looks forward to understanding where the information goes beyond the coordinators.

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The IMT has not received any evidence of what the current case/workload looks like. The submissions from the CPD support (b) and (c). As a follow up to the statement noted during the previous period, there was no further indication that there has been any practice put in place to address those expenses incurred by the

peer support members and other Professional Counseling Division members when they purchase items out of pocket to facilitate various activities such as coffee, donuts, pizza, tissue, etc., used for the counseling services they are providing.

The IMT looks forward to the review of the Professional Counseling Division's quality of services with detailed data assessments.

Paragraph 404 Compliance Progress History

FIRST REPORTING PERIOD	SECOND REPORTING PERIOD	THIRD REPORTING PERIOD
SEPTEMBER 1, 2019 – AUGUST 31, 2019	SEPTEMBER 1, 2019 – FEBRUARY 29, 2020	MARCH 1, 2020 – DECEMBER 31, 2020
COMPLIANCE PROGRESS:	COMPLIANCE PROGRESS:	COMPLIANCE PROGRESS:
Not Applicable	None	Under Assessment
FOURTH REPORTING PERIOD	**FIFTH REPORTING PERIOD**	**SIXTH REPORTING PERIOD**
JANUARY 1, 2021 – JUNE 30, 2021	JULY 1, 2021 – DECEMBER 31, 2021	JANUARY 1, 2022 – JUNE 30, 2022
COMPLIANCE PROGRESS:	COMPLIANCE PROGRESS:	COMPLIANCE PROGRESS:
Preliminary	Preliminary	Preliminary

Officer Wellness and Support: ¶406

406. *By January 1, 2020, CPD will develop and adopt a standard operating procedure ("SOP") outlining the roles and responsibilities of the Chaplains Unit. The Chaplains Unit SOP will identify that: a. the purpose of the Chaplains Unit is to: i. support the wellness of CPD members who voluntarily seek consultation with representatives of the Chaplains Unit; ii. make referrals to licensed mental health professionals and other service providers, when appropriate; iii. provide pastoral care to CPD members who voluntarily seek such services; iv. offer voluntary preventive programs for the purposes of supporting, encouraging, and affirming CPD members in their professional and family lives; and v. provide support in moments of crisis as requested by CPD members. b. when acting in the official capacity of a CPD Chaplain, representatives of the Chaplains Unit will refrain from actions or statements that are inconsistent with CPD policy. c. representatives of the Chaplains Unit, including CPD members and non-CPD members, will receive training regarding the roles and responsibilities of the Chaplains Unit.*

Compliance Progress

(Reporting Period: January 1, 2022, through June 30, 2022)

Preliminary:	***In Compliance*** **(SECOND REPORTING PERIOD)**
Secondary:	***In Compliance*** **(THIRD REPORTING PERIOD)**
Full:	***Not in Compliance***

During the sixth reporting period, the City and the CPD maintained Preliminary and Secondary compliance with ¶406.

To assess Preliminary compliance with ¶406, we reviewed the CPD's relevant policies and documents following the process described in the Consent Decree (¶¶626–41), which outlines applicable consultation, resolution, workout, and public comment periods. To determine Secondary compliance with ¶406, we reviewed the CPD's training development, implementation, and evaluation.

To evaluate Full compliance with ¶406, we sought to determine whether the CPD had sufficiently implemented its policy and training resulting in the Chaplains Unit operating in a manner consistent with those materials. Additionally, we looked for evidence that the CPD implemented mechanisms to regularly assess whether the Chaplains Unit is operating in accordance with Standard Operating Procedure (SOP) 20-01 and whether adjustments should be made to the Chaplains Unit or SOP 20-01.

Progress before the Sixth Reporting Period

In prior reporting periods, the City and the CPD achieved Preliminary and Secondary compliance with ¶406 by revising and finalizing SOP 20-01 and submitting and revising the Chaplains Unit SOP training materials, along with documentation demonstrating the chaplains' review of the training materials.

During the fifth reporting period, we reviewed a revised version of SOP 20-01. The IMT appreciates the efforts made in this revised version and issued a no objection letter. However, in our no objection letter issued for the policy, we reiterated that the CPD should strongly consider changing the "pastoral care" language with more inclusive terminology as the represented religions do not all typically use "pastoral" in their respective terminology. Moreover, the CPD should consider including a provision for confidentiality if a chaplain's religious ordination does not provide for a confidentiality privilege.

Additionally, during this reporting period, the IMT participated in a virtual site visit with a few chaplains. During the visit, we learned that the CPD had five full time chaplains and two part-time chaplains. We also learned of a new CPD member tracking form that the chaplains were using to collect data from their scheduled and unscheduled visits and encounters with CPD members.

It was also shared with the IMT that the chaplains attend roll calls and are located at the police academy for greater access to staff. Members of the Chaplain's Unit also discussed specific programs and innovative efforts designed to further promote CPD members' wellness. For instance, the Chaplain's Unit was organizing a couple's retreat and received some grant funding to reduce the overall cost of attendance for couples, to occur during the sixth reporting period. We stated that we looked forward to seeing the reported results of the event along with other data currently collected on the tracking forms.

We further stressed the importance of data collection to analyze where the unit's greatest resources are being expended and where potential gaps in services exist. While the chaplains are manually tracking information on the CPD member tracking form, a technology solution would more efficiently analyze the appropriate data.

The IMT stated that to reach Full compliance, the City and the CPD would need to demonstrate the data collection and analysis process. Additionally, the IMT would need to review training records for the chaplains.

Progress in the Sixth Reporting Period

The development and implementation of SOP 20-01 supports the Preliminary and Secondary compliance for ¶406. However, the Professional Counseling Division (also known as the PCD) has submitted the Chaplain's Unit SOP during the current reporting period. At that time, the IMT and the Office of the Illinois Attorney General offered no objections.

During this reporting period, the IMT met with the chaplains during a virtual site visit. The chaplains referenced one of the challenges they sometimes face is working with the primary personnel list with contact information that is not accurate. The Primary List is not always up-to-date and sometimes they have difficulty reaching employees. The IMT did inquire about the Couples Retreat. The planning activities occurred during the fifth reporting period and was held in February 2022. A short evaluation was provided to the participants to complete. The results yielded ratings of four and five – where five was the largest positive response. Although the IMT did not see the survey or know what was measured in the survey, the Chaplains expressed the success of the event. A total of 10 couples attended the retreat-all who registered were able to attend.

During the last reporting period, it was further noted that units within the Professional Counseling Division sometimes expend personal funds to accommodate circumstances when providing services or responding to crisis. They will sometime purchase refreshments and miscellaneous supplies as needed to do their work. The IMT suggested that the CPD consider budgeting funds to either cover payment for the items as needed or reimburse the CPD member after the purchase. No response was received by the IMT.

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The workload assessment remains a challenge as the IMT did not receive a definitive indication of caseload they currently manage. Without the proper and accurate accounting of its caseloads, it remains difficult to predict or forecast for additional chaplain support and resources without supporting metrics that could better aid in determining if the current number of chaplains is sufficient for the size of the organization.

The IMT continues to recommend that the CPD look for opportunities for training that is specific for chaplains outside of the training provided by their respective religious institutions.

Paragraph 406 Compliance Progress History

FIRST REPORTING PERIOD
SEPTEMBER 1, 2019 – AUGUST 31, 2019
COMPLIANCE PROGRESS:
Not Applicable

SECOND REPORTING PERIOD
SEPTEMBER 1, 2019 – FEBRUARY 29, 2020
COMPLIANCE PROGRESS:
Preliminary

THIRD REPORTING PERIOD
MARCH 1, 2020 – DECEMBER 31, 2020
COMPLIANCE PROGRESS:
Secondary

FOURTH REPORTING PERIOD
JANUARY 1, 2021 – JUNE 30, 2021
COMPLIANCE PROGRESS:
Secondary

FIFTH REPORTING PERIOD
JULY 1, 2021 – DECEMBER 31, 2021
COMPLIANCE PROGRESS:
Secondary

SIXTH REPORTING PERIOD
JANUARY 1, 2022 – JUNE 30, 2022
COMPLIANCE PROGRESS:
Secondary

Officer Wellness and Support: ¶407

407. *CPD will continue to require that whenever a CPD member has experienced a duty-related traumatic incident, the member must attend counseling with a licensed mental health professional. The Director of the Professional Counseling Division or his or her designee will be responsible for documenting that a CPD member has attended the mandatory counseling and has completed the requirements of the Traumatic Incident Stress Management Program prior to the member returning to regular duty assignment. CPD will require any CPD member who has experienced a duty-related traumatic incident, unless medically unable to do so, to meet with a licensed mental health professional within seven days of the incident, and will ensure that it has an adequate staff of licensed mental health professionals who can accommodate this timing requirement.*

Compliance Progress

(Reporting Period: January 1, 2022, through June 30, 2022)

Preliminary:	***In Compliance*** **(FOURTH REPORTING PERIOD)**
Secondary:	***Not in Compliance***
Full:	***Not Yet Assessed***

During the sixth reporting period, the City and the CPD remained in Preliminary compliance with ¶407.

To evaluate Preliminary compliance with ¶407, we reviewed the CPD's relevant policies and documents following the process described in the Consent Decree. For Secondary compliance with this paragraph, we reviewed the CPD's training development, implementation, and evaluation.

Progress before the Sixth Reporting Period

In the fourth reporting period, the City and the CPD achieved Preliminary compliance with ¶407 after finalizing the *Traumatic Incident Stress Management Program* (TISMP) directive (E06-03). The CPD also submitted clinicians' training materials for the Traumatic Incident Stress Management Program in the fourth reporting period.

In the *Annual Supervisor In-Service* training (2022), an instructional note was included to disseminate E06-03, among other resources, during the training. This topic area is also presented later in the training's lesson plan. The IMT appreciates that the CPD ensured that the policy was provided to each student.

During a virtual site visit with the Professional Counseling Division in the fifth reporting period, the range of 24 hours to two weeks for counseling visits for employees who are involved in traumatic incidents was addressed as a follow-up noted in the *Annual Report to the Superintendent*. The notation referenced the importance of reducing the turnaround time for scheduled appointments. During the virtual site visit discussion, the Professional Counseling Division noted they can offer appointments within a few days of the initial call, but also acknowledged there are times where the face-to-face meeting is immediate and within the 24 hours depending on the circumstances. The IMT and Professional Counseling Division also discussed the high caseload and the average visits per day per counselor, which can sometimes interfere or cause a delay in scheduling.

The IMT reiterated the significance of having the data to draw from and being able to review anonymized records. The Professional Counseling Division needs to review its own data to see where it is best positioned to provide adequate and qualitative services to the members of the CPD in emergencies, ongoing counseling sessions, and newly scheduled visits.

The City and the CPD maintained Preliminary compliance with ¶407, but moving forward, the IMT stressed that City and the CPD should finalize the Traumatic Incident Stress Management Program training and implement technology solutions to adequately track the necessary data to achieve additional levels of compliance.

Progress in the Sixth Reporting Period

During this reporting period, the City and CPD have submitted productions for the Traumatic Incident Stress Management Program training based on the eLearning format. During the current reporting period, the IMT did respond to the CPD with regard to looking forward to reviewing the data following the release of eLearning attendance and referrals. Additionally, the IMT seeks to review data records noted in the module regarding:

- Qualifying incidents to Traumatic Incident Stress Management Program employee referral;
- Immediate follow-up upon the initial referral;
- Data stipulated in the release from the Traumatic Incident Stress Management Program.

The eLearning was not presented with a pre- or post-test, but the pre- and post-tests were submitted before the end of the sixth reporting period. The IMT further stated that, “the TISMP curriculum was found to be clear, concise and relevant” with the specific policies noted along with information regarding counseling resources and ways to contact the Professional Counseling Division for services.

During this period, the CIT In-Service training – 2022 curriculum was submitted for IMT and Office of the Illinois Attorney General review as well. The sixth module provides information that covers officer wellness with specific information regarding Traumatic Incident Stress Management Program.

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The IMT reiterates again as in the fifth reporting period that the data is important for developing plans, forecasting resources, and ensuring the consistency of delivering qualitative services to those in need, in addition to verification that the Professional Counseling Division's mental health counselors-as directed, can show follow up records six months after the initial consultations.

Paragraph 407 Compliance Progress History

FIRST REPORTING PERIOD	SECOND REPORTING PERIOD	THIRD REPORTING PERIOD
SEPTEMBER 1, 2019 – AUGUST 31, 2019	SEPTEMBER 1, 2019 – FEBRUARY 29, 2020	MARCH 1, 2020 – DECEMBER 31, 2020
COMPLIANCE PROGRESS:	COMPLIANCE PROGRESS:	COMPLIANCE PROGRESS:
Not Applicable	Not Applicable	None

FOURTH REPORTING PERIOD	FIFTH REPORTING PERIOD	SIXTH REPORTING PERIOD
JANUARY 1, 2021 – JUNE 30, 2021	JULY 1, 2021 – DECEMBER 31, 2021	JANUARY 1, 2022 – JUNE 30, 2022
COMPLIANCE PROGRESS:	COMPLIANCE PROGRESS:	COMPLIANCE PROGRESS:
Preliminary	Preliminary	Preliminary

Officer Wellness and Support: ¶408

408. *In addition to providing mandatory initial consultations and additional consultations as appropriate or as requested by CPD members, CPD's licensed mental health professionals will follow up with members who have experienced a duty-related traumatic incident within six months to offer additional support services.*

Compliance Progress

(Reporting Period: January 1, 2022, through June 30, 2022)

Preliminary:	***In Compliance*** **(FOURTH REPORTING PERIOD)**
Secondary:	***Not in Compliance***
Full:	***Not Yet Assessed***

During the sixth reporting period, the City and the CPD maintained Preliminary compliance with ¶408.

To evaluate Preliminary compliance with ¶408, we reviewed the CPD's relevant policies and documents following the process described in the Consent Decree (¶¶626–41), which outlines applicable consultation, resolution, workout, and public comment periods. To assess Secondary compliance, we need to review the CPD's training development, implementation, and evaluation.

Progress before the Sixth Reporting Period

In previous reporting periods, the City and the CPD achieved Preliminary compliance with ¶408 by establishing language in *Traumatic Incident Stress Management Program* (TISMP) Directive E06-03 that the Professional Counseling Division personnel follow up with members released from the Traumatic Incident Stress Management Program within six months to offer additional support services.

Although the *Traumatic Incident Stress Management Program* directive had been finalized and the public comment period occurred during the fourth period, the IMT was not provided any records that have addressed the sixth month follow-up that is required by ¶408.

In a virtual meeting during the fifth reporting period, the Professional Counseling Division apprised the IMT that various curricula were being reviewed and eLearning was under development to be produced in early 2022. The IMT provided concerns related to the duration of time it takes from the development of a lesson plan through its instructional period and would prefer to more of an expedited effort by the CPD to ensure that timely information is presented.

As with ¶407, the CPD did not reach Secondary compliance during the fourth or fifth reporting periods because the CPD did not provide the IMT with evidence that the Traumatic Incident Stress Management Program clinicians' training materials were finalized and delivered. The IMT will need to review additional data that will support: (1) additional services, (2) completion of counseling services, or (3) any related referrals beyond the services provided by Professional Counseling Division. The IMT also anticipated a finalized review of the Traumatic Incident Stress Management Program training materials in a future reporting period.

Progress in the Sixth Reporting Period

During the fifth reporting period, the Professional Counseling Division apprised the IMT of a status update regarding several officer wellness policies, initiatives, programs, and trainings. As such, the Professional Counseling Division continues to provide services to those seeking same upon being referred to the Professional Counseling Division after having experienced a duty-related traumatic incident. Per ¶408 and Directive E06-03, the Professional Counseling Division's mental health counselors are directed to follow up six months after the initial consultations. The Professional Counseling Division has not submitted any records showing their adherence to this ¶and other policy stipulations.

As stipulated in the previous reporting periods, the IMT still awaits review of data that will support:

- additional services;
- completion of counseling services;
- any additional related referrals beyond the services provided by the Professional Counseling Division; and
- Traumatic Incident Stress Management Program eLearning (¶¶407, 408, 409)

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Although the eLearning curriculum of the Traumatic Incident Stress Management Program training has been developed, the IMT looks forward to the review of the completed training and the associated data relevant training and the counseling services that are applicable to those members who have been involved in the firearm-related discharge.

Paragraph 408 Compliance Progress History

FIRST REPORTING PERIOD
SEPTEMBER 1, 2019 – AUGUST 31, 2019
COMPLIANCE PROGRESS:
Not Applicable

SECOND REPORTING PERIOD
SEPTEMBER 1, 2019 – FEBRUARY 29, 2020
COMPLIANCE PROGRESS:
Not Applicable

THIRD REPORTING PERIOD
MARCH 1, 2020 – DECEMBER 31, 2020
COMPLIANCE PROGRESS:
None

FOURTH REPORTING PERIOD
JANUARY 1, 2021 – JUNE 30, 2021
COMPLIANCE PROGRESS:
Preliminary

FIFTH REPORTING PERIOD
JULY 1, 2021 – DECEMBER 31, 2021
COMPLIANCE PROGRESS:
Preliminary

SIXTH REPORTING PERIOD
JANUARY 1, 2022 – JUNE 30, 2022
COMPLIANCE PROGRESS:
Preliminary

Officer Wellness and Support: ¶409

409. *CPD has implemented a mandatory program for members who have experienced an officer-involved firearms discharge that consists of peer group discussions and other components. CPD will ensure that this program is overseen by a licensed mental health professional assigned to the Professional Counseling Division, reflects best practices, and comports with CPD's use of force policies and training.*

Compliance Progress (Reporting Period: January 1, 2022, through June 30, 2022)

Preliminary:	***In Compliance*** **(FIRST REPORTING PERIOD)**
Secondary:	***Not in Compliance***
Full:	***Not Yet Assessed***

During the sixth reporting period, the City and the CPD maintained Preliminary compliance with ¶409.

To evaluate Preliminary compliance with ¶409, we reviewed the CPD's relevant policies and documents following the process described in the Consent Decree (¶¶626–41), which outlines applicable consultation, resolution, workout, and public comment periods. To assess Secondary compliance, we need to review the CPD's training development, implementation, and evaluation.

Progress before the Sixth Reporting Period

In the first reporting period, the City and the CPD achieved Preliminary compliance with ¶409 by implementing a mandatory, Commission on Accreditation for Law Enforcement Agencies (CALEA) qualified program for officers who have experienced an officer-involved firearm discharge. The CPD maintained Preliminary compliance with ¶409 before reporting periods by finalizing the *Traumatic Incident Stress Management Program* (TISMP) Directive E06-03. The IMT reviewed training materials for clinicians for the Traumatic Incident Stress Management Program in February 2021 and provided comments.

During the fifth reporting period, although the CPD submitted the Traumatic Incident Stress Management Program training for review in February 2021, the training had yet to be finalized and provided.

To reach additional levels of compliance, the IMT looked forward to receiving records showing oversight and review, by a licensed mental health professional, of the mandatory program and its review process to ensure best practices and comports with the CPD's use-of-force policies in training. Furthermore, the IMT explained that the City and the CPD would need to complete the training materials

and provide evidence that the training has been delivered along with an accounting of attendees and the other instructional delivery-related data.

Progress in the Sixth Reporting Period

The Professional Counseling Division (also known as the PCD) oversees the Traumatic Incident Stress Management Program as noted in policy, training, various strategies, and the relative paragraphs of the Consent Decree. As noted in ¶408, the Professional Counseling Division apprised the IMT of a status update regarding several officer wellness policies, initiatives, programs, and trainings. While the Professional Counseling Division continues to provide services to those who are referred to the Professional Counseling Division after having experienced a duty-related traumatic incident, the IMT has not received any information, data, nor reviewed any records that document the efforts being made per ¶408 and Directive E06-03. The Professional Counseling Division has not submitted any records showing their adherence to this paragraph and other policy stipulations.

As stipulated in the previous reporting periods, the IMT still awaits review of data that will support:

- prescribed Professional Counseling Division services,
- group discussions and other components pertinent to this paragraph,
- completion of counseling services, and
- any additional related referrals beyond the services solely provided by the Professional Counseling Division.

Paragraph 409 Compliance Progress History

FIRST REPORTING PERIOD	SECOND REPORTING PERIOD	THIRD REPORTING PERIOD
SEPTEMBER 1, 2019 – AUGUST 31, 2019	SEPTEMBER 1, 2019 – FEBRUARY 29, 2020	MARCH 1, 2020 – DECEMBER 31, 2020
COMPLIANCE PROGRESS:	COMPLIANCE PROGRESS:	COMPLIANCE PROGRESS:
Preliminary	Preliminary	Preliminary
FOURTH REPORTING PERIOD	**FIFTH REPORTING PERIOD**	**SIXTH REPORTING PERIOD**
JANUARY 1, 2021 – JUNE 30, 2021	JULY 1, 2021 – DECEMBER 31, 2021	JANUARY 1, 2022 – JUNE 30, 2022
COMPLIANCE PROGRESS:	COMPLIANCE PROGRESS:	COMPLIANCE PROGRESS:
Preliminary	Preliminary	Preliminary

Officer Wellness and Support: ¶410

410. *CPD will continue to place any CPD member who has discharged a firearm, excluding training discharges, unintentional discharges, or discharges for the destruction of an animal where no person was injured, on mandatory administrative duty assignment for a minimum period of 30 days. Prior to permitting the member to return to regular field duties, CPD will require the member to (a) complete the Traumatic Incident Stress Management Program and any training determined by CPD to be appropriate; and (b) receive authorization from the First Deputy Superintendent. Authorization to return to regular field duties may be withheld pending the outcome of any administrative or criminal investigation.*

Compliance Progress

(Reporting Period: January 1, 2022, through June 30, 2022)

Preliminary:	***In Compliance*** **(FOURTH REPORTING PERIOD)**
Secondary:	***Not in Compliance***
Full:	***Not Yet Assessed***

During the sixth reporting period, the City and the CPD maintained Preliminary compliance with ¶410.

To evaluate Preliminary compliance with ¶410, we reviewed the CPD's relevant policies and documents following the process described in the Consent Decree (¶¶626–41), which outlines applicable consultation, resolution, workout, and public comment periods. To evaluate Secondary compliance with this paragraph, we reviewed the data sources relevant to compliance with the paragraph. We paid particular attention to the City and the CPD's acquisition or implementation of a technological solution that allows for reliable data tracking now and in the future.

Progress before the Sixth Reporting Period

In previous reporting periods, the City and the CPD achieved Preliminary compliance with ¶410 by finalizing the *Traumatic Incident Stress Management Program* (TISMP) Directive E06-03. This directive clearly defines the types of firearm discharges that mandate Traumatic Incident Stress Management Program referral. In addition, E06-03 requires the Professional Counseling Division (also known as the PCD) to notify the Office of First Deputy Superintendent when a member who was referred to the Traumatic Incident Stress Management Program due to a firearm discharge is released from the program. The policy also requires members who have discharged a firearm to respond consistent with another CPD

directive, *Firearm Discharge Incidents Authorized Use and Post-Discharge Administrative Procedures*, G03-02-03.

During the fifth reporting period, the IMT was not presented with any of the data sources to support compliance with ¶410 specific to Secondary compliance. The IMT explained that to reach Secondary compliance, the City and the CPD would need to implement a technology solution that allows for data collection and analysis to track the Professional Counseling Division unit's and members' compliance effectively and accurately with this directive.

Progress in the Sixth Reporting Period

The City and The CPD continue to remain at Preliminary compliance with ¶410 during the Sixth reporting period. It is necessary to evaluate the data sources that reflect and support compliance of this paragraph. Those data sources are specific to the CPD members who have discharged their firearm under specific circumstances; on mandatory administrative duty assignments for a minimum of 30 days.

To date, the IMT has not received any production of anonymized data indicating:

1) the number of members on admin duty,
2) the number mandated to complete the Traumatic Incident Stress Management Program, and any other specific training that may be required,
3) data reflective of those returning to regular field duty, and
4) those who were not permitted to return or were extended pending the outcome of an investigation.

The IMT has not been presented with the aforementioned data needed to assess compliance with ¶410.

The Preliminary compliance status was reached by the City and the CPD in finalizing the policy E06-03, which articulates the mandatory requirement for the Traumatic Incident Stress Management Program referral.

Throughout the Sixth reporting period, the IMT has been apprised of the anticipated implementation of the iCarol Technology solution. However, the IMT is concerned about whether this is a data set that can be captured by the iCarol platform as the continuity of this training and respective tracking of an employee referred to the Traumatic Incident Stress Management Program (due to the firearm discharge) may include a number of other entities within the CPD who also address portions of this case-by-case matter). The example offered is IAB, Training, Employees Assistance Program, external resources may all be connected to this

one employee before they are returned to full duty. The IMT seeks to understand how all touch points are captured and properly recorded to ensure the consistency and continuity of this paragraph is applied accordingly. Additionally, as these events and incidents occur, the IMT seeks to understand how data is mirrored by the various facets created by this mandate:

1) the notification of the deputy superintendent,
2) the additional training that may be required, and
3) the extension of the admin duty beyond 30 days resulting in withholding one's return to regular duty.

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It is important that these facets are captured. In several discussions regarding when and what data will be imported into the iCarol system, there has been no indication that it will include historical data. The IMT would like to see some historical data in this area as ¶410 encompasses a number of other entities to include the Deputy Superintendent, training, and other referrals, and those aspects of the requirement that may not be currently captured or recorded at this time. The IMT await further discussion and the data solutions that address both ¶410 and E06-03 in order to begin moving toward Secondary compliance.

Paragraph 410 Compliance Progress History

FIRST REPORTING PERIOD	SECOND REPORTING PERIOD	THIRD REPORTING PERIOD
SEPTEMBER 1, 2019 – AUGUST 31, 2019	SEPTEMBER 1, 2019 – FEBRUARY 29, 2020	MARCH 1, 2020 – DECEMBER 31, 2020
COMPLIANCE PROGRESS:	COMPLIANCE PROGRESS:	COMPLIANCE PROGRESS:
Not Applicable	Not Applicable	None

FOURTH REPORTING PERIOD	FIFTH REPORTING PERIOD	SIXTH REPORTING PERIOD
JANUARY 1, 2021 – JUNE 30, 2021	JULY 1, 2021 – DECEMBER 31, 2021	JANUARY 1, 2022 – JUNE 30, 2022
COMPLIANCE PROGRESS:	COMPLIANCE PROGRESS:	COMPLIANCE PROGRESS:
Preliminary	Preliminary	Preliminary

Officer Wellness and Support: ¶411

> ***411.*** *At least annually, CPD will determine whether members who have experienced a duty-related traumatic incident have attended the mandatory counseling sessions and have completed the Traumatic Incident Stress Management Program.*

Compliance Progress (Reporting Period: January 1, 2022, through June 30, 2022)

Recurring Schedule: Annually ☐ **Met** ☑ **Missed**

Preliminary: ***In Compliance*** **(SECOND REPORTING PERIOD)**
Secondary: ***Not in Compliance***
Full: ***Not Yet Assessed***

During the sixth reporting period, the City and the CPD maintained Preliminary compliance with ¶411. However, the CPD will not be able to maintain compliance if they do not submit the annual report required for this paragraph moving forward.

To assess Preliminary compliance with ¶411, we reviewed the CPD's relevant policies and documents following the process described in the Consent Decree (¶¶626–41), which outlines applicable consultation, resolution, workout, and public comment periods. For Secondary compliance, we reviewed the CPD's training development, implementation, and evaluation. We also sought to review records that are sufficient to show that the CPD has qualified personnel fulfilling the responsibilities delineated by ¶411.

Progress before the Sixth Reporting Period

In previous reporting periods, the City and the CPD achieved Preliminary compliance with ¶411 by submitting a CPD Audit Unit report providing a review of the Traumatic Incident Stress Management Program (TISMP) and including ¶411's requirements into Directive E06-03. Specifically, E06-03 requires the Audit Division to:

> *conduct an annual assessment to determine the extent to which members who experience traumatic incidents are referred to the [TISMP] and the extent to which referred members attend the mandatory debriefing session(s), complete the [TISMP], and receive follow-up communication and support services.*

The CPD did not provide the required annual assessment by the end of the fourth nor during the fifth reporting period. We reiterated the importance of

implementing a technology solution and await the basic data to determine Secondary compliance.

To reach Secondary compliance, the IMT explained that the City and the CPD would need to provide evidence of an annual review, as well as implement a technology solution to allow for reliable and efficient tracking of compliance with ¶411. We also explained that we would look for the City and the CPD to train personnel to appropriately analyze data on program compliance which will then inform the annual review and report.

Progress in the Sixth Reporting Period

The mandate of ¶411 also reflects the mandates stipulated in E06-03. During the Sixth reporting period, the City and the CPD have not progressed beyond Preliminary compliance. During the Sixth reporting period, the IMT did not receive any data or related productions that support further compliance for ¶411. In a previous period, the CPD submitted the CPD Audit Unit Report that reviewed the Traumatic Incident Stress Management Program and ¶411, which paralleled the E06-03. No productions or submission have been presented since then.

The IMT is concerned that this requirement should be routinely collected as these events do occur and some facet of this data should already exist to be only enhanced with technology solutions. Therefore, the IMT should expect to see historical data applied to ¶411.

Until further productions and submissions meet the stipulations required in ¶411, the City and The CPD cannot move towards Secondary compliance. Furthermore, the CPD must submit the required annual report moving forward to maintain current levels of compliance. Beyond Secondary compliance, we will look forward to the routinized data collection and related assessments that verifiably support ¶411.

Paragraph 411 Compliance Progress History

FIRST REPORTING PERIOD	SECOND REPORTING PERIOD	THIRD REPORTING PERIOD
SEPTEMBER 1, 2019 – AUGUST 31, 2019	SEPTEMBER 1, 2019 – FEBRUARY 29, 2020	MARCH 1, 2020 – DECEMBER 31, 2020
COMPLIANCE PROGRESS:	COMPLIANCE PROGRESS:	COMPLIANCE PROGRESS:
Not Applicable	Preliminary	Preliminary
FOURTH REPORTING PERIOD	**FIFTH REPORTING PERIOD**	**SIXTH REPORTING PERIOD**
JANUARY 1, 2021 – JUNE 30, 2021	JULY 1, 2021 – DECEMBER 31, 2021	JANUARY 1, 2022 – JUNE 30, 2022
COMPLIANCE PROGRESS:	COMPLIANCE PROGRESS:	COMPLIANCE PROGRESS:
Preliminary	Preliminary	Preliminary

Officer Wellness and Support: ¶412

412. *Where it would add to the quality or effectiveness of the training, CPD will involve mental health professionals, as feasible, practical, and appropriate, in developing and reviewing recruit and in-service training on stress management, alcohol and substance abuse, officer wellness, and the support services available to CPD members.*

Compliance Progress (Reporting Period: January 1, 2022, through June 30, 2022)

Preliminary:	***In Compliance*** **(FIFTH REPORTING PERIOD)**
Secondary:	***Under Assessment***
Full:	***Not Yet Assessed***

During the sixth reporting period, the City and the CPD maintained Preliminary compliance with ¶412.

To evaluate Preliminary compliance with ¶412, the IMT reviewed the CPD's relevant policies and documents following the process described in the Consent Decree (¶¶626-641), which outlines applicable consultation, resolution, workout, and public comments periods.

For Secondary compliance, we reviewed the CPD's training development, implementation, and evaluation. We also sought to determine how the CPD is seeking input from mental health professionals in developing and reviewing the training on mental health related topics, what feedback the professionals provide, and how the CPD utilizes such feedback.

Progress before the Sixth Reporting Period

In the third reporting period, we provided a status update stating the CPD had engaged the expertise of several outside professionals to assist in the development of a variety of programs and materials. In the fourth reporting period, the CPD revised Special Order S11-10, *Department Training*, which includes mental-health experts among the list of outside experts to be called on, and the IMT provided a no-objection notice. The CPD also partnered with several outside professionals in the development and delivery of the *In-Service Officer Wellness* training materials, to which we submitted a no-objection notice.

The CPD also produced the *Employee Assistance Program (EAP) Recruit Training* curriculum and lesson plans, presented by a licensed professional from the Professional Counseling Division (also known as the PCD).

During the fourth and fifth reporting period, the CPD had submitted several Officer Wellness training curricula, including the *2021 In-Service Officer Wellness Training*, the *EAP Pre-Service Promotional Training*, and the *EAP Recruit Training*.

During the fifth reporting period, the IMT was able to observe the delivery of the *2021 In-Service Officer Wellness Training* and participate in a virtual site visit discussion with members of the Professional Counseling Division to discuss observation of the curriculum delivery and instruction. Additionally, the IMT was able to observe the financial wellness topical area conducted by representative from an external resource.

Additionally, in the fifth reporting period, a member of an outside mental-health resource attended an officer wellness meeting to discuss steps taken to develop curriculum and programming. The partnership with other mental-health professionals is a significant aspect of both the training development and providing services to CPD members to ensure that practices remain both relevant and current in providing services to the CPD members. Appendix G of the *2021 Training Plan* includes a list of external resources and subject-matter experts who have provided input in the development of specific training material and who have delivered instruction of the lesson plan. The CPD also finalized S11-10 during the fifth reporting period, which addresses the requirements of this paragraph.[1]

With the CPD's involvement of outside experts in developing these training materials, and the finalization of S11-10, the IMT reached Preliminary compliance. The IMT indicated that we would continue to look for evidence that trainings have been delivered to members to reach further levels of compliance.

Progress in the Sixth Reporting Period

During this reporting period, the IMT received the *Employees Assistance Program Recruitment Training* curriculum for compliance records. The IMT and the Office of the Illinois Attorney General submitted a no-objection notice with comments in appreciation for a clear, concise revision of the curriculum. This particular lesson plan introduces the wellness program to recruits who have joined the CPD. The curriculum is particularly important for recruit classes as they are introduced to the available internal and external resources and services that further promote mental health and wellness. With emphasis on confidentiality, introduction to the Professional Counseling Division and the programs offered, the curriculum presents the avenues by which to contact the Professional Counseling Division and support units for stress management and related mental health matters.

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The IMT does recommend that the CPD and the City consider adding the financial wellness component to this curriculum in the future. When new recruits enter the unique work environment of law-enforcement, the IMT suggests that financial literacy education be a consideration in an effort to mitigate the associated stress is that is often correlated to financial management. Additionally, the continuity of financial resource education allows the recruits and the CPD members to develop a greater understanding of their benefits, related investments, and establish a more financially sound portfolio as well.

The IMT looks forward to the enhanced documentation of those mental health providers and resources that support ¶412 and the Professional Counseling Division's efforts to promote wellness. As such, the CPD remains Under Assessment and the IMT looks forward to the finalization of S11–10 and the conclusion of the *EAP Recruit Training*. Although the CPD only presented one production regarding ¶412, throughout the Sixth reporting period, the IMT did note that the Professional Counseling Division has premised aspects of this paragraph ranging from in-service training to support services that are found in other productions. Several of those productions that are currently being developed do reference several external resources and related best practices to include: the US Department of Defense on suicide prevention, credit union on aspects of financial wellness, Traumatic Incident Stress Management Program, philanthropic support for the Couples Retreat, Georgetown University with the ABLE curriculum and NAMI. The IMT does look forward to seeing an inclusive list that reflects to the CPD's continued and expanding engagement with those resources that further wellness and support of the recruits and the greater CPD membership.

Lastly, the data reflecting the class completion and attendance records, pre- and post-test data is expected to be submitted as productions to be reviewed by the IMT as well.

Paragraph 412 Compliance Progress History

FIRST REPORTING PERIOD	SECOND REPORTING PERIOD	THIRD REPORTING PERIOD
SEPTEMBER 1, 2019 – AUGUST 31, 2019	SEPTEMBER 1, 2019 – FEBRUARY 29, 2020	MARCH 1, 2020 – DECEMBER 31, 2020
COMPLIANCE PROGRESS:	COMPLIANCE PROGRESS:	COMPLIANCE PROGRESS:
Not Applicable	Not Applicable	Status Update
FOURTH REPORTING PERIOD	**FIFTH REPORTING PERIOD**	**SIXTH REPORTING PERIOD**
JANUARY 1, 2021 – JUNE 30, 2021	JULY 1, 2021 – DECEMBER 31, 2021	JANUARY 1, 2022 – JUNE 30, 2022
COMPLIANCE PROGRESS:	COMPLIANCE PROGRESS:	COMPLIANCE PROGRESS:
Under Assessment	Preliminary	Preliminary

Officer Wellness and Support: ¶413

413. *CPD will involve experts, such as psychologists and cognitive and behavioral scientists, in developing training on use of force where their expertise would enhance the effectiveness of the training. The training topics that may benefit from such expertise could include: a. peer intervention by fellow officers to stop the use of excessive force; b. the interaction of human perception and threat assessment; and c. de-escalation and defusing techniques, including psychological methods of situation control, verbal control and communication, conflict resolution, and anger management.*

Compliance Progress

(Reporting Period: January 1, 2022, through June 30, 2022)

Preliminary:	***In Compliance*** **(FIFTH REPORTING PERIOD)**
Secondary:	***Not in Compliance***
Full:	***Not Yet Assessed***

During the sixth reporting period, the City and the CPD maintained Preliminary compliance with ¶413.

To evaluate Preliminary compliance with ¶413, the IMT reviewed the CPD's relevant policies and documents following the process described in the Consent Decree (¶¶626-641), which outlines applicable consultation, resolution, workout, and public comments periods.

For Secondary compliance, we reviewed the CPD's training development, implementation, and evaluation. We also sought to determine how the CPD is identifying the means and methods by which input is sought from experts in developing training on use of force where their expertise would enhance the effectiveness of the training, how the CPD is seeking input from experts in developing these trainings, what feedback the experts provide, and how the CPD utilizes such feedback.

Progress before the Sixth Reporting Period

In the third reporting period, we provided a status update, indicating we had reviewed documents reflecting the CPD's engagement of behavioral science experts in developing a variety of trainings. In the fourth reporting period, in addition to reviewing revisions to Special Order S11-10, *Department Training*, as discussed in ¶412 above, we reviewed the City and the CPD's *2021 Training Plan*.

During the fifth reporting period, the IMT reviewed and provided comments on the *2021 Training Plan*. We appreciated the CPD's efforts to involve outside

expertise to develop and review CPD curricula and to incorporate experts and guest speakers in the instruction. The outside experts are noted in Appendix G of the *2021 Training Plan*.

The CPD also finalized S11-10 during the fifth reporting period, which addresses the requirements of this paragraph. Therefore, the City and the CPD met Preliminary compliance with ¶413. To reach Secondary compliance, the IMT expects evidence that shows the relevant trainings have been delivered.

Progress in the Sixth Reporting Period

As noted in ¶412, the City and the CPD have made some strides towards involving experts in assisting them in the development of training on the use of force. However, this paragraph is still under assessment. The IMT does appreciate the effort the CPD has taken to include the ABLE training founded on the campus of Georgetown University. As this training has been nationally recognized, it requires train-the-trainer certification to ensure continuity of the training experience.

The CPD has referenced some professional organizations throughout the submission of various lesson plans. However, the delivery of those lesson plans, date of attendance and finalizing S11-10 is a critical component needed to move this paragraph toward compliance. Some outside Subject Matter Experts (SMEs) are noted in other productions and viewed by the IMT during the initial production submissions. However, several productions are either being presented as instruction or are still in various stages of development to include the Suicide Prevention Initiative, and 2022 Communications Strategy.

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The IMT looks forward to seeing a report that identifies how the CPD has utilized these SMEs and the capacities in which they serve as evidence to support ¶413 of the Consent Decree.

Paragraph 413 Compliance Progress History

FIRST REPORTING PERIOD	SECOND REPORTING PERIOD	THIRD REPORTING PERIOD
SEPTEMBER 1, 2019 – AUGUST 31, 2019	SEPTEMBER 1, 2019 – FEBRUARY 29, 2020	MARCH 1, 2020 – DECEMBER 31, 2020
COMPLIANCE PROGRESS:	COMPLIANCE PROGRESS:	COMPLIANCE PROGRESS:
Not Applicable	Not Applicable	Status Update
FOURTH REPORTING PERIOD	**FIFTH REPORTING PERIOD**	**SIXTH REPORTING PERIOD**
JANUARY 1, 2021 – JUNE 30, 2021	JULY 1, 2021 – DECEMBER 31, 2021	JANUARY 1, 2022 – JUNE 30, 2022
COMPLIANCE PROGRESS:	COMPLIANCE PROGRESS:	COMPLIANCE PROGRESS:
Under Assessment	Preliminary	Preliminary

Officer Wellness and Support: ¶414

> ***414.*** *CPD will ensure that all CPD members are provided in-service training on stress management, alcohol and substance abuse, and officer wellness at least every three years. CPD will include training regarding stress management, alcohol and substance abuse, officer wellness, and support services in the recruit training program.*

Compliance Progress (Reporting Period: January 1, 2022, through June 30, 2022)

Preliminary:	***In Compliance*** **(FOURTH REPORTING PERIOD)**
Secondary:	***Under Assessment***
Full:	***Not Yet Assessed***

During the sixth reporting period, the City and the CPD maintained Preliminary compliance and remained under assessment for Secondary compliance with ¶414.

To assess Preliminary compliance with ¶414, the IMT reviewed the CPD's relevant policies and documents following the process described in the Consent Decree (¶¶626-641), which outlines applicable consultation, resolution, workout, and public comments periods. We also reviewed training materials that demonstrate the development of programs relevant to compliance with ¶414. To evaluate Secondary compliance with ¶414, the IMT reviewed the CPD's training development, implementation, and evaluation (¶286). For Full compliance, we will need to determine whether the CPD offers sufficient recruit training and in-services training on stress management, substance use disorder, and officer wellness.

Progress before the Sixth Reporting Period

In previous reporting periods, the City and the CPD achieved Preliminary compliance with ¶414 by (1) submitting curricula for the Officer Wellness Training and the Employee Assistance Program (EAP) Pre-Service Promotional Training and (2) including verbiage in *Traumatic Incident Stress Management Program* (TISMP) Directive E06-01 that satisfies the requirements of ¶414. The CPD also submitted and revised *2021 In-Service Officer Wellness Training* materials, to which the IMT provided a no-objection notice. The IMT learned this training began in June 2021 and anticipated receiving evidence that all officers received this training in the fifth reporting period.

At the close of the fifth reporting period, the CPD submitted the *EAP Recruit Training Course Production* to be reviewed by the IMT.

During the fifth reporting period, the IMT observed the In-Service Officer Wellness training to CPD members. However, the IMT did not receive any attendance records or any related data in this reporting period indicating attendance and the percentage of CPD membership that have yet to receive the training. The IMT looks forward to reviewing the respective data following the course instruction in a future reporting period.

The City and the CPD remained in Preliminary compliance while under assessment for Secondary compliance during the fifth reporting period, and explained that to reach Secondary compliance, the CPD will need to submit the *Employees Assistance Program Recruit Course Training* materials and proof that these trainings have been delivered to all members of the CPD.

Progress in the Sixth Reporting Period

During the Sixth reporting period, the CPD has submitted several training productions for in-service training on the topic of stress management; alcohol and substance use disorders; and support services to include recruit training as well. The Employees Assistance Program Recruit Training was submitted to the IMT for review and to demonstrate Secondary compliance. The IMT provided feedback and the Office of the Illinois Attorney General provided and no-objection notice. The *Employees Assistance Program Recruit Training* will be instructed during this reporting period. However, the IMT awaits the records of completion, attendance, pre- and post-testing as evidence to determine if the criteria for ¶414 has been met in order to reach Secondary compliance.

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The IMT looks forward to the sustainable records, training and routine training schedules that will ensure that each recruiting class is presented with this most pertinent information that apprises recruits of wellness at the onset of their careers. The IMT does encourage the CPD to incorporate some informative facet of financial wellness into the Employees Assistance Program training as the financial matters can sometimes be the source of those types of stressors that this training attempts to offer preventive remedies that promote wellness.

Additionally, the Traumatic Incident Stress Management Program training further promotes wellness and was also reviewed during this reporting period. This training thus ensures that all CPD members are provided in-service training on stress management and alcohol and substance use disorder along with general officer wellness. Again, the IMT will await the data from the class attendance to include pre-and post- test as well. The IMT further recognizes the Annual Supervisor 2022 In-Service training also addresses some of the same topical areas.

These required data sets are necessary for the CPD to move forward for consideration of Secondary compliance.

Paragraph 414 Compliance Progress History

FIRST REPORTING PERIOD	SECOND REPORTING PERIOD	THIRD REPORTING PERIOD
SEPTEMBER 1, 2019 – AUGUST 31, 2019	SEPTEMBER 1, 2019 – FEBRUARY 29, 2020	MARCH 1, 2020 – DECEMBER 31, 2020
COMPLIANCE PROGRESS:	COMPLIANCE PROGRESS:	COMPLIANCE PROGRESS:
Not Applicable	Not Applicable	Status Update
FOURTH REPORTING PERIOD	**FIFTH REPORTING PERIOD**	**SIXTH REPORTING PERIOD**
JANUARY 1, 2021 – JUNE 30, 2021	JULY 1, 2021 – DECEMBER 31, 2021	JANUARY 1, 2022 – JUNE 30, 2022
COMPLIANCE PROGRESS:	COMPLIANCE PROGRESS:	COMPLIANCE PROGRESS:
Preliminary	Preliminary	Preliminary

Officer Wellness and Support: ¶415

415. *By July 1, 2020, and periodically thereafter, CPD will conduct a department-wide equipment and technology audit to determine what equipment is outdated, broken, or otherwise in need of repair or replacement. During each audit, CPD will solicit feedback from representatives of the collective bargaining units representing CPD members.*

Compliance Progress

(Reporting Period: January 1, 2022, through June 30, 2022)

Recurring Schedule: Ongoing ☐ **Met** ☑ **Missed**

Preliminary: ***Not in Compliance***
Secondary: ***Not Yet Assessed***
Full: ***Not Yet Assessed***

During the sixth reporting period, the City and the CPD remained out of compliance with ¶415.

To assess Preliminary compliance with ¶415, the IMT sought to review the CPD's relevant policies and documents directing the completion of periodic audits and solicitation of feedback from the collective bargaining units as required by ¶415, following the process described in the Consent Decree (¶¶626–41), which outlines applicable consultation, resolution, workout, and public comments periods.

Progress before the Sixth Reporting Period

In prior reporting periods, the City and the CPD did not reached Preliminary compliance because they did not provide evidence that a policy has been created to direct the completion of periodic audits as required by ¶415. Additionally, we noted that ¶415 calls for equipment and technology audits to be conducted "periodically." The IMT suggested that when the City and the CPD draft a policy to guide compliance with this paragraph, they should include a timing requirement that guides the frequency of these audits. Once this policy is finalized, we would look for the CPD to meet its own deadlines for completing the department-wide equipment and technology audits.

Despite the lack of a policy, during the fourth reporting period, the City and the CPD submitted an Equipment and Technology Audit. While we appreciated the efforts in completing this audit, it did not fully address the requirements of ¶415. Specifically, the audit did not provide a full and clear picture of (1) the equipment and technology in the CPD's possession; (2) the state of that equipment and technology; or (3) any recommendations for addressing any identified concerns or

problems with CPD's equipment or technology. Moreover, we had not received indication that all collective-bargaining units were consulted in the completion of this audit. The IMT indicated that the City and the CPD would need to submit a policy that guides compliance with ¶415, and include all requirements set out in ¶415 in the Equipment and Technology Audit.

During the fifth reporting period, the IMT did not receive any materials pertaining to this paragraph. The March 19, 2021 Audit from the CPD appeared to be a basic IT assessment of some of the technology equipment the CPD has available. A true audit would afford the CPD to support proposals and budgetary forecasting for some of the technology needs that are frequently reiterated in the IMT reports.

Having not met the requirements for ¶415, the IMT noted we would look for future evidence that addresses a true framework of an audit process in subsequent reporting periods.

Progress in the Sixth Reporting Period

Noted in the previous reporting period, the City and the CPD have not reached Preliminary compliance. The lists from the City and the CPD that were submitted were not informative in demonstrating the accurate accounting of equipment and technology. The IMT did not have a clear and full picture of the:

1) equipment and technology in the CPD's possession,

2) the state of that equipment and technology, nor

3) any recommendations for addressing any identified concerns or problems with the listed/non-listed equipment or technology to include proper disposal and surplus of same.

***

During the Sixth reporting period, the IMT has met with the PSA/Data Committee on several occasions, including a virtual site visit regarding the specific needs to be addressed in the department-wide equipment and technology audit to help determine what equipment is current, functional, non-functional, reached the end of life, and necessitates repair or replacement. The discussions have been both informative and reflective of understanding what information is needed; how to conduct the audit; and the conveyance of why such an audit is necessary. Communication is key. The robust conversations should yield the required records and data necessary to meet Preliminary and future compliance for ¶415.

Paragraph 415 Compliance Progress History

FIRST REPORTING PERIOD
SEPTEMBER 1, 2019 – AUGUST 31, 2019
COMPLIANCE PROGRESS:
Not Applicable

SECOND REPORTING PERIOD
SEPTEMBER 1, 2019 – FEBRUARY 29, 2020
COMPLIANCE PROGRESS:
Not Applicable

THIRD REPORTING PERIOD
MARCH 1, 2020 – DECEMBER 31, 2020
COMPLIANCE PROGRESS:
None

FOURTH REPORTING PERIOD
JANUARY 1, 2021 – JUNE 30, 2021
COMPLIANCE PROGRESS:
None

FIFTH REPORTING PERIOD
JULY 1, 2021 – DECEMBER 31, 2021
COMPLIANCE PROGRESS:
None

SIXTH REPORTING PERIOD
JANUARY 1, 2022 – JUNE 30, 2022
COMPLIANCE PROGRESS:
None

Officer Wellness and Support: ¶416

416. *Within 90 days of the completion of the initial audit, CPD will develop a plan, including a timeline for implementation, to prioritize and address the needs for repair or replacement of equipment and technology as identified through the needs assessment ("Equipment and Technology Audit Response Plan"). CPD will implement the Equipment and Technology Audit Response Plan in accordance with the specified timeline for implementation.*

Compliance Progress

(Reporting Period: January 1, 2022, through June 30, 2022)

Deadline:	Moving	✓ **Not Yet Applicable**
Preliminary:	***Not in Compliance***	
Secondary:	***Not Yet Assessed***	
Full:	***Not Yet Assessed***	

During the sixth reporting period, the City and the CPD remained out of Preliminary compliance with ¶416.

To assess Preliminary compliance with ¶416, the IMT sought to review the CPD's relevant policies and documents directing the development of an Equipment and Technology Audit Response Plan as required by ¶416, following the process described in the Consent Decree (¶¶626-641), which outline applicable consultation, resolution, workout, and public comments periods.

Progress before the Sixth Reporting Period

In previous reporting periods, the City and the CPD did not reach Preliminary compliance with ¶416. The IMT provided a status update in the third reporting period indicating we had not received any documents demonstrating compliance with this paragraph. As noted in our assessment of ¶415, the City and the CPD had not completed a sufficient technology and equipment audit. Without an adequate audit, the City and the CPD are unable to reach compliance with ¶416. We noted that, although the City and the CPD completed an audit—one which did not satisfy ¶415—they did not produce any additional documentation to show that the CPD developed an Equipment and Technology Audit Response plan to address the issues identified in the audit.

The requirements of ¶416 cannot be met without also meeting ¶415's requirements. As noted earlier, ¶415 requires a periodically scheduled audit to be conducted and details produced to determine the status of equipment and

technology. While the City produced a simplistic audit, they did not produce a comprehensive audit to meet ¶415's requirements, nor did the IMT receive evidence that the representatives of the collective bargaining units provided feedback.

Without the comprehensive initial audit, the CPD cannot meet the requirements of ¶416, which call for producing a plan to include a timeline for future audits in efforts to prioritize needs, repairs, and replacement of equipment and technology.

As noted in ¶415, a comprehensive audit could afford the city and the CPD to build a replacement, repair, disposal report that could later be used for budgetary planning and forecasting in the future.

The IMT looks forward to an update regarding ¶416 and next steps to remedy this multi-faceted issue to reach Preliminary compliance. Because of this the City and the CPD continued to remain out of Preliminary compliance with ¶416.

Progress in the Sixth Reporting Period

As noted in ¶415, the conversations have afforded clear, concise discussion of expectations to meet ¶414 and ¶415. As ¶416 is pursuant to paragraph ¶415 of the Consent Decree, the IMT looks forward to the comprehensive auditing process as well as an audit plan to identify the steps, timelines, and process by which the CPD will take in the future to create a more routinize standard to determine the state of its equipment and technology.

The IMT looks forward to the reports being produced by the PSA/Data Committee.

Paragraph 416 Compliance Progress History

FIRST REPORTING PERIOD	SECOND REPORTING PERIOD	THIRD REPORTING PERIOD
SEPTEMBER 1, 2019 – AUGUST 31, 2019	SEPTEMBER 1, 2019 – FEBRUARY 29, 2020	MARCH 1, 2020 – DECEMBER 31, 2020
COMPLIANCE PROGRESS:	COMPLIANCE PROGRESS:	COMPLIANCE PROGRESS:
Not Applicable	Not Applicable	Status Update

FOURTH REPORTING PERIOD	FIFTH REPORTING PERIOD	SIXTH REPORTING PERIOD
JANUARY 1, 2021 – JUNE 30, 2021	JULY 1, 2021 – DECEMBER 31, 2021	JANUARY 1, 2022 – JUNE 30, 2022
COMPLIANCE PROGRESS:	COMPLIANCE PROGRESS:	COMPLIANCE PROGRESS:
None	None	None

Officer Wellness and Support: ¶417

417. *As a component of the Equipment and Technology Audit Response Plan, CPD will develop a schedule for future periodic audits. The schedule will specify the time period within which future periodic audits will occur. The time period may vary for different equipment types to account for differences in the expected useful life of different equipment types. CPD will perform the periodic audits in accordance with the schedule.*

Compliance Progress (Reporting Period: January 1, 2022, through June 30, 2022)

Preliminary:	***Not in Compliance***
Secondary:	***Not Yet Assessed***
Full:	***Not Yet Assessed***

During the sixth reporting period, the City and the CPD remained out of Preliminary compliance with ¶417.

To evaluate Preliminary compliance with ¶417, the IMT sought to review the CPD's relevant policies and documents directing the development of a schedule for future periodic audits as a component of the Equipment and Technology Audit Response Plan as required by ¶417, following the process described in the Consent Decree (¶¶626-641), which outline applicable consultation, resolution, workout, and public comments periods. Specifically, the policy should specify how and when the audits should be completed to adequately identify the current state of technology in CPD's possession and provide sufficient details to allow the CPD to quickly determine what technology or equipment is outdated, broken, or otherwise in need of repair.

Progress before the Sixth Reporting Period

The IMT provided a status update in the third reporting period stating the CPD's ability to comply with this paragraph was stalled because it needed to implement a new Inventory Control System. As mentioned in our assessment of ¶¶415–16, the City and the CPD have not developed a policy to guide the process or procedures—including a schedule—for engaging in periodic audits of technology and equipment. Because of this the City and the CPD did not reach Preliminary compliance with ¶417.

Paragraph 417 is a subsequent paragraph to processes involving ¶¶415–16. As of the fifth reporting period, the IMT had not received any updated information regarding the creation of a comprehensive equipment and technology audit. As noted in the fourth reporting period, a scheduled audit to be conducted

"periodically" would provide a timing requirement that would serve as a guide for the frequency of such audits in the future. Without a policy that creates the framework for processes, scheduling future audits, requirements of the audits, and steps to take follow in the audit report, ¶¶415–17 cannot reach Preliminary compliance.

Progress in the Sixth Reporting Period

As noted in ¶416, the IMT references the need for the CPD to establish a schedule that provides a routinized process to conduct the audit within a specified time. The IMT will suggest that the audit is conducted, and its report is released within a sufficient timeframe that would allow the necessary units within the CPD to fiscally plan and forecast for any equipment and components that are at the end of life and require repairs or replacement. This enables the CPD to be strategic in its effort to determine immediate needs and long-term needs; thus, determining both expedient requisitions versus capital planning.

The IMT looks forward to the production of such evidence in order to move ¶417 towards some level of compliance.

Paragraph 417 Compliance Progress History

FIRST REPORTING PERIOD	SECOND REPORTING PERIOD	THIRD REPORTING PERIOD
SEPTEMBER 1, 2019 – AUGUST 31, 2019	SEPTEMBER 1, 2019 – FEBRUARY 29, 2020	MARCH 1, 2020 – DECEMBER 31, 2020
COMPLIANCE PROGRESS:	COMPLIANCE PROGRESS:	COMPLIANCE PROGRESS:
Not Applicable	Not Applicable	Status Update
FOURTH REPORTING PERIOD	**FIFTH REPORTING PERIOD**	**SIXTH REPORTING PERIOD**
JANUARY 1, 2021 – JUNE 30, 2021	JULY 1, 2021 – DECEMBER 31, 2021	JANUARY 1, 2022 – JUNE 30, 2022
COMPLIANCE PROGRESS:	COMPLIANCE PROGRESS:	COMPLIANCE PROGRESS:
None	None	None

Officer Wellness and Support: ¶418

418. *In order to facilitate physical health and mental well-being, CPD will ensure its members have access to exercise equipment at CPD facilities in geographically dispersed areas throughout the City.*

Compliance Progress (Reporting Period: January 1, 2022, through June 30, 2022)

Preliminary:	***In Compliance*** **(THIRD REPORTING PERIOD)**
Secondary:	***Not in Compliance***
Full:	***Not Yet Assessed***

During the sixth reporting period, the City and the CPD maintained Preliminary compliance with ¶418.

To evaluate Preliminary compliance with ¶418, we reviewed lists provided by the CPD accounting for the exercise equipment in the CPD's possession and listing the location of the equipment. For Secondary compliance, we reviewed various data sources to determine whether the City has conducted a survey to ensure that equipment is dispersed throughout Chicago to meet the demand in each location.

Progress before the Sixth Reporting Period

In previous reporting periods, the City and the CPD achieved Preliminary compliance with ¶418 by submitting information which accounted for the exercise equipment possessed by the CPD, along with the location of that equipment. The IMT stated that moving forward, we would look for evidence that the City has conducted a survey to ensure the exercise equipment was dispersed throughout the city such that it meets the demands present in each location. Additionally, we would expect future equipment audits to report on the condition of this equipment.

During the fifth reporting period, the IMT did not receive any evidence reflective of the survey referenced in the previous reporting period, which is necessary for Secondary compliance. During the fifth reporting period, the IMT reviewed the prior productions listing the gym equipment at the various locations. However, we noted that some documentation showed serial numbers but not the equipment item or name, which made it difficult to know what type of equipment the serial number is attached to at the various locations for inventory purposes and future replacement purposes.

Without identity of the equipment and without a means of determining access and utility of the equipment, the City and the CPD will be challenged in meeting the requirements of ¶418. The IMT anticipated both the survey to determine

access to equipment and locations and clarification and identification of the type of equipment listed on the previous productions in future reporting periods.

Progress in the Sixth Reporting Period

In the previous reporting period, the CPD did produce various lists of equipment their assigned locations throughout the CPD. The City and the CPD received Preliminary compliance with these production submissions. However, during the fifth reporting period, the IMT indicated that the productions did not provide critical information to afford any reader an understanding of what equipment the identifying number was attached to. Nor did it provide the ability to determine utility of the equipment, end of life, any necessary repairs, or the need for replacement. The IMT reiterates a notation from Independent Monitoring Report 5 on ¶418 indicating the challenge(s) that are created by not accurately identifying equipment to include the specific type of equipment to be listed as well.

Therefore, the IMT cannot consider further compliance levels until these matters are adequately addressed and the productions of the equipment audits are aligned with other informed audits. Simply stated, equipment, though geographically placed throughout the City has not been properly inventoried to indicate identity, utility, location, identifying inventory numbers. Lastly, the IMT would recommend this type of inventory process be placed on the schedule as well as to assure the equipment repairs or replacement are done in the most fiscally efficient manner. This ensures that as new facilities come on-line that the Furniture, Fixtures, and Equipment can be properly budgeted for in the construction/up-fit costs.

During this reporting period, the CPD has brought the Southside Station on-line and is proposing the Northwest Station to be approved in the 2022–2023 (FY23) budget year. The wellness inclusion of these facilities allows for the member units of the Professional Counseling Division to be co-located to provide for greater wellness/counseling access for the CPD membership.

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The physical and mental well-being is further supported by the access to exercise equipment. Therefore, the IMT looks forward to the accurate reporting/audit of the equipment in the various locations, which includes the two new facilities as well. It is important to know that equipment is accessible. However, it is also important to know what equipment is available to ensure that the exercise/physical fitness needs are being efficiently and effectively met via the distribution of same as well.

Paragraph 418 Compliance Progress History

FIRST REPORTING PERIOD SEPTEMBER 1, 2019 – AUGUST 31, 2019	SECOND REPORTING PERIOD SEPTEMBER 1, 2019 – FEBRUARY 29, 2020	THIRD REPORTING PERIOD MARCH 1, 2020 – DECEMBER 31, 2020
COMPLIANCE PROGRESS: Not Applicable	COMPLIANCE PROGRESS: Not Applicable	COMPLIANCE PROGRESS: Preliminary
FOURTH REPORTING PERIOD JANUARY 1, 2021 – JUNE 30, 2021	**FIFTH REPORTING PERIOD** JULY 1, 2021 – DECEMBER 31, 2021	**SIXTH REPORTING PERIOD** JANUARY 1, 2022 – JUNE 30, 2022
COMPLIANCE PROGRESS: Preliminary	COMPLIANCE PROGRESS: Preliminary	COMPLIANCE PROGRESS: Preliminary

Appendix 9
Accountability and Transparency Compliance Assessments, by Paragraph

Appendix 9
Accountability and Transparency Compliance Assessments, by Paragraph

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Accountability and Transparency: ¶424

424. *When members of the public submit complaints to the City ("complainants"), those complaints must be courteously received, properly classified, and efficiently investigated. Throughout a non-criminal investigation of the actions of a member (an "administrative investigation"), complainants should be able to track the status of their complaints and receive current, accurate information.*

Compliance Progress (Reporting Period: January 1, 2022, through June 30, 2022)

Preliminary:		***In Compliance*** **(FIFTH REPORTING PERIOD)**[1]
	CPD	***In Compliance*** **(FIFTH REPORTING PERIOD)**
	COPA	***In Compliance*** **(FIFTH REPORTING PERIOD)**
Secondary:		***Not in Compliance***
	CPD	***Not in Compliance***
	COPA	***In Compliance*** **(FIFTH REPORTING PERIOD)**
Full:		***Not in Compliance***
	CPD	***Not Yet Assessed***
	COPA	***In Compliance*** **(NEW)**

In the sixth reporting period, COPA reached Full compliance with ¶424. The CPD made efforts toward but did not ultimately reach Secondary compliance with this paragraph. Because all relevant City entities must reach levels of compliance to bring the City, as a whole, into compliance, the City has not yet reached Secondary compliance.

To evaluate Preliminary compliance with ¶424, the IMT reviewed the CPD's and COPA's relevant policies and documents following the process described in the Consent Decree (¶¶626–41), which outlines applicable consultation, resolution, workout, and public comment periods.[2] To evaluate Secondary compliance with

[1] As referenced above, the Consent Decree requires actions by various City entities, including the CPD, COPA, the Police Board, and the Office of the Inspector General. Ultimately, the City is responsible for ensuring compliance. As a result, if a Consent Decree paragraph requires actions by multiple City entities, we will not find that the City has met Preliminary, Secondary, or Full compliance until all those entities have met the corresponding level of compliance. Nonetheless, for some paragraphs, we will clarify compliance assessments for each entity to demonstrate which benchmarks have been met.

[2] The OAG, the City, and the IMT agreed to a stipulation that provides a different review process for review of COPA policies and training materials. *See Stipulation Regarding the Policy and Training Review Process for the Civilian Office of Police Accountability (COPA)*, *Illinois v. Chicago*, Case No. 17-cv-6260 (January 30, 2020), https://cpdmonitoringteam.com/wp-content/uploads/2020/06/2020_01-Stipulation-Regarding-the-Policy-and-Training-Review-Process-for.._.pdf. The review process in the Stipulation mirrors the review process under ¶¶626–

this paragraph, we reviewed the CPD's and COPA's training development, implementation, and evaluation (¶286). To evaluate Full compliance with this paragraph, we evaluated whether the entities have implemented their policies and trainings such that complaints are courteously received, properly classified, and efficiently investigated, and community members are able to track the status of investigations into their complaint.

Progress before the Sixth Reporting Period

In previous reporting periods, the CPD and its Bureau of Internal Affairs (BIA) provided draft Unit Directives relating to ¶424 but had not finalized those directives. In the fifth reporting period, the CPD BIA compiled and provided drafts of various directives that were relevant to the requirements of ¶424, specifically General Order G08-01-02, *Complaint Initiation and Log Number Investigation Assignment*. CPD reached Preliminary compliance in the fifth reporting period due to the finalization of the General Order.

In previous reporting periods, COPA finalized 3.1.1, *Intake*, as well as 3.1.2, *Fact Gathering & Investigative Process*, which propelled COPA to reach Preliminary compliance. In the fifth reporting period, COPA revised its *Intake Unit: Overview of Policies and Procedures In-Service* training and submitted evidence that 99% of its personnel completed this training during the fifth reporting period. This propelled COPA to reach Secondary compliance in the fifth reporting period.

Progress in the Sixth Reporting Period

In the sixth reporting period, the CPD began to work toward Secondary compliance. BIA provided a first draft of its eLearning relevant to ¶424. This material remains in the drafting phase. The training module, spoken narrative, and written content speaks to the requirements of ¶424. We look forward to reviewing further developed BIA eLearning materials in the next reporting period.

This reporting period, COPA provided evidence that COPA is fulfilling the requirements of ¶424. COPA accepts complaints in a variety of means including, but not limited to phone and email. In addition, COPA's website directs complainants to the Chicago Data Portal, which allows complainants to use their Log Number to search and learn the status of their complaints. This transparent portal shows the classification and status of the investigation evidencing that complaints are being properly classified and efficiently investigated. With this, COPA reached Full compliance with ¶424.

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41, but among other things, gives the OAG and the IMT a shorter timeframe for review of COPA policies and training materials.

Moving forward, we will look for CPD to finalize BIA's eLearning to instruct compliance with ¶424 and provide it for review. For COPA, we will look for evidence demonstrating that COPA continues to follow policies and trainings such that community members' complaints are being courteously received and that complainants are able to track the status of investigations into their complaint. To sustain Full compliance, COPA will also need to demonstrate that the various methods by which COPA receives complaints are courteous.

Paragraph 424 Compliance Progress History

FIRST REPORTING PERIOD	SECOND REPORTING PERIOD	THIRD REPORTING PERIOD
SEPTEMBER 1, 2019 – AUGUST 31, 2019	SEPTEMBER 1, 2019 – FEBRUARY 29, 2020	MARCH 1, 2020 – DECEMBER 31, 2020
COMPLIANCE PROGRESS:	COMPLIANCE PROGRESS:	COMPLIANCE PROGRESS:
Not Applicable	Not Applicable	Not Applicable
FOURTH REPORTING PERIOD	**FIFTH REPORTING PERIOD**	**SIXTH REPORTING PERIOD**
JANUARY 1, 2021 – JUNE 30, 2021	JULY 1, 2021 – DECEMBER 31, 2021	JANUARY 1, 2022 – JUNE 30, 2022
COMPLIANCE PROGRESS:	COMPLIANCE PROGRESS:	COMPLIANCE PROGRESS:
Not Applicable	Preliminary	Preliminary

Accountability and Transparency: ¶¶425–26

425. *The City, CPD, and COPA will ensure individuals are allowed to submit complaints in multiple ways, including: in person to COPA or at a CPD district station, by telephone, online, anonymously, and through third party representatives. To ensure broad and easy access to its complaint system, within 90 days of the Effective Date: a. the City, CPD, and COPA will make the process for filing a complaint widely available to the public, including in-person, by telephone, and online; b. the City, CPD, and COPA will make the process for filing a complaint available electronically; c. the City, CPD, and COPA will make information on filing a complaint and accompanying instructions accessible to people who speak languages other than English and will provide telephonic language interpretation services consistent with the City's and CPD's existing limited English proficiency policies and this Agreement; d. the City, CPD, and COPA will ensure individuals may submit allegations of misconduct, regardless of whether the individual is a member or perceived member of an identifiable group, based upon, but not limited to: race, ethnicity, color, national origin, ancestry, religion, disability status, gender, gender identity, sexual orientation, marital status, parental status, military discharge status, financial status, or lawful source of income; e. the City, CPD, and COPA will continue to ensure that members of the public may make complaints via telephone using free 24-hour services, including by calling 311 and being given the option to leave a voicemail for COPA or speak to a CPD supervisor, and will clearly display this information on their respective websites and other appropriate City and CPD printed materials; f. the City, CPD, and COPA will ensure that instructions for submitting complaints are available via telephone, on-line, and in-person; and g. the City and CPD will ensure that complaint filing information is prominently displayed on CPD website's homepage, including by linking to COPA's online complaint form.*

426. *As part of the COPA's system for processing non-confidential complaints and administrative notifications (the "intake process"), each complaint and administrative notification will be assigned a unique tracking number. This unique tracking number will be linked with all phases of the investigation and disciplinary process, through the final disposition.*

Compliance Progress (Reporting Period: January 1, 2022, through June 30, 2022)

		¶425	¶426
Preliminary:		***In Compliance*** **(FIFTH REPORTING PERIOD)**	***In Compliance*** **(FIFTH REPORTING PERIOD)**
	CPD	***In Compliance*** **(FIFTH REPORTING PERIOD)**	***In Compliance*** **(FIFTH REPORTING PERIOD)**
	COPA	***In Compliance*** **(FOURTH REPORTING PERIOD)**	***In Compliance*** **(FOURTH REPORTING PERIOD)**
Secondary:		***Not in Compliance***	***Not in Compliance***
	CPD	***Not in Compliance***	***Not in Compliance***
	COPA	***In Compliance*** **(FIFTH REPORTING PERIOD)**	***In Compliance*** **(FIFTH REPORTING PERIOD)**
Full:		***Not in Compliance***	***Not in Compliance***
	CPD	***Not Yet Assessed***	***Not Yet Assessed***
	COPA	***In Compliance*** **(NEW)**	***In Compliance*** **(NEW)**

In the sixth reporting period, the CPD maintained Preliminary compliance with ¶425 and ¶426, and COPA reached Full compliance with these paragraphs. Because all relevant City entities must reach levels of compliance to bring the City, as a whole, into compliance, the City has not yet reached Secondary compliance.

To evaluate Preliminary compliance with ¶¶425–26, the IMT reviewed the CPD's and COPA's policies following the policy process described in the Consent Decree (¶¶626–41). To evaluate Secondary compliance with these paragraphs, we reviewed the entities' training development, materials, implementation, and evaluation.[3] To evaluate Full compliance with these paragraphs, we reviewed various data sources including but not limited to training materials, demonstrations, complaint submission systems, and website features to determine whether the entities have implemented their policies and trainings such that they are acting in accordance with ¶425–26's mandates.

Progress before the Sixth Reporting Period

In the fourth reporting period, COPA finalized Policy 3.1.1, *Intake*, which met the requirements for Preliminary compliance for ¶425 and ¶426. In the fifth reporting period, COPA provided materials for its training *Intake Unit: Overview of Policies and Procedures In-Service* and 99% of COPA personnel completed this training in

[3] The OAG, the City, and the IMT agreed to a stipulation that provides a different review process for review of COPA policies and training materials. *See Stipulation Regarding the Policy and Training Review Process for the Civilian Office of Police Accountability (COPA), Illinois v. Chicago*, Case No. 17-cv-6260 (January 30, 2020). The review process in the Stipulation mirrors the review process under ¶¶626–41, but among other things, gives the OAG and the IMT a shorter timeframe for review of COPA policies and training materials.

the fifth reporting period, bringing COPA into Secondary compliance with both paragraphs.

In previous reporting periods, the CPD and BIA were in the process of creating and finalizing policies that spoke to the requirements of ¶¶425–26. The CPD submitted a consultation draft of its *Case Management System* Unit Directive in the fourth reporting period, but this Unit Directive remained in the collaborative review and revision process at the end of the fifth reporting period. Also in the fifth reporting period, the CPD and BIA finalized General Order G08-01-02, *Complaint Initiation and Log Number Investigation Assignment*, and General Order G08-01, *Complaint and Disciplinary System*. Through these efforts, the CPD reached Preliminary compliance in the fifth reporting period.

Progress in the Sixth Reporting Period

During this reporting period, the CPD and BIA provided a first draft of its eLearning which is relevant to ¶425(d) and ¶426. While the reviewed materials remained in the drafting stage, the training module, the spoken narrative, and written content suggest the training will address the requirements of ¶426. We look forward to reviewing further developed BIA eLearning materials in the next reporting period.

Additionally, the CPD provided a revised version of Special Order S08-01-01, *Log Number Case Management System*, for review. We submitted a no-objection notice subject to one change relevant to other Consent Decree paragraphs.[4] Although the CPD did not submit the Special Order to comply with the requirements of ¶426, it does instruct compliance with the paragraph. S08-01-01 remains in the collaborative review and revision process.

Having reached Secondary compliance in the fifth reporting period, COPA focused on gaining Full compliance in the sixth reporting period. COPA provided materials for its training: *Case Management System: Overview of Policy and Procedures*. The lesson plan properly trains on the requirements set out in ¶425 in the main paragraph, as well as ¶425(a) and (e) regarding how COPA will accept complaints. Along with the lesson plan, COPA provided a statement of personnel who developed and

[4] Under the Consent Decree policy review process, the City and the CPD consult with the IMT and the OAG to develop or revise policies in accordance with Consent Decree requirements. *See* ¶¶626–37. The City and the CPD provide the policy for review at least 30 days before the policy is scheduled to go into effect, and the IMT and the OAG have 30 days to comment on the policy. *See* ¶¶627–28. The City, the CPD, the IMT, and the OAG then work together to resolve comments. The IMT and the OAG will, separately and in writing, notify the City and the CPD that they no longer have any comments, which is referred to as a "no-objection notice." Once the City and the CPD receive a no-objection notice from both the IMT and the OAG, the City and the CPD will begin the process of finalizing the policy. Typically, this includes the CPD posting the policy on its website for public comment for at least 15 days. The City and the CPD must then consider those comments and make additional changes, as appropriate. *See* ¶633.

implemented the training materials. Finally, COPA provided a demo presentation for review. The IMT believes this training submission was very comprehensive.

Additionally, COPA's website provides opportunities and options for the public to submit complaints or allegations of misconduct involving CPD members. These website features have been operational for several monitoring periods and COPA has continued to improve its website's features to ensure that the public has quick and easy access to information about how complaints and allegations of misconduct can be made to COPA. This reporting period, COPA also demonstrated how the Case Management System can be used to register and collect information on the ways COPA receives complaints, and provided data regarding how complaints were received in 2019, 2020, and 2021. The information provided indicates COPA continues to make available to the public several means through which a community member can file a complaint, and that the public is aware of these options. With this, COPA reached Full compliance with ¶425.

COPA also provided documentation this reporting period demonstrating how the Log Number assigned at intake follows the investigation through all phases of the investigation and disciplinary process to its final disposition, including the findings and discipline imposed, per the requirements of ¶426.

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Moving forward, we will look for the CPD to finalize BIA's eLearning to instruct compliance with ¶426 and provide it for review, as well as training instructing compliance with its policies and ¶425. For COPA, we will look for evidence of continued Full compliance with ¶425–26's mandates.

Paragraph 425 Compliance Progress History

FIRST REPORTING PERIOD SEPTEMBER 1, 2019 – AUGUST 31, 2019 COMPLIANCE PROGRESS:	SECOND REPORTING PERIOD SEPTEMBER 1, 2019 – FEBRUARY 29, 2020 COMPLIANCE PROGRESS:	THIRD REPORTING PERIOD MARCH 1, 2020 – DECEMBER 31, 2020 COMPLIANCE PROGRESS:
None	None	None
FOURTH REPORTING PERIOD **JANUARY 1, 2021 – JUNE 30, 2021** **COMPLIANCE PROGRESS:**	**FIFTH REPORTING PERIOD** **JULY 1, 2021 – DECEMBER 31, 2021** **COMPLIANCE PROGRESS:**	**SIXTH REPORTING PERIOD** **JANUARY 1, 2022 – JUNE 30, 2022** **COMPLIANCE PROGRESS:**
None	Preliminary	Preliminary

Paragraph 426 Compliance Progress History

FIRST REPORTING PERIOD SEPTEMBER 1, 2019 – AUGUST 31, 2019	SECOND REPORTING PERIOD SEPTEMBER 1, 2019 – FEBRUARY 29, 2020	THIRD REPORTING PERIOD MARCH 1, 2020 – DECEMBER 31, 2020
COMPLIANCE PROGRESS: None	COMPLIANCE PROGRESS: None	COMPLIANCE PROGRESS: None
FOURTH REPORTING PERIOD JANUARY 1, 2021 – JUNE 30, 2021	**FIFTH REPORTING PERIOD** JULY 1, 2021 – DECEMBER 31, 2021	**SIXTH REPORTING PERIOD** JANUARY 1, 2022 – JUNE 30, 2022
COMPLIANCE PROGRESS: None	COMPLIANCE PROGRESS: Preliminary	COMPLIANCE PROGRESS: Preliminary

Accountability and Transparency: ¶427

427. *The City and CPD will ensure all complaints are accepted, documented, submitted to COPA, and investigated in accordance with this Agreement and the applicable collective bargaining agreement, whether submitted: by a CPD member or a member of the public; verbally or in writing; in person, by telephone, online, or by a complainant anonymously; or by a third-party representative.*

Compliance Progress (Reporting Period: January 1, 2022, through June 30, 2022)

Preliminary:		***In Compliance*** **(FIFTH REPORTING PERIOD)**[5]
	CPD	***In Compliance*** **(FIFTH REPORTING PERIOD)**
	COPA	***In Compliance*** **(FOURTH REPORTING PERIOD)**
Secondary:		***Not in Compliance***
	CPD	***Not in Compliance***
	COPA	***In Compliance*** **(FIFTH REPORTING PERIOD)**
Full:		***Not in Compliance***
	CPD	***Not Yet Assessed***
	COPA	***Not in Compliance***

In the sixth reporting period, COPA maintained Secondary compliance with ¶427. The CPD maintained Preliminary compliance with this paragraph. Because all relevant City entities must reach levels of compliance to bring the City, as a whole, into compliance, the City has not yet reached Secondary compliance.

To evaluate Preliminary compliance with ¶427, the IMT reviewed the CPD's and COPA's relevant policies and documents following the process described in the Consent Decree (¶¶626–41).[6] To evaluate Secondary compliance with this paragraph, we reviewed the CPD's and COPA's training development, implementation,

[5] As referenced above, the Consent Decree requires actions by various City entities, including the CPD, COPA, the Police Board, and the Office of the Inspector General. Ultimately, the City is responsible for ensuring compliance. As a result, if a Consent Decree paragraph requires actions by multiple City entities, we will not find that the City has met Preliminary, Secondary, or Full compliance until all those entities have met the corresponding level of compliance. Nonetheless, for some paragraphs, we will clarify compliance assessments for each entity to demonstrate which benchmarks have been met.

[6] The OAG, the City, and the IMT agreed to a stipulation that provides a different review process for review of COPA policies and training materials. *See Stipulation Regarding the Policy and Training Review Process for COPA*, *Illinois v. Chicago*, Case No. 1:17-cv-06260 (Jan. 30, 2020). The review process in the Stipulation mirrors the review process under ¶¶626–41, but among other things, gives the OAG and the IMT a shorter timeframe for review of COPA policies and training materials.

and evaluation (¶286). To evaluate Full compliance with this paragraph, we considered whether the entities have implemented their policies and trainings such that they are acting in accordance with ¶427's mandates.

Progress before the Sixth Reporting Period

Throughout previous reporting periods, the CPD worked to draft, revise, and finalize General Order G08-01-02, *Complaint Initiation and Log Number Investigation Assignment*.[7] By the end of the fifth reporting period, the CPD finalized this policy and reached Preliminary compliance.

COPA reached Preliminary compliance for this paragraph in the fourth reporting period by finalizing its Policy 3.1.1, *Intake*. In the fifth reporting period, COPA provided the IMT with documents for its *Intake Unit: Overview of Policies and Procedures In-Service* training materials, which related to the requirements of ¶427 and provided evidence that 99% of its personnel completed the training. Through these efforts, COPA reached Secondary compliance.

Progress in the Sixth Reporting Period

In the sixth reporting period, the CPD began to work toward Secondary compliance. BIA provided a first draft of its eLearning relevant to ¶427. On page 29 of the training module, the spoken narrative and written content appears that it will address the requirements of ¶427 for training once the CPD and BIA submit the eLearning module for final approval. We understand that the BIA eLearning materials are still in draft state and are not in final, presentation form. We look forward to reviewing further developed BIA eLearning materials in the next reporting period.

This reporting period, COPA did not produce any evidence related to full compliance efforts under ¶427.

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Moving forward, we will look for CPD to finalize its eLearning to instruct compliance with ¶427 and provide it for review. For COPA, we will look for evidence that COPA has implemented its policies and trainings such that it is acting in accordance with ¶427's mandates.

[7] The name of this directive has changed twice during the collaborative review and revision process. The first draft was titled *Specific Responsibilities Regarding Allegations of Misconduct*, and the second through the fourth drafts were titled *Initiation and Assignment of Investigations into Allegations of Misconduct*.

Paragraph 427 Compliance Progress History

FIRST REPORTING PERIOD
SEPTEMBER 1, 2019 – AUGUST 31, 2019
COMPLIANCE PROGRESS:
Not Applicable

SECOND REPORTING PERIOD
SEPTEMBER 1, 2019 – FEBRUARY 29, 2020
COMPLIANCE PROGRESS:
Not Applicable

THIRD REPORTING PERIOD
MARCH 1, 2020 – DECEMBER 31, 2020
COMPLIANCE PROGRESS:
None

FOURTH REPORTING PERIOD
JANUARY 1, 2021 – JUNE 30, 2021
COMPLIANCE PROGRESS:
None

FIFTH REPORTING PERIOD
JULY 1, 2021 – DECEMBER 31, 2021
COMPLIANCE PROGRESS:
Preliminary

SIXTH REPORTING PERIOD
JANUARY 1, 2022 – JUNE 30, 2022
COMPLIANCE PROGRESS:
Preliminary

Accountability and Transparency: ¶428

428. *When a CPD member becomes aware of an individual who wants to make a complaint regarding a CPD member's conduct, he or she will promptly provide the individual with COPA's contact information and notify a supervisor of the complaint received in the field. CPD will also ensure that, in response to complaints about CPD members, supervisors respond to the scene, document the complaint, and submit it to COPA. If the supervisor allegedly authorized, engaged in conduct that led to, witnessed, or otherwise allegedly participated in the incident complained of, the supervisor will contact his or her immediate supervisor, who will assign another supervisor to immediately document the complaint and submit it to COPA.*

Compliance Progress (Reporting Period: January 1, 2022, through June 30, 2022)

Preliminary:	***In Compliance*** **(FIFTH REPORTING PERIOD)**
Secondary:	***Not in Compliance***
Full:	***Not Yet Assessed***

In the sixth reporting period, the CPD maintained Preliminary compliance with ¶428.

To evaluate Preliminary compliance with ¶428, the IMT reviewed the CPD's relevant policies and documents following the process described in the Consent Decree (¶¶626–41), which outlines applicable consultation, resolution, workout, and public comment periods. To evaluate Secondary compliance with this paragraph, we reviewed the CPD's training development, implementation, and evaluation (¶286).

Progress before the Sixth Reporting Period

The City and the CPD reached Preliminary compliance with ¶428 in the fifth reporting period. The CPD had worked to revise its General Order G08-01-02, *Complaint Initiation and Log Number Investigation Assignment*, which addressed the requirements of ¶428. In the fifth reporting period, we submitted a no-objection notice to the revised G08-01-02 and the CPD posted G08-01-02 for public comment for 15 days.[8] The CPD finalized the General Order, reaching Preliminary compliance with ¶428.

[8] Under the Consent Decree policy review process, the City and the CPD consult with the IMT and the OAG to develop or revise policies in accordance with Consent Decree requirements. *See* ¶¶626–37. The City and the CPD provide the policy for review at least 30 days before the policy is scheduled to go into effect, and the IMT and the OAG have 30 days to comment on

Progress in the Sixth Reporting Period

In the sixth reporting period, the CPD began to work toward Secondary compliance. BIA provided a first draft of its eLearning relevant to ¶428. The training module, the spoken narrative, and written content explains that Supervisors will respond to the scene of a complaint when requested, which is relevant to this paragraph. However, it does not address all components of the paragraph. We understand that the BIA eLearning materials are still in draft state and are not in final, presentation form. We look forward to reviewing a further revised version of this training.

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Moving forward, we will look for CPD to finalize BIA's eLearning to instruct compliance with ¶428 and provide it for review.

Paragraph 428 Compliance Progress History

FIRST REPORTING PERIOD	SECOND REPORTING PERIOD	THIRD REPORTING PERIOD
SEPTEMBER 1, 2019 – AUGUST 31, 2019	SEPTEMBER 1, 2019 – FEBRUARY 29, 2020	MARCH 1, 2020 – DECEMBER 31, 2020
COMPLIANCE PROGRESS:	COMPLIANCE PROGRESS:	COMPLIANCE PROGRESS:
Not Applicable	Not Applicable	None

FOURTH REPORTING PERIOD	FIFTH REPORTING PERIOD	SIXTH REPORTING PERIOD
JANUARY 1, 2021 – JUNE 30, 2021	JULY 1, 2021 – DECEMBER 31, 2021	JANUARY 1, 2022 – JUNE 30, 2022
COMPLIANCE PROGRESS:	COMPLIANCE PROGRESS:	COMPLIANCE PROGRESS:
None	Preliminary	Preliminary

the policy. *See* ¶¶627–28. The City, the CPD, the IMT, and the OAG then work together to resolve comments. The IMT and the OAG will, separately and in writing, notify the City and the CPD that they no longer have any comments, which is referred to as a "no-objection notice." Once the City and the CPD receive a no-objection notice from both the IMT and the OAG, the City and the CPD will begin the process of finalizing the policy. Typically, this includes the CPD posting the policy on its website for public comment for at least 15 days. The City and the CPD must then consider those comments and make additional changes, as appropriate. *See* ¶633.

Accountability and Transparency: ¶429

429. *The City will continue to ensure that a website is made available to CPD members to anonymously report officer misconduct ("anonymous reporting website") and will internally disseminate information regarding the anonymous reporting website to all CPD members. Reports made on the anonymous reporting website will not relieve CPD members of their duties under CPD Rules of Conduct 21 and 22.*

Compliance Progress

(Reporting Period: January 1, 2022, through June 30, 2022)

Preliminary:	***In Compliance*** **(FIFTH REPORTING PERIOD)**
Secondary:	***Not in Compliance***
Full:	***Not Yet Assessed***

In the sixth reporting period, the CPD maintained Preliminary compliance with ¶429.

To evaluate Preliminary compliance with ¶429, the IMT reviewed the CPD's relevant policies and documents following the process described in the Consent Decree (¶¶626–41), which outlines applicable consultation, resolution, workout, and public comment periods. To evaluate Secondary compliance with this paragraph, we reviewed the CPD's training development, implementation, and evaluation (¶286).

Progress before the Sixth Reporting Period

In previous reporting periods, the Office of the Inspector General continued to host a website for CPD members to anonymously report officer misconduct. The CPD worked to revise and finalize General Order G08-01, *Complaint and Disciplinary System*, a portion of which was directed to the requirements of ¶429. The CPD finalized the G08-01 on the last day of the fifth reporting period. Additionally, Section IX of the *Office of the Inspector General (OIG) Online Complaint Form* addressed ¶429. Although the policy covered the requirements of the paragraph—and the CPD therefore reached Preliminary compliance—we reiterated concerns expressed in the fourth reporting period: although the policy addresses the language of ¶429, we are concerned that the policy may leave members uncertain of the extent to which members who make anonymous reports are able to keep their identity unknown in the process. We encouraged the CPD to consider how it might take a step beyond the requirements of ¶429 to not only comply with this paragraph, but to provide additional clarity and protection to members reporting misconduct via the Office of the Inspector General website.

Progress in the Sixth Reporting Period

In the sixth reporting period, the CPD began to work toward Secondary compliance. BIA provided a first draft of its eLearning relevant to ¶429. The training materials refer to the website for anonymous reporting of officer misconduct, and informs that the City will ensure a website is available for anonymous reporting of officer misconduct. Both of these aspects are relevant to components of ¶429. We understand that the BIA eLearning materials are still in draft state and are not in final, presentation form. We look forward to reviewing further developed BIA eLearning materials in the next reporting period.

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Moving forward, we will look for CPD to finalize BIA's eLearning to instruct compliance with ¶429 and provide it for review.

Paragraph 429 Compliance Progress History

FIRST REPORTING PERIOD	SECOND REPORTING PERIOD	THIRD REPORTING PERIOD
SEPTEMBER 1, 2019 – AUGUST 31, 2019	SEPTEMBER 1, 2019 – FEBRUARY 29, 2020	MARCH 1, 2020 – DECEMBER 31, 2020
COMPLIANCE PROGRESS:	COMPLIANCE PROGRESS:	COMPLIANCE PROGRESS:
Status Update	Status Update	Status Update
FOURTH REPORTING PERIOD	**FIFTH REPORTING PERIOD**	**SIXTH REPORTING PERIOD**
JANUARY 1, 2021 – JUNE 30, 2021	JULY 1, 2021 – DECEMBER 31, 2021	JANUARY 1, 2022 – JUNE 30, 2022
COMPLIANCE PROGRESS:	COMPLIANCE PROGRESS:	COMPLIANCE PROGRESS:
Under Assessment	Preliminary	Preliminary

Accountability and Transparency: ¶430

430. *COPA will ensure that individuals who submit electronic complaints receive a copy of the information contained in the complaint via electronic mail, if an electronic mail address is provided, upon submission.*

Compliance Progress (Reporting Period: January 1, 2022, through June 30, 2022)

Preliminary:	***In Compliance*** **(FOURTH REPORTING PERIOD)**
Secondary:	***In Compliance*** **(FIFTH REPORTING PERIOD)**
Full:	***In Compliance*** **(NEW)**
Sustainment Period Ends	***June 30, 2024***

In the sixth reporting period, COPA reached Full compliance with ¶430.

To evaluate Preliminary compliance with ¶430, the IMT reviewed the COPA's relevant policies and documents following the process described in the Consent Decree (¶¶626–41), which outlines applicable consultation, resolution, workout, and public comment periods.[9] To assess Secondary compliance with this paragraph, we reviewed COPA's training development, implementation, and evaluation (¶286).[10] To evaluate Full compliance with this paragraph, we reviewed various data sources including but not limited to training materials, presentations, demonstrations, and case files to determine whether COPA has implemented its policies and trainings such that it is acting in accordance with ¶430's mandates.

Progress before the Sixth Reporting Period

In previous reporting periods, COPA met Preliminary compliance by finalizing its *Intake Policy*, which requires that an electronic copy of the complaint be provided to a complainant who files an online compliant via email. In the fifth reporting period, COPA moved into Secondary compliance with its *Intake Unit: Overview of Policies and Procedures In-Service* training. This training touches on the requirements of ¶430 and COPA's 3.1.1 *Intake* policy. COPA provided evidence that the training was completed by 99% of its personnel.

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[9] The OAG, the City, and the IMT agreed to a stipulation that provides a different review process for review of COPA policies and training materials. *See Stipulation Regarding the Policy and Training Review Process for COPA*, *Illinois v. Chicago*, Case No. 1:17-cv-06260 (Jan. 30, 2020). The review process in the Stipulation mirrors the review process under ¶¶626–41, but among other things, gives the OAG and the IMT a shorter timeframe for review of COPA policies and training materials.

[10] The IMT evaluates training materials using as our standard the "ADDIE" model of curriculum development and implementation. This model typically incorporates the following elements: training needs assessment' curriculum design and development; training implementations (or delivery); and training evaluation.

Progress in the Sixth Reporting Period

Although COPA reached Secondary compliance for providing adequate training relevant to this paragraph, COPA continues to develop and provide training that speaks to the requirements of ¶430. For example, COPA provided materials for its training: *Case Management System: Overview of Policy and Procedures*. The lesson plan properly reinforces training on the requirements set out in ¶430 by stating how COPA will provide a notice to the complainant upon receipt of a complaint. Along with the lesson plan, COPA provided a statement of personnel who developed and implemented the training materials. Finally, COPA provided a demo presentation for review. The IMT believes this is one of the most complete training submissions submitted to date. In addition to the materials provided, the IMT audited COPA's training *Mandatory In-Service Case Management System*, which was taught in accordance with the lesson plan provided to the IMT previously. COPA's instructors were knowledgeable, and we provided suggestions to COPA for the instructors moving forward. COPA received the feedback positively and committed to improvements in future trainings. Although COPA did not submit training records relevant to participation in trainings for the sixth reporting period, we anticipate receiving those records in the seventh reporting period showing more than 95% of its personnel participating in each training. With this, COPA remained in Secondary compliance.

Related to Full compliance, COPA provided two case files. These cases demonstrate that copies of complaints were delivered via email to the complainants in a timely manner, and that COPA received notification when the copies of the complaints were successfully delivered to the complainant's email address. In addition, COPA's website contains a link to the Case Portal where anyone can review the status of investigations, including searching by individual Log Numbers. We reviewed a random and robust sample of cases. This demonstrates that COPA is actualizing the requirements of ¶430. With this, COPA reached Full compliance.

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Moving forward, we will look for COPA to provide evidence that at least 95% of its personnel received its *Case Management System: Overview of Policy and Procedures* training and that COPA employees are acting in accordance with ¶439's mandates. Additionally, we will look for documentation evidencing that individuals who submit electronic complaints continue to receive a receipt or acknowledgement that the complaint was received.

Paragraph 430 Compliance Progress History

FIRST REPORTING PERIOD
SEPTEMBER 1, 2019 – AUGUST 31, 2019
COMPLIANCE PROGRESS:
Not Applicable

SECOND REPORTING PERIOD
SEPTEMBER 1, 2019 – FEBRUARY 29, 2020
COMPLIANCE PROGRESS:
Status Update

THIRD REPORTING PERIOD
MARCH 1, 2020 – DECEMBER 31, 2020
COMPLIANCE PROGRESS:
Status Update

FOURTH REPORTING PERIOD
JANUARY 1, 2021 – JUNE 30, 2021
COMPLIANCE PROGRESS:
Preliminary

FIFTH REPORTING PERIOD
JULY 1, 2021 – DECEMBER 31, 2021
COMPLIANCE PROGRESS:
Secondary

SIXTH REPORTING PERIOD
JANUARY 1, 2022 – JUNE 30, 2022
COMPLIANCE PROGRESS:
Full

Accountability and Transparency: ¶431

431. *The City and CPD will undertake best efforts to ensure that the absence of a signed complainant affidavit alone will not preclude an administrative investigation.*

Compliance Progress (Reporting Period: January 1, 2022, through June 30, 2022)

Preliminary:		***In Compliance*** **(FOURTH REPORTING PERIOD)**[11]
	CPD	***In Compliance*** **(FOURTH REPORTING PERIOD)**
	COPA	***In Compliance*** **(FOURTH REPORTING PERIOD)**
Secondary:		***Not in Compliance***
	CPD	***Not in Compliance***
	COPA	***In Compliance*** **(FIFTH REPORTING PERIOD)**
Full:		***Not in Compliance***
	CPD	***Not Yet Assessed***
	COPA	***Not in Compliance***

In the sixth reporting period, the CPD maintained Preliminary compliance and COPA maintained Secondary compliance with ¶431. Because all relevant City entities must reach levels of compliance to bring the City, as a whole, into compliance, the City has not yet reached Secondary compliance.

To evaluate Preliminary compliance with ¶431, we reviewed the CPD's and COPA's relevant policies and documents following the process described in the Consent Decree (¶¶626–41).[12] To evaluate Secondary compliance, we reviewed the entities' training development, implementation, and evaluation. To evaluate Full compliance with this paragraph, we considered whether the entities have implemented their policies and trainings such that they are acting in accordance with ¶431's mandates.

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[11] As referenced above, the Consent Decree requires actions by various City entities, including the CPD, COPA, the Police Board, and the Office of the Inspector General. Ultimately, the City is responsible for ensuring compliance. As a result, if a Consent Decree paragraph requires actions by multiple City entities, we will not find that the City has met Preliminary, Secondary, or Full compliance until all those entities have met the corresponding level of compliance. Nonetheless, for some paragraphs, we will clarify compliance assessments for each entity to demonstrate which benchmarks have been met.

[12] The OAG, the City, and the IMT agreed to a stipulation that provides a different review process for review of COPA policies and training materials. *See Stipulation Regarding the Policy and Training Review Process for COPA*, *Illinois v. Chicago*, Case No. 1:17-cv-06260 (Jan. 30, 2020). The review process in the Stipulation mirrors the review process under ¶¶626–41, but among other things, gives the OAG and the IMT a shorter timeframe for review of COPA policies and training materials.

Progress before the Sixth Reporting Period

The CPD and COPA reached Preliminary compliance in the fourth reporting period. The CPD revised General Order G08-01, *Complaint and Disciplinary Procedures,* which addresses the affidavit-override process and exceptions to the affidavit requirement. In the fifth reporting period, we submitted a no-objection notice to G08-01.[13] The CPD finalized the policy on the last day of the reporting period after receiving public comment.

COPA reached Preliminary compliance by finalizing 3.1.1. *Intake* policy, which was finalized in the fourth reporting period. The *Intake* policy addresses ¶431 by noting that a sworn affidavit is not required for a preliminary investigation to begin. In the fifth reporting period, COPA compiled and submitted for review materials for a training titled *COPA Intake Unit: Overview of Policies and Procedures*. The IMT submitted a no-objection notice and COPA demonstrated that the training was completed by 99% of its personnel. This moved COPA into Secondary compliance.

Progress in the Sixth Reporting Period

This reporting period, the CPD and COPA did not produce any documentation that demonstrated efforts related to ¶431.

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Moving forward we will look for the CPD to provide training related to ¶431 and its related policy to ensure members are aware of the paragraph's mandate. For COPA, we will look for evidence that COPA has undertaken best efforts to ensure that an administrative investigation is not precluded by a lack of a signed complainant affidavit, in line with its policy, training, and ¶431.

[13] Under the Consent Decree policy review process, the City and the CPD consult with the IMT and the OAG to develop or revise policies in accordance with Consent Decree requirements. *See* ¶¶626–37. The City and the CPD provide the policy for review at least 30 days before the policy is scheduled to go into effect, and the IMT and the OAG have 30 days to comment on the policy. *See* ¶¶627–28. The City, the CPD, the IMT, and the OAG then work together to resolve comments. The IMT and the OAG will, separately and in writing, notify the City and the CPD that they no longer have any comments, which is referred to as a "no-objection notice." Once the City and the CPD receive a no-objection notice from both the IMT and the OAG, the City and the CPD will begin the process of finalizing the policy. Typically, this includes the CPD posting the policy on its website for public comment for at least 15 days. The City and the CPD must then consider those comments and make additional changes, as appropriate. *See* ¶633.

Paragraph 431 Compliance Progress History

FIRST REPORTING PERIOD
SEPTEMBER 1, 2019 – AUGUST 31, 2019
COMPLIANCE PROGRESS:
Not Applicable

SECOND REPORTING PERIOD
SEPTEMBER 1, 2019 – FEBRUARY 29, 2020
COMPLIANCE PROGRESS:
Status Update

THIRD REPORTING PERIOD
MARCH 1, 2020 – DECEMBER 31, 2020
COMPLIANCE PROGRESS:
None

FOURTH REPORTING PERIOD
JANUARY 1, 2021 – JUNE 30, 2021
COMPLIANCE PROGRESS:
Preliminary

FIFTH REPORTING PERIOD
JULY 1, 2021 – DECEMBER 31, 2021
COMPLIANCE PROGRESS:
Preliminary

SIXTH REPORTING PERIOD
JANUARY 1, 2022 – JUNE 30, 2022
COMPLIANCE PROGRESS:
Preliminary

Accountability and Transparency: ¶432

432. *The City and CPD will require that complaints about any CPD member are accepted, documented, submitted to COPA, and investigated even if the complainant could not identify the CPD member's name or other employee-identifying number, including star or badge number.*

Compliance Progress (Reporting Period: January 1, 2022, through June 30, 2022)

Preliminary:		***In Compliance*** **(FIFTH REPORTING PERIOD)**[14]
	CPD	***In Compliance*** **(FIFTH REPORTING PERIOD)**
	COPA	***In Compliance*** **(FOURTH REPORTING PERIOD)**
Secondary:		***Not in Compliance***
	CPD	***Not in Compliance***
	COPA	***In Compliance*** **(FIFTH REPORTING PERIOD)**
Full:		***Not in Compliance***
	CPD	***Not Yet Assessed***
	COPA	***In Compliance*** **(NEW)**

In the sixth reporting period, COPA reached Full compliance with ¶432. The CPD made efforts toward but did not ultimately reach Secondary compliance with this paragraph. Because all relevant City entities must reach levels of compliance to bring the City, as a whole, into compliance, the City has not yet reached Secondary compliance.

To evaluate Preliminary compliance with ¶432, we reviewed the CPD's and COPA's relevant policies and documents following the process described in the Consent Decree (¶¶626–41).[15] To evaluate Secondary compliance, we reviewed the entities' training development, implementation, and evaluation. To evaluate Full compliance with this paragraph, we reviewed various data sources including but not limited to documentation related to case intakes and up-to-date lists of complaint

[14] As referenced above, the Consent Decree requires actions by various City entities, including the CPD, COPA, the Police Board, and the Office of the Inspector General. Ultimately, the City is responsible for ensuring compliance. As a result, if a Consent Decree paragraph requires actions by multiple City entities, we will not find that the City has met Preliminary, Secondary, or Full compliance until all those entities have met the corresponding level of compliance. Nonetheless, for some paragraphs, we will clarify compliance assessments for each entity to demonstrate which benchmarks have been met.

[15] The OAG, the City, and the IMT agreed to a stipulation that provides a different review process for review of COPA policies and training materials. *See Stipulation Regarding the Policy and Training Review Process for COPA*, *Illinois v. Chicago*, Case No. 1:17-cv-06260 (Jan. 30, 2020). The review process in the Stipulation mirrors the review process under ¶¶626–41, but among other things, gives the OAG and the IMT a shorter timeframe for review of COPA policies and training materials.

cases to determine whether the entities have implemented their policies and trainings such that they are acting in accordance with ¶432's mandates.

Progress before the Sixth Reporting Period

In previous reporting periods, the CPD worked to revise General Order G08-01-02[16] to instruct compliance with ¶432. In the fifth reporting period, the CPD continued revising G08-01-02. We provided a no-objection notice to G08-01-02.[17] Thereafter, the CPD posted the policy for public comment and finalized the policy on the last day of the fifth reporting period.

COPA, on the other hand, reached Preliminary compliance in the fourth reporting period by finalizing Policy 3.1.1 *Intake*, which mandates compliance with ¶432's requirements. In the fifth reporting period, COPA moved into Secondary compliance with its *Intake Unit: Overview of Policies and Procedures In-Service* training. After we submitted a no-objection notice, COPA demonstrated that the training was completed by 99% of its personnel.

Progress in the Sixth Reporting Period

In the sixth reporting period, the CPD began to work toward Secondary compliance. BIA provided a first draft of its eLearning. The training module, the spoken narrative, and the written content suggests that it will address the requirements of ¶432 for training. We understand that the BIA eLearning materials are still in draft state and are not in final, presentation form. We look forward to reviewing further developed BIA eLearning materials in the next reporting period.

This reporting period, COPA provided two examples of Case Intakes involving unknown CPD members. These examples demonstrate COPA's adherence to the requirements of ¶432. COPA provided additional detail regarding six 2021 complaint

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[16] The name of this directive has changed twice during the collaborative review and revision process. The first draft was titled *Specific Responsibilities Regarding Allegations of Misconduct*, and the second through the fourth drafts were titled *Initiation and Assignment of Investigations into Allegations of Misconduct*.

[17] Under the Consent Decree policy review process, the City and the CPD consult with the IMT and the OAG to develop or revise policies in accordance with Consent Decree requirements. *See* ¶¶626–37. The City and the CPD provide the policy for review at least 30 days before the policy is scheduled to go into effect, and the IMT and the OAG have 30 days to comment on the policy. *See* ¶¶627–28. The City, the CPD, the IMT, and the OAG then work together to resolve comments. The IMT and the OAG will, separately and in writing, notify the City and the CPD that they no longer have any comments, which is referred to as a "no-objection notice." Once the City and the CPD receive a no-objection notice from both the IMT and the OAG, the City and the CPD will begin the process of finalizing the policy. Typically, this includes the CPD posting the policy on its website for public comment for at least 15 days. The City and the CPD must then consider those comments and make additional changes, as appropriate. *See* ¶633.

cases and eleven 2022 complaint cases and provided an up-to-date list of complaint cases for which complaints were made to COPA with no CPD employee identification information. With this, COPA reached Full compliance.

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Moving forward, we will look for CPD to revise BIA's eLearning to instruct compliance with ¶432 and provide it for review. For COPA, we will look for evidence that COPA continues to follow its policies and trainings such that it is acting in accordance with ¶432's mandates.

Paragraph 432 Compliance Progress History

FIRST REPORTING PERIOD	SECOND REPORTING PERIOD	THIRD REPORTING PERIOD
SEPTEMBER 1, 2019 – AUGUST 31, 2019	SEPTEMBER 1, 2019 – FEBRUARY 29, 2020	MARCH 1, 2020 – DECEMBER 31, 2020
COMPLIANCE PROGRESS:	COMPLIANCE PROGRESS:	COMPLIANCE PROGRESS:
Not Applicable	Not Applicable	None

FOURTH REPORTING PERIOD	FIFTH REPORTING PERIOD	SIXTH REPORTING PERIOD
JANUARY 1, 2021 – JUNE 30, 2021	JULY 1, 2021 – DECEMBER 31, 2021	JANUARY 1, 2022 – JUNE 30, 2022
COMPLIANCE PROGRESS:	COMPLIANCE PROGRESS:	COMPLIANCE PROGRESS:
None	Preliminary	Preliminary

Accountability and Transparency: ¶433

433. *CPD will require that officers provide their name and star number, or in the case of non-sworn members other employee-identifying number, to any member of the public, upon request.*

Compliance Progress

(Reporting Period: January 1, 2022, through June 30, 2022)

Preliminary:	***In Compliance*** **(NEW)**
Secondary:	***Not Yet Assessed***
Full:	***Not Yet Assessed***

In the sixth reporting period, the City moved into Preliminary Compliance with ¶433 through the efforts of the CPD.

To evaluate Preliminary compliance with ¶433, we reviewed the CPD's relevant policies and documents following the process described in the Consent Decree (¶¶626–41).

Progress before the Sixth Reporting Period

In previous reporting periods, the CPD worked to finalize a policy that requires CPD officers to provide their star number and name or other employee-identifying number to public members upon request. Toward the end of the fourth reporting period, the CPD provided a draft of its General Order G02-01, *Protection of Human Rights*. We reviewed this draft at the start of the fifth reporting period. By the end of the fifth reporting period, the draft General Order remained in the collaborative review and revision process.

Progress in the Sixth Reporting Period

In the sixth reporting period, the CPD provided a revised version of General Order G02-01, *Protection of Human Rights*. The CPD addressed ¶433 within the General Order by requiring officers and employees to provide their name, star number, and employee identifying number to any member of the public upon request. We provided CPD a no-objection notice on June 17, 2022, and noted our appreciation that the CPD submitted documentation to demonstrate community engagement in the development of and revisions to G02-01.[18] Before receiving the no-objection notice from the IMT and the OAG, the CPD posted the policy for public comment

[18] Under the Consent Decree policy review process, the City and the CPD consult with the IMT and the OAG to develop or revise policies in accordance with Consent Decree requirements. *See* ¶¶626–37. The City and the CPD provide the policy for review at least 30 days before the policy is scheduled to go into effect, and the IMT and the OAG have 30 days to comment on the policy. *See* ¶¶627–28. The City, the CPD, the IMT, and the OAG then work together to resolve comments. The IMT and the OAG will, separately and in writing, notify the City and the CPD that they no longer have any comments, which is referred to as a "no-objection notice."

again on June 14, 2022, and finalized the policy on the final day of the reporting period.

Additionally, the CPD and BIA provided a first draft of its eLearning relevant to ¶433. The training module, the spoken narrative, and the written content suggests that this training will address the requirements of ¶433 once the CPD and BIA submit the eLearning module for final approval. We understand that the BIA eLearning materials are still in draft state and are not in final, presentation form. We look forward to reviewing further developed BIA eLearning materials in the next reporting period.

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Moving forward, we will look for the CPD to develop training instructing compliance with its policies and ¶433.

Paragraph 433 Compliance Progress History

FIRST REPORTING PERIOD	SECOND REPORTING PERIOD	THIRD REPORTING PERIOD
SEPTEMBER 1, 2019 – AUGUST 31, 2019	SEPTEMBER 1, 2019 – FEBRUARY 29, 2020	MARCH 1, 2020 – DECEMBER 31, 2020
COMPLIANCE PROGRESS:	COMPLIANCE PROGRESS:	COMPLIANCE PROGRESS:
Not Applicable	Not Applicable	None

FOURTH REPORTING PERIOD	FIFTH REPORTING PERIOD	SIXTH REPORTING PERIOD
JANUARY 1, 2021 – JUNE 30, 2021	JULY 1, 2021 – DECEMBER 31, 2021	JANUARY 1, 2022 – JUNE 30, 2022
COMPLIANCE PROGRESS:	COMPLIANCE PROGRESS:	COMPLIANCE PROGRESS:
None	None	Preliminary

Once the City and the CPD receive a no-objection notice from both the IMT and the OAG, the City and the CPD will begin the process of finalizing the policy. Typically, this includes the CPD posting the policy on its website for public comment for at least 15 days. The City and the CPD must then consider those comments and make additional changes, as appropriate. *See* ¶633.

Accountability and Transparency: ¶434

434. *When CPD responds to or investigates incidents involving allegations of officer involved domestic violence, CPD will ensure that COPA is provided an administrative notification. COPA will initiate the intake process and investigate all such allegations in accordance with this Agreement.*

Compliance Progress (Reporting Period: January 1, 2022, through June 30, 2022)

Preliminary:		***Not in Compliance***[19]
	CPD	***Not in Compliance***
	COPA	***In Compliance*** **(FOURTH REPORTING PERIOD)**
Secondary:		***Not in Compliance***
	CPD	***Not in Compliance***
	COPA	***In Compliance*** **(FIFTH REPORTING PERIOD)**
Full:		***Not in Compliance***
	CPD	***Not Yet Assessed***
	COPA	***Not in Compliance***

In the sixth reporting period, COPA maintained Secondary compliance with ¶434. The CPD made efforts toward but did not ultimately reach Preliminary compliance with this paragraph. Because all relevant City entities must reach levels of compliance to bring the City, as a whole, into compliance, the City has not yet reached Preliminary compliance.

To evaluate Preliminary compliance with ¶434, we reviewed the CPD's and COPA's relevant policies and documents following the process described in the Consent Decree (¶¶626–41).[20] To evaluate Secondary compliance, we reviewed the entities' training development, implementation, and evaluation. To evaluate Full compliance with this paragraph, we reviewed various data sources to determine whether the entities have implemented their policies and trainings such that they are acting in accordance with ¶434's mandates. To meet Full compliance, the City,

[19] As referenced above, the Consent Decree requires actions by various City entities, including the CPD, COPA, the Police Board, and the Office of the Inspector General. Ultimately, the City is responsible for ensuring compliance. As a result, if a Consent Decree paragraph requires actions by multiple City entities, we will not find that the City has met Preliminary, Secondary, or Full compliance until all those entities have met the corresponding level of compliance. Nonetheless, for some paragraphs, we will clarify compliance assessments for each entity to demonstrate which benchmarks have been met.

[20] The OAG, the City, and the IMT agreed to a stipulation that provides a different review process for review of COPA policies and training materials. *See Stipulation Regarding the Policy and Training Review Process for COPA*, *Illinois v. Chicago*, Case No. 1:17-cv-06260 (Jan. 30, 2020). The review process in the Stipulation mirrors the review process under ¶¶626–41, but among other things, gives the OAG and the IMT a shorter timeframe for review of COPA policies and training materials.

the CPD, and COPA will need to demonstrate that the corresponding policies and training materials are implemented into practice. For COPA, this means providing case-specific information regarding intake and investigations that demonstrates the requirements of this paragraph.

Progress before the Sixth Reporting Period

In previous reporting periods, the City as a whole did not reach Preliminary compliance because the CPD had not finalized a policy mandating compliance with ¶434's requirements. In the fifth reporting period, the CPD worked to revise General Order G08-01-02, *Complaint Initiation and Log Number Investigation Assignment*. Although the CPD revised G08-01-02 and received a no-objection notice from the IMT, the policy fell short of the requirements set out in ¶434, which requires the CPD to ensure that COPA is notified "when CPD responds to or investigates incidents involving allegations of officer-involved domestic violence."[21] We noted that while the CPD did finalize the policy, minor revisions are necessary to move into Preliminary compliance.

COPA, on the other hand, finalized Policy 3.1.1, *Intake*, in the fourth reporting period, which not only met the requirements of ¶434, but exceeded the mandates of ¶434. In the fifth reporting period, COPA undertook developing and providing training to its personnel. We reviewed COPA's *Intake Unit: Overview of Policies and Procedures In-Service* training, which instructed compliance with the requirements of ¶434, and COPA provided evidence that 99% of its personnel completed this training. Therefore, COPA moved into Secondary compliance in the fifth reporting period.

Progress in the Sixth Reporting Period

In the sixth reporting period, the CPD began to work toward Secondary compliance. BIA provided a first draft of its eLearning relevant to ¶434. The draft training module, spoken narrative, and written content appears that it will address the requirements of ¶434 once the CPD and BIA submit the eLearning module for final approval. We understand that the BIA eLearning materials are still in draft state

[21] Under the Consent Decree policy review process, the City and the CPD consult with the IMT and the OAG to develop or revise policies in accordance with Consent Decree requirements. *See* ¶¶626–37. The City and the CPD provide the policy for review at least 30 days before the policy is scheduled to go into effect, and the IMT and the OAG have 30 days to comment on the policy. *See* ¶¶627–28. The City, the CPD, the IMT, and the OAG then work together to resolve comments. The IMT and the OAG will, separately and in writing, notify the City and the CPD that they no longer have any comments, which is referred to as a "no-objection notice." Once the City and the CPD receive a no-objection notice from both the IMT and the OAG, the City and the CPD will begin the process of finalizing the policy. Typically, this includes the CPD posting the policy on its website for public comment for at least 15 days. The City and the CPD must then consider those comments and make additional changes, as appropriate. *See* ¶633.

and are not in final, presentation form. We look forward to reviewing further developed BIA eLearning materials in the next reporting period.

While we appreciate the efforts related to training, the CPD has not yet provided revisions to General Order G08-01-02, *Complaint Initiation and Log Number Investigation Assignment*. As stated in the fifth reporting period, Section IV.A of this policy partially addresses the requirements of ¶434. In addition, Section V.A.6.a.1. provides a helpful explanation of COPA's responsibilities as related to ¶434. G08-01-02 requires that "all complaints against Department members, including any allegation of a sworn Department member committing domestic violence, are accepted, documented, and submitted to COPA." This requirement includes reporting of "misconduct observed or complaints submitted via social media." But this falls shy of the requirements set out in ¶434, which requires the CPD to ensure that COPA is notified "when CPD responds to or investigates incidents involving allegations of officer-involved domestic violence." We continue to encourage the CPD to revise G08-01-02 to further instruct compliance with the requirements of ¶434. With minor editing of G08-01-02, the CPD could move into Preliminary compliance with ¶434 in the seventh reporting period.

This reporting period, COPA provided data in a chart illustrating the numbers and locations of occurrences in which CPD personnel were involved in domestic violence and sexual misconduct incidents from 2019 to 2022. This chart provides an overall view of the numbers and mapped locations and to some degree demonstrates that the CPD provides allegations of such officer-involved incidents to COPA, and that COPA intakes and investigates the allegations. While we appreciate this information, we need further information regarding the intake and investigations detailing how the process was initiated and completed. The IMT requests that more case-specific information be provided to demonstrate Full compliance in further reporting periods.

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Moving forward, we will look for CPD to finalize BIA's eLearning to instruct compliance with ¶434 and provide it for review. Additionally, we will look for the CPD to further revise G08-01-02 to further instruct compliance with the requirements of ¶434. For COPA, we will look for detailed evidence that COPA has implemented its policies and trainings such that it is acting in accordance with ¶434's mandates.

Paragraph 434 Compliance Progress History

FIRST REPORTING PERIOD	SECOND REPORTING PERIOD	THIRD REPORTING PERIOD
SEPTEMBER 1, 2019 – AUGUST 31, 2019	SEPTEMBER 1, 2019 – FEBRUARY 29, 2020	MARCH 1, 2020 – DECEMBER 31, 2020
COMPLIANCE PROGRESS:	COMPLIANCE PROGRESS:	COMPLIANCE PROGRESS:
Status Update	Status Update	None

FOURTH REPORTING PERIOD	FIFTH REPORTING PERIOD	SIXTH REPORTING PERIOD
JANUARY 1, 2021 – JUNE 30, 2021	JULY 1, 2021 – DECEMBER 31, 2021	JANUARY 1, 2022 – JUNE 30, 2022
COMPLIANCE PROGRESS:	COMPLIANCE PROGRESS:	COMPLIANCE PROGRESS:
None	None	None

Accountability and Transparency: ¶435

435. *The City, CPD, and COPA will require that complaints alleging that a CPD member refused to accept a complaint, discouraged the filing of a complaint, or provided false or misleading information about filing a complaint are accepted, documented, and submitted to COPA for investigation and, where appropriate, recommended for discipline.*

Compliance Progress (Reporting Period: January 1, 2022, through June 30, 2022)

Preliminary:		***Not in Compliance***[22]
	CPD	***Not in Compliance***
	COPA	***In Compliance*** **(FOURTH REPORTING PERIOD)**
Secondary:		***Not in Compliance***
	CPD	***Not in Compliance***
	COPA	***In Compliance*** **(FIFTH REPORTING PERIOD)**
Full:		***Not in Compliance***
	CPD	***Not Yet Assessed***
	COPA	***Not in Compliance***

In the sixth reporting period, COPA maintained Secondary compliance with ¶435. The CPD made efforts toward but did not ultimately reach Preliminary compliance with this paragraph. Because all relevant City entities must reach levels of compliance to bring the City, as a whole, into compliance, the City has not yet reached Preliminary compliance.

To evaluate Preliminary compliance with ¶435, we reviewed the CPD's and COPA's relevant policies and documents following the process described in the Consent Decree (¶¶626–41).[23] To evaluate Secondary compliance, we reviewed the entities' training development, implementation, and evaluation. To evaluate Full com-

[22] As referenced above, the Consent Decree requires actions by various City entities, including the CPD, COPA, the Police Board, and the Office of the Inspector General. Ultimately, the City is responsible for ensuring compliance. As a result, if a Consent Decree paragraph requires actions by multiple City entities, we will not find that the City has met Preliminary, Secondary, or Full compliance until all those entities have met the corresponding level of compliance. Nonetheless, for some paragraphs, we will clarify compliance assessments for each entity to demonstrate which benchmarks have been met.

[23] The OAG, the City, and the IMT agreed to a stipulation that provides a different review process for review of COPA policies and training materials. *See Stipulation Regarding the Policy and Training Review Process for COPA*, *Illinois v. Chicago*, Case No. 1:17-cv-06260 (Jan. 30, 2020). The review process in the Stipulation mirrors the review process under ¶¶626–41, but among other things, gives the OAG and the IMT a shorter timeframe for review of COPA policies and training materials.

pliance with this paragraph, we considered whether the entities have implemented their policies and trainings such that they are acting in accordance with ¶435's mandates.

Progress before the Sixth Reporting Period

In previous reporting periods, the CPD made progress toward Preliminary compliance with this paragraph through its drafting and revision efforts related to General Order G08-01-02, *Complaint Initiation and Log Number Investigation Assignment*. We also reviewed related training submitted by the CPD Bureau of Internal Affairs (BIA), *Complaint Initiation Process.* We submitted a no-objection notice to this training in April 2021. We did not, however, receive additional information related to this training. In the fifth reporting period, the CPD finalized G08-01-02, but this policy does not sufficiently address ¶435's requirement that subjects of such complaints be, where appropriate, recommended for discipline.

COPA, on the other hand, finalized Policy 3.1.1, *Intake*, in the fourth reporting period, which moved it into Preliminary compliance. In the fifth reporting period, COPA provided us with materials for its training *Intake Unit: Overview of Policies and Procedures In-Service*. COPA provided evidence that the training was completed by 99% of its personnel, which moved COPA into Secondary compliance.

Progress in the Sixth Reporting Period

In the sixth reporting period, the CPD began to work toward Secondary compliance. BIA provided a first draft of its eLearning relevant to ¶435. The draft training module, spoken narrative, and written content suggest that the training will address the requirements of ¶435 once the CPD and BIA submit the eLearning module for final approval. We understand that the BIA eLearning materials are still in draft state and are not in final, presentation form. We look forward to reviewing further developed BIA eLearning materials in the next reporting period.

Additionally, the CPD has not yet provided revisions to General Order G08-01-02, *Complaint Initiation and Log Number Investigation Assignment*. As stated in the fifth reporting period, this policy does not sufficiently address ¶435's requirement that subjects of such complaints be, where appropriate, recommended for discipline. We continue to encourage the CPD to revise G08-01-02 to further instruct compliance with the requirements of ¶435. With minor editing of G08-01-02, the CPD could move into Preliminary compliance with ¶435 in the seventh reporting period.

This reporting period, COPA did not produce any documentation that demonstrated efforts related to ¶435.

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Moving forward, we will look for the CPD to finalize BIA's eLearning to instruct compliance with ¶435 and provide it for review. Additionally, we will look for the CPD to further revise G08-01-02 to further instruct compliance with the requirements of ¶435. For COPA, we will look for evidence that COPA has implemented its policies and trainings such that it is acting in accordance with ¶435's mandates.

Paragraph 435 Compliance Progress History

FIRST REPORTING PERIOD	SECOND REPORTING PERIOD	THIRD REPORTING PERIOD
SEPTEMBER 1, 2019 – AUGUST 31, 2019	SEPTEMBER 1, 2019 – FEBRUARY 29, 2020	MARCH 1, 2020 – DECEMBER 31, 2020
COMPLIANCE PROGRESS:	COMPLIANCE PROGRESS:	COMPLIANCE PROGRESS:
Status Update	Status Update	None

FOURTH REPORTING PERIOD	FIFTH REPORTING PERIOD	SIXTH REPORTING PERIOD
JANUARY 1, 2021 – JUNE 30, 2021	JULY 1, 2021 – DECEMBER 31, 2021	JANUARY 1, 2022 – JUNE 30, 2022
COMPLIANCE PROGRESS:	COMPLIANCE PROGRESS:	COMPLIANCE PROGRESS:
None	Under Assessment	None

Accountability and Transparency: ¶436

436. *Within 90 days of the Effective Date, CPD will ensure that there are adequate policies and practices in place to encourage and protect CPD members who report potential misconduct by other CPD members. Such policies will provide, at a minimum: a. that CPD members promptly report any misconduct of which they are aware to a supervisor; b. that the supervisor document such alleged misconduct and promptly report it to COPA; and c. that all forms of retaliation, interference, intimidation, and coercion against a CPD member who reports misconduct or cooperates with an investigation of misconduct, are strictly prohibited.*

Compliance Progress (Reporting Period: January 1, 2022, through June 30, 2022)

Preliminary:	***In Compliance* (FIFTH REPORTING PERIOD)**
Secondary:	***Not in Compliance***
Full:	***Not Yet Assessed***

In the sixth reporting period, the CPD maintained Preliminary compliance with ¶436.

To evaluate Preliminary compliance with ¶436, the IMT reviewed the CPD's relevant policies and documents following the process described in the Consent Decree (¶¶626–41), which outlines applicable consultation, resolution, workout, and public comment periods. These paragraphs delineate various requirements, such as requiring that policies be "plainly written, logically organized, and use clearly defined terms." To evaluate Secondary compliance, we reviewed the CPD's training development, implementation, and evaluation.

Progress before the Sixth Reporting Period

In previous reporting periods, the CPD worked toward Preliminary compliance by providing various versions of General Orders, including but not limited to G08-01-02, *Complaint Initiation and Log Number Investigation Assignment*, and G08-05, *Prohibition on Retaliation*.[24] Although the CPD made significant progress toward Preliminary compliance in the third and fourth reporting periods, the policies remained in the revision stages of creating and finalizing policies that speak to the requirements of ¶436 at the beginning of the fifth reporting period.

[24] The name of this directive changed twice during the collaborative review and revision process. The first draft was titled *Specific Responsibilities Regarding Allegations of Misconduct*, and the second through the fourth drafts were titled *Initiation and Assignment of Investigations into Allegations of Misconduct*.

In the fifth reporting period, the CPD revised General Order G08-01, *Complaint and Discovery Procedures*, and General Order G08-01-02, *Complaint Initiation and Log Number Investigation Assignment.*[25] We provided a no-objection notice to both policies and the CPD posted the general orders for public comment.[26] On the last day of the fifth reporting period, the CPD finalized the policies. This moved the CPD into Preliminary compliance.

Progress in the Sixth Reporting Period

In the sixth reporting period, the CPD began to work toward Secondary compliance. BIA provided a first draft of its eLearning relevant to ¶436. The draft training module, spoken narrative, and written content appears that it will address the requirements of ¶436(b) and (c) for training once the CPD and BIA submit the eLearning module for final approval. However, the draft of the eLearning module does not seem to instruct compliance with the requirements of ¶436(a): "that CPD members promptly report any misconduct of which they are aware to a supervisor." We understand that the BIA eLearning materials are still in draft state and are not in final, presentation form. We encourage the CPD to make further edits to this training so that all components of ¶436 are covered.

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Moving forward, we will look for CPD to finalize its eLearning to instruct compliance with ¶436 and provide it for review.

[25] The name of this directive has changed twice during the collaborative review and revision process. The first draft was titled *Specific Responsibilities Regarding Allegations of Misconduct*, and the second through the fourth drafts were titled *Initiation and Assignment of Investigations into Allegations of Misconduct*.

[26] Under the Consent Decree policy review process, the City and the CPD consult with the IMT and the OAG to develop or revise policies in accordance with Consent Decree requirements. *See* ¶¶626–37. The City and the CPD provide the policy for review at least 30 days before the policy is scheduled to go into effect, and the IMT and the OAG have 30 days to comment on the policy. *See* ¶¶627–28. The City, the CPD, the IMT, and the OAG then work together to resolve comments. The IMT and the OAG will, separately and in writing, notify the City and the CPD that they no longer have any comments, which is referred to as a "no-objection notice." Once the City and the CPD receive a no-objection notice from both the IMT and the OAG, the City and the CPD will begin the process of finalizing the policy. Typically, this includes the CPD posting the policy on its website for public comment for at least 15 days. The City and the CPD must then consider those comments and make additional changes, as appropriate. *See* ¶633.

Paragraph 436 Compliance Progress History

FIRST REPORTING PERIOD
SEPTEMBER 1, 2019 – AUGUST 31, 2019
COMPLIANCE PROGRESS:
None

SECOND REPORTING PERIOD
SEPTEMBER 1, 2019 – FEBRUARY 29, 2020
COMPLIANCE PROGRESS:
None

THIRD REPORTING PERIOD
MARCH 1, 2020 – DECEMBER 31, 2020
COMPLIANCE PROGRESS:
None

FOURTH REPORTING PERIOD
JANUARY 1, 2021 – JUNE 30, 2021
COMPLIANCE PROGRESS:
None

FIFTH REPORTING PERIOD
JULY 1, 2021 – DECEMBER 31, 2021
COMPLIANCE PROGRESS:
Preliminary

SIXTH REPORTING PERIOD
JANUARY 1, 2022 – JUNE 30, 2022
COMPLIANCE PROGRESS:
Preliminary

Accountability and Transparency: ¶437

437. *CPD will expressly prohibit all forms of retaliation, intimidation, coercion, or adverse action against any person who reports misconduct or cooperates with an administrative investigation.*

Compliance Progress (Reporting Period: January 1, 2022, through June 30, 2022)

Preliminary:	***In Compliance*** **(THIRD REPORTING PERIOD)**
Secondary:	***Not in Compliance***
Full:	***Not Yet Assessed***

In the sixth reporting period, the CPD maintained Preliminary compliance with ¶437.

To evaluate Preliminary compliance with ¶437, the IMT reviewed the CPD's policies following the policy process described in the Consent Decree (¶¶626–41), which outlines applicable consultation, resolution, workout, and public comment periods. These paragraphs delineate various requirements, such as requiring that policies be "plainly written, logically organized, and use clearly defined terms." To evaluate Secondary compliance with this paragraph, we reviewed among other things, the CPD's training development, implementation, and evaluation (¶286).[27]

Progress before the Sixth Reporting Period

In previous reporting periods, the CPD maintained Preliminary compliance with ¶437 due to the finalized General Order G08-05, *Prohibition on Retaliation*. In the fourth reporting period, the IMT reviewed BIA's *Complaint Initiation Process – BIA Investigators & Accountability Sergeants Annual Training*. However, we did not receive BIA's corresponding on-boarding training. Additionally, the CPD had produced related training—the *2020 Supervisor In-Service Refresher* training—but this training remained in the collaborative review and revision process at the end of the fourth reporting period. In the fifth reporting period, the CPD and BIA produced no new information pertaining to the requirements of ¶437.

Progress in the Sixth Reporting Period

In the sixth reporting period, the CPD began to work toward Secondary compliance. BIA provided a first draft of its eLearning relevant to ¶435. The draft training module, spoken narrative, and written content suggests that this training will in-

[27] The IMT evaluates training materials using as our standard the "ADDIE" model of curriculum development and implementation. This model typically incorporates the following elements: training needs assessment' curriculum design and development; training implementations (or delivery); and training evaluation.

struct trainees on requirements of ¶437 once the CPD and BIA submit the eLearning module for final approval. We understand that the BIA eLearning materials are still in draft state and are not in final, presentation form. We look forward to reviewing further developed BIA eLearning materials in the next reporting period.

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Moving forward, we will look for CPD to finalize its eLearning to instruct compliance with ¶437 and provide it for review.

Paragraph 437 Compliance Progress History

FIRST REPORTING PERIOD	SECOND REPORTING PERIOD	THIRD REPORTING PERIOD
SEPTEMBER 1, 2019 – AUGUST 31, 2019	SEPTEMBER 1, 2019 – FEBRUARY 29, 2020	MARCH 1, 2020 – DECEMBER 31, 2020
COMPLIANCE PROGRESS:	COMPLIANCE PROGRESS:	COMPLIANCE PROGRESS:
Not Applicable	Not Applicable	Preliminary
FOURTH REPORTING PERIOD	**FIFTH REPORTING PERIOD**	**SIXTH REPORTING PERIOD**
JANUARY 1, 2021 – JUNE 30, 2021	JULY 1, 2021 – DECEMBER 31, 2021	JANUARY 1, 2022 – JUNE 30, 2022
COMPLIANCE PROGRESS:	COMPLIANCE PROGRESS:	COMPLIANCE PROGRESS:
Preliminary	Preliminary	Preliminary

Accountability and Transparency: ¶438

438. *OAG acknowledges that the City, CPD, and COPA are working to create an electronic Case Management System ("CMS"). The City, CPD, and COPA will ensure that the CMS maintains accurate data regarding the number, classification, and status of all administrative investigations, from the intake process through the final disciplinary decision, if any, and through any grievance process, arbitration, Police Board proceeding, or appeal relating to the final disciplinary decision (the "final disposition"). CMS will be maintained by appropriate personnel from the City, CPD, and COPA. The CMS will be fully operational by June 30, 2020.*

Compliance Progress

(Reporting Period: January 1, 2022, through June 30, 2022)

Preliminary:		***Not in Compliance***[28]
	CPD	***Not in Compliance***
	COPA	***In Compliance*** **(FOURTH REPORTING PERIOD)**
Secondary:		***Not in Compliance***
	CPD	***Not in Compliance***
	COPA	***Not in Compliance***
Full:		***Not Yet Assessed***

In the sixth reporting period, the CPD made efforts toward, but ultimately did not reach Preliminary compliance with ¶438. COPA maintained Preliminary compliance with this paragraph. Because all relevant City entities must reach levels of compliance to bring the City, as a whole, into compliance, the City has not yet reached Preliminary compliance.

To evaluate Preliminary compliance with ¶438, the IMT reviewed the CPD's and COPA's policies following the policy process described in the Consent Decree (¶¶626–41), which outlines applicable consultation, resolution, workout, and public comment periods.[29] To evaluate Secondary compliance with this paragraph, we

[28] As referenced above, the Consent Decree requires actions by various City entities, including the CPD, COPA, the Police Board, and the Office of the Inspector General. Ultimately, the City is responsible for ensuring compliance. As a result, if a Consent Decree paragraph requires actions by multiple City entities, we will not find that the City has met Preliminary, Secondary, or Full compliance until all those entities have met the corresponding level of compliance. Nonetheless, for some paragraphs, we will clarify compliance assessments for each entity to demonstrate which benchmarks have been met.

[29] The OAG, the City, and the IMT agreed to a stipulation that provides a different review process for review of COPA policies and training materials. *See Stipulation Regarding the Policy and Training Review Process for COPA*, *Illinois v. Chicago*, Case No. 1:17-cv-06260 (Jan. 30, 2020). The review process in the Stipulation mirrors the review process under ¶¶626–41, but among

reviewed the entities' training development, materials, implementation, and evaluation (¶286).

Progress before the Sixth Reporting Period

In previous reporting periods, the CPD showed commitment to compliance with ¶438 by conducting *Case Management System Investigative Console-Conducting/Investigations* training and developed its *Case Management System Updates and Enhancements Annual Training*. However, many of the requirements of ¶438 were not addressed. The CPD also developed a *Case Management System User Guide* for its BIA Investigators and Accountability Sergeants. In the fifth reporting period, the CPD and BIA provided drafts of Unit Directive, *Case Management System*. By the end of the reporting period, it remained in the collaborative review and revision process. Additionally, CPD drafted and revised Special Order S08-01-01, *Conducting Log Number Investigations*.[30] Although the Special Order addressed the requirements of ¶438, it also remained in the collaborative review and revision process at the end of the reporting period.

COPA, on the other hand, reached Preliminary compliance in the fourth reporting period due to the finalization of Policy 3.1.6, *Clear and Column Case Management System Systems*. In the fifth reporting period, COPA provided training materials for review—*Case Management System: Overview of Policy and Procedures*. The IMT submitted a no-objection notice to the training, but COPA did not provide the training by the end of the reporting period.[31] The IMT expected the training to be held in January 2022 for at least 95% of its personnel to obtain Secondary compliance.

Progress in the Sixth Reporting Period

This reporting period, the CPD continued to work toward Preliminary compliance. The CPD submitted a revised Special Order S08-01-01, *Log Number Case Manage-*

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other things, gives the OAG and the IMT a shorter timeframe for review of COPA policies and training materials.

30 This policy was renumbered to S08-01-05 in the sixth reporting period.

31 Under the Consent Decree policy review process, the City and the CPD consult with the IMT and the OAG to develop or revise policies in accordance with Consent Decree requirements. *See* ¶¶626–37. The City and the CPD provide the policy for review at least 30 days before the policy is scheduled to go into effect, and the IMT and the OAG have 30 days to comment on the policy. *See* ¶¶627–28. The City, the CPD, the IMT, and the OAG then work together to resolve comments. The IMT and the OAG will, separately and in writing, notify the City and the CPD that they no longer have any comments, which is referred to as a "no-objection notice." Once the City and the CPD receive a no-objection notice from both the IMT and the OAG, the City and the CPD will begin the process of finalizing the policy. Typically, this includes the CPD posting the policy on its website for public comment for at least 15 days. The City and the CPD must then consider those comments and make additional changes, as appropriate. *See* ¶633.

ment System, for review. Section III.A of the draft policy speaks to ¶438's requirement that the Case Management System maintains accurate data from the intake process through the final disciplinary decision. We submitted a no-objection notice on June 3, 2022, but that no objection was subject to additional revision including adding language clarifying that the Log Number will follow the investigation from the intake process to the final disposition. This policy remained in the collaborative review and revision process at the end of the fifth reporting period.

Additionally, the CPD submitted Special Order S08-01-05, *Conducting Log Number Investigations*, for review.[32] This revised policy instructs compliance with the requirements of ¶438. Although the IMT provided comments to various versions of the policy throughout the sixth reporting period, additional revisions remain necessary before the CPD finalizes this policy.

COPA provided its *Case Management System: Overview of Policy and Procedures* this reporting period, but we have not yet received documentation showing that COPA provided its training to 95% of its staff. This reporting period, COPA provided documentation demonstrating how the Log Number assigned at intake follows the investigation through to its final disposition, including the findings and discipline imposed, per the requirements of ¶438. We expect these efforts will continue to into the future reporting periods.

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The CPD continued to make progress toward Preliminary compliance with ¶438; both S08-01-01, *Log Number Case Management System* and S08-01-05*, Conducting Log Number Investigations*, remained in the collaborative review and revision process at the end of the sixth reporting period. We look forward to the CPD prioritizing revisions of S08-01-01 and S08-01-05 early in the seventh reporting period to allow the CPD ample time to revise, post for public comment, and finalize these polices. Doing so would propel the CPD into Preliminary compliance. We will also look for COPA to provide evidence that it has provided its *Case Management System: Overview of Policy and Procedures* training to at least 95% of its personnel.

[32] The *Conducting Log Number Investigations* policy was produced in previous reporting periods as S08-01-01. The policy was re-numbered as S08-01-05 when it was produced May 5, 2022. We refer to the policy in this report as S08-01-05 for clarity.

Paragraph 438 Compliance Progress History

FIRST REPORTING PERIOD
SEPTEMBER 1, 2019 – AUGUST 31, 2019
COMPLIANCE PROGRESS:
Not Applicable

SECOND REPORTING PERIOD
SEPTEMBER 1, 2019 – FEBRUARY 29, 2020
COMPLIANCE PROGRESS:
Not Applicable

THIRD REPORTING PERIOD
MARCH 1, 2020 – DECEMBER 31, 2020
COMPLIANCE PROGRESS:
Under Assessment

FOURTH REPORTING PERIOD
JANUARY 1, 2021 – JUNE 30, 2021
COMPLIANCE PROGRESS:
None

FIFTH REPORTING PERIOD
JULY 1, 2021 – DECEMBER 31, 2021
COMPLIANCE PROGRESS:
None

SIXTH REPORTING PERIOD
JANUARY 1, 2022 – JUNE 30, 2022
COMPLIANCE PROGRESS:
None

Accountability and Transparency: ¶439

439. *The City and CPD will ensure that complainants and their representatives are able to track non-confidential unique tracking numbers from the intake process through final disposition via telephone and in person. By June 30, 2020, the City will also ensure complainants and their representatives are able to track the status of non-confidential unique tracking numbers from the intake process through final disposition online.*

Compliance Progress		(Reporting Period: January 1, 2022, through June 30, 2022)
Preliminary:		***In Compliance*** **(FIFTH REPORTING PERIOD)**[33]
	CPD	***In Compliance*** **(FIFTH REPORTING PERIOD)**
	COPA	***In Compliance*** **(FOURTH REPORTING PERIOD)**
Secondary:		***Not in Compliance***
	CPD	***Not in Compliance***
	COPA	***In Compliance*** **(FIFTH REPORTING PERIOD)**
Full:		***Not in Compliance***
	CPD	***Not Yet Assessed***
	COPA	***In Compliance*** **(NEW)**

In the sixth reporting period, the CPD maintained Preliminary compliance with ¶439. COPA made efforts toward but did not ultimately reach Full compliance with this paragraph. Because all relevant City entities must reach levels of compliance to bring the City, as a whole, into compliance, the City has not yet reached Secondary compliance.

To evaluate Preliminary compliance with ¶439, the IMT reviewed the CPD's and COPA's policies following the policy process described in the Consent Decree (¶¶626–41), which outlines applicable consultation, resolution, workout, and public comment periods.[34] To evaluate Secondary compliance with this paragraph, we

[33] As referenced above, the Consent Decree requires actions by various City entities, including the CPD, COPA, the Police Board, and the Office of the Inspector General. Ultimately, the City is responsible for ensuring compliance. As a result, if a Consent Decree paragraph requires actions by multiple City entities, we will not find that the City has met Preliminary, Secondary, or Full compliance until all those entities have met the corresponding level of compliance. Nonetheless, for some paragraphs, we will clarify compliance assessments for each entity to demonstrate which benchmarks have been met.

[34] The OAG, the City, and the IMT agreed to a stipulation that provides a different review process for review of COPA policies and training materials. *See Stipulation Regarding the Policy and Training Review Process for COPA*, *Illinois v. Chicago*, Case No. 1:17-cv-06260 (Jan. 30, 2020). The review process in the Stipulation mirrors the review process under ¶¶626–41, but among other things, gives the OAG and the IMT a shorter timeframe for review of COPA policies and training materials.

reviewed the entities' training development, materials, implementation, and evaluation (¶286). To evaluate Full compliance with this paragraph, we reviewed various data sources including but not limited to documentation and demonstration of complaint tracking systems to determine whether the CPD and COPA has sufficiently implemented its policy and training, as well as a Case Management System that fulfills the requirements of ¶439.

Progress before the Sixth Reporting Period

In previous reporting periods, the CPD worked on developing and revising G08-01-02, *Complaint Initiation and Log Number Investigation Assignment*, to fully address the requirements of ¶439.[35] In the fifth reporting period, the CPD submitted multiple revised drafts during the reporting period, and we ultimately submitted a no-objection notice in November 2021.[36] The finalization of this policy moved the CPD into Preliminary compliance.

COPA in past reporting periods finalized Policy 3.1.6, *Clear and Column Case Management System Systems*, developed an *Employee Agreement Regarding Use of CLEAR and Column Case Management System Systems* form, and at the end of the fourth reporting period submitted policy 3.1.1, *Intake*, as evidence of compliance. In the fifth reporting period, COPA compiled and submitted for review materials for a training titled *Intake Unit: Overview of Policies and Procedures In-Service* and demonstrated that more than 95% of its personnel received the training. COPA also provided materials for its training *Case Management System: Overview of Policy and Procedures*, and the IMT understood that COPA would provide the training in January 2022. These efforts moved COPA into Secondary compliance in the fifth reporting period.

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[35] The name of this directive changed twice during the collaborative review and revision process. The first draft was titled *Specific Responsibilities Regarding Allegations of Misconduct*, and the second through the fourth drafts were titled *Initiation and Assignment of Investigations into Allegations of Misconduct*.

[36] Under the Consent Decree policy review process, the City and the CPD consult with the IMT and the OAG to develop or revise policies in accordance with Consent Decree requirements. *See* ¶¶626–37. The City and the CPD provide the policy for review at least 30 days before the policy is scheduled to go into effect, and the IMT and the OAG have 30 days to comment on the policy. *See* ¶¶627–28. The City, the CPD, the IMT, and the OAG then work together to resolve comments. The IMT and the OAG will, separately and in writing, notify the City and the CPD that they no longer have any comments, which is referred to as a "no-objection notice." Once the City and the CPD receive a no-objection notice from both the IMT and the OAG, the City and the CPD will begin the process of finalizing the policy. Typically, this includes the CPD posting the policy on its website for public comment for at least 15 days. The City and the CPD must then consider those comments and make additional changes, as appropriate. *See* ¶633.

Progress in the Sixth Reporting Period

This reporting period, the CPD did not produce any documentation that demonstrated efforts related to ¶439.

Although COPA reached Secondary compliance for providing adequate training relevant to this paragraph, COPA continues to develop and provide training that speaks to the requirements of ¶430. For example, COPA provided materials for its training *Case Management System: Overview of Policy and Procedures*. The lesson plan explains how a Log Number is created allowing the complaint to be tracked, which instructs compliance with the requirements of ¶439. The IMT commends COPA for providing a training that discusses the entire process rather than simply stating that complaints can be tracked. Along with the lesson plan, COPA provided a statement of personnel who developed and implemented the training materials. Finally, COPA provided a demo presentation for review. The IMT believes this training submission was very comprehensive. In addition to the materials provided, the IMT audited COPA's training *Mandatory In-Service Case Management System*, which was taught in accordance with the lesson plan provided to the IMT previously. COPA's instructors were knowledgeable, and we provided suggestions to COPA for the instructors moving forward. COPA received the feedback positively and committed to improvements in future trainings. Although COPA did not submit training records relevant to participation in trainings for the sixth reporting period, we anticipate receiving those records in the seventh reporting period showing more than 95% of its personnel participating in each training.

Related to Full compliance, COPA provided documentation demonstrating how the Log Number assigned at intake follows the investigation through to its final disposition, including the findings and discipline imposed, per the requirements of ¶439. COPA's website allows a complainant to input the Log Number and see where the complaint is in the investigation process.

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Moving forward, we will look for the CPD to develop training instructing compliance with its policies and ¶439. Additionally, we will look for COPA to provide evidence that at least 95% of its personnel received its *Case Management System: Overview of Policy and Procedures* training and that COPA employees are acting in accordance with ¶439's mandates, and further evidence demonstrating continued full compliance with this paragraph.

Paragraph 439 Compliance Progress History

FIRST REPORTING PERIOD SEPTEMBER 1, 2019 – AUGUST 31, 2019	SECOND REPORTING PERIOD SEPTEMBER 1, 2019 – FEBRUARY 29, 2020	THIRD REPORTING PERIOD MARCH 1, 2020 – DECEMBER 31, 2020
COMPLIANCE PROGRESS: Not Applicable	COMPLIANCE PROGRESS: Not Applicable	COMPLIANCE PROGRESS: None
FOURTH REPORTING PERIOD JANUARY 1, 2021 – JUNE 30, 2021	**FIFTH REPORTING PERIOD** JULY 1, 2021 – DECEMBER 31, 2021	**SIXTH REPORTING PERIOD** JANUARY 1, 2022 – JUNE 30, 2022
COMPLIANCE PROGRESS: None	COMPLIANCE PROGRESS: Preliminary	COMPLIANCE PROGRESS: Preliminary

Accountability and Transparency: ¶440

440. *The City, CPD, and COPA will ensure that all non-confidential complaints are processed by COPA as follows: a. all non-confidential complaints of alleged misconduct received by CPD, including BIA and CPD supervisors, are documented and submitted to COPA within 24 hours of receipt; b. all complaints of alleged misconduct submitted to the anonymous reporting website and all non-confidential complaints of alleged misconduct received by the OIG will be submitted to COPA by the end of the next business day after the complaint was received; c. upon receipt of a complaint, COPA will promptly assign the complaint a unique tracking number, make an initial determination of the classification(s) of the alleged misconduct, and will either retain the complaint for investigation or transfer the complaint to BIA for investigation; d. COPA, pursuant to its ordinance and this Agreement, will have the jurisdiction to conduct administrative investigations of all allegations of misconduct that involve: i. excessive force; ii. Domestic violence; iii. Improper search or seizure of individuals or property; iv. Coercion; v. verbal abuse as defined under Municipal Code of Chicago, § 2-78-100, including any unwelcome sexual advances or requests for sexual favors; or vi. Unlawful denial of access to counsel. E. COPA, pursuant to its ordinance and this Agreement, will receive immediate administrative notification of and have jurisdiction to conduct administrative investigations of all incidents, including those in which no allegation of misconduct has been made, involving: i. firearm discharges by CPD officers that could potentially strike an individual ("officer-involved shooting"); ii. Taser or stun gun discharges by CPD officers that result in death or serious bodily injury; iii. Any person who dies or sustains serious bodily injury while in CPD custody, or as a result of CPD actions; iv. "officer-involved deaths," as that term is defined in 50 ILCS 727/1-5; and v. other weapons discharges and other uses of CPD-issued equipment as a weapon that results in death or serious bodily injury, at the COPA Chief Administrator's discretion; f. the City, CPD, and COPA will ensure that all allegations are recorded and classified appropriately, even if the complainant does not accurately characterize the alleged misconduct; g. if BIA or district personnel conducting investigations into misconduct identify allegations of misconduct that are within COPA's administrative investigative jurisdiction as defined herein, the investigator will promptly notify COPA; and h. if a complaint contains multiple allegations of misconduct,*

one or more of which falls within COPA's administrative investigation jurisdiction as defined herein, COPA will have the right of first refusal to conduct an administrative investigation of the entire complaint.

Compliance Progress (Reporting Period: January 1, 2022, through June 30, 2022)

Preliminary:	***Not in Compliance***[37]
CPD	***Not in Compliance***
COPA	***In Compliance*** **(FOURTH REPORTING PERIOD)**
Deputy PSIG	***In Compliance*** **(FOURTH REPORTING PERIOD)**
Secondary:	***Not in Compliance***
CPD	***Not in Compliance***
COPA	***In Compliance*** **(FIFTH REPORTING PERIOD)**
Deputy PSIG	***In Compliance*** **(FOURTH REPORTING PERIOD)**
Full:	***Not in Compliance***
CPD	***Not Yet Assessed***
COPA	***Not in Compliance***
Deputy PSIG	***In Compliance*** **(FOURTH REPORTING PERIOD)**

In the sixth reporting period, COPA maintained Secondary compliance with ¶440. The CPD made efforts toward but did not ultimately reach Preliminary compliance with this paragraph. The Deputy PSIG maintained Full compliance with ¶440 in the fifth reporting period. But because all relevant City entities must reach levels of compliance to bring the City, as a whole, into compliance, the City has not yet reached Preliminary compliance.

To evaluate Preliminary compliance with ¶440, the IMT reviewed the CPD's, COPA's, and the Deputy PSIG's policies following the policy process described in the Consent Decree (¶¶626–41).[38] To evaluate Secondary compliance with this paragraph, we reviewed the entities' training development, materials, implementation, and evaluation (¶286). To evaluate Full compliance with this paragraph, we considered whether the entities have implemented their policies and trainings

[37] As referenced above, the Consent Decree requires actions by various City entities, including the CPD, COPA, the Police Board, and the Office of the Inspector General. Ultimately, the City is responsible for ensuring compliance. As a result, if a Consent Decree paragraph requires actions by multiple City entities, we will not find that the City has met Preliminary, Secondary, or Full compliance until all those entities have met the corresponding level of compliance. Nonetheless, for some paragraphs, we will clarify compliance assessments for each entity to demonstrate which benchmarks have been met.

[38] The OAG, the City, and the IMT agreed to a stipulation that provides a different review process for review of COPA policies and training materials. *See Stipulation Regarding the Policy and Training Review Process for COPA*, *Illinois v. Chicago*, Case No. 1:17-cv-06260 (Jan. 30, 2020). The review process in the Stipulation mirrors the review process under ¶¶626–41, but among other things, gives the OAG and the IMT a shorter timeframe for review of COPA policies and training materials.

such that they are acting in accordance with ¶440's mandates. Specific to determining whether the Deputy PSIG maintained Full compliance, we review materials submitted by the Deputy PSIG, which included spreadsheets noting all COPA notifications made by the Office of the Inspector General and a memorandum detailing summary statistics relevant to ¶440's requirements.

Progress before the Sixth Reporting Period

In previous reporting periods, the CPD, COPA, and the Office of the Inspector General made progress toward compliance at different rates. The CPD previously produced General Order G08-01-02, *Complaint Initiation and Log Number Investigation*,[39] and two BIA Unit Directives (*Initiation of Log Numbers in the Case Management* System and *Assignment of Administrative Log Number Investigations).*[40] These policies did not address all subparagraphs relevant to the CPD. In the fifth reporting period, the CPD worked to address ¶440(a), (e), (f), (g), and (h) as it revised G08-01-02, *Complaint Initiation and Log Number Investigation.* The IMT submitted a no-objection notice and the CPD finalized the General Order on the last day of the reporting period.[41] Additionally, the CPD provided revisions of Special Order S08-01-01, *Conducting Log Number Investigations*, but it remained in the collaborative review and revision process at the close of the fifth reporting period. Lastly, the CPD has provided several BIA Unit Directives relevant to the requirements of ¶440 such as *Initial Responsibilities in Assigned Log Number Investigations*, which speaks to ¶440(g) and (h), and *Initiation of Log Numbers in the Case Management System*, which addressed ¶440(f). These directives were not finalized by the end of the reporting period.

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[39] The name of this directive changed twice during the collaborative review and revision process. The first draft was titled *Specific Responsibilities Regarding Allegations of Misconduct*, and the second through the fourth drafts were titled *Initiation and Assignment of Investigations into Allegations of Misconduct*.

[40] In the sixth reporting period, the CPD informed the IMT and the OAG that BIA would begin to move away from Unit Directives. Instead of Unit Directives, instruction will be provided in General Orders and Special Orders. This applies to the BIA Unit Directives that we reviewed, and in some instances provided no-objection notices to in previous reporting periods. The CPD began this process in the sixth reporting period and it is ongoing.

[41] Under the Consent Decree policy review process, the City and the CPD consult with the IMT and the OAG to develop or revise policies in accordance with Consent Decree requirements. *See* ¶¶626–37. The City and the CPD provide the policy for review at least 30 days before the policy is scheduled to go into effect, and the IMT and the OAG have 30 days to comment on the policy. *See* ¶¶627–28. The City, the CPD, the IMT, and the OAG then work together to resolve comments. The IMT and the OAG will, separately and in writing, notify the City and the CPD that they no longer have any comments, which is referred to as a "no-objection notice." Once the City and the CPD receive a no-objection notice from both the IMT and the OAG, the City and the CPD will begin the process of finalizing the policy. Typically, this includes the CPD posting the policy on its website for public comment for at least 15 days. The City and the CPD must then consider those comments and make additional changes, as appropriate. *See* ¶633.

COPA submitted and finalized Policy 3.1.1, *Intake*, which addressed the requirements of ¶440(c), (e), (f), and (h). Additionally, COPA provided a draft ordinance 2-78-120 that aimed to address subparagraphs (d) and (e). In the fifth reporting period, COPA provided for review training materials for its training, *Intake Unit: Overview of Policies and Procedures In Service 2021*. In addition, COPA demonstrated that more than 95% of its personnel received the training. Additionally, COPA produced a revised draft ordnance 2-78-120. The IMT commended COPA on taking the lead to develop its own policies for the response and investigations of officer involved shootings and deaths, which were noted in COPA's draft policy, *Major Incident Responses – Officer-Involved Shooting of Officer-Involved Death*.

Finally, the Deputy PSIG reached Full compliance by providing a supplement to its *Investigations Manual*, which contained policies and training materials regarding the submission and process for submitting alleged misconduct to COPA. The Deputy PSIG also provided training records to help establish Full compliance. In the fifth reporting period, the Deputy PSIG provided a memorandum to the IMT and the OAG that provided an update on its performance as it relates to the requirements of ¶440(b). In 2019, PSIG reported 68.5% of complaints to COPA by the end of the next business day, but in 2021, this number jumped to 94.2%.

Progress in the Sixth Reporting Period

In the sixth reporting period, the CPD continued to work toward Preliminary compliance. BIA provided a first draft of its eLearning relevant to ¶440. The draft training module, spoken narrative, and written content suggest that the training will address the requirements of ¶440(a) once the CPD and BIA submit the eLearning module for final approval. But the materials do not appear to address the other relevant subparagraphs in the eLearning training. We understand that the BIA eLearning materials are still in draft state and are not in final, presentation form. We look forward to reviewing these revised materials in the coming reporting periods.

Additionally, the CPD provided Special Order S08-01-05, *Conducting Log Number Investigations* for review.[42] The revised policy addressed the requirements of ¶440(g) in section VI.B.8, but the policy remained in the collaborative review and revision process at the end of the sixth reporting period. The CPD also provided

[42] In the sixth reporting period, the CPD renumbered the policy previously labeled S08-01-01; it is now S08-01-05, *Conducting Log Number Investigations*.

Special Order S08-01-04, *Initial Investigatory Responsibilities in Log Number Investigations* for review.[43] This policy speaks to the requirements of ¶440(g). This policy too remained in the collaborative review and revision process at the end of the sixth reporting period.

This reporting period, COPA did not produce any documentation that demonstrated efforts related to ¶440.

The focus for the Deputy PSIG in the sixth reporting period was maintaining Full compliance. The Deputy PSIG provided a memorandum detailing its compliance with the requirements of ¶440(b). According to a May 2022 production, 91% of the time, the OIG reports complaints by the end of the next business day. This demonstrates continued Full compliance with ¶440.

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Moving forward, we look forward to working with the CPD to finalize policies that instruct compliance with ¶440. We also look forward to receiving information from COPA demonstrating that it is complying with ¶440 and its related policies. For the Deputy PSIG, we expect to receive information that demonstrates continued Full compliance.

Paragraph 440 Compliance Progress History

FIRST REPORTING PERIOD	SECOND REPORTING PERIOD	THIRD REPORTING PERIOD
SEPTEMBER 1, 2019 – AUGUST 31, 2019	SEPTEMBER 1, 2019 – FEBRUARY 29, 2020	MARCH 1, 2020 – DECEMBER 31, 2020
COMPLIANCE PROGRESS:	COMPLIANCE PROGRESS:	COMPLIANCE PROGRESS:
Not Applicable	Not Applicable	Not Applicable
FOURTH REPORTING PERIOD	**FIFTH REPORTING PERIOD**	**SIXTH REPORTING PERIOD**
JANUARY 1, 2021 – JUNE 30, 2021	JULY 1, 2021 – DECEMBER 31, 2021	JANUARY 1, 2022 – JUNE 30, 2022
COMPLIANCE PROGRESS:	COMPLIANCE PROGRESS:	COMPLIANCE PROGRESS:
None	None	None

[43] In the sixth reporting period, the CPD informed the IMT and the OAG that BIA would begin to move away from Unit Directives. Instead of Unit Directives, instruction will be provided in General Orders and Special Orders. This applies to the BIA Unit Directives that we reviewed, and in some instances provided no-objection notices to in previous reporting periods. The CPD began this process in sixth reporting period and incorporated instruction previously included in the BIA *Initial Responsibilities in Assigned Log Number Investigations* Unit Directive (to which we submitted a no-objection in October 2021) into S08-01-04. This process of incorporating Unit Directives into General Orders and Special Orders is ongoing.

Accountability and Transparency: ¶441

441. *The City will undertake best efforts to ensure that COPA has jurisdiction to conduct administrative investigations of allegations of sexual misconduct, as defined by this Agreement.*

Compliance Progress (Reporting Period: January 1, 2022, through June 30, 2022)

Preliminary:	***In Compliance*** **(FIFTH REPORTING PERIOD)**
Secondary:	***In Compliance*** **(NEW)**
Full:	***In Compliance*** **(NEW)**
Sustainment Period Ends	***June 30, 2024***

In the sixth reporting period, the City reached Secondary and Full compliance with ¶441.

To evaluate Preliminary compliance with ¶441, the IMT reviewed COPA's policies following the policy process described in the Consent Decree (¶¶626–41), which outlines applicable consultation, resolution, workout, and public comment periods for a draft ordinance.[44] To evaluate Secondary compliance with this paragraph, we spoke with relevant City representatives and reviewed memoranda, city ordinances, and other relevant documentation regarding the City's efforts to ensure that COPA has jurisdiction to conduct administrative investigations of allegations of sexual misconduct. To evaluate Full compliance, we considered whether the City's efforts ensured that COPA had the requisite jurisdiction as contemplated by this paragraph and utilized best efforts toward this end.

Progress before the Sixth Reporting Period

In previous reporting periods, COPA provided a memorandum that included updates on its efforts to properly train investigative personnel in sexual-assault investigations, including trainings regarding interviewing victims of sexual assault. Additionally, a working group was developed with the goal of improving the investigative and notification process among all of the agencies. The City also provided a draft City Ordinance change to 2-78-120 that included specific language consistent with the Consent Decree language on COPA's jurisdiction of sexual-misconduct complaints. In the fifth reporting period, the City provided a revised draft Ordinance 2-78-120, which gives COPA the authority to investigate sexual misconduct allegations with language that closely aligns with the requirements of the

[44] The OAG, the City, and the IMT agreed to a stipulation that provides a different review process for review of COPA policies and training materials. *See Stipulation Regarding the Policy and Training Review Process for COPA*, *Illinois v. Chicago*, Case No. 1:17-cv-06260 (Jan. 30, 2020). The review process in the Stipulation mirrors the review process under ¶¶626–41, but among other things, gives the OAG and the IMT a shorter timeframe for review of COPA policies and training materials.

Consent Decree. COPA also provided its *Sexual Misconduct* policy, which it finalized at the end of the reporting period. Through COPA's efforts, the City reached Preliminary compliance with ¶441.

Progress in the Sixth Reporting Period

In the sixth reporting period, the City continued to work toward Preliminary compliance by providing a *Memorandum of Understanding: Joint Sexual Misconduct Investigations*. The memorandum addresses the requirements of ¶441. Additionally, the Municipal Code 2-78-100 and 2-78-120 give specific authority to COPA to investigate complaints of sexual misconduct. It even goes further than the Consent Decree requires by indicating that COPA, the Cook County State's Attorney's Office, and BIA have a Sexual Misconduct Working Group to develop protocols and best practices for investigating sexual misconduct and domestic violence cases involving CPD employees. With this, the City reached Secondary compliance with ¶441.

Additionally, COPA submitted a memo regarding COPA's jurisdiction to investigate allegations of sexual misconduct, as well as the City Council's Journal of Proceedings regarding the City's ordinance amendments for COPA's jurisdiction of sexual misconduct investigations. These documents meet the City and COPA's obligations to ensure that COPA has jurisdiction to conduct administrative investigations of allegations of sexual misconduct. COPA worked closely with the IMT and the OAG to ensure correct language that will allow these specific investigations. Additionally, the City Board of Aldermen overwhelmingly passed the revised ordinance. Taken together these efforts demonstrate full support by the City's leadership for COPA's investigation of such allegations. With this documentation and proof that the City has ensured that COPA has the requisite jurisdiction to conduct administrative investigations of allegations of sexual misconduct, the City has reached Full compliance.

Lastly, COPA provided certification at the end of the reporting period that demonstrated that COPA provided its Forensic Experiential Trauma Interviews (FETI) Training to its investigative staff handling investigations of allegations of sexual misconduct.

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Through the *Memorandum of Understanding: Joint Sexual Misconduct Investigations*, the City reached Secondary compliance. Additionally, by providing a memo regarding COPA's jurisdiction to investigate allegations of sexual misconduct, as well as the City Council's Journal of Proceedings regarding the City's ordinance amendments for COPA's jurisdiction of sexual misconduct investigations, the City has reached Full compliance. We look forward to reviewing documentation that proves the City remains in Full compliance in future reporting periods.

Paragraph 441 Compliance Progress History

FIRST REPORTING PERIOD	SECOND REPORTING PERIOD	THIRD REPORTING PERIOD
SEPTEMBER 1, 2019 – AUGUST 31, 2019	SEPTEMBER 1, 2019 – FEBRUARY 29, 2020	MARCH 1, 2020 – DECEMBER 31, 2020
COMPLIANCE PROGRESS:	COMPLIANCE PROGRESS:	COMPLIANCE PROGRESS:
Status Update	Status Update	Status Update

FOURTH REPORTING PERIOD	FIFTH REPORTING PERIOD	SIXTH REPORTING PERIOD
JANUARY 1, 2021 – JUNE 30, 2021	JULY 1, 2021 – DECEMBER 31, 2021	JANUARY 1, 2022 – JUNE 30, 2022
COMPLIANCE PROGRESS:	COMPLIANCE PROGRESS:	COMPLIANCE PROGRESS:
None	Preliminary	Full

Accountability and Transparency: ¶442

442. *The City will ensure COPA has appropriately trained and experienced staff to conduct sexual misconduct investigations.*

Compliance Progress (Reporting Period: January 1, 2022, through June 30, 2022)

Preliminary:	***In Compliance*** **(FOURTH REPORTING PERIOD)**
Secondary:	***In Compliance*** **(FOURTH REPORTING PERIOD)**
Full:	***In Compliance*** **(NEW)**
Sustainment Period Ends	***June 30, 2024***

In the sixth reporting period, the City reached Full compliance with ¶442.

To evaluate Preliminary compliance with ¶442, the IMT reviewed COPA's relevant policies and documents following the process described in the Consent Decree (¶¶626–41), which outlines applicable consultation, resolution, workout, and public comment periods.[45] To evaluate Secondary compliance with this paragraph, we reviewed the entities' training development, materials, implementation, and evaluation (¶286). To evaluate Full compliance with this paragraph, we reviewed COPA's relevant data and evidence regarding investigations into sexual misconduct to determine whether it is operating in accordance with the paragraph and related policy, specifically whether it has implemented its policies and training such that sexual misconduct investigations are conducted by trained and experienced staff. More specifically, we looked at sample data regarding who conducted the investigations and evidence that the investigations were completed in compliance with policy.

Progress before the Sixth Reporting Period

In previous reporting periods, the City and COPA achieved Preliminary and Secondary compliance by submitting a Training Plan and a memo regarding COPA's Special Victim Squad, as well as a comprehensive lesson plan and accompanying presentation, *Sexual Assault Training: Understanding the Neurobiology of Trauma and Applying Trauma Informed Investigative Techniques*. Additionally, COPA produced its in-service training spreadsheet that detailed the trainings it provided (including the sexual assault training) and the list of attendees. In the fifth reporting period, the City and COPA provided a revised policy, *Sexual Misconduct Investiga-*

[45] The OAG, the City, and the IMT agreed to a stipulation that provides a different review process for review of COPA policies and training materials. *See Stipulation Regarding the Policy and Training Review Process for COPA*, *Illinois v. Chicago*, Case No. 1:17-cv-06260 (Jan. 30, 2020). The review process in the Stipulation mirrors the review process under ¶¶626–41, but among other things, gives the OAG and the IMT a shorter timeframe for review of COPA policies and training materials.

tions, for review. This policy addressed the requirements of ¶442 and COPA finalized the policy. Additionally, COPA produced the *Sexual Misconduct Best Efforts* letter that also addressed the requirements of ¶442.

Progress in the Sixth Reporting Period

In the sixth reporting period, the City continued to work toward Full compliance by providing a *Memorandum of Understanding: Joint Sexual Misconduct Investigations*. The memorandum seeks to ensure that investigators approach their investigations and the victim interviews as victim-oriented, which is best practice. The memorandum provides documentation to show that the City is utilizing best practices and ensuring that COPA has appropriately trained and experienced staff to conduct sexual misconduct investigations. Additionally, COPA provided certification demonstrating that COPA provided its Forensic Experiential Trauma Interviews (FETI) Training to its investigative staff handling investigations of allegations of sexual misconduct. With this, COPA reached Full compliance.

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We look forward to the City continuing these efforts to maintain Full compliance with ¶442 in future reporting periods.

Paragraph 442 Compliance Progress History

FIRST REPORTING PERIOD SEPTEMBER 1, 2019 – AUGUST 31, 2019 COMPLIANCE PROGRESS: Status Update	SECOND REPORTING PERIOD SEPTEMBER 1, 2019 – FEBRUARY 29, 2020 COMPLIANCE PROGRESS: Status Update	THIRD REPORTING PERIOD MARCH 1, 2020 – DECEMBER 31, 2020 COMPLIANCE PROGRESS: Status Update
FOURTH REPORTING PERIOD JANUARY 1, 2021 – JUNE 30, 2021 COMPLIANCE PROGRESS: Secondary	FIFTH REPORTING PERIOD JULY 1, 2021 – DECEMBER 31, 2021 COMPLIANCE PROGRESS: Secondary	SIXTH REPORTING PERIOD JANUARY 1, 2022 – JUNE 30, 2022 COMPLIANCE PROGRESS: Full

Accountability and Transparency: ¶443

443. *Consistent with COPA's jurisdiction, after conferring about the details of a particular criminal sexual misconduct investigation involving a CPD member, COPA and BIA may jointly agree that BIA may conduct the administrative investigation into allegations of sexual misconduct when they jointly determine that doing so avoids unnecessary disruption to the complainant.*

Compliance Progress (Reporting Period: January 1, 2022, through June 30, 2022)

Preliminary:		***Not in Compliance***[46]
	CPD	***Not in Compliance***
	COPA	***In Compliance*** (FIFTH REPORTING PERIOD)
Secondary:		***Not in Compliance***
	CPD	***Not in Compliance***
	COPA	***In Compliance*** (NEW)
Full:		***Not in Compliance***
	CPD	***Not in Compliance***
	COPA	***In Compliance*** (NEW)

In the sixth reporting period, the COPA reached Full compliance with ¶443. The CPD made efforts toward but did not ultimately reach Preliminary compliance with this paragraph. Because all relevant City entities must reach levels of compliance to bring the City, as a whole, into compliance, the City has not yet reached Preliminary compliance.

To evaluate Preliminary compliance with ¶443, the IMT reviewed the CPD's and COPA's relevant policies and documents following the process described in the Consent Decree (¶¶626–41), which outlines applicable consultation, resolution, workout, and public comment periods.[47] To evaluate Secondary compliance with this paragraph, we reviewed the entities' training development, materials, imple-

[46] As referenced above, the Consent Decree requires actions by various City entities, including the CPD, COPA, the Police Board, and the Office of the Inspector General. Ultimately, the City is responsible for ensuring compliance. As a result, if a Consent Decree paragraph requires actions by multiple City entities, we will not find that the City has met Preliminary, Secondary, or Full compliance until all those entities have met the corresponding level of compliance. Nonetheless, for some paragraphs, we will clarify compliance assessments for each entity to demonstrate which benchmarks have been met.

[47] The OAG, the City, and the IMT agreed to a stipulation that provides a different review process for review of COPA policies and training materials. *See Stipulation Regarding the Policy and Training Review Process for COPA*, *Illinois v. Chicago*, Case No. 1:17-cv-06260 (Jan. 30, 2020). The review process in the Stipulation mirrors the review process under ¶¶626–41, but among other things, gives the OAG and the IMT a shorter timeframe for review of COPA policies and training materials.

mentation, and evaluation (¶286). To evaluate Full compliance, we reviewed various data sources to determine whether the entities sufficiently implemented their training and policies relevant to ¶443.

Progress before the Sixth Reporting Period

In previous reporting periods, the City provided an unsigned draft *Memorandum of Understanding regarding Joint Sexual Misconduct Investigations*. By the end of the fourth reporting period, neither COPA nor the CPD had finalized corresponding written guidance following the Consent Decree process in ¶443. In the fifth reporting period, BIA provided a revised draft of General Order G08-06, *Prohibitions of Sexual Misconduct*, which addresses the requirements of ¶443 in Section VI.B.[48] By the end of the reporting period, the policy remained in the collaborative review and revision process.

COPA, on the other hand, in the fifth reporting period submitted for review the *COPA Sexual Misconduct Investigations Policy*. COPA even went beyond the requirements of ¶443 by describing factors that might be considered when making the determination that "BIA may conduct the administrative investigation." The IMT provided a no-objection notice to the policy, and COPA finalized the policy, which moved COPA into Preliminary compliance.[49]

Progress in the Sixth Reporting Period

In the sixth reporting period, the City and the CPD continued to work toward Preliminary compliance by providing a revised General Order G08-06, *Prohibitions of Sexual Misconduct*.[50] The revised policy addresses only some of the requirements of ¶443. By the end of the reporting period, the policy remained in the collaborative review and revision process.

COPA worked toward Secondary compliance by providing a *Memorandum of Understanding: Joint Sexual Misconduct Investigations*. The memorandum addresses

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48 The CPD and BIA previously submitted this policy under the number G08-05.

49 Under the Consent Decree policy review process, the City and the CPD consult with the IMT and the OAG to develop or revise policies in accordance with Consent Decree requirements. *See* ¶¶626–37. The City and the CPD provide the policy for review at least 30 days before the policy is scheduled to go into effect, and the IMT and the OAG have 30 days to comment on the policy. *See* ¶¶627–28. The City, the CPD, the IMT, and the OAG then work together to resolve comments. The IMT and the OAG will, separately and in writing, notify the City and the CPD that they no longer have any comments, which is referred to as a "no-objection notice." Once the City and the CPD receive a no-objection notice from both the IMT and the OAG, the City and the CPD will begin the process of finalizing the policy. Typically, this includes the CPD posting the policy on its website for public comment for at least 15 days. The City and the CPD must then consider those comments and make additional changes, as appropriate. *See* ¶633.

50 The CPD originally numbered this policy G08-05 but has numbered it G08-06 since the May 5, 2021 draft.

the requirements of ¶443. Additionally, the Municipal Code 2-78-100 and 2-78-120 give specific authority to COPA to investigate complaints of sexual misconduct. It even goes further than the requirements of the Consent Decree by indicating that COPA, the Cook County State's Attorney's Office, and BIA have developed a Sexual Misconduct Working Group to develop protocols and best practices for investigating sexual misconduct and domestic violence cases involving CPD employees.

Additionally, COPA submitted a memo regarding COPA's jurisdiction to investigate allegations of sexual misconduct, as well as the City Council's Journal of Proceedings regarding the City's ordinance amendments for COPA's jurisdiction of sexual misconduct investigations. These documents meet the City and COPA's obligations to ensure that COPA has jurisdiction to conduct administrative investigations of allegations of sexual misconduct. COPA worked closely with the IMT and the OAG to ensure correct language that will allow these specific investigations. Additionally, the City Board of Aldermen overwhelmingly passed the revised ordinance. Taken altogether, this demonstrates full support of the city leadership for COPA's investigation of such allegations.

Lastly, COPA provided certification at the end of the reporting period that demonstrated that COPA provided its Forensic Experiential Trauma Interviews (FETI) Training to its investigative staff handling investigations of allegations of sexual misconduct. With all of this COPA moved into Full compliance.

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We look forward to working with the CPD to finalize G08-06 directing compliance with ¶443. We expect that these efforts will take place early in the seventh reporting period to allow the CPD ample time to revise and finalize the policy, which would propel the CPD into Preliminary compliance. We look forward to COPA providing documentation evidencing continued willingness to cooperate with BIA regarding sexual misconduct complaints to demonstrate Full compliance with ¶443 in future reporting periods.

Paragraph 443 Compliance Progress History

FIRST REPORTING PERIOD	SECOND REPORTING PERIOD	THIRD REPORTING PERIOD
SEPTEMBER 1, 2019 – AUGUST 31, 2019	SEPTEMBER 1, 2019 – FEBRUARY 29, 2020	MARCH 1, 2020 – DECEMBER 31, 2020
COMPLIANCE PROGRESS:	COMPLIANCE PROGRESS:	COMPLIANCE PROGRESS:
Status Update	Status Update	None

FOURTH REPORTING PERIOD	FIFTH REPORTING PERIOD	SIXTH REPORTING PERIOD
JANUARY 1, 2021 – JUNE 30, 2021	JULY 1, 2021 – DECEMBER 31, 2021	JANUARY 1, 2022 – JUNE 30, 2022
COMPLIANCE PROGRESS:	COMPLIANCE PROGRESS:	COMPLIANCE PROGRESS:
None	None	None

Accountability and Transparency: ¶444

444. *Within ten days of the final disciplinary decision of each complaint of sexual misconduct against a CPD member alleging conduct against a non-CPD member, the City will provide the Deputy PSIG with the complete administrative investigative file, subject to applicable law. The Deputy PSIG will review and analyze each administrative investigative file and, on an annual basis, the Deputy PSIG will publish a report: a. assessing the quality of the sexual misconduct administrative investigations reviewed; b. recommending changes in policies and practices to better prevent, detect, or investigate sexual misconduct; and c. providing aggregate data on the administrative investigations reviewed, including: i. the volume and nature of allegations investigated, broken down by investigating agency; ii. The percentage of investigations referred to the Cook County State's Attorney's Office ("CCSAO") for criminal review; iii. The percentage of investigations criminally prosecuted; iv. The percentage of investigations closed after the Preliminary investigation; v. the percentage of investigations closed for lack of a signed complainant affidavit; and vi. The investigative findings and recommendations, including a summary breakdown of discipline recommended for investigations with sustained findings.*

Compliance Progress (Reporting Period: January 1, 2022, through June 30, 2022)

Recurring Schedule: Annually ☑ **Not Yet Applicable**

Preliminary:	***Not in Compliance***[51]
CPD	***Not in Compliance***
COPA	***In Compliance*** **(FIFTH REPORTING PERIOD)**
Deputy PSIG	***In Compliance*** **(THIRD REPORTING PERIOD)**
Secondary:	***Not in Compliance***
CPD	***Not in Compliance***
COPA	***Not in Compliance***
Deputy PSIG	***In Compliance*** **(FOURTH REPORTING PERIOD)**
Full:	***Not in Compliance***
CPD	***Not in Compliance***
COPA	***Not in Compliance***
Deputy PSIG	***In Compliance*** **(FOURTH REPORTING PERIOD)**

In the sixth reporting period, the Deputy PSIG continued to maintain Full compliance with ¶444. The CPD made efforts toward but did not ultimately reach Preliminary compliance with this paragraph. COPA maintained Preliminary compliance, but did not reach Secondary compliance. Because all relevant City entities must reach levels of compliance to bring the City, as a whole, into compliance, the City has not yet reached Preliminary compliance.

To evaluate Preliminary compliance with ¶444, the IMT reviewed the CPD's, COPA's, and the Office of the Inspector General's policies following the policy process described in the Consent Decree (¶¶626–41), which outlines applicable consultation, resolution, workout, and public comment periods. These paragraphs delineate various requirements, such as requiring that policies be "plainly written, logically organized, and use clearly defined terms."[52]

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[51] As referenced above, the Consent Decree requires actions by various City entities, including the CPD, COPA, the Police Board, and the Office of the Inspector General. Ultimately, the City is responsible for ensuring compliance. As a result, if a Consent Decree paragraph requires actions by multiple City entities, we will not find that the City has met Preliminary, Secondary, or Full compliance until all those entities have met the corresponding level of compliance. Nonetheless, for some paragraphs, we will clarify compliance assessments for each entity to demonstrate which benchmarks have been met.

[52] The OAG, the City, and the IMT agreed to a stipulation that provides a different review process for review of COPA policies and training materials. *See Stipulation Regarding the Policy and Training Review Process for COPA*, *Illinois v. Chicago*, Case No. 1:17-cv-06260 (Jan. 30, 2020). The review process in the Stipulation mirrors the review process under ¶¶626–41, but among other things, gives the OAG and the IMT a shorter timeframe for review of COPA policies and training materials.

To evaluate Secondary compliance with this paragraph, we reviewed the entities' training development, materials, implementation, and evaluation (¶286).[53] To evaluate Full compliance with this paragraph, we reviewed the Office of the Inspector General's policies to determine whether they have been sufficiently implemented and whether the Deputy PSIG's annual reports satisfy each subparagraph of ¶444. We also reviewed Office of the Inspector General's annual report on BIA's and COPA's sexual misconduct investigations.

Progress before the Sixth Reporting Period

In previous reporting periods, the entities worked toward compliance at differing rates. While the Deputy PSIG met Full compliance, neither the CPD nor COPA achieved Preliminary compliance by the end of the fourth reporting period because they had not yet implemented policies that demonstrate compliance with ¶444.

The Deputy PSIG met Full compliance in the fourth reporting period because its *General Policy Manual* and *Annual Report* addressed the requirements of ¶444(c). The Deputy PSIG also provided training materials for review that addressed the requirements of ¶444—ultimately propelling it into Full compliance. In the fifth reporting period, the Deputy PSIG worked to maintain Full compliance. PSIG's *General Policy Manual* produced in the fifth reporting period continued to address the requirements of ¶444(a) and (b). Additionally, PSIG's *Report on Investigations of Sexual Misconduct Allegations Against Chicago Police Department Members* continued to address 444(c). PSIG's training materials submitted in the fourth reporting period continued to address the requirements of ¶444. Finally, the Deputy PSIG informally submitted a memorandum discussing its performance related to the requirements of ¶444(b). In 2019 through the first nine months of 2021, the Deputy PSIG had steadily improved its reporting to meet the requirements of ¶444(b).

In the fifth reporting period, the CPD and BIA produced no information pertaining to the requirements of ¶444. The responsibilities outlined by ¶444 require efforts on the part of the CPD.

COPA, on the other hand, submitted for review the *COPA Sexual Misconduct Investigations Policy*. COPA finalized this policy in the reporting period after receiving a no-objection notice.[54] This moved COPA into Preliminary compliance with ¶444.

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[53] The IMT evaluates training materials using as our standard the "ADDIE" model of curriculum development and implementation. This model typically incorporates the following elements: training needs assessment' curriculum design and development; training implementations (or delivery); and training evaluation.

[54] Under the Consent Decree policy review process, the City and the CPD consult with the IMT and the OAG to develop or revise policies in accordance with Consent Decree requirements. *See* ¶¶626–37. The City and the CPD provide the policy for review at least 30 days before the policy is scheduled to go into effect, and the IMT and the OAG have 30 days to comment on

Additionally, COPA provided a revision to the draft ordinance 2-78-120, which provides direction and gives COPA the authority to investigate sexual misconduct allegations. This ordinance was not yet in effect by the end of the fifth reporting period.

Progress in the Sixth Reporting Period

At the start of the sixth reporting period, City entities were in different stages of compliance. The CPD continued to work toward Preliminary compliance. COPA began to work toward Secondary compliance. The Deputy PSIG worked to maintain Full compliance.

The CPD provided a revised General Order G08-06, *Prohibitions of Sexual Misconduct*.[55] The revised policy does not address the requirements of ¶444. The IMT provided comments to the CPD on May 11, 2022, stating that the CPD should revise the policy to better instruct compliance with ¶444, which requires that the administrative file must be provided to the PSIG within 10 days of the final disciplinary decision. By the end of the reporting period, the policy remained in the collaborative review and revision process.

COPA did not produce any documentation that demonstrated efforts related to ¶444 in the sixth reporting period.

The City submitted a *Memorandum of Understanding: Joint Sexual Misconduct Investigations*. The memorandum addresses the requirements of ¶444 that requires COPA and BIA to provide the full administrative file to the PSIG within ten days of the final disciplinary decision. The requirements of ¶444(a–c) are the responsibility of PSIG and are adequately addressed within PSIG's policies that have been submitted. Additionally, PSIG's *Report on Investigations of Sexual Misconduct* was provided for review. It details that BIA and COPA have made improvements to their reporting to the PSIG during 2021. Additionally, both agencies, but particularly the CPD, have work to do to ensure timely investigations and reporting.

The focus for the Deputy PSIG in the sixth reporting period was maintaining Full compliance. PSIG's *Report on Investigations of Sexual Misconduct Allegations Against CPD Members* produced this reporting period continued to address the

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the policy. *See* ¶¶627–28. The City, the CPD, the IMT, and the OAG then work together to resolve comments. The IMT and the OAG will, separately and in writing, notify the City and the CPD that they no longer have any comments, which is referred to as a "no-objection notice." Once the City and the CPD receive a no-objection notice from both the IMT and the OAG, the City and the CPD will begin the process of finalizing the policy. Typically, this includes the CPD posting the policy on its website for public comment for at least 15 days. The City and the CPD must then consider those comments and make additional changes, as appropriate. *See* ¶633.

[55] The CPD originally numbered this policy G08-05 but has numbered it G08-06 since the May 5, 2021 draft.

requirements of ¶444(a). The report provides a thorough review of BIA and COPA investigations into CPD sexual misconduct cases for the 2021 calendar year. PSIG's report indicates that both agencies have improved at reporting their cases to PSIG and continues to show that the PSIG evaluates the cases thoroughly and appropriately. Additionally, the report continued to address the requirements of ¶444(b) by providing recommendations for changes or improvements to processes and policy for both BIA and COPA. Both entities responded to PSIG, to which the responses were included in the report. Lastly, the report continued to address the requirements of ¶444(c) by addressing all aspects of the paragraph.

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The CPD must draft, revise, and finalize policies that instruct compliance with ¶444 to reach Preliminary compliance. For COPA, we anticipate receiving information in the seventh reporting period regarding COPA's training on its policy and the requirements of ¶444. Lastly, we look forward to the Office of the Inspector General providing information in the coming reporting periods that demonstrates continued compliance with ¶444.

Paragraph 444 Compliance Progress History

FIRST REPORTING PERIOD	SECOND REPORTING PERIOD	THIRD REPORTING PERIOD
SEPTEMBER 1, 2019 – AUGUST 31, 2019	SEPTEMBER 1, 2019 – FEBRUARY 29, 2020	MARCH 1, 2020 – DECEMBER 31, 2020
COMPLIANCE PROGRESS:	COMPLIANCE PROGRESS:	COMPLIANCE PROGRESS:
Status Update	Status Update	None

FOURTH REPORTING PERIOD	FIFTH REPORTING PERIOD	SIXTH REPORTING PERIOD
JANUARY 1, 2021 – JUNE 30, 2021	JULY 1, 2021 – DECEMBER 31, 2021	JANUARY 1, 2022 – JUNE 30, 2022
COMPLIANCE PROGRESS:	COMPLIANCE PROGRESS:	COMPLIANCE PROGRESS:
None	None	None

Accountability and Transparency: ¶445

445. *The City will use best efforts to initiate and undertake a process with the CCSAO, United States Attorney's Office, Cook County Public Defender's Office, and the Federal Defender's Office to share information on at least a quarterly basis regarding any affirmative judicial findings made during the course of criminal proceedings that a CPD member was untruthful, including any findings made at suppression hearings. Upon receipt of information from the CCSAO, United States Attorney's Office, Cook County Public Defender's Office, and the Federal Defender's Office that may suggest misconduct COPA will initiate the intake process.*

Compliance Progress (Reporting Period: January 1, 2022, through June 30, 2022)

Recurring Schedule: Quarterly ☐ **Met** ☑ **Missed**

Preliminary:		***Not in Compliance***[56]
	CPD	***Not in Compliance***
	COPA	***In Compliance*** (FIFTH REPORTING PERIOD)
Secondary:		***Not in Compliance***
	CPD	***Not in Compliance***
	COPA	***In Compliance*** (FIFTH REPORTING PERIOD)
Full:		***Not in Compliance***
	CPD	***Not Yet Assessed***
	COPA	***Not in Compliance***

In the sixth reporting period, COPA made efforts toward but did not ultimately reach Full compliance with this paragraph. The CPD did not produce any information relative to compliance this reporting period and therefore did not reach Preliminary compliance. Because all relevant City entities must reach levels of compliance to bring the City, as a whole, into compliance, the City has not yet reached Preliminary compliance.

To evaluate Preliminary compliance with ¶445, the IMT reviewed the CPD's and COPA's relevant policies and documents following the process described in the

[56] As referenced above, the Consent Decree requires actions by various City entities, including the CPD, COPA, the Police Board, and the Office of the Inspector General. Ultimately, the City is responsible for ensuring compliance. As a result, if a Consent Decree paragraph requires actions by multiple City entities, we will not find that the City has met Preliminary, Secondary, or Full compliance until all those entities have met the corresponding level of compliance. Nonetheless, for some paragraphs, we will clarify compliance assessments for each entity to demonstrate which benchmarks have been met.

Consent Decree (¶¶626–41).[57] To evaluate Secondary compliance with ¶445, the IMT reviewed the CPD's and COPA's training development, implementation, and evaluation (¶286). To evaluate Full compliance with this paragraph, we considered whether the entities have implemented their policies and trainings such that they are acting in accordance with ¶445's mandates.

Progress before the Sixth Reporting Period

In previous reporting periods, the City did not reach Preliminary compliance with ¶445 or the corresponding quarterly deadline to share information as stated in the Consent Decree. COPA submitted Policy 1.3.8, *Civil and Criminal Complaint Review*, and Policy 3.1.1, *Intake*, for evidence of compliance. Although COPA made efforts towards helping the City achieve Preliminary compliance, we stressed that it is crucial that the City take a more holistic approach toward compliance with this paragraph making sure that ¶445's requirements are understood and mandated by the City, not just COPA.

In the fifth reporting period, COPA's finalized Policy 3.1.1, *Intake*, incorporated the requirements of ¶445. Additionally, COPA provided a training, *Intake Unit: Overview of Policies and Procedures: In Service 2021*, to which a portion of the training addressed the requirements of the paragraph. COPA provided evidence that at least 95% of its personnel received the training. With this, COPA reached Preliminary and Secondary compliance in the fifth reporting period. We continued to note that the City cannot fulfill the requirements of this paragraph through COPA's efforts alone. The City should ensure that BIA and COPA have a similar policy.

Progress in the Sixth Reporting Period

This reporting period, the CPD again did not produce any documentation that demonstrated efforts related to ¶445. We continue to note that the City cannot reach compliance through the efforts of COPA alone.

However, COPA revised its policy, *Civil and Criminal Complaint Review*. The policy addresses COPA's responsibilities and expectations arising from ¶445. Not only does the policy's guidance document provide the intention of COPA to address the Consent Decree paragraph, but it provides instruction for how COPA employees

[57] The OAG, the City, and the IMT agreed to a stipulation that provides a different review process for review of COPA policies and training materials. *See Stipulation Regarding the Policy and Training Review Process for COPA*, *Illinois v. Chicago*, Case No. 1:17-cv-06260 (Jan. 30, 2020). The review process in the Stipulation mirrors the review process under ¶¶626–41, but among other things, gives the OAG and the IMT a shorter timeframe for review of COPA policies and training materials.

are to fulfill the requirements of the policy and ¶445. The IMT provided a no-objection notice.[58]

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This reporting period, the CPD did not produce any information that instructs compliance with ¶445. As we stated in the last reporting period, we understand that the City cannot force non-City entities to meet the requirements of this paragraph. However, COPA has taken the initiative to ensure it provides this information to other agencies. This paragraph cannot be in compliance through the efforts of COPA, alone, and with this the City has also not met the quarterly deadline set out by the paragraph. We look forward to the City prioritizing the development and finalization of policies that instruct compliance with ¶445 in the seventh reporting period.

Paragraph 445 Compliance Progress History

FIRST REPORTING PERIOD	SECOND REPORTING PERIOD	THIRD REPORTING PERIOD
SEPTEMBER 1, 2019 – AUGUST 31, 2019	SEPTEMBER 1, 2019 – FEBRUARY 29, 2020	MARCH 1, 2020 – DECEMBER 31, 2020
COMPLIANCE PROGRESS:	COMPLIANCE PROGRESS:	COMPLIANCE PROGRESS:
Not Applicable	Status Update	None
FOURTH REPORTING PERIOD	**FIFTH REPORTING PERIOD**	**SIXTH REPORTING PERIOD**
JANUARY 1, 2021 – JUNE 30, 2021	JULY 1, 2021 – DECEMBER 31, 2021	JANUARY 1, 2022 – JUNE 30, 2022
COMPLIANCE PROGRESS:	COMPLIANCE PROGRESS:	COMPLIANCE PROGRESS:
None	None	None

[58] Under the Consent Decree policy review process, the City and the CPD consult with the IMT and the OAG to develop or revise policies in accordance with Consent Decree requirements. *See* ¶¶626–37. The City and the CPD provide the policy for review at least 30 days before the policy is scheduled to go into effect, and the IMT and the OAG have 30 days to comment on the policy. *See* ¶¶627–28. The City, the CPD, the IMT, and the OAG then work together to resolve comments. The IMT and the OAG will, separately and in writing, notify the City and the CPD that they no longer have any comments, which is referred to as a "no-objection notice." Once the City and the CPD receive a no-objection notice from both the IMT and the OAG, the City and the CPD will begin the process of finalizing the policy. Typically, this includes the CPD posting the policy on its website for public comment for at least 15 days. The City and the CPD must then consider those comments and make additional changes, as appropriate. *See* ¶633.

Accountability and Transparency: ¶446

446. *In the course of investigating a complaint, the City, CPD, and COPA will ensure: a. within five business days of receipt of a non-confidential complaint COPA or BIA will send non-anonymous complainants or their representatives a written notice of receipt. The notice will include the unique tracking number assigned to the complaint. The notice will advise the complainant or his or her representative whether BIA or COPA will be investigating the complaint, and how the complainant or his or her representative may inquire about the status of the investigation. The notice will not contain any language discouraging participation in the investigation. B. within 60 days of the final disciplinary decision the complainant will be provided a copy of the Administrative Summary Report.*

Compliance Progress (Reporting Period: January 1, 2022, through June 30, 2022)

Preliminary:		***In Compliance*** **(FIFTH REPORTING PERIOD)**[59]
	CPD	***In Compliance*** **(FIFTH REPORTING PERIOD)**
	COPA	***In Compliance*** **(FOURTH REPORTING PERIOD)**
Secondary:		***Not in Compliance***
	CPD	***Not in Compliance***
	COPA	***In Compliance*** **(FIFTH REPORTING PERIOD)**
Full:		***Not in Compliance***
	CPD	***Not Yet Assessed***
	COPA	***Not in Compliance***

In the sixth reporting period, COPA maintained Secondary compliance with ¶446. The CPD made efforts toward but did not ultimately reach Secondary compliance with this paragraph. Because all relevant City entities must reach levels of compliance to bring the City, as a whole, into compliance, the City has not yet reached Secondary compliance.

To evaluate Preliminary compliance with ¶446, the IMT reviewed the CPD's and COPA's policies following the policy process described in the Consent Decree

[59] As referenced above, the Consent Decree requires actions by various City entities, including the CPD, COPA, the Police Board, and the Office of the Inspector General. Ultimately, the City is responsible for ensuring compliance. As a result, if a Consent Decree paragraph requires actions by multiple City entities, we will not find that the City has met Preliminary, Secondary, or Full compliance until all those entities have met the corresponding level of compliance. Nonetheless, for some paragraphs, we will clarify compliance assessments for each entity to demonstrate which benchmarks have been met.

(¶¶626–41), which outlines applicable consultation, resolution, workout, and public comment periods.[60] To evaluate Secondary compliance with this paragraph, we reviewed the entities' training development, materials, implementation, and evaluation (¶286). To evaluate Full compliance with this paragraph, we considered whether the entities have implemented their policies and trainings such that they are providing sufficient notice pursuant to the requirements of this paragraph.

Progress before the Sixth Reporting Period

In previous reporting periods, the CPD provided a draft of General Order G08-01-02 and BIA provided a draft of its *Assignment of Administrative Log Number Investigations* Unit Directive.[61] In the fifth reporting period, the CPD revised General Order G08-01-02, *Complaint Initiation and Log Number Investigation Assignment*, which spoke to the requirements of ¶446(a). Additionally, BIA submitted a revised version of Special Order S08-01-04, *Post Investigation Log Number Procedures* that addresses ¶446(b).[62] The IMT provided a no-objection notice to both policies, and the CPD finalized the policies on the last day of the fifth reporting period.[63] BIA also submitted its *Administrative Summary Report* packet that pertains to the requirements of ¶446(b). With this, the CPD moved into Preliminary compliance in the fifth reporting period.

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60 The OAG, the City, and the IMT agreed to a stipulation that provides a different review process for review of COPA policies and training materials. *See Stipulation Regarding the Policy and Training Review Process for COPA*, *Illinois v. Chicago*, Case No. 1:17-cv-06260 (Jan. 30, 2020). The review process in the Stipulation mirrors the review process under ¶¶626–41, but among other things, gives the OAG and the IMT a shorter timeframe for review of COPA policies and training materials.

61 The name of this directive changed twice during the collaborative review and revision process. The first draft was titled *Specific Responsibilities Regarding Allegations of Misconduct*, and the second through the fourth drafts were titled *Initiation and Assignment of Investigations into Allegations of Misconduct*.
The CPD and BIA previously named this Unit Directive "Assignment of Administrative Log Number Investigations. This Unit Directive is now named "Initial Responsibilities in Assigned Log Number Investigations.

62 The CPD changed the name of this directive during the revision stage. It was previously known as *Documenting Log Number Investigations and Post Investigations Procedures*.

63 Under the Consent Decree policy review process, the City and the CPD consult with the IMT and the OAG to develop or revise policies in accordance with Consent Decree requirements. *See* ¶¶626–37. The City and the CPD provide the policy for review at least 30 days before the policy is scheduled to go into effect, and the IMT and the OAG have 30 days to comment on the policy. *See* ¶¶627–28. The City, the CPD, the IMT, and the OAG then work together to resolve comments. The IMT and the OAG will, separately and in writing, notify the City and the CPD that they no longer have any comments, which is referred to as a "no-objection notice." Once the City and the CPD receive a no-objection notice from both the IMT and the OAG, the City and the CPD will begin the process of finalizing the policy. Typically, this includes the CPD posting the policy on its website for public comment for at least 15 days. The City and the CPD must then consider those comments and make additional changes, as appropriate. *See* ¶633.

COPA reached Preliminary compliance by finalizing Policy 3.2.2, *Timeliness Benchmarks* in previous reporting periods. In the fifth reporting period, COPA provided its training, *COPA Intake Unit: Overview of Policies and Procedures: In Service 2021*, which addressed ¶446, and provided evidence that at least 95% of its personnel received the training. With this, COPA moved into Secondary compliance in the fifth reporting period.

Progress in the Sixth Reporting Period

In the sixth reporting period, the CPD began to work toward Secondary compliance. BIA provided a first draft of its eLearning relevant to ¶446(b). The draft training module, spoken narrative, and written content suggest that this training will address the requirements of ¶446(b) once the CPD and BIA submit the eLearning module for final approval. We understand that the BIA eLearning materials are still drafts and are not in final, presentation form. We look forward to reviewing further developed BIA eLearning materials in the next reporting period. The CPD did not produce any documentation that demonstrated efforts related to ¶446(a).

This reporting period, COPA did not produce any documentation that demonstrated efforts related to ¶446.

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Moving forward, we will look for CPD to finalize BIA's eLearning to instruct compliance with ¶446(b) and provide it for review. We also will look for the CPD to provide training that instructs compliance with ¶446(a). For COPA, we look forward to receiving additional information related to ¶446 to ensure that COPA has sufficiently implemented its policies and training of such policies.

Paragraph 446 Compliance Progress History

FIRST REPORTING PERIOD	SECOND REPORTING PERIOD	THIRD REPORTING PERIOD
SEPTEMBER 1, 2019 – AUGUST 31, 2019	SEPTEMBER 1, 2019 – FEBRUARY 29, 2020	MARCH 1, 2020 – DECEMBER 31, 2020
COMPLIANCE PROGRESS:	COMPLIANCE PROGRESS:	COMPLIANCE PROGRESS:
Not Applicable	Status Update	Status Update
FOURTH REPORTING PERIOD	**FIFTH REPORTING PERIOD**	**SIXTH REPORTING PERIOD**
JANUARY 1, 2021 – JUNE 30, 2021	JULY 1, 2021 – DECEMBER 31, 2021	JANUARY 1, 2022 – JUNE 30, 2022
COMPLIANCE PROGRESS:	COMPLIANCE PROGRESS:	COMPLIANCE PROGRESS:
None	Preliminary	Preliminary

Accountability and Transparency: ¶447

447. *The City and CPD will require that all COPA and BIA personnel and Accountability Sergeants communicate with complainants and involved CPD members in a professional and respectful manner.*

Compliance Progress (Reporting Period: January 1, 2022, through June 30, 2022)

Preliminary:		***In Compliance*** **(FIFTH REPORTING PERIOD)**[64]
	CPD	***In Compliance*** **(FIFTH REPORTING PERIOD)**
	COPA	***In Compliance*** **(FOURTH REPORTING PERIOD)**
Secondary:		***Not in Compliance***
	CPD	***Not in Compliance***
	COPA	***In Compliance*** **(FIFTH REPORTING PERIOD)**
Full:		***Not in Compliance***
	CPD	***Not Yet Assessed***
	COPA	***Not in Compliance***

In the sixth reporting period, COPA maintained Secondary compliance with ¶447 and the CPD maintained Preliminary compliance. Because all relevant City entities must reach levels of compliance to bring the City, as a whole, into compliance, the City has not yet reached Secondary compliance.

To evaluate Preliminary compliance with ¶447, the IMT reviewed the CPD's and COPA's policies following the policy process described in the Consent Decree (¶¶626–41), which outlines applicable consultation, resolution, workout, and public comment periods.[65] To evaluate Secondary compliance with this paragraph, we reviewed the entities' training development, materials, implementation, and evaluation (¶286). To evaluate Full compliance with this paragraph, we considered whether the entities have implemented their policies and trainings such that they

[64] As referenced above, the Consent Decree requires actions by various City entities, including the CPD, COPA, the Police Board, and the Office of the Inspector General. Ultimately, the City is responsible for ensuring compliance. As a result, if a Consent Decree paragraph requires actions by multiple City entities, we will not find that the City has met Preliminary, Secondary, or Full compliance until all those entities have met the corresponding level of compliance. Nonetheless, for some paragraphs, we will clarify compliance assessments for each entity to demonstrate which benchmarks have been met.

[65] The OAG, the City, and the IMT agreed to a stipulation that provides a different review process for review of COPA policies and training materials. *See Stipulation Regarding the Policy and Training Review Process for COPA*, *Illinois v. Chicago*, Case No. 1:17-cv-06260 (Jan. 30, 2020). The review process in the Stipulation mirrors the review process under ¶¶626–41, but among other things, gives the OAG and the IMT a shorter timeframe for review of COPA policies and training materials.

are requiring all COPA and BIA personnel and Accountability Sergeants to communicate with complainants and CPD members in a professional manner pursuant to the requirements of this paragraph.

Progress before the Sixth Reporting Period

In the fifth reporting period, the CPD reached Preliminary compliance. The CPD submitted a revised version of BIA's Unit Directive *Initial Responsibilities in Assigned Log Number Investigations*.[66] This Unit Directive did not address all requirements of ¶447 and was not finalized by the end of the reporting period. Additionally, the CPD revised Special Order S08-01, *Complaint and Disciplinary Investigators and Investigations*, which incorporated the requirements of ¶447. We submitted a no-objection notice and the CPD finalized the policy on the last day of the reporting period.[67] Finally, the CPD produced Special Order S08-01-01, *Conducting Log Number Investigations*, which fully addressed the requirements of ¶447. At the end of the fifth reporting period, it remained in the collaborative review and revision process.

COPA finalized Policy 3.1.1, *Intake*, which propelled COPA to Preliminary compliance in the fourth reporting period. Building on this in the fifth reporting period, COPA provided training materials for its training *COPA Intake Unit: Overview of Policies and Procedures: In Service 2021* for review. COPA provided evidence that at least 95% of its personnel received the training, which moved COPA into Secondary compliance.

Progress in the Sixth Reporting Period

This reporting period, neither CPD nor COPA produced any documentation that demonstrated efforts related to ¶447.

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[66] Previous drafts of this Unit Directive were titled *Conduct of Investigation: Initial Responsibilities.*

[67] Under the Consent Decree policy review process, the City and the CPD consult with the IMT and the OAG to develop or revise policies in accordance with Consent Decree requirements. *See* ¶¶626–37. The City and the CPD provide the policy for review at least 30 days before the policy is scheduled to go into effect, and the IMT and the OAG have 30 days to comment on the policy. *See* ¶¶627–28. The City, the CPD, the IMT, and the OAG then work together to resolve comments. The IMT and the OAG will, separately and in writing, notify the City and the CPD that they no longer have any comments, which is referred to as a "no-objection notice." Once the City and the CPD receive a no-objection notice from both the IMT and the OAG, the City and the CPD will begin the process of finalizing the policy. Typically, this includes the CPD posting the policy on its website for public comment for at least 15 days. The City and the CPD must then consider those comments and make additional changes, as appropriate. *See* ¶633.

We look forward to reviewing the CPD's training on Special Order S08-01, *Complaint and Disciplinary Investigators and Investigations* to meet the requirements of ¶447. For COPA, we look forward to receiving additional information related to ¶447 to ensure COPA has sufficiently implemented its policies and training of such policies.

Paragraph 447 Compliance Progress History

FIRST REPORTING PERIOD	SECOND REPORTING PERIOD	THIRD REPORTING PERIOD
SEPTEMBER 1, 2019 – AUGUST 31, 2019	SEPTEMBER 1, 2019 – FEBRUARY 29, 2020	MARCH 1, 2020 – DECEMBER 31, 2020
COMPLIANCE PROGRESS:	COMPLIANCE PROGRESS:	COMPLIANCE PROGRESS:
Not Applicable	Not Applicable	Status Update

FOURTH REPORTING PERIOD	FIFTH REPORTING PERIOD	SIXTH REPORTING PERIOD
JANUARY 1, 2021 – JUNE 30, 2021	JULY 1, 2021 – DECEMBER 31, 2021	JANUARY 1, 2022 – JUNE 30, 2022
COMPLIANCE PROGRESS:	COMPLIANCE PROGRESS:	COMPLIANCE PROGRESS:
None	Preliminary	Preliminary

Accountability and Transparency: ¶448

448. *If COPA, BIA, or the district does not arrive at the investigative findings and recommendations within 180 days, COPA, BIA or an Accountability Sergeant will, thereafter, periodically, but not less than once every 60 days, attempt contact with the complainant or his or her representative to provide status updates until the investigative findings and recommendations are issued. Such contacts will be documented in the administrative investigative file. By 2020, this requirement will be satisfied by providing complainants and their representatives the ability to track the status of non-confidential unique tracking numbers from the intake process through final disposition online.*

Compliance Progress (Reporting Period: January 1, 2022, through June 30, 2022)

Preliminary:		***In Compliance*** **(FIFTH REPORTING PERIOD)**[68]
	CPD	***In Compliance*** **(FIFTH REPORTING PERIOD)**
	COPA	***In Compliance*** **(FOURTH REPORTING PERIOD)**
Secondary:		***Not in Compliance***
	CPD	***Not in Compliance***
	COPA	***Not in Compliance***
Full:		***Not Yet Assessed***

In the sixth reporting period, the CPD and COPA maintained Preliminary compliance with ¶448.

To evaluate Preliminary compliance with ¶448, the IMT reviewed the CPD's and COPA's policies following the policy process described in the Consent Decree (¶¶626–41), which outlines applicable consultation, resolution, workout, and public comment periods.[69] To evaluate Secondary compliance with this paragraph, we

[68] As referenced above, the Consent Decree requires actions by various City entities, including the CPD, COPA, the Police Board, and the Office of the Inspector General. Ultimately, the City is responsible for ensuring compliance. As a result, if a Consent Decree paragraph requires actions by multiple City entities, we will not find that the City has met Preliminary, Secondary, or Full compliance until all those entities have met the corresponding level of compliance. Nonetheless, for some paragraphs, we will clarify compliance assessments for each entity to demonstrate which benchmarks have been met.

[69] The OAG, the City, and the IMT agreed to a stipulation that provides a different review process for review of COPA policies and training materials. *See Stipulation Regarding the Policy and Training Review Process for COPA*, *Illinois v. Chicago*, Case No. 1:17-cv-06260 (Jan. 30, 2020). The review process in the Stipulation mirrors the review process under ¶¶626–41, but among other things, gives the OAG and the IMT a shorter timeframe for review of COPA policies and training materials.

reviewed the entities' training development, materials, implementation, and evaluation (¶286).

Progress before the Sixth Reporting Period

In the fifth reporting period, the CPD revised S08-01, *Complaint and Disciplinary Investigators and Investigations*. Throughout the fifth reporting period, the CPD submitted three different revised versions to the IMT for review. The IMT provided a no-objection notice and the CPD finalized the policy on the last day of the reporting period.[70] This moved the CPD into Preliminary compliance with ¶448.

COPA reached Preliminary compliance in the fourth reporting period. COPA finalized Policy 3.2.2, *Timeliness Benchmarks*, which meets the requirements of ¶448 as it relates to COPA. In the fifth reporting period, COPA did not submit evidence showing efforts toward Secondary compliance with ¶448, and therefore maintained Preliminary compliance.

Progress in the Sixth Reporting Period

This reporting period, the CPD and COPA did not produce any documentation that demonstrated efforts related to ¶448.

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We look forward to the CPD and COPA providing training materials for review that instruct compliance with ¶448 in the next reporting period.

Paragraph 448 Compliance Progress History

FIRST REPORTING PERIOD	SECOND REPORTING PERIOD	THIRD REPORTING PERIOD
SEPTEMBER 1, 2019 – AUGUST 31, 2019	SEPTEMBER 1, 2019 – FEBRUARY 29, 2020	MARCH 1, 2020 – DECEMBER 31, 2020
COMPLIANCE PROGRESS:	COMPLIANCE PROGRESS:	COMPLIANCE PROGRESS:
Status Update	Status Update	Status Update
FOURTH REPORTING PERIOD	**FIFTH REPORTING PERIOD**	**SIXTH REPORTING PERIOD**
JANUARY 1, 2021 – JUNE 30, 2021	JULY 1, 2021 – DECEMBER 31, 2021	JANUARY 1, 2022 – JUNE 30, 2022
COMPLIANCE PROGRESS:	COMPLIANCE PROGRESS:	COMPLIANCE PROGRESS:
None	Preliminary	Preliminary

[70] Under the Consent Decree policy review process, the City and the CPD consult with the IMT and the OAG to develop or revise policies in accordance with Consent Decree requirements. *See* ¶¶626–37. The City and the CPD provide the policy for review at least 30 days before the policy is scheduled to go into effect, and the IMT and the OAG have 30 days to comment on the policy. *See* ¶¶627–28. The City, the CPD, the IMT, and the OAG then work together to resolve comments. The IMT and the OAG will, separately and in writing, notify the City and the CPD that they no longer have any comments, which is referred to as a "no-objection notice." Once the City and the CPD receive a no-objection notice from both the IMT and the OAG, the City and the CPD will begin the process of finalizing the policy. Typically, this includes the CPD posting the policy on its website for public comment for at least 15 days. The City and the CPD must then consider those comments and make additional changes, as appropriate. *See* ¶633.

Accountability and Transparency: ¶449

449. *The City and CPD will notify the complainant in writing if an officer elects to file a labor grievance relating to any discipline imposed as a result of the complainant's complaint. Upon reaching the final disposition, the City and CPD will advise the complainant in writing of the final disposition.*

Compliance Progress (Reporting Period: January 1, 2022, through June 30, 2022)

Preliminary:	***In Compliance* (FIFTH REPORTING PERIOD)**
Secondary:	***Not in Compliance***
Full:	***Not Yet Assessed***

In the sixth reporting period, the City and the CPD maintained Preliminary compliance with ¶449.

To evaluate Preliminary compliance with ¶449, the IMT reviewed the CPD's relevant policies and documents following the process described in the Consent Decree (¶¶626–41), which outlines applicable consultation, resolution, workout, and public comment periods. To evaluate Secondary compliance with this paragraph, we reviewed the entities' training development, materials, implementation, and evaluation (¶286).

Progress before the Sixth Reporting Period

In previous reporting periods, the CPD worked to revise and finalize Special Order S08-01-04, *Post Investigation Log Number Procedures*, the draft of which addresses the requirements of ¶449.[71] In the fifth reporting period, the CPD continued to revise S08-01-04. We provided a no-objection notice and the CPD finalized the policy on the last day of the reporting period.[72] This moved CPD into Preliminary compliance.

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[71] This directive was previously submitted to the IMT as *Documenting Log Number Investigations and Post Investigations*.

[72] Under the Consent Decree policy review process, the City and the CPD consult with the IMT and the OAG to develop or revise policies in accordance with Consent Decree requirements. *See* ¶¶626–37. The City and the CPD provide the policy for review at least 30 days before the policy is scheduled to go into effect, and the IMT and the OAG have 30 days to comment on the policy. *See* ¶¶627–28. The City, the CPD, the IMT, and the OAG then work together to resolve comments. The IMT and the OAG will, separately and in writing, notify the City and the CPD that they no longer have any comments, which is referred to as a "no-objection notice." Once the City and the CPD receive a no-objection notice from both the IMT and the OAG, the City and the CPD will begin the process of finalizing the policy. Typically, this includes the CPD posting the policy on its website for public comment for at least 15 days. The City and the CPD must then consider those comments and make additional changes, as appropriate. *See* ¶633.

Progress in the Sixth Reporting Period

In the sixth reporting period, the CPD began to work toward Secondary compliance. BIA provided a first draft of its eLearning relevant to ¶449. The draft training module, spoken narrative, and written content appears that it will address the requirements of ¶449 for training once the CPD and BIA submit the eLearning module for final approval. We understand that the BIA eLearning materials are still in draft state and are not in final, presentation form.

***

Moving forward, we will look for CPD to finalize its eLearning to instruct compliance with ¶449 and provide it for review.

Paragraph 449 Compliance Progress History

FIRST REPORTING PERIOD	SECOND REPORTING PERIOD	THIRD REPORTING PERIOD
SEPTEMBER 1, 2019 – AUGUST 31, 2019	SEPTEMBER 1, 2019 – FEBRUARY 29, 2020	MARCH 1, 2020 – DECEMBER 31, 2020
COMPLIANCE PROGRESS:	COMPLIANCE PROGRESS:	COMPLIANCE PROGRESS:
Not Applicable	Not Applicable	Status Update

FOURTH REPORTING PERIOD	FIFTH REPORTING PERIOD	SIXTH REPORTING PERIOD
JANUARY 1, 2021 – JUNE 30, 2021	JULY 1, 2021 – DECEMBER 31, 2021	JANUARY 1, 2022 – JUNE 30, 2022
COMPLIANCE PROGRESS:	COMPLIANCE PROGRESS:	COMPLIANCE PROGRESS:
None	Preliminary	Preliminary

Accountability and Transparency: ¶450

450. *CPD will develop and implement policies to ensure that a CPD member who is alleged to be involved in misconduct (the "involved member") receives notice that he or she is under administrative investigation. The policies will provide, at a minimum: a. CPD members under investigation will not receive such notice of confidential investigations, but will receive notice prior to being formally interviewed by COPA, BIA, or an Accountability Sergeant; b. such notice will comport with due process and the law, and will describe the nature of the complaint made against the involved member, and the involved member's rights, but will not contain any information that is part of a confidential investigation; and c. once a CPD member has been notified or otherwise becomes aware that he or she is the subject of an administrative investigation, the CPD member will not review the following documents and evidence related to an incident under administrative investigation, until notified by BIA that he or she is permitted to do so, or as may be required to testify as a witness in criminal or civil proceedings: i. any investigative files; ii. any reports (except for reports about the incident authored by the CPD member); or iii. any other evidence, from any source, including body and dashboard camera footage (except as permitted for purposes of completing incident reports or other documentation).*

Compliance Progress

(Reporting Period: January 1, 2022, through June 30, 2022)

Preliminary:	***Not in Compliance***
Secondary:	***Not Yet Assessed***
Full:	***Not Yet Assessed***

In the sixth reporting period, the CPD made efforts toward but did not ultimately reach Preliminary compliance with ¶450.

To evaluate Preliminary compliance with ¶450, the IMT reviewed the CPD's relevant policies and documents following the process described in the Consent Decree (¶¶626–41), which outlines applicable consultation, resolution, workout, and public comment periods.

Progress before the Sixth Reporting Period

In previous reporting periods, BIA worked to draft and revise policies that speak to the requirements of ¶450. BIA had previously submitted BIA's *Accountability Sergeant* Unit Directive that spoke to but did not fully address the requirements of

¶450. In addition, BIA submitted BIA's *Administrative Misconduct Investigations* Unit Directive, which did address ¶450 and the subparagraphs. In the fifth reporting period, we provided a no-objection notice to BIA's revised Unit Directive, *Administrative Misconduct Investigations*.[73] However, the policy was not posted for public comment and was not finalized by the end of the reporting period.[74] The CPD and BIA also submitted a first draft of Special Order S08-01-01, *Conducting Log Number Investigations*, that addressed all requirements of ¶450 and its subparagraphs, but it also was not finalized by the end of the reporting period.

Progress in the Sixth Reporting Period

In the sixth reporting period, the CPD renumbered the policy previously labeled S08-01-01, and it is now S08-01-05, *Conducting Log Number Investigations*. We anticipate this Special Order will direct compliance with the requirements of ¶450, but at the end of the sixth reporting period, this policy remained in the collaborative review and revision process.

***

We look forward to the CPD prioritizing revisions of S08-01-05 early in the seventh reporting period to allow the CPD ample time to revise, post for public comment, and finalize the policy. Doing so would propel the CPD into Preliminary compliance.

[73] Under the Consent Decree policy review process, the City and the CPD consult with the IMT and the OAG to develop or revise policies in accordance with Consent Decree requirements. *See* ¶¶626–37. The City and the CPD provide the policy for review at least 30 days before the policy is scheduled to go into effect, and the IMT and the OAG have 30 days to comment on the policy. *See* ¶¶627–28. The City, the CPD, the IMT, and the OAG then work together to resolve comments. The IMT and the OAG will, separately and in writing, notify the City and the CPD that they no longer have any comments, which is referred to as a "no-objection notice." Once the City and the CPD receive a no-objection notice from both the IMT and the OAG, the City and the CPD will begin the process of finalizing the policy. Typically, this includes the CPD posting the policy on its website for public comment for at least 15 days. The City and the CPD must then consider those comments and make additional changes, as appropriate. *See* ¶633.

[74] In the sixth reporting period, the CPD informed the IMT and the OAG that BIA would begin to move away from Unit Directives. Instead of Unit Directives, instruction will be provided in General Orders and Special Orders. This applies to the BIA Unit Directives that we reviewed, and in some instances provided no-objection notices to in previous reporting periods. The CPD began this process in the sixth reporting period and it is ongoing.

Paragraph 450 Compliance Progress History

FIRST REPORTING PERIOD
SEPTEMBER 1, 2019 – AUGUST 31, 2019
COMPLIANCE PROGRESS:
Not Applicable

SECOND REPORTING PERIOD
SEPTEMBER 1, 2019 – FEBRUARY 29, 2020
COMPLIANCE PROGRESS:
Status Update

THIRD REPORTING PERIOD
MARCH 1, 2020 – DECEMBER 31, 2020
COMPLIANCE PROGRESS:
Status Update

FOURTH REPORTING PERIOD
JANUARY 1, 2021 – JUNE 30, 2021
COMPLIANCE PROGRESS:
None

FIFTH REPORTING PERIOD
JULY 1, 2021 – DECEMBER 31, 2021
COMPLIANCE PROGRESS:
None

SIXTH REPORTING PERIOD
JANUARY 1, 2022 – JUNE 30, 2022
COMPLIANCE PROGRESS:
None

Accountability and Transparency: ¶451

451. *A CPD member who reviews audio or video evidence for purposes of completing an incident report will document in writing that he or she reviewed the evidence in each relevant incident report.*

Compliance Progress

(Reporting Period: January 1, 2022, through June 30, 2022)

Preliminary:	***Not in Compliance***
Secondary:	***Not Yet Assessed***
Full:	***Not Yet Assessed***

In the sixth reporting period, the CPD made efforts toward but did not ultimately reach Preliminary compliance with ¶451.

To evaluate Preliminary compliance with ¶451, the IMT reviewed the CPD's relevant policies and documents following the process described in the Consent Decree (¶¶626–41), which outlines applicable consultation, resolution, workout, and public comment periods. These paragraphs delineate various requirements, such as requiring that policies be "plainly written, logically organized, and use clearly defined terms."

Progress before the Sixth Reporting Period

In previous reporting periods, the CPD drafted and revised policies that speak to the requirements of ¶451. The CPD provided revised versions of Special Order S03-14, *Body Worn Cameras*, but it did not sufficiently address ¶451 because it did not require officers to document in an incident report whether they reviewed the evidence. In the fifth reporting period, the CPD and BIA produced no information pertaining to the requirements of ¶451.

Progress in the Sixth Reporting Period

In the sixth reporting period, the CPD continued to work toward Preliminary compliance by submitting a revised Special Order S03-14, *Body-Worn Cameras*. This policy met the requirements of ¶451 by stating that "department members will . . . document the review of their [body-worn camera] recording of an incident in the narrative portion of any report they complete for the incident (e.g., incident case report, Arrest Report, Tactical Response Report)." By the end of the sixth reporting period, this policy remained in the collaborative review and revision process.

***

We look forward to working with the CPD to revise S03-14 to instruct compliance with ¶451 in the seventh reporting period.

Paragraph 451 Compliance Progress History

FIRST REPORTING PERIOD	SECOND REPORTING PERIOD	THIRD REPORTING PERIOD
SEPTEMBER 1, 2019 – AUGUST 31, 2019	SEPTEMBER 1, 2019 – FEBRUARY 29, 2020	MARCH 1, 2020 – DECEMBER 31, 2020
COMPLIANCE PROGRESS:	COMPLIANCE PROGRESS:	COMPLIANCE PROGRESS:
Status Update	Status Update	None

FOURTH REPORTING PERIOD	FIFTH REPORTING PERIOD	SIXTH REPORTING PERIOD
JANUARY 1, 2021 – JUNE 30, 2021	JULY 1, 2021 – DECEMBER 31, 2021	JANUARY 1, 2022 – JUNE 30, 2022
COMPLIANCE PROGRESS:	COMPLIANCE PROGRESS:	COMPLIANCE PROGRESS:
None	None	None

Accountability and Transparency: ¶452

452. *Consistent with the applicable collective bargaining agreements, CPD will require members to cooperate with administrative investigations, including appearing for an administrative interview when requested by COPA, BIA, or an Accountability Sergeant and will provide all requested documents and evidence under the CPD member's custody and control.*

Compliance Progress

(Reporting Period: January 1, 2022, through June 30, 2022)

Preliminary:	***In Compliance*** **(FIFTH REPORTING PERIOD)**
Secondary:	***Not in Compliance***
Full:	***Not Yet Assessed***

In the sixth reporting period, the City and the CPD maintained Preliminary compliance with ¶452. The CPD made efforts toward but did not ultimately reach Secondary compliance with this paragraph.

To evaluate Preliminary compliance with ¶452, the IMT reviewed the CPD's relevant policies and documents following the process described in the Consent Decree (¶¶626–41), which outlines applicable consultation, resolution, workout, and public comment periods. To evaluate Secondary compliance with this paragraph, we reviewed the entities' training development, materials, implementation, and evaluation (¶286).

Progress before the Sixth Reporting Period

In previous reporting periods, the CPD and BIA drafted and revised General Order G08-01, *Complaint and Disciplinary Procedures*, which is relevant to ¶452's requirements. In addition to this progress toward Preliminary compliance, BIA provided the *Log Number Investigations* training, which is relevant to ¶452. This training remained in the collaborative review and revision process at the end of the fourth reporting period. In the fifth reporting period, the CPD further revised General Order G08-01, *Complaint and Disciplinary System*.[75] After multiple revisions in the fifth reporting period, we submitted a no-objection notice and the CPD finalized the policy on the last day of the reporting period.[76] This propelled the CPD into Preliminary compliance.

[75] CPD previously submitted versions of G08-01 named *Complaint and Disciplinary Procedures*.

[76] Under the Consent Decree policy review process, the City and the CPD consult with the IMT and the OAG to develop or revise policies in accordance with Consent Decree requirements. *See* ¶¶626–37. The City and the CPD provide the policy for review at least 30 days before the policy is scheduled to go into effect, and the IMT and the OAG have 30 days to comment on

Progress in the Sixth Reporting Period

In the sixth reporting period, the CPD began to work toward Secondary compliance. BIA provided a first draft of its eLearning relevant to ¶452. The draft training module, spoken narrative, and written content appears that it will address the requirements of ¶452 for training once the CPD and BIA submit the eLearning module for final approval. We understand that the BIA eLearning materials are still in draft state and are not in final, presentation form. We look forward to receiving further revised versions of this training material.

***

Moving forward, we will look for CPD to finalize BIA's eLearning to instruct compliance with ¶452 and provide it for review.

Paragraph 452 Compliance Progress History

FIRST REPORTING PERIOD	SECOND REPORTING PERIOD	THIRD REPORTING PERIOD
SEPTEMBER 1, 2019 – AUGUST 31, 2019	SEPTEMBER 1, 2019 – FEBRUARY 29, 2020	MARCH 1, 2020 – DECEMBER 31, 2020
COMPLIANCE PROGRESS:	COMPLIANCE PROGRESS:	COMPLIANCE PROGRESS:
Not Applicable	Not Applicable	None

FOURTH REPORTING PERIOD	FIFTH REPORTING PERIOD	SIXTH REPORTING PERIOD
JANUARY 1, 2021 – JUNE 30, 2021	JULY 1, 2021 – DECEMBER 31, 2021	JANUARY 1, 2022 – JUNE 30, 2022
COMPLIANCE PROGRESS:	COMPLIANCE PROGRESS:	COMPLIANCE PROGRESS:
None	Preliminary	Preliminary

the policy. *See* ¶¶627–28. The City, the CPD, the IMT, and the OAG then work together to resolve comments. The IMT and the OAG will, separately and in writing, notify the City and the CPD that they no longer have any comments, which is referred to as a "no-objection notice." Once the City and the CPD receive a no-objection notice from both the IMT and the OAG, the City and the CPD will begin the process of finalizing the policy. Typically, this includes the CPD posting the policy on its website for public comment for at least 15 days. The City and the CPD must then consider those comments and make additional changes, as appropriate. *See* ¶633.

Accountability and Transparency: ¶453

453. *If a criminal investigation of a CPD member's conduct has commenced, COPA, BIA, or the Accountability Sergeant will continue the administrative investigation, absent specific circumstances that would jeopardize the criminal investigation. In such circumstances, the determination to postpone the administrative investigation, along with the rationale for doing so, will be documented by COPA, BIA or the district in writing.*

Compliance Progress (Reporting Period: January 1, 2022, through June 30, 2022)

Preliminary:		***Not in Compliance***[77]
	CPD	***Not in Compliance***
	COPA	***In Compliance*** **(FIFTH REPORTING PERIOD)**
Secondary:		***Not in Compliance***
	CPD	***Not Yet Assessed***
	COPA	***Not in Compliance***
Full:		***Not Yet Assessed***

In the sixth reporting period, COPA maintained Preliminary compliance with ¶453. The CPD made efforts toward but did not ultimately reach Preliminary compliance with this paragraph. Because all relevant City entities must reach levels of compliance to bring the City, as a whole, into compliance, the City has not yet reached Preliminary compliance.

To evaluate Preliminary compliance with ¶453, the IMT reviewed the CPD's and COPA's relevant policies and documents following the process described in the Consent Decree (¶¶626–41), which outlines applicable consultation, resolution, workout, and public comment periods.[78] To evaluate Secondary compliance with this paragraph, we reviewed the entities' training development, materials, implementation, and evaluation (¶286).

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[77] As referenced above, the Consent Decree requires actions by various City entities, including the CPD, COPA, the Police Board, and the Office of the Inspector General. Ultimately, the City is responsible for ensuring compliance. As a result, if a Consent Decree paragraph requires actions by multiple City entities, we will not find that the City has met Preliminary, Secondary, or Full compliance until all those entities have met the corresponding level of compliance. Nonetheless, for some paragraphs, we will clarify compliance assessments for each entity to demonstrate which benchmarks have been met.

[78] The OAG, the City, and the IMT agreed to a stipulation that provides a different review process for review of COPA policies and training materials. *See Stipulation Regarding the Policy and Training Review Process for COPA*, *Illinois v. Chicago*, Case No. 1:17-cv-06260 (Jan. 30, 2020). The review process in the Stipulation mirrors the review process under ¶¶626–41, but among other things, gives the OAG and the IMT a shorter timeframe for review of COPA policies and training materials.

Progress before the Sixth Reporting Period

The CPD did not provide any evidence of efforts pertaining to ¶453 until the fifth reporting period. In the fifth reporting period, the CPD submitted submitting Special Order S08-01-01, *Conducting Log Number Investigations*, which addresses ¶453. This policy goes beyond the requirements of ¶453, providing additional direction regarding documenting situations in writing, uploading the documentation into the Case Management System, and directing the BIA Investigator or Accountability Sergeant to notify their supervisor. The IMT provided comments on the draft, which remained in the collaborative review and revision process by the end of the fifth reporting period.

In the fifth reporting period, COPA submitted a revised version of COPA Policy, 3.1.2, *Fact Gathering and the Investigative Process*, which addresses the requirements of ¶453 verbatim. The policy went through the Community Policy Review Working Group and was finalized. This propelled COPA into Preliminary compliance.

Progress in the Sixth Reporting Period

In the sixth reporting period, the CPD renumbered the Special Order previously labeled S08-01-01; it is now S08-01-05, *Conducting Log Number Investigations*. This revised policy instructs compliance with the requirements of ¶453 by directing that that administrative investigation will continue if a criminal investigation of the same incident is occurring, except if the administrative investigation would jeopardize the criminal investigation. This Special Order remained in the collaborative review and revision process at the end of the sixth reporting period.

This reporting period, COPA did not produce any documentation that demonstrated efforts related to ¶453.

***

We look forward to the CPD prioritizing revisions of S08-01-05 early in the seventh reporting period to allow the CPD ample time to revise, post for public comment, and finalize the policy. Doing so would propel the CPD into Preliminary compliance. For COPA, we will look to review training materials that instruct compliance with ¶453.

Paragraph 453 Compliance Progress History

FIRST REPORTING PERIOD
SEPTEMBER 1, 2019 – AUGUST 31, 2019
COMPLIANCE PROGRESS:
Not Applicable

SECOND REPORTING PERIOD
SEPTEMBER 1, 2019 – FEBRUARY 29, 2020
COMPLIANCE PROGRESS:
Status Update

THIRD REPORTING PERIOD
MARCH 1, 2020 – DECEMBER 31, 2020
COMPLIANCE PROGRESS:
Status Update

FOURTH REPORTING PERIOD
JANUARY 1, 2021 – JUNE 30, 2021
COMPLIANCE PROGRESS:
None

FIFTH REPORTING PERIOD
JULY 1, 2021 – DECEMBER 31, 2021
COMPLIANCE PROGRESS:
None

SIXTH REPORTING PERIOD
JANUARY 1, 2022 – JUNE 30, 2022
COMPLIANCE PROGRESS:
None

Accountability and Transparency: ¶454

454. *COPA, BIA, and the districts will conduct objective, comprehensive, and timely investigations of complaints.*

Compliance Progress		(Reporting Period: January 1, 2022, through June 30, 2022)
Preliminary:		***In Compliance*** **(FIFTH REPORTING PERIOD)**
	CPD	***In Compliance*** **(FIFTH REPORTING PERIOD)**
	COPA	***In Compliance*** **(FOURTH REPORTING PERIOD)**
Secondary:		***Not in Compliance***
	CPD	***Not in Compliance***
	COPA	***In Compliance*** **(FIFTH REPORTING PERIOD)**
Full:		***Not in Compliance***
	CPD	***Not Yet Assessed***
	COPA	***Not in Compliance***

In the sixth reporting period, COPA maintained Secondary compliance and made efforts towards, but did not ultimately reach Full compliance with ¶454. The CPD maintained Preliminary compliance and made efforts toward Secondary compliance with this paragraph. Because all relevant City entities must reach levels of compliance to bring the City, as a whole, into compliance, the City has not yet reached Secondary compliance.

To evaluate Preliminary compliance with ¶454, the IMT reviewed the CPD's and COPA's relevant policies and documents following the process described in the Consent Decree (¶¶626–41).[79] To evaluate Secondary compliance, the IMT reviewed the entities' training development, implementation, and evaluation (¶286). To evaluate Full compliance with this paragraph, we considered whether the entities have implemented their policies and trainings such that they are acting in accordance with ¶454's mandates.

Progress before the Sixth Reporting Period

In previous reporting periods, the CPD continued to draft and revise policies that spoke to the requirements of ¶454. In the fifth reporting period, the CPD revised G08-01, *Complaint and Disciplinary System*.[80] Additionally, the CPD submitted a revised S08-01, *Complaint and Disciplinary Investigators and Investigations*, which

[79] The OAG, the City, and the IMT agreed to a stipulation that provides a different review process for review of COPA policies and training materials. *See Stipulation Regarding the Policy and Training Review Process for COPA*, *Illinois v. Chicago*, Case No. 1:17-cv-06260 (Jan. 30, 2020). The review process in the Stipulation mirrors the review process under ¶¶626–41, but among other things, gives the OAG and the IMT a shorter timeframe for review of COPA policies and training materials.

[80] The CPD previously submitted this General Order as *Complaint and Disciplinary Procedures*.

also fully addresses the requirements of ¶454. We provided no-objection notices and the CPD finalized the policies in the fifth reporting period.[81] This moved CPD into Preliminary compliance.

In the fourth reporting period, COPA finalized two Policies, *Recommendations Regarding Department Member Duties and Power* and *Fact Gathering and the Investigative Process*; both address the requirements of ¶454, which moved COPA into Preliminary compliance. In the fifth reporting period, COPA compiled and submitted for review various documents, including 3.1.4, *Affidavits, Affidavit Overrides, Exceptions to Affidavit Requirement*; 3.1.6, *Clear and Column Case Management System Systems*; 3.1.1, *Intake*; 2.1.2, *Transparency Issues – Release of Video and Related Materials*; *Candidates for COPA Employment*; and *Major Incident Responses*. These policies all addressed the requirements of ¶454. To demonstrate efforts toward Secondary compliance, COPA submitted materials for *COPA Intake Unit: Overview of Policies and Procedures: In Service 2021 Training*. COPA provided evidence that at least 95% of its personnel received the training. Additionally, COPA provided materials for the training for *Case Management System: Overview of Policy and Procedures* that addressed the principles of ¶454 and we understood that COPA planned to provide the training in January 2022. These efforts propelled COPA into Secondary compliance in the fifth reporting period.

Progress in the Sixth Reporting Period

In the sixth reporting period, the CPD began to work toward Secondary compliance. BIA provided a first draft of its eLearning relevant to ¶454. The draft training module, spoken narrative, and written content suggest that the training, which remains in draft form, will address the requirements of ¶454 when the training is further developed. We look forward to reviewing the further revised training materials in the upcoming reporting period.

COPA began to work toward Full compliance by providing a revised Policy 3.1.4, *Affidavits, Affidavit Overrides, Exceptions to Affidavit Requirements*. The policy addressed the requirements of ¶454 and we submitted a no-objection notice on May

[81] Under the Consent Decree policy review process, the City and the CPD consult with the IMT and the OAG to develop or revise policies in accordance with Consent Decree requirements. *See* ¶¶626–37. The City and the CPD provide the policy for review at least 30 days before the policy is scheduled to go into effect, and the IMT and the OAG have 30 days to comment on the policy. *See* ¶¶627–28. The City, the CPD, the IMT, and the OAG then work together to resolve comments. The IMT and the OAG will, separately and in writing, notify the City and the CPD that they no longer have any comments, which is referred to as a "no-objection notice." Once the City and the CPD receive a no-objection notice from both the IMT and the OAG, the City and the CPD will begin the process of finalizing the policy. Typically, this includes the CPD posting the policy on its website for public comment for at least 15 days. The City and the CPD must then consider those comments and make additional changes, as appropriate. *See* ¶633.

24, 2022. By the end of the sixth reporting period, COPA had not yet finalized the policy.

***

Moving forward, we will look for CPD to finalize BIA's eLearning to instruct compliance with ¶454 and provide it for review. For COPA, we look forward to COPA training at least 95% of its personnel in its *Case Management System: Overview of Policy and Procedures* training in the seventh reporting period, as well as finalization of its *Affidavits, Affidavit Overrides, Exceptions to Affidavit Requirements* policy. Related to Full compliance, we will look for COPA to provide evidence that it has implemented its policies and training such that COPA personnel act in accordance with ¶454.

Paragraph 454 Compliance Progress History

FIRST REPORTING PERIOD	SECOND REPORTING PERIOD	THIRD REPORTING PERIOD
SEPTEMBER 1, 2019 – AUGUST 31, 2019	SEPTEMBER 1, 2019 – FEBRUARY 29, 2020	MARCH 1, 2020 – DECEMBER 31, 2020
COMPLIANCE PROGRESS:	COMPLIANCE PROGRESS:	COMPLIANCE PROGRESS:
Not Applicable	Not Applicable	Status Update
FOURTH REPORTING PERIOD	**FIFTH REPORTING PERIOD**	**SIXTH REPORTING PERIOD**
JANUARY 1, 2021 – JUNE 30, 2021	JULY 1, 2021 – DECEMBER 31, 2021	JANUARY 1, 2022 – JUNE 30, 2022
COMPLIANCE PROGRESS:	COMPLIANCE PROGRESS:	COMPLIANCE PROGRESS:
None	Preliminary	Preliminary

Accountability and Transparency: ¶455

455. *All investigative findings will be based on the appropriate standard of proof. This standard will be clearly delineated in COPA and BIA policies, training, and procedures.*

Compliance Progress (Reporting Period: January 1, 2022, through June 30, 2022)

Preliminary:		***In Compliance*** **(FIFTH REPORTING PERIOD)**[82]
	CPD	***In Compliance*** **(FIFTH REPORTING PERIOD)**
	COPA	***In Compliance*** **(FOURTH REPORTING PERIOD)**
Secondary:		***Not in Compliance***
	CPD	***Not in Compliance***
	COPA	***Not in Compliance***
Full:		***Not Yet Assessed***

In the sixth reporting period, the CPD and COPA made efforts toward, but did not ultimately reach Secondary compliance with ¶455.

To evaluate Preliminary compliance with ¶455, the IMT reviewed the CPD's and COPA's relevant policies and documents following the process described in the Consent Decree (¶¶626–41), which outlines applicable consultation, resolution, workout, and public comment periods.[83] To evaluate Secondary compliance, the IMT reviewed the entities' training development, implementation, and evaluation (¶286).

Progress before the Sixth Reporting Period

In previous reporting periods, we reviewed several items relevant to the CPD's efforts toward compliance with ¶455, including draft G08-01, *Complaint and Disciplinary System*. Additionally, we reviewed *Findings, Recommendations and Effective Log Number Closings Training* that addressed the requirements of ¶455, but the information from the training was not included in policy. In the fifth reporting

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[82] As referenced above, the Consent Decree requires actions by various City entities, including the CPD, COPA, the Police Board, and the Office of the Inspector General. Ultimately, the City is responsible for ensuring compliance. As a result, if a Consent Decree paragraph requires actions by multiple City entities, we will not find that the City has met Preliminary, Secondary, or Full compliance until all those entities have met the corresponding level of compliance. Nonetheless, for some paragraphs, we will clarify compliance assessments for each entity to demonstrate which benchmarks have been met.

[83] The OAG, the City, and the IMT agreed to a stipulation that provides a different review process for review of COPA policies and training materials. *See Stipulation Regarding the Policy and Training Review Process for COPA*, *Illinois v. Chicago*, Case No. 1:17-cv-06260 (Jan. 30, 2020). The review process in the Stipulation mirrors the review process under ¶¶626–41, but among other things, gives the OAG and the IMT a shorter timeframe for review of COPA policies and training materials.

period, the CPD revised G08-01, *Complaint and Disciplinary System.*[84] We provided a no-objection notice and the CPD finalized the policy on the last day of the reporting period. This moved the CPD into Preliminary compliance.

COPA met Preliminary compliance with ¶455 in the fourth reporting period by finalizing its policy 3.1.3, COPA's *Final Summary Report*. In the fifth reporting period, COPA did not produce evidence of steps toward Secondary compliance with ¶455.

Progress in the Sixth Reporting Period

In the sixth reporting period, the CPD began to work toward Secondary compliance. BIA provided a first draft of its eLearning relevant to ¶455. The draft training module, spoken narrative, and written content suggest that this training will instruct compliance with ¶455. We understand that the BIA eLearning materials are still in draft state and are not in final, presentation form. We look forward to reviewing a further revised version of this training in the coming reporting periods.

COPA continued to work toward Secondary compliance by providing its *Disciplinary and Remedial Recommendations In-Service* lesson plan. This training addresses the requirements of ¶455. The IMT provided a no-objection notice to the training materials on March 14, 2022 and June 1, 2022.[85] Additionally, the IMT virtually attended this training on June 24, 2022. The instructor was knowledgeable, timely followed the approved lesson plan, and allowed for participant interaction. Although COPA did not submit training records to demonstrate the extent of personnel who have completed the training for the sixth reporting period, we anticipate receiving these records in the seventh reporting period. Once COPA provides evidence that 95% of the personnel have completed the training, COPA will move into Secondary compliance.

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[84] The CPD previously submitted this General Order as *Complaint and Disciplinary Procedures*.

[85] Under the Consent Decree policy review process, the City and the CPD consult with the IMT and the OAG to develop or revise policies in accordance with Consent Decree requirements. *See* ¶¶626–37. The City and the CPD provide the policy for review at least 30 days before the policy is scheduled to go into effect, and the IMT and the OAG have 30 days to comment on the policy. *See* ¶¶627–28. The City, the CPD, the IMT, and the OAG then work together to resolve comments. The IMT and the OAG will, separately and in writing, notify the City and the CPD that they no longer have any comments, which is referred to as a "no-objection notice." Once the City and the CPD receive a no-objection notice from both the IMT and the OAG, the City and the CPD will begin the process of finalizing the policy. Typically, this includes the CPD posting the policy on its website for public comment for at least 15 days. The City and the CPD must then consider those comments and make additional changes, as appropriate. *See* ¶633.

Moving forward, we will look for the CPD to finalize BIA's eLearning to instruct compliance with ¶455 and provide it for review. For COPA, we look forward to receiving training records that show that at least 95% of its personnel participated in the training.

Paragraph 455 Compliance Progress History

FIRST REPORTING PERIOD	SECOND REPORTING PERIOD	THIRD REPORTING PERIOD
SEPTEMBER 1, 2019 – AUGUST 31, 2019	SEPTEMBER 1, 2019 – FEBRUARY 29, 2020	MARCH 1, 2020 – DECEMBER 31, 2020
COMPLIANCE PROGRESS:	COMPLIANCE PROGRESS:	COMPLIANCE PROGRESS:
Status Update	Status Update	Status Update
FOURTH REPORTING PERIOD	**FIFTH REPORTING PERIOD**	**SIXTH REPORTING PERIOD**
JANUARY 1, 2021 – JUNE 30, 2021	JULY 1, 2021 – DECEMBER 31, 2021	JANUARY 1, 2022 – JUNE 30, 2022
COMPLIANCE PROGRESS:	COMPLIANCE PROGRESS:	COMPLIANCE PROGRESS:
None	Preliminary	Preliminary

Accountability and Transparency: ¶456

456. *The City will ensure that the disciplinary histories of current and former CPD members are reviewed prior to employment with COPA, or assignment within BIA or as an Accountability Sergeant.*

Compliance Progress (Reporting Period: January 1, 2022, through June 30, 2022)

Preliminary:		***In Compliance*** **(FIFTH REPORTING PERIOD)**[86]
	CPD	***In Compliance*** **(FIFTH REPORTING PERIOD)**
	COPA	***In Compliance*** **(FIFTH REPORTING PERIOD)**
Secondary:		***Not in Compliance***
	CPD	***Not in Compliance***
	COPA	***Not in Compliance***
Full:		***Not Yet Assessed***

In the sixth reporting period, the CPD and COPA maintained Preliminary compliance with ¶456.

To evaluate Preliminary compliance with ¶456, the IMT reviewed the CPD's and COPA's relevant policies and documents following the process described in the Consent Decree (¶¶626–41), which outlines applicable consultation, resolution, workout, and public comment periods.[87] To evaluate Secondary compliance, the IMT reviewed the entities' guidance or written processes setting out who will be tasked with checking an individual's disciplinary history prior to employment or assignment, and how that information is presented to the appropriate individuals tasked with hiring or assignment.

[86] As referenced above, the Consent Decree requires actions by various City entities, including the CPD, COPA, the Police Board, and the Office of the Inspector General. Ultimately, the City is responsible for ensuring compliance. As a result, if a Consent Decree paragraph requires actions by multiple City entities, we will not find that the City has met Preliminary, Secondary, or Full compliance until all those entities have met the corresponding level of compliance. Nonetheless, for some paragraphs, we will clarify compliance assessments for each entity to demonstrate which benchmarks have been met.

[87] The OAG, the City, and the IMT agreed to a stipulation that provides a different review process for review of COPA policies and training materials. *See Stipulation Regarding the Policy and Training Review Process for COPA*, *Illinois v. Chicago*, Case No. 1:17-cv-06260 (Jan. 30, 2020). The review process in the Stipulation mirrors the review process under ¶¶626–41, but among other things, gives the OAG and the IMT a shorter timeframe for review of COPA policies and training materials.

Progress before the Sixth Reporting Period

In previous reporting periods, the IMT reviewed BIA's *Accountability Sergeants* Unit Directive that included specific standards to disqualify candidates from serving as Accountability Sergeants.[88] The IMT continuously raised concerns regarding the low standards that had been set in the directive. In the fifth reporting period, the CPD revised Special Order S08-01, *Complaint and Disciplinary Investigators and Investigations*. After a second round of revisions in the fifth reporting period, the policy addressed the requirements of ¶456. We provided a no-objection notice and the CPD finalized the policy on the last day of the reporting period.[89] This moved the CPD into Preliminary compliance.

COPA previously compiled a draft policy, *Candidates for COPA Employment – Current or Former Chicago Police Department Member*, which exceeded the requirements of ¶456 regarding the hiring process of former and current CPD employees. We provided a no-objection notice and COPA finalized the policy by the end of the fifth reporting period. This moved COPA into Preliminary compliance.

Progress in the Sixth Reporting Period

This reporting period, COPA did not produce any documentation that demonstrated efforts related to ¶456. The CPD provided an audit to demonstrate that at that time, the vast majority of CPD Sergeants met the enhanced standards for BIA and Accountability Sergeant assignment.

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As stated in the previous reporting period, we will look forward to evidence that individuals responsible for hiring to BIA and COPA are aware of candidate require-

[88] In the sixth reporting period, the CPD informed the IMT and the OAG that BIA would begin to move away from Unit Directives. Instead of Unit Directives, instruction will be provided in General Orders and Special Orders. This applies to the BIA Unit Directives that we reviewed, and in some instances provided no-objection notices to in previous reporting periods. The CPD began this process in the sixth reporting period, and the process is ongoing.

[89] Under the Consent Decree policy review process, the City and the CPD consult with the IMT and the OAG to develop or revise policies in accordance with Consent Decree requirements. *See* ¶¶626–37. The City and the CPD provide the policy for review at least 30 days before the policy is scheduled to go into effect, and the IMT and the OAG have 30 days to comment on the policy. *See* ¶¶627–28. The City, the CPD, the IMT, and the OAG then work together to resolve comments. The IMT and the OAG will, separately and in writing, notify the City and the CPD that they no longer have any comments, which is referred to as a "no-objection notice." Once the City and the CPD receive a no-objection notice from both the IMT and the OAG, the City and the CPD will begin the process of finalizing the policy. Typically, this includes the CPD posting the policy on its website for public comment for at least 15 days. The City and the CPD must then consider those comments and make additional changes, as appropriate. *See* ¶633.

ments as set out by ¶456 and their respective policies, and that process are developed to make clear who is tasked with checking disciplinary history for employment or assignment candidates. The CPD and COPA will then need to provide proof that they are following their respective policies.

Paragraph 456 Compliance Progress History

FIRST REPORTING PERIOD SEPTEMBER 1, 2019 – AUGUST 31, 2019	SECOND REPORTING PERIOD SEPTEMBER 1, 2019 – FEBRUARY 29, 2020	THIRD REPORTING PERIOD MARCH 1, 2020 – DECEMBER 31, 2020
COMPLIANCE PROGRESS: Status Update	COMPLIANCE PROGRESS: Status Update	COMPLIANCE PROGRESS: Status Update
FOURTH REPORTING PERIOD JANUARY 1, 2021 – JUNE 30, 2021	**FIFTH REPORTING PERIOD** JULY 1, 2021 – DECEMBER 31, 2021	**SIXTH REPORTING PERIOD** JANUARY 1, 2022 – JUNE 30, 2022
COMPLIANCE PROGRESS: None	COMPLIANCE PROGRESS: Preliminary	COMPLIANCE PROGRESS: Preliminary

Accountability and Transparency: ¶457

457. *Within 90 days of the Effective Date, CPD will create a written policy regarding the circumstances under which BIA will retain and investigate complaints itself and under which BIA will transfer complaints to a CPD district for investigation. The policy will include as factors in that decision: consideration of the involved CPD member's complaint and disciplinary history and the seriousness of the alleged misconduct. It will be designed to ensure that all investigations are completed in a timely and thorough manner and in compliance with this Agreement.*

Compliance Progress

(Reporting Period: January 1, 2022, through June 30, 2022)

Preliminary:	***In Compliance*** **(FIFTH REPORTING PERIOD)**
Secondary:	***Not in Compliance***
Full:	***Not Yet Assessed***

In the sixth reporting period, the City and the CPD maintained Preliminary compliance with ¶457.

To evaluate Preliminary compliance with ¶457, the IMT reviewed the CPD's relevant policies and documents following the process described in the Consent Decree (¶¶626–41), which outlines applicable consultation, resolution, workout, and public comment periods. To evaluate Secondary compliance, the IMT reviewed the entities' training development, implementation, and evaluation (¶286).

Progress before the Sixth Reporting Period

In previous reporting periods, the CPD provided various policy and training documents for review, including Special Order S08-01, *Complaint and Disciplinary Investigators and Investigations* policy, and BIA's *Assignment of Administrative Log Number Investigations* Unit Directive. Additionally, CPD provided BIA's *Intake and Case Assignment Process On-Boarding* training that partially addressed ¶457. The CPD revised and finalized S08-01 in the fifth reporting period. This moved the CPD into Preliminary compliance. Additionally, BIA provided a "finalized" version of the *BIA Accountability Sergeants* Unit Directive that provided an in-depth consideration of all requirements in ¶457, even adding considerations beyond what is required in this paragraph. However, that directive was not posted for public comment prior to the end of the fifth reporting period.[90]

[90] In the sixth reporting period, the CPD informed the IMT and the OAG that BIA would begin to move away from Unit Directives. Instead of Unit Directives, instruction will be provided in General Orders and Special Orders. This applies to the BIA Unit Directives that we reviewed, and

Progress in the Sixth Reporting Period

In the sixth reporting period, the CPD began to work toward Secondary compliance. BIA provided a first draft of its eLearning relevant to ¶452. The draft training module, spoken narrative, and written content appears that it will address the requirements of ¶457 for training once the CPD and BIA submit the eLearning module for final approval. We understand that the BIA eLearning materials are still in draft state and are not in final, presentation form. We look forward to reviewing further developed BIA eLearning materials in the next reporting period.

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Moving forward, we will look for CPD to finalize its eLearning to instruct compliance with ¶457 and provide it for review.

Paragraph 457 Compliance Progress History

FIRST REPORTING PERIOD SEPTEMBER 1, 2019 – AUGUST 31, 2019 COMPLIANCE PROGRESS: None	SECOND REPORTING PERIOD SEPTEMBER 1, 2019 – FEBRUARY 29, 2020 COMPLIANCE PROGRESS: None	THIRD REPORTING PERIOD MARCH 1, 2020 – DECEMBER 31, 2020 COMPLIANCE PROGRESS: None
FOURTH REPORTING PERIOD JANUARY 1, 2021 – JUNE 30, 2021 COMPLIANCE PROGRESS: None	FIFTH REPORTING PERIOD JULY 1, 2021 – DECEMBER 31, 2021 COMPLIANCE PROGRESS: Preliminary	SIXTH REPORTING PERIOD JANUARY 1, 2022 – JUNE 30, 2022 COMPLIANCE PROGRESS: Preliminary

in some instances provided no-objection notices to in previous reporting periods. The CPD began this process in sixth reporting period, and it is ongoing.

Accountability and Transparency: ¶459

459. *Within 30 days of receiving an allegation: a. COPA and BIA will assess the allegation to determine whether the complainant has alleged potential misconduct; and b. if potential misconduct is alleged, COPA, BIA, or the district will initiate a Preliminary investigation into the complaint.*

Compliance Progress (Reporting Period: January 1, 2022, through June 30, 2022)

Preliminary:		***Not in Compliance***[91]
	CPD	***Not in Compliance***
	COPA	***In Compliance*** **(FOURTH REPORTING PERIOD)**
Secondary:		***Not in Compliance***
	CPD	***Not in Compliance***
	COPA	***In Compliance*** **(FIFTH REPORTING PERIOD)**
Full:		***Not in Compliance***
	CPD	***Not Yet Assessed***
	COPA	***Not in Compliance***

In the sixth reporting period, COPA maintained Secondary compliance with ¶459. The CPD made efforts toward but did not ultimately reach Preliminary compliance with this paragraph.

To evaluate Preliminary compliance with ¶459, the IMT reviewed the CPD's and COPA's relevant policies and documents following the process described in the Consent Decree (¶¶626–41), which outlines applicable consultation, resolution, workout, and public comment periods.[92] To evaluate Secondary compliance, the IMT reviewed the entities' training development, implementation, and evaluation (¶286). To evaluate Full compliance with this paragraph, we considered whether the entities have implemented their policies and trainings such that they are acting in accordance with ¶459's mandates.

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[91] As referenced above, the Consent Decree requires actions by various City entities, including the CPD, COPA, the Police Board, and the Office of the Inspector General. Ultimately, the City is responsible for ensuring compliance. As a result, if a Consent Decree paragraph requires actions by multiple City entities, we will not find that the City has met Preliminary, Secondary, or Full compliance until all those entities have met the corresponding level of compliance. Nonetheless, for some paragraphs, we will clarify compliance assessments for each entity to demonstrate which benchmarks have been met.

[92] The OAG, the City, and the IMT agreed to a stipulation that provides a different review process for review of COPA policies and training materials. *See Stipulation Regarding the Policy and Training Review Process for COPA*, *Illinois v. Chicago*, Case No. 1:17-cv-06260 (Jan. 30, 2020). The review process in the Stipulation mirrors the review process under ¶¶626–41, but among other things, gives the OAG and the IMT a shorter timeframe for review of COPA policies and training materials.

Progress before the Sixth Reporting Period

In previous reporting periods, the CPD provided BIA's *Complainant Communications and Timeliness policy*. Additionally, the CPD provided BIA's *Policies and Communications Techniques Onboard and Annual Training,* which oversimplified the requirements of ¶459 and required additional revisions. In the fifth reporting period, the CPD revised its policy, *Initial Responsibilities in Assigned Log Number Investigations*, but it was not posted for public comment prior to the end of the reporting period. The CPD also presented Special Order S08-01-01, *Conducting Log Number Investigations* for review, but it remained in the collaborative review and revision process by the end of the fifth reporting period.

COPA, in the fourth reporting period, finalized its policy 3.2.2, *Timeliness Benchmarks Jurisdictional Decisions, Triage and Preliminary Investigation* which addressed the requirements of ¶459 and moved COPA into Preliminary compliance. In the fifth reporting period, COPA compiled and submitted for review materials for a training entitled *COPA Intake Unit: Overview of Policies and Procedures In-Service 2021*. COPA provided evidence that at least 95% of its personnel received the training, which propelled it into Secondary compliance.

Progress in the Sixth Reporting Period

In the sixth reporting period, the CPD informed the IMT and the OAG that BIA would begin to move away from Unit Directives. Instead of Unit Directives, instruction will be provided in General Orders and Special Orders. This applies to the BIA Unit Directives that we reviewed, and in some instances provided no-objection notices to in previous reporting periods. The CPD began this process in the sixth reporting period, and incorporated instruction previously included in the BIA *Initial Responsibilities in Assigned Log Number Investigations* Unit Directive (to which we submitted a no-objection in October 2021) into S08-01-04. This process of incorporating Unit Directives into General Orders and Special Orders is ongoing. Special Order S08-01-04, *Initial Investigatory Responsibilities in Log Number Investigations*, addressed the requirements of ¶459. On June 29, 2022 we submitted a no-objection notice subject to minor revisions to the policy.[93] By the end of the reporting period, the policy remained in the collaborative review and revision process.

[93] Under the Consent Decree policy review process, the City and the CPD consult with the IMT and the OAG to develop or revise policies in accordance with Consent Decree requirements. *See* ¶¶626–37. The City and the CPD provide the policy for review at least 30 days before the policy is scheduled to go into effect, and the IMT and the OAG have 30 days to comment on the policy. *See* ¶¶627–28. The City, the CPD, the IMT, and the OAG then work together to resolve comments. The IMT and the OAG will, separately and in writing, notify the City and the CPD that they no longer have any comments, which is referred to as a "no-objection notice." Once the City and the CPD receive a no-objection notice from both the IMT and the OAG, the

This reporting period, COPA did not produce any documentation that demonstrated efforts related to ¶459.

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Moving forward, we will look for the CPD to revise and finalize S08-01-04 to instruct compliance with ¶459. For COPA, we will look for evidence that COPA has sufficiently implemented and trained upon the requirements of ¶459 and related policies.

Paragraph 459 Compliance Progress History

FIRST REPORTING PERIOD	SECOND REPORTING PERIOD	THIRD REPORTING PERIOD
SEPTEMBER 1, 2019 – AUGUST 31, 2019	SEPTEMBER 1, 2019 – FEBRUARY 29, 2020	MARCH 1, 2020 – DECEMBER 31, 2020
COMPLIANCE PROGRESS:	COMPLIANCE PROGRESS:	COMPLIANCE PROGRESS:
Not Applicable	Status Update	Status Update
FOURTH REPORTING PERIOD	**FIFTH REPORTING PERIOD**	**SIXTH REPORTING PERIOD**
JANUARY 1, 2021 – JUNE 30, 2021	JULY 1, 2021 – DECEMBER 31, 2021	JANUARY 1, 2022 – JUNE 30, 2022
COMPLIANCE PROGRESS:	COMPLIANCE PROGRESS:	COMPLIANCE PROGRESS:
None	None	None

City and the CPD will begin the process of finalizing the policy. Typically, this includes the CPD posting the policy on its website for public comment for at least 15 days. The City and the CPD must then consider those comments and make additional changes, as appropriate. *See* ¶633.

Accountability and Transparency: ¶460

460. *Preliminary investigations will take all reasonable steps to discover any and all objective verifiable evidence relevant to the complaint or administrative notification through the identification, retention, review, and analysis of all available evidence, including, but not limited to: all time-sensitive evidence, audio and video evidence, physical evidence, arrest reports, photographic evidence, GPS records, computer data, and witness interviews. All reasonable steps will be taken to preserve relevant evidence identified during the Preliminary investigation.*

Compliance Progress (Reporting Period: January 1, 2022, through June 30, 2022)

Preliminary:		***Not in Compliance***[94]
	CPD	***Not in Compliance***
	COPA	***In Compliance*** **(FOURTH REPORTING PERIOD)**
Secondary:		***Not in Compliance***
	CPD	***Not Yet Assessed***
	COPA	***Not in Compliance***
Full:		***Not Yet Assessed***

The CPD continued to work on developing and finalizing policy relevant to ¶460. COPA maintained Preliminary compliance with this paragraph, but did not reach Secondary compliance. Because all relevant City entities must reach levels of compliance to bring the City, as a whole, into compliance, the City has not yet reached Preliminary compliance.

To evaluate Preliminary compliance with ¶460, the IMT reviewed the CPD's and COPA's relevant policies and documents following the process described in the Consent Decree (¶¶626–41), which outlines applicable consultation, resolution, workout, and public comment periods.[95] To evaluate Secondary compliance, the

[94] As referenced above, the Consent Decree requires actions by various City entities, including the CPD, COPA, the Police Board, and the Office of the Inspector General. Ultimately, the City is responsible for ensuring compliance. As a result, if a Consent Decree paragraph requires actions by multiple City entities, we will not find that the City has met Preliminary, Secondary, or Full compliance until all those entities have met the corresponding level of compliance. Nonetheless, for some paragraphs, we will clarify compliance assessments for each entity to demonstrate which benchmarks have been met.

[95] The OAG, the City, and the IMT agreed to a stipulation that provides a different review process for review of COPA policies and training materials. *See Stipulation Regarding the Policy and Training Review Process for COPA*, *Illinois v. Chicago*, Case No. 1:17-cv-06260 (Jan. 30, 2020). The review process in the Stipulation mirrors the review process under ¶¶626–41, but among other things, gives the OAG and the IMT a shorter timeframe for review of COPA policies and training materials.

IMT reviewed the entities' training development, implementation, and evaluation (¶286).

Progress before the Sixth Reporting Period

Previously, in the fourth reporting period, the CPD submitted several policies for review that sought to address the requirements of ¶460, including BIA's *Conduct of Investigation: Sworn Affidavits and Sworn Affidavit Overrides*; *Complainant Communication Procedures and Timelines*; *Conduct of Investigations: Initial Responsibilities*; and *Intake Initiation of Log Number*. However, these policies were not finalized by the end of the fifth reporting period.

COPA, in the fourth reporting period, finalized its Policy 3.1.2, *Fact Gathering and the Investigative Process*, which addressed the requirements of ¶460 and moved COPA into Preliminary compliance. In the fifth reporting period, COPA submitted materials for a training titled *Intake Unit: Overview of Policies and Procedures In-Service 2021*. This training partially addressed the requirements of ¶460, and COPA provided the training to its personnel. Therefore, COPA made progress toward but had not reached Secondary compliance with ¶460 by the end of the fifth reporting period.

Progress in the Sixth Reporting Period

This reporting period, the CPD submitted multiple revised versions of S08-01-05, *Conducting Log Number Investigations*.[96] The IMT provided feedback on each draft. On June 30, 2022, the last day of the reporting period, the CPD submitted a further revised version, which remains under review. While we appreciate the revisions and improvements made to this policy, the policy does not completely address ¶460, which requires that reasonable steps be taken to "preserve relevant evidence identified during the preliminary investigation" and that steps be taken to "discover any and all objective verifiable evidence relevant to the complaint." ¶460. We recommend that the CPD further revise S08-01-05 to fully meet the requirements of ¶460.

Additionally, the CPD submitted multiple revised versions of S08-01-04, *Initial Investigatory Responsibilities in Log Number Investigations*.[97] On June 30, 2022, the

[96] The *Conducting Log Number Investigations* policy was produced in previous reporting periods as S08-01-01. The policy was re-numbered as S08-01-05 when it was produced May 5, 2022.

[97] In the sixth reporting period, the CPD informed the IMT and the OAG that BIA would begin to move away from Unit Directives. Instead of Unit Directives, instruction will be provided in General Orders and Special Orders. This applies to the BIA Unit Directives that we reviewed, and in some instances provided no-objection notices to in previous reporting periods. The CPD began this process in sixth reporting period, and incorporated instruction previously included in the BIA Directive *Initial Responsibilities in Assigned Log Number Investigations* into S08-01-

last day of the reporting period, the CPD submitted a further revised version. Therefore this policy remained in the collaborative review and revision process at the end of the sixth reporting period. We noted that the revised policy addresses the requirements of ¶460 by stating that the objective verifiable evidence relevant to the investigation be reviewed, retained, and analyzed and included the types of evidence that should be considered during the Preliminary investigation. We submitted a conditional no-objection notice to the revised S08-01-04 on June 29, 2022.

COPA did not submit any materials related to ¶460 in the sixth reporting period.

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The City did not reach Preliminary compliance with ¶460 in the sixth reporting period. The CPD submitted policies that partially addressed ¶460. COPA maintained Preliminary compliance with this paragraph, but did not submit any materials in the sixth reporting period demonstrating Secondary compliance.

In the next reporting period, we will look for the CPD to revise S08-01-05, *Conducing Log Number Investigations* to more completely address the requirements of ¶460. We also expect that the CPD should be able to post for public comment and finalize S08-01-05 in the seventh reporting period. For COPA, we look forward to reviewing the training developed on the *Fact Gathering and the Investigative Process* policy.

Paragraph 460 Compliance Progress History

FIRST REPORTING PERIOD	SECOND REPORTING PERIOD	THIRD REPORTING PERIOD
SEPTEMBER 1, 2019 – AUGUST 31, 2019	SEPTEMBER 1, 2019 – FEBRUARY 29, 2020	MARCH 1, 2020 – DECEMBER 31, 2020
COMPLIANCE PROGRESS:	COMPLIANCE PROGRESS:	COMPLIANCE PROGRESS:
Not Applicable	Status Update	Status Update
FOURTH REPORTING PERIOD	**FIFTH REPORTING PERIOD**	**SIXTH REPORTING PERIOD**
JANUARY 1, 2021 – JUNE 30, 2021	JULY 1, 2021 – DECEMBER 31, 2021	JANUARY 1, 2022 – JUNE 30, 2022
COMPLIANCE PROGRESS:	COMPLIANCE PROGRESS:	COMPLIANCE PROGRESS:
None	None	None

05. This process of incorporating Unit Directives into General Orders and Special Orders is ongoing.

Accountability and Transparency: ¶461

¶461 *Allegations of misconduct based on verbal abuse will be preliminarily investigated to determine whether it is appropriate to continue the investigation. Anonymously submitted misconduct allegations will be preliminarily investigated to determine whether it is appropriate to continue the investigation, in accordance with the applicable collective bargaining agreements in effect at the time of the allegation is made.*

Compliance Progress (Reporting Period: January 1, 2022, through June 30, 2022)

Preliminary:		***Not in Compliance***[98]
	CPD	***Not in Compliance***
	COPA	***In Compliance*** (FOURTH REPORTING PERIOD)
Secondary:		***Not in Compliance***
	CPD	***Not in Compliance***
	COPA	***In Compliance*** (FIFTH REPORTING PERIOD)
Full:		***Not in Compliance***
	CPD	***Not Yet Assessed***
	COPA	***Not in Compliance***

The City did not reach Preliminary compliance with ¶461 in the fifth reporting period, but we anticipate the City will reach Preliminary compliance in the seventh reporting period. The CPD drafted and revised a policy directing compliance with ¶461, but has not yet finalized the policy. COPA, which reached Preliminary and Secondary compliance in previous reporting periods, maintained compliance. Because all relevant City entities must reach levels of compliance to bring the City, as a whole, into compliance, the City has not yet reached Preliminary compliance.

To evaluate Preliminary compliance with ¶461, the IMT reviewed the CPD's and COPA's relevant policies and documents following the process described in the Consent Decree (¶¶626–41), which outlines applicable consultation, resolution, workout, and public comment periods.[99] To evaluate Secondary compliance, the

[98] As referenced above, the Consent Decree requires actions by various City entities, including the CPD, COPA, the Police Board, and the Office of the Inspector General. Ultimately, the City is responsible for ensuring compliance. As a result, if a Consent Decree paragraph requires actions by multiple City entities, we will not find that the City has met Preliminary, Secondary, or Full compliance until all those entities have met the corresponding level of compliance. Nonetheless, for some paragraphs, we will clarify compliance assessments for each entity to demonstrate which benchmarks have been met.

[99] The OAG, the City, and the IMT agreed to a stipulation that provides a different review process for review of COPA policies and training materials. *See Stipulation Regarding the Policy and Training Review Process for COPA*, *Illinois v. Chicago*, Case No. 1:17-cv-06260 (Jan. 30, 2020). The review process in the Stipulation mirrors the review process under ¶¶626–41, but among

IMT reviewed the entities' training development, implementation, and evaluation (¶286). To evaluate Full compliance, the IMT reviewed various sources to determine whether the City, the CPD, and COPA have sufficiently implemented their policies and training.

Progress before the Sixth Reporting Period

Previously, the CPD produced BIA Unit Directives that partially addressed the requirements of ¶461, such as the *Assignment of Administrative Log Number Investigations* Unit Directive. In addition to these, the CPD produced S08-01-01, *Conducting Log Number Investigations* for review in the fifth reporting period. Neither the Unit Directives nor S08-01-01 were finalized by the end of the fifth reporting period.

In the fourth reporting period, COPA produced, revised, and finalized its *Intake* policy and *Fact Gathering and the Investigative Process* policy. This moved COPA into Preliminary compliance. In the fifth reporting period, COPA reached Secondary compliance by providing materials for its training *COPA Intake Unit: Overview of Policies and Procedures In-Service 2021*. This lesson plan properly trained on the requirements set out in ¶461 and was presented to at least 95% of COPA's personnel.

Progress in the Sixth Reporting Period

In the final two months of the sixth reporting period, the CPD submitted multiple revised versions of S08-01-04, *Initial Investigatory Responsibilities in Log Number Investigations.*[100] Sections III.C–D of the policy address the requirements of ¶461. On June 29, the IMT submitted a no-objection notice to S08-01-04 that was conditional to the CPD making a few additional changes. On June 30, 2022, the last day of the reporting period, the CPD submitted a further revised version. Therefore, this policy remained in the collaborative review and revision process at the end of the sixth reporting period.

COPA did not submit any materials related to ¶461 in the sixth reporting period.

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With the drafts of S08-01-04, which address the requirements of ¶461, the CPD has made progress toward Preliminary compliance in the sixth reporting period.

other things, gives the OAG and the IMT a shorter timeframe for review of COPA policies and training materials.

[100] S08-01-04 includes information that was previously included in the BIA Directive *Initial Responsibilities in Assigned Log Number Investigations*, to which the IMT submitted a no-objection notice on October 14, 2021.

The CPD has not yet finalized this policy, and therefore, has not yet reached Preliminary compliance. We expect that CPD will finalize this policy in the seventh reporting period. If CPD does so, we anticipate the CPD will reach Preliminary compliance with ¶461 in the seventh reporting period.

Because COPA did not produce any materials relevant to ¶461 in the sixth reporting period, COPA did not reach additional levels of compliance. We look forward to receiving additional information related to ¶461 efforts to ensure COPA sufficiently implemented its policies and training of policies that were completed in previous reporting periods.

Paragraph 461 Compliance Progress History

FIRST REPORTING PERIOD	SECOND REPORTING PERIOD	THIRD REPORTING PERIOD
SEPTEMBER 1, 2019 – AUGUST 31, 2019	SEPTEMBER 1, 2019 – FEBRUARY 29, 2020	MARCH 1, 2020 – DECEMBER 31, 2020
COMPLIANCE PROGRESS:	COMPLIANCE PROGRESS:	COMPLIANCE PROGRESS:
Status Update	Status Update	Status Update
FOURTH REPORTING PERIOD	**FIFTH REPORTING PERIOD**	**SIXTH REPORTING PERIOD**
JANUARY 1, 2021 – JUNE 30, 2021	JULY 1, 2021 – DECEMBER 31, 2021	JANUARY 1, 2022 – JUNE 30, 2022
COMPLIANCE PROGRESS:	COMPLIANCE PROGRESS:	COMPLIANCE PROGRESS:
None	None	None

Accountability and Transparency: ¶462

462. *A signed complainant affidavit will not be required to conduct a Preliminary investigation.*

Compliance Progress		(Reporting Period: January 1, 2022, through June 30, 2022)
Preliminary:		***In Compliance*** **(FIFTH REPORTING PERIOD)**[101]
	CPD	***In Compliance*** **(FIFTH REPORTING PERIOD)**
	COPA	***In Compliance*** **(FOURTH REPORTING PERIOD)**
Secondary:		***Not in Compliance***
	CPD	***Not in Compliance***
	COPA	***In Compliance*** **(FIFTH REPORTING PERIOD)**
Full:		***Not in Compliance***
	CPD	***Not Yet Assessed***
	COPA	***Not in Compliance***

The City maintained Preliminary compliance with ¶462 in the sixth reporting period. The City has also made progress toward Secondary compliance. COPA previously reached Secondary compliance, and this reporting period, the CPD provided evidence of efforts toward Secondary compliance.

To evaluate Preliminary compliance with ¶462, the IMT reviewed the CPD's and COPA's relevant policies and documents following the process described in the Consent Decree (¶¶626–41), which outlines applicable consultation, resolution, workout, and public comment periods.[102] To evaluate Secondary compliance, the IMT reviewed the entities' training development, implementation, and evaluation (¶286). To evaluate Full compliance, the IMT reviewed various sources to determine whether the City, the CPD, and COPA have sufficiently implemented their policies and training.

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[101] As referenced above, the Consent Decree requires actions by various City entities, including the CPD, COPA, the Police Board, and the Office of the Inspector General. Ultimately, the City is responsible for ensuring compliance. As a result, if a Consent Decree paragraph requires actions by multiple City entities, we will not find that the City has met Preliminary, Secondary, or Full compliance until all those entities have met the corresponding level of compliance. Nonetheless, for some paragraphs, we will clarify compliance assessments for each entity to demonstrate which benchmarks have been met.

[102] The OAG, the City, and the IMT agreed to a stipulation that provides a different review process for review of COPA policies and training materials. *See Stipulation Regarding the Policy and Training Review Process for COPA*, *Illinois v. Chicago*, Case No. 1:17-cv-06260 (Jan. 30, 2020). The review process in the Stipulation mirrors the review process under ¶¶626–41, but among other things, gives the OAG and the IMT a shorter timeframe for review of COPA policies and training materials.

Progress before the Sixth Reporting Period

In previous reporting periods, the CPD produced various draft policies relevant to ¶462. Most recently, in the fifth reporting period, the CPD submitted Special Order S08-01-01, *Conducting Log Number Investigations*, which addressed the requirements of ¶462. S08-01-01 remained in the collaborative review process at the end of the fifth reporting period. In addition, the CPD revised and finalized General Order G08-01, *Complaint and Disciplinary System*.[103] This moved the CPD into Preliminary compliance.

COPA reached Preliminary compliance in the fourth reporting period by finalizing its Policy 3.1.1, *Intake*, which covers the requirements of ¶462. In the fifth reporting period, COPA submitted for review materials for a training titled *COPA Intake Unit: Overview of Policies and Procedures In-Service 2021*. The lesson plan properly trained on the requirements in ¶462, and the training was administered to 99% of COPA's staff, allowing COPA to achieve Secondary compliance.

Progress in the Sixth Reporting Period

In the sixth reporting period, the CPD submitted multiple revised versions of S08-01-05, *Conducting Log Number Investigations*.[104] While the CPD has covered the requirements of ¶462 in G08-01, the S08-01-05 policy is also relevant to the requirements of ¶462. We appreciate the CPD incorporating Consent Decree requirements and principles in multiple policies and appreciate the opportunity to review all of these policies. Upon review of an earlier draft of S08-01-05, we encouraged the CPD to consider breaking the policy into several separate policies on discrete topics to allow for simpler navigation of policies. On June 30, 2022, the last day of the reporting period, the CPD submitted a further revised draft of S08-01-05. Therefore, this policy remained in the collaborative review and revision process at the end of the sixth reporting period.

Additionally, the CPD submitted draft BIA eLearning materials for review. These materials were still in draft stage and not in final presentation form. The draft training materials addressed the requirements of ¶462. We look forward to reviewing further developed BIA eLearning materials in the next reporting period. COPA did not submit any materials related to ¶462 in the sixth reporting period.

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The CPD made dual efforts relevant to ¶462 in the sixth reporting period: drafting and revising S08-01-05, and providing draft BIA eLearning materials that appear to

[103] The CPD previously submitted this General Order as *Complaint and Disciplinary Procedures*.

[104] The *Conducting Log Number Investigations* policy was produced in previous reporting periods as S08-01-01. The policy was re-numbered as S08-01-05 when it was produced May 5, 2022. We refer to the policy in this report as S08-01-05 for clarity.

be on track to instruct compliance with ¶462 requirements. The CPD's G08-01 policy, which moved the CPD into Preliminary compliance, remains in place, and therefore the CPD has maintained Preliminary compliance and made progress toward Secondary compliance with ¶462 in the sixth reporting period.

COPA previously reached Secondary compliance and maintained that compliance in the sixth reporting period. Moving forward, we look forward to receiving additional information related to COPA's ¶462 efforts to ensure COPA has sufficiently implemented its policies and training of such policies.

Paragraph 462 Compliance Progress History

FIRST REPORTING PERIOD	SECOND REPORTING PERIOD	THIRD REPORTING PERIOD
SEPTEMBER 1, 2019 – AUGUST 31, 2019	SEPTEMBER 1, 2019 – FEBRUARY 29, 2020	MARCH 1, 2020 – DECEMBER 31, 2020
COMPLIANCE PROGRESS:	COMPLIANCE PROGRESS:	COMPLIANCE PROGRESS:
Not Applicable	Status Update	None
FOURTH REPORTING PERIOD	**FIFTH REPORTING PERIOD**	**SIXTH REPORTING PERIOD**
JANUARY 1, 2021 – JUNE 30, 2021	JULY 1, 2021 – DECEMBER 31, 2021	JANUARY 1, 2022 – JUNE 30, 2022
COMPLIANCE PROGRESS:	COMPLIANCE PROGRESS:	COMPLIANCE PROGRESS:
None	Preliminary	Preliminary

Accountability and Transparency: ¶463

463. *The City, CPD, and COPA will ensure that, within 30 days of receiving a complaint, COPA, BIA, and Accountability Sergeants initiate and make reasonable attempts to secure a signed complainant affidavit, including in-person visits, phone calls, and other methods. Such attempts will reasonably accommodate the complainant's disability status, language proficiency, and incarceration status. a. If COPA, BIA, or the Accountability Sergeant is unable to obtain a signed complainant affidavit despite having made reasonable attempts to do so, COPA or BIA (for investigations conducted by both BIA and Accountability Sergeants) will assess whether the evidence collected in the Preliminary investigation is sufficient to continue the investigation. b. If the Preliminary investigation reveals objective verifiable evidence suggesting it is necessary and appropriate for the investigation to continue, BIA (for investigations conducted by BIA and Accountability Sergeants) will seek written approval for an override affidavit executed by the Chief Administrator of COPA, and COPA (for investigations conducted by COPA) will seek written approval for an override affidavit executed by the Chief of BIA. c. The Chief Administrator of COPA or the Chief of BIA will provide an override affidavit if there is objective verifiable evidence suggesting it is necessary and appropriate, and in the interests of justice, for the investigation to continue.*

Compliance Progress

(Reporting Period: January 1, 2022, through June 30, 2022)

Preliminary:		***Not in Compliance***[105]
	CPD	***Not in Compliance***
	COPA	***Not in Compliance***
Secondary:		***Not Yet Assessed***
Full:		***Not Yet Assessed***

The City made progress toward Preliminary compliance with ¶463 in the sixth reporting period, but did not ultimately reach Preliminary compliance. The CPD drafted and revised policies that addressed ¶463's requirements, but the policies were not finalized by the close of the sixth reporting period. COPA also submitted

[105] As referenced above, the Consent Decree requires actions by various City entities, including the CPD, COPA, the Police Board, and the Office of the Inspector General. Ultimately, the City is responsible for ensuring compliance. As a result, if a Consent Decree paragraph requires actions by multiple City entities, we will not find that the City has met Preliminary, Secondary, or Full compliance until all those entities have met the corresponding level of compliance. Nonetheless, for some paragraphs, we will clarify compliance assessments for each entity to demonstrate which benchmarks have been met.

a draft policy relevant to ¶463 in the sixth reporting period, but the policy was not finalized by the end of the sixth reporting period.

To evaluate Preliminary compliance with ¶463, the IMT reviewed the CPD's and COPA's relevant policies and documents following the process described in the Consent Decree (¶¶626–41), which outlines applicable consultation, resolution, workout, and public comment periods.[106]

Progress before the Sixth Reporting Period

In previous reporting periods, the CPD produced for review several draft policies that relate to ¶463's requirements. This included draft BIA Unit Directives: *Conduct of Investigation; Sworn Affidavits and Sworn Affidavit Overrides*, *Complainant Communication Procedures and Timelines* policy, the *Conduct of Investigations: Initial Responsibilities*, and *The Assignment of Log Number Investigations*. These policies were never finalized in accordance with the Consent Decree. In the fifth reporting period, the CPD produced Special Order S08-01, *Complaint and Disciplinary Investigators and Investigations*, which addresses the main paragraph of ¶463 and subparagraphs (a) and (b). The CPD posted the Special Order for public comment and, on the last day of the reporting period, finalized the Special Order. In addition, the CPD produced S08-01-01, *Conducting Log Number Investigations*, which addresses the main paragraph of ¶463 and subparagraphs (a–c). This was not finalized by the end of the fifth reporting period.

In the fifth reporting period, COPA submitted for review COPA 3.1.4, *Affidavits, Affidavit Overrides, Exceptions to Affidavit Requirement*, which addresses the main paragraph of ¶463 and subparagraphs (a) and (c). However, the policy only partially addressed ¶463(b). The policy remained in the collaborative review and revision process at the end of the fifth reporting period. Therefore, COPA did not reach Preliminary compliance with ¶463. COPA also provided materials for its training titled *COPA Intake Unit: Overview of Policies and Procedures In-Service 2021* lesson plan, which addressed all requirements of ¶463 and was presented to at least 95% of COPA's personnel.

Progress in the Sixth Reporting Period

This reporting period, the CPD submitted multiple revised versions of S08-01-04, which provides instruction related to the main paragraph of ¶463 and subsections

[106] The OAG, the City, and the IMT agreed to a stipulation that provides a different review process for review of COPA policies and training materials. *See Stipulation Regarding the Policy and Training Review Process for COPA*, *Illinois v. Chicago*, Case No. 1:17-cv-06260 (Jan. 30, 2020). The review process in the Stipulation mirrors the review process under ¶¶626–41, but among other things, gives the OAG and the IMT a shorter timeframe for review of COPA policies and training materials.

(a)-(b). This policy provides good instruction and clear expectations for investigators. Upon review, we suggested that the CPD include language relevant to ¶463's instruction that investigators will make reasonable attempts to secure a signed affidavit. We submitted a no-objection notice conditional to a few additional revisions of S08-01-04 on June 29, 2022.[107] On June 30, 2022, the last day of the reporting period, the CPD submitted a further revised version. Therefore, this policy remained in the collaborative review and revision process at the end of the sixth reporting period. In addition, the CPD submitted S08-01-05, which speaks to the requirements of ¶463(c). Like S08-01-04, the CPD produced a revised S08-01-05 on June 30, 2022, and therefore, this policy remained in the collaborative review and revision process at the end of the sixth reporting period.

The City and COPA provided the IMT with a further revised version of the policy *Affidavits, Affidavit Overrides, Exceptions to Affidavit Requirement* this reporting period. Earlier drafts of this policy had been submitted in previous reporting periods and remained in the collaborative review and revision process at the end of the fifth reporting period; however, at the end of fifth reporting period, we noted that the requirements of subsection (b) were not yet addressed. COPA revised this policy such that it meets all requirements of ¶463 and its subparagraphs. The IMT submitted a no-objection notice to *Affidavits, Affidavit Overrides, Exceptions to Affidavit Requirement* on May 24, 2022, but the policy has not yet been finalized.

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Because, the CPD and COPA had not yet finalized policies relevant to ¶463's requirements by the close of the sixth reporting period, they did not move into Preliminary compliance. However, we expect that both entities will finalize the policies they submitted for review in the sixth reporting period in the seventh reporting period. This will move the entities into compliance.

[107] Under the Consent Decree policy review process, the City and the CPD consult with the IMT and the OAG to develop or revise policies in accordance with Consent Decree requirements. See ¶¶626–37. The City and the CPD provide the policy for review at least 30 days before the policy is scheduled to go into effect, and the IMT and the OAG have 30 days to comment on the policy. See ¶¶627–28. The City, the CPD, the IMT, and the OAG then work together to resolve comments. The IMT and the OAG will, separately and in writing, notify the City and the CPD that they no longer have any comments, which is referred to as a "no-objection notice." Once the City and the CPD receive a no-objection notice from both the IMT and the OAG, the City and the CPD will begin the process of finalizing the policy. Typically, this includes the CPD posting the policy on its website for public comment for at least 15 days. The City and the CPD must then consider those comments and make additional changes, as appropriate. See ¶633.

Paragraph 463 Compliance Progress History

FIRST REPORTING PERIOD
SEPTEMBER 1, 2019 – AUGUST 31, 2019
COMPLIANCE PROGRESS:
Not Applicable

SECOND REPORTING PERIOD
SEPTEMBER 1, 2019 – FEBRUARY 29, 2020
COMPLIANCE PROGRESS:
Status Update

THIRD REPORTING PERIOD
MARCH 1, 2020 – DECEMBER 31, 2020
COMPLIANCE PROGRESS:
None

FOURTH REPORTING PERIOD
JANUARY 1, 2021 – JUNE 30, 2021
COMPLIANCE PROGRESS:
None

FIFTH REPORTING PERIOD
JULY 1, 2021 – DECEMBER 31, 2021
COMPLIANCE PROGRESS:
None

SIXTH REPORTING PERIOD
JANUARY 1, 2022 – JUNE 30, 2022
COMPLIANCE PROGRESS:
None

Accountability and Transparency: ¶464

464. *In the course of conducting thorough and complete misconduct investigations, COPA, BIA, and the districts will: a. take all reasonable steps to promptly identify, collect, and consider all relevant circumstantial, direct, and physical evidence, including officer-recorded audio or video taken with body-worn cameras or other recording devices; b. take all reasonable steps to locate and interview all witnesses as soon as feasible, including non-CPD member witnesses, and attempt to interview any complainant or witness in-person at a time and place that is convenient and accessible for the complainant or witness, when feasible; c. determine whether there are any other open administrative investigations involving the same involved member, and monitor or combine the investigation(s), as appropriate; d. audio record non-CPD member interviews subject to the interviewee's consent, or promptly prepare summaries of interviews when the interview is not recorded; e. take all reasonable steps to identify the involved and witness CPD member(s) if the complainant was unable do so; f. determine if there may have been additional misconduct beyond that initially alleged. COPA, BIA, or the district will take all reasonable steps to ensure that such identified misconduct is fully and fairly documented, classified, and investigated; g. as applicable, consider a CPD member's behavior based on the available training records and disciplinary history, including complaints in which allegations were not sustained, as permitted by law and any applicable collective bargaining agreement; and h. identify and take into account known relevant evidence gathered in parallel criminal investigation or criminal or civil litigation, if available.*

Compliance Progress (Reporting Period: January 1, 2022, through June 30, 2022)

Preliminary:		***Not in Compliance***[108]
	CPD	***Not in Compliance***
	COPA	***In Compliance*** **(FIFTH REPORTING PERIOD)**
Secondary:		***Not in Compliance***
	CPD	***Not Yet Assessed***
	COPA	***Not in Compliance***
Full:		***Not Yet Assessed***

In the fifth reporting period, the City made progress toward but did not ultimately reach Preliminary compliance. COPA maintained Preliminary compliance, which it reached in the fifth reporting period, and the CPD made notable efforts in revising a draft policy that speaks to the requirements of ¶464. Because all relevant City entities must reach levels of compliance to bring the City, as a whole, into compliance, the City has not yet reached Preliminary compliance.

To evaluate Preliminary compliance with ¶464, the IMT reviewed the CPD's and COPA's relevant policies and documents following the process described in the Consent Decree (¶¶626–41).[109] To evaluate Secondary compliance, the IMT reviewed the entities' training development, implementation, and evaluation (¶286).

Progress before the Sixth Reporting Period

In the fifth reporting period, the CPD submitted, revised, and ultimately finalized S08-01, *Complaint and Disciplinary Investigators and Investigations*, which addresses ¶464(a), (b), (c), (d), and (f). The CPD also submitted Special Order S08-01-01, *Conducting Log Number investigations*, which addressed all requirements of ¶464, but S08-01-01 was not finalized by the close of the fifth reporting period. The CPD had also produced various BIA Unit Directives relevant to this paragraph in previous reporting periods: BIA's draft *Administrative Misconduct Investigations*

[108] As referenced above, the Consent Decree requires actions by various City entities, including the CPD, COPA, the Police Board, and the Office of the Inspector General. Ultimately, the City is responsible for ensuring compliance. As a result, if a Consent Decree paragraph requires actions by multiple City entities, we will not find that the City has met Preliminary, Secondary, or Full compliance until all those entities have met the corresponding level of compliance. Nonetheless, for some paragraphs, we will clarify compliance assessments for each entity to demonstrate which benchmarks have been met.

[109] The OAG, the City, and the IMT agreed to a stipulation that provides a different review process for review of COPA policies and training materials. *See Stipulation Regarding the Policy and Training Review Process for COPA*, *Illinois v. Chicago*, Case No. 1:17-cv-06260 (Jan. 30, 2020). The review process in the Stipulation mirrors the review process under ¶¶626–41, but among other things, gives the OAG and the IMT a shorter timeframe for review of COPA policies and training materials.

Unit Directive; the *Photo Room Operations* policy; and the *Conduct of Investigation: Initial Responsibilities* policy. These Unit Directives were not finalized as necessary to allow the CPD to reach compliance.

COPA reached Preliminary compliance in the fifth reporting period by submitting, revising, and finalized its Policies 3.1.2, *Fact Gathering and the Investigative Process*, which addressed most of ¶464 but did not address ¶464(g), and 3.2.1, *Disciplinary and Remedial Recommendations*, which addresses all of ¶464's requirements.

Progress in the Sixth Reporting Period

In the sixth reporting period, the CPD renumbered the policy previously labeled S08-01-01; it is now S08-01-05, *Conducting Log Number Investigations*. Throughout this reporting period, the CPD continued to revise this policy, which was the subject of ongoing efforts at the end of the fifth reporting period. On June 30, 2022, the last day of the reporting period, the CPD submitted a further revised version. Therefore, this policy remained in the collaborative review and revision process at the end of the sixth reporting period. In draft form, this policy addresses the requirements of ¶464, but the CPD has not yet reached Preliminary compliance because the policy has not yet been finalized. We anticipate that the CPD will continue to make concerted efforts toward revising and finalizing this policy in the seventh reporting period.

This reporting period, COPA maintained Preliminary compliance with ¶464 and began making progress toward Secondary compliance by submitting its *Disciplinary and Remedial Recommendation* training materials, which trains on portions of ¶464 requirements. To reach Secondary compliance, COPA will need to instruct on all of ¶464 requirements, providing the training to at least 95% of relevant personnel.

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The City made progress toward but did not reach Preliminary compliance in the sixth reporting period. While COPA maintained Preliminary compliance, the CPD also made additional efforts in revising a policy that should move the CPD into Preliminary compliance once it is finalized under the Consent Decree process. We will look for COPA to continue to make progress on training relevant to ¶464 in the seventh reporting period.

Paragraph 464 Compliance Progress History

FIRST REPORTING PERIOD
SEPTEMBER 1, 2019 – AUGUST 31, 2019
COMPLIANCE PROGRESS:
Not Applicable

SECOND REPORTING PERIOD
SEPTEMBER 1, 2019 – FEBRUARY 29, 2020
COMPLIANCE PROGRESS:
Status Update

THIRD REPORTING PERIOD
MARCH 1, 2020 – DECEMBER 31, 2020
COMPLIANCE PROGRESS:
None

FOURTH REPORTING PERIOD
JANUARY 1, 2021 – JUNE 30, 2021
COMPLIANCE PROGRESS:
None

FIFTH REPORTING PERIOD
JULY 1, 2021 – DECEMBER 31, 2021
COMPLIANCE PROGRESS:
None

SIXTH REPORTING PERIOD
JANUARY 1, 2022 – JUNE 30, 2022
COMPLIANCE PROGRESS:
None

Accountability and Transparency: ¶465

465. *When conducting an administrative interview of any CPD member, COPA, BIA, and the districts will: a. ask the identity of other persons with whom he or she has communicated regarding the incident in question, and the date, time, place, and content of such communication, subject to any evidentiary privilege recognized under Illinois or federal law; b. ask whether he or she has reviewed any audio or video footage of the incident in question, and, if so, the date, time, and place the video or audio was reviewed; c. ask whether he or she is aware of any media or social media coverage of the incident in question, and, if so, the content and source of such known media coverage; d. note on the record of the interview anytime the CPD member seeks or obtains information from his or her legal or union representative, as well as the length of any "off the record" discussion between the CPD member and his or her legal or union representative and ensure that the CPD member's counsel or representative does nothing to disrupt or interfere with the interview; e. document, and make part of the investigative file, all requests made on behalf of a CPD member to reschedule an interview; and f. audio record all CPD member in-person interviews.*

Compliance Progress (Reporting Period: January 1, 2022, through June 30, 2022)

Preliminary:		***Not in Compliance***[110]
	CPD	***Not in Compliance***
	COPA	***In Compliance*** **(FIFTH REPORTING PERIOD)**
Secondary:		***Not in Compliance***
	CPD	***Not Yet Assessed***
	COPA	***Not in Compliance***
Full:		***Not Yet Assessed***

The City did not reach Preliminary compliance with ¶465 in the sixth reporting period, because the CPD has not yet finalized a policy mandating action in accordance with this paragraph's requirements. COPA maintained Preliminary compliance with this paragraph in the sixth reporting period. But because all relevant City

[110] As referenced above, the Consent Decree requires actions by various City entities, including the CPD, COPA, the Police Board, and the Office of the Inspector General. Ultimately, the City is responsible for ensuring compliance. As a result, if a Consent Decree paragraph requires actions by multiple City entities, we will not find that the City has met Preliminary, Secondary, or Full compliance until all those entities have met the corresponding level of compliance. Nonetheless, for some paragraphs, we will clarify compliance assessments for each entity to demonstrate which benchmarks have been met.

entities must reach levels of compliance to bring the City, as a whole, into compliance, the City has not yet reached Preliminary compliance.

To evaluate Preliminary compliance with ¶465, the IMT reviewed the CPD's and COPA's relevant policies and documents following the process described in the Consent Decree (¶¶626–41), which outlines applicable consultation, resolution, workout, and public comment periods. These paragraphs delineate various requirements, such as requiring that policies be "plainly written, logically organized, and use clearly defined terms."[111] To evaluate Secondary compliance, the IMT reviewed the entities' training development, implementation, and evaluation (¶286).

Progress before the Sixth Reporting Period

In previous reporting periods, the CPD provided BIA's draft *Administrative Misconduct Investigation* Unit Directive, which addressed the requirements of ¶465, but this Unit Directive was not posted for public comment and finalized. In the fifth reporting period, the CPD submitted a draft of Special Order S08-01-01, *Conducting Log Number Investigations*. This draft policy directs action in accordance with al of ¶465's requirements, but at the end of the fifth reporting period, this policy remained in the collaborative review and revision process. Therefore, the CPD had not yet reached Preliminary compliance.

In the fifth reporting period, COPA reached Preliminary compliance by submitting, revising, and finalizing Policy 3.1.2(b), *COPA Interviews-Chicago Police Department Members*, which addressed all parts of ¶465.

Progress in the Sixth Reporting Period

In the sixth reporting period, the CPD renumbered the policy previously labeled S08-01-01; it is now S08-01-05, *Conducting Log Number Investigations*. On June 30, 2022, the last day of the reporting period, the CPD submitted a further revised version. Therefore, this policy remained in the collaborative review and revision process at the end of the sixth reporting period. Sections III.B.8.b.2–8 of the most recent draft of S08-01-05 that we reviewed fully addresses the requirements of ¶465 and its subparagraphs, which outlines the steps taken when conducting an administrative review of any CPD member.

[111] The OAG, the City, and the IMT agreed to a stipulation that provides a different review process for review of COPA policies and training materials. *See Stipulation Regarding the Policy and Training Review Process for COPA*, *Illinois v. Chicago*, Case No. 1:17-cv-06260 (Jan. 30, 2020). The review process in the Stipulation mirrors the review process under ¶¶626–41, but among other things, gives the OAG and the IMT a shorter timeframe for review of COPA policies and training materials.

In the sixth reporting period, COPA maintained Preliminary compliance with ¶465, but did not submit evidence of Secondary compliance with ¶465 in the sixth reporting period.

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While COPA maintained Preliminary compliance with ¶465 in the sixth reporting period, the City did not yet reach Preliminary compliance because the CPD has not yet finalized a policy directing action in line with ¶465's requirements. If the CPD continues to revise S08-01-05 in the seventh reporting period as it has at the end of the sixth reporting period, we anticipate that the CPD will be in Preliminary compliance next reporting period. As for COPA, we look forward to reviewing training materials instructing compliance with ¶465 and its policies which speak to the requirements of this paragraph.

Paragraph 465 Compliance Progress History

FIRST REPORTING PERIOD	SECOND REPORTING PERIOD	THIRD REPORTING PERIOD
SEPTEMBER 1, 2019 – AUGUST 31, 2019	SEPTEMBER 1, 2019 – FEBRUARY 29, 2020	MARCH 1, 2020 – DECEMBER 31, 2020
COMPLIANCE PROGRESS:	COMPLIANCE PROGRESS:	COMPLIANCE PROGRESS:
Not Applicable	Status Update	None
FOURTH REPORTING PERIOD	**FIFTH REPORTING PERIOD**	**SIXTH REPORTING PERIOD**
JANUARY 1, 2021 – JUNE 30, 2021	JULY 1, 2021 – DECEMBER 31, 2021	JANUARY 1, 2022 – JUNE 30, 2022
COMPLIANCE PROGRESS:	COMPLIANCE PROGRESS:	COMPLIANCE PROGRESS:
None	None	None

Accountability and Transparency: ¶466

466. *When assessing credibility, COPA, BIA, and the districts will: a. make credibility determinations of statements made by complainants, involved CPD members, and witnesses based on independent, unbiased, and credible evidence, taking into account any known record or final determination of deception or untruthfulness in legal proceedings, administrative investigations, or other investigations; and b. critically evaluate all statements, like any other evidence, giving no automatic preference to, or discounting, any statement solely due to its source, including statements made by CPD members.*

Compliance Progress (Reporting Period: January 1, 2022, through June 30, 2022)

Preliminary:		***Not in Compliance***[112]
	CPD	***Not in Compliance***
	COPA	***In Compliance*** (FOURTH REPORTING PERIOD)
Secondary:		***Not in Compliance***
	CPD	***Not Yet Assessed***
	COPA	***In Compliance*** (FIFTH REPORTING PERIOD)
Full:		***Not in Compliance***
	CPD	***Not Yet Assessed***
	COPA	***In Compliance*** (NEW)

This reporting period, the CPD did not reach Preliminary compliance because CPD has not yet finalized a policy directing compliance with ¶466's requirements. COPA maintained Preliminary and Secondary compliance with ¶466 this reporting period and moved into Full compliance. Because all relevant City entities must reach levels of compliance to bring the City, as a whole, into compliance, the City has not yet reached Preliminary compliance.

To evaluate Preliminary compliance with ¶466, the IMT reviewed the CPD's and COPA's relevant policies and documents following the process described in the Consent Decree (¶¶626–41), which outlines applicable consultation, resolution, workout, and public comment periods.[113] To evaluate Secondary compliance, the

[112] As referenced above, the Consent Decree requires actions by various City entities, including the CPD, COPA, the Police Board, and the Office of the Inspector General. Ultimately, the City is responsible for ensuring compliance. As a result, if a Consent Decree paragraph requires actions by multiple City entities, we will not find that the City has met Preliminary, Secondary, or Full compliance until all those entities have met the corresponding level of compliance. Nonetheless, for some paragraphs, we will clarify compliance assessments for each entity to demonstrate which benchmarks have been met.

[113] The OAG, the City, and the IMT agreed to a stipulation that provides a different review process for review of COPA policies and training materials. *See Stipulation Regarding the Policy and*

IMT reviewed the entities' training development, implementation, and evaluation (¶286). To evaluate Full compliance, the IMT reviewed various sources to determine whether the City, the CPD, and COPA have sufficiently implemented their policies and training.

Progress before the Sixth Reporting Period

In the fifth reporting period, the CPD provided draft S08-01-01, *Conducting Log Number Investigations*, which spoke to the requirements of ¶466(a) and (b). This policy remained in the collaborative review and revision process at the end of the fifth reporting period, and therefore, the CPD did not reach Preliminary compliance. In addition, in past reporting periods, the CPD submitted BIA's *Administrative Misconduct Investigations* Unit Directive that sought to address the requirements of ¶466. We submitted a no-objection notice to BIA's *Administrative Misconduct Investigation* Unit Directive in July 2021.[114] However, the directive was not posted for public comment by the end of the reporting period.

In the fourth reporting period, COPA provided its Policy 3.1.3 *Final Summary Report*, which addressed ¶¶466(a) and (b) in detail and exceeds the requirements of this paragraph. This allowed COPA to achieve Preliminary compliance. In the fifth reporting period, COPA provided materials for the *Witness Reliability: In Service Training*, which completely addressed ¶446. By presenting the *Witness Reliability: In Service Training* to at least 95% of its personnel, COPA reached Secondary compliance.

Progress in the Sixth Reporting Period

In the sixth reporting period, the CPD renumbered the policy previously labeled S08-01-01; it is now S08-01-05, *Conducting Log Number Investigations*. The CPD submitted multiple revised drafts of S08-01-05. On June 30, 2022, the last day of the reporting period, the CPD submitted a further revised version. Therefore, this

Training Review Process for COPA, *Illinois v. Chicago*, Case No. 1:17-cv-06260 (Jan. 30, 2020). The review process in the Stipulation mirrors the review process under ¶¶626–41, but among other things, gives the OAG and the IMT a shorter timeframe for review of COPA policies and training materials.

114 Under the Consent Decree policy review process, the City and the CPD consult with the IMT and the OAG to develop or revise policies in accordance with Consent Decree requirements. *See* ¶¶626–37. The City and the CPD provide the policy for review at least 30 days before the policy is scheduled to go into effect, and the IMT and the OAG have 30 days to comment on the policy. *See* ¶¶627–28. The City, the CPD, the IMT, and the OAG then work together to resolve comments. The IMT and the OAG will, separately and in writing, notify the City and the CPD that they no longer have any comments, which is referred to as a "no-objection notice." Once the City and the CPD receive a no-objection notice from both the IMT and the OAG, the City and the CPD will begin the process of finalizing the policy. Typically, this includes the CPD posting the policy on its website for public comment for at least 15 days. The City and the CPD must then consider those comments and make additional changes, as appropriate. *See* ¶633.

policy remained in the collaborative review and revision process at the end of the sixth reporting period. We note that Section IV.A.1–2 of this draft policy completely addresses the requirements of ¶466 and its subparagraphs, which outlines steps taken when assessing credibility during misconduct investigations.

This reporting period, COPA produced three sample Final Summary Reports (also known as FSRs) for review. In addition to providing these samples we note that COPA has posted Final Summary Reports from 2017 through 2022. We reviewed the three samples provided by COPA and others on its website. The Final Summary Reports make credibility determinations of statements from complainants, officers, and witnesses, and the reports note whether the body-worn-camera footage support the version of events and officer statements. The Final Summary Reports also demonstrate a consideration of the relevant officer's performance history and records before a disciplinary decision is made. These reports demonstrate that COPA is following the requirements of ¶466 and its related policies and training.

We commend COPA for publishing this information on its website—an action not required by the Consent Decree. This demonstrates COPA's continued commitment to transparency and improving community rapport and trust. Taking it a step further, COPA's website has a page titled "About Summary Reports of Investigation," where COPA explains the Final Summary Reports, section-by-section, allowing a reader to understand what should be included in the various sections of the report.

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Because the CPD did not finalize a policy codifying the requirements of ¶466, the City did not reach Preliminary compliance. Early in the seventh reporting period, we anticipate that the CPD will finalize S08-01-05, which would bring the CPD and the City into Preliminary compliance. COPA moved into Full compliance in the sixth reporting period by demonstrating its evaluation of statements through thorough investigations via its publicly available Final Summary Reports. Moving forward we will look for evidence that COPA continues to make such credibility determinations through thorough investigations.

Paragraph 466 Compliance Progress History

FIRST REPORTING PERIOD SEPTEMBER 1, 2019 – AUGUST 31, 2019 COMPLIANCE PROGRESS: Not Applicable	SECOND REPORTING PERIOD SEPTEMBER 1, 2019 – FEBRUARY 29, 2020 COMPLIANCE PROGRESS: Status Update	THIRD REPORTING PERIOD MARCH 1, 2020 – DECEMBER 31, 2020 COMPLIANCE PROGRESS: None
FOURTH REPORTING PERIOD JANUARY 1, 2021 – JUNE 30, 2021 COMPLIANCE PROGRESS: None	FIFTH REPORTING PERIOD JULY 1, 2021 – DECEMBER 31, 2021 COMPLIANCE PROGRESS: None	SIXTH REPORTING PERIOD JANUARY 1, 2022 – JUNE 30, 2022 COMPLIANCE PROGRESS: None

Accountability and Transparency: ¶467

467. *For each allegation associated with a misconduct investigation, COPA, BIA, or the districts will explicitly identify and recommend one of the following findings: a. "Sustained," where it is determined the allegation is supported by a preponderance of the evidence; b. "Not Sustained," where it is determined there is insufficient evidence to prove the allegations by a preponderance of the evidence; c. "Unfounded," where it is determined, by clear and convincing evidence, that an allegation is false or not factual; or d. "Exonerated," where it is determined, by clear and convincing evidence, that the conduct described in the allegation occurred but is lawful and proper.*

Compliance Progress (Reporting Period: January 1, 2022, through June 30, 2022)

Preliminary:		***In Compliance*** **(FIFTH REPORTING PERIOD)**[115]
	CPD	***In Compliance*** **(FIFTH REPORTING PERIOD)**
	COPA	***In Compliance*** **(FOURTH REPORTING PERIOD)**
Secondary:		***Not in Compliance***
	CPD	***Not in Compliance***
	COPA	***Not in Compliance***
Full:		***Not Yet Assessed***

The City maintained Preliminary compliance with ¶467 in the sixth reporting period, and made efforts toward Secondary compliance through the CPD's efforts in compiling draft training materials. Ultimately, though, neither the CPD nor COPA reached Secondary compliance with ¶467 in the sixth reporting period.

To evaluate Preliminary compliance with ¶467, the IMT reviewed the CPD's and COPA's relevant policies and documents following the process described in the Consent Decree (¶¶626–41), which outlines applicable consultation, resolution, workout, and public comment periods.[116] To evaluate Secondary compliance, the

[115] As referenced above, the Consent Decree requires actions by various City entities, including the CPD, COPA, the Police Board, and the Office of the Inspector General. Ultimately, the City is responsible for ensuring compliance. As a result, if a Consent Decree paragraph requires actions by multiple City entities, we will not find that the City has met Preliminary, Secondary, or Full compliance until all those entities have met the corresponding level of compliance. Nonetheless, for some paragraphs, we will clarify compliance assessments for each entity to demonstrate which benchmarks have been met.

[116] The OAG, the City, and the IMT agreed to a stipulation that provides a different review process for review of COPA policies and training materials. *See Stipulation Regarding the Policy and Training Review Process for COPA*, *Illinois v. Chicago*, Case No. 1:17-cv-06260 (Jan. 30, 2020). The review process in the Stipulation mirrors the review process under ¶¶626–41, but among other things, gives the OAG and the IMT a shorter timeframe for review of COPA policies and training materials.

IMT reviewed the entities' training development, implementation, and evaluation (¶286).

Progress before the Sixth Reporting Period

The CPD reached Preliminary compliance with ¶467 in the fifth reporting period, when it posted for public comment and finalized General Order G08-01, *Complaint and Disciplinary System.* G08-01 addresses all requirements of ¶467, including all enumerated in the subparagraphs. The CPD also provided in previous reporting periods BIA's draft *Administrative Summary Report* Unit Directive which spoke to the mandates of ¶467.[117]

COPA reached Preliminary compliance with ¶467 in the fourth reporting period when it finalized Policy 3.1.3, *Final Summary Report*. COPA had not provided evidence of efforts toward Secondary compliance with ¶467 by the end of the fifth reporting period.

Progress in the Sixth Reporting Period

In the sixth reporting period, the CPD maintained Preliminary compliance and made efforts toward Secondary compliance. The CPD submitted draft BIA eLearning materials for review. These materials were still in draft stage and not in final presentation form. The IMT submitted feedback to the CPD on these materials in May 2022. We look forward to reviewing further developed BIA eLearning materials in the next reporting period.

In the sixth reporting period, COPA provided samples of its Final Summary Reports (also known as FSRs), which can also be found on COPA's website. There readers can locate cases by log number and read about the allegations made, the investigation, and disposition. We appreciate this information being available to the public .We note however, that to reach Secondary compliance, COPA will need to provide training relevant to the requirements of ¶467.

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The City maintained Preliminary compliance with ¶467 in the sixth reporting period, but did not reach Secondary Compliance. In the seventh reporting period, we hope to receive further revised and more finalized drafts of the BIA eLearning materials. Once that training is finalized, we will look for evidence that the CPD has provided the training. As for COPA, we look forward to reviewing draft training

[117] In the sixth reporting period, the CPD informed the IMT and the OAG that BIA would begin to move away from Unit Directives. Instead of Unit Directives, instruction will be provided in General Orders and Special Orders. This applies to the BIA Unit Directives that we reviewed, and in some instances provided no-objection notices to in previous reporting periods. This process of incorporating Unit Directives into General Orders and Special Orders is ongoing.

materials instructing compliance with Policy 3.1.3, *Final Summary Report,* in the coming reporting period.

Paragraph 467 Compliance Progress History

FIRST REPORTING PERIOD SEPTEMBER 1, 2019 – AUGUST 31, 2019	SECOND REPORTING PERIOD SEPTEMBER 1, 2019 – FEBRUARY 29, 2020	THIRD REPORTING PERIOD MARCH 1, 2020 – DECEMBER 31, 2020
COMPLIANCE PROGRESS: Not Applicable	COMPLIANCE PROGRESS: Status Update	COMPLIANCE PROGRESS: None
FOURTH REPORTING PERIOD JANUARY 1, 2021 – JUNE 30, 2021	**FIFTH REPORTING PERIOD** JULY 1, 2021 – DECEMBER 31, 2021	**SIXTH REPORTING PERIOD** JANUARY 1, 2022 – JUNE 30, 2022
COMPLIANCE PROGRESS: None	COMPLIANCE PROGRESS: Preliminary	COMPLIANCE PROGRESS: Preliminary

Accountability and Transparency: ¶468

468. *COPA, BIA, and the districts will ensure that investigators do not: a. ask leading questions that suggest legal justifications for the CPD member's conduct during interviews of witnesses, complainants, or the involved CPD member; b. make statements that could discourage a CPD member or non-CPD member witness from providing a full account of the specific allegations; c. close an administrative investigation solely because of findings in a related criminal proceedings; d. consider findings in a related criminal investigation to solely determine whether a CPD member engaged in misconduct; e. disregard a witness's statement solely because the witness has some connection to either the complainant or the CPD member or because the witness or complainant has a criminal history; or f. close an investigation solely because the complainant seeks to withdraw the complaint or is unavailable, unwilling, or unable to cooperate with an administrative investigation. If the complainant is unable or unwilling to provide information beyond the initial complaint, the administrative investigation will continue based on the available evidence in accordance with this Agreement, applicable law, and any applicable collective bargaining agreements.*

Compliance Progress (Reporting Period: January 1, 2022, through June 30, 2022)

Preliminary:		***Not in Compliance***[118]
	CPD	***Not in Compliance***
	COPA	***In Compliance*** **(FIFTH REPORTING PERIOD)**
Secondary:		***Not in Compliance***
	CPD	***Not Yet Assessed***
	COPA	***Not in Compliance***
Full:		***Not Yet Assessed***

The City did not reach Preliminary compliance with ¶468 in the sixth reporting period. The CPD continued to revise policy relevant to ¶468, but did not finalize this policy by the end of the sixth reporting period. COPA maintained Preliminary compliance with this paragraph in the sixth reporting period. Because all relevant

[118] As referenced above, the Consent Decree requires actions by various City entities, including the CPD, COPA, the Police Board, and the Office of the Inspector General. Ultimately, the City is responsible for ensuring compliance. As a result, if a Consent Decree paragraph requires actions by multiple City entities, we will not find that the City has met Preliminary, Secondary, or Full compliance until all those entities have met the corresponding level of compliance. Nonetheless, for some paragraphs, we will clarify compliance assessments for each entity to demonstrate which benchmarks have been met.

City entities must reach levels of compliance to bring the City, as a whole, into compliance, the City has not yet reached Preliminary compliance.

To evaluate Preliminary compliance with ¶468, the IMT reviewed the CPD's and COPA's relevant policies and documents following the process described in the Consent Decree (¶¶626–41), which outlines applicable consultation, resolution, workout, and public comment periods.[119] To evaluate Secondary compliance, the IMT reviewed the entities' training development, implementation, and evaluation (¶286).

Progress before the Sixth Reporting Period

In previous reporting periods, the CPD provided BIA's *Administrative Misconduct Investigation* Unit Directive, which was thorough and instructed compliance with all of ¶468's requirements. However, this Unit Directive was never finalized as required to achieve Preliminary compliance.[120] Most recently, in the fifth reporting period, the CPD submitted a draft of Special Order S08-01-01, *Conducting Log Number Investigations*. This draft Special Order addressed the requirements of ¶468 and all of its subparagraphs, but it remained in the collaborative review and revision process by the end of the fifth reporting period.

COPA reached Preliminary compliance with In the fourth reporting period, COPA made significant progress with ¶468 in the fifth reporting period, when it finalized two policies that together mandate compliance with the requirements ¶468: Policy 3.1.2, *Fact Gathering and the Investigative Process;* and Policy 3.1.2(b), *Interviews – Chicago Police Department Members*.

Progress in the Sixth Reporting Period

In the sixth reporting period, the CPD renumbered the policy previously labeled S08-01-01; it is now S08-01-05, *Conducting Log Number Investigations.* The CPD submitted multiple revised versions of S08-01-05 throughout this reporting period. Section III.F.1–6 of the draft S08-01-05 addresses ¶468 and its subparagraphs, which outlines what investigators should not be permitted to do during misconduct investigations. On June 30, 2022, the last day of the reporting period,

[119] The OAG, the City, and the IMT agreed to a stipulation that provides a different review process for review of COPA policies and training materials. *See Stipulation Regarding the Policy and Training Review Process for COPA*, *Illinois v. Chicago*, Case No. 1:17-cv-06260 (Jan. 30, 2020). The review process in the Stipulation mirrors the review process under ¶¶626–41, but among other things, gives the OAG and the IMT a shorter timeframe for review of COPA policies and training materials.

[120] In the sixth reporting period, the CPD informed the IMT and the OAG that BIA would begin to move away from Unit Directives. Instead of Unit Directives, instruction will be provided in General Orders and Special Orders. This applies to the BIA Unit Directives that we reviewed, and in some instances provided no-objection notices to in previous reporting periods. This process of incorporating Unit Directives into General Orders and Special Orders is ongoing.

the CPD submitted a further revised version. Therefore, this policy remained in the collaborative review and revision process at the end of the sixth reporting period.

COPA maintained Preliminary Compliance with ¶468 in the sixth reporting period, but did not produce materials relevant to subsequent levels of compliance with ¶468 in the sixth reporting period.

***

The City did not reach Preliminary compliance with ¶468 in the sixth reporting period because the CPD has not yet finalized a policy codifying the requirements of ¶468. We expect that the CPD will finalize S08-01-05 in the seventh reporting period and thereby obtain Preliminary compliance. We hope to see COPA training materials instructing compliance with ¶468 during the seventh reporting period.

Paragraph 468 Compliance Progress History

FIRST REPORTING PERIOD	SECOND REPORTING PERIOD	THIRD REPORTING PERIOD
SEPTEMBER 1, 2019 – AUGUST 31, 2019	SEPTEMBER 1, 2019 – FEBRUARY 29, 2020	MARCH 1, 2020 – DECEMBER 31, 2020
COMPLIANCE PROGRESS:	COMPLIANCE PROGRESS:	COMPLIANCE PROGRESS:
Not Applicable	Status Update	None
FOURTH REPORTING PERIOD	**FIFTH REPORTING PERIOD**	**SIXTH REPORTING PERIOD**
JANUARY 1, 2021 – JUNE 30, 2021	JULY 1, 2021 – DECEMBER 31, 2021	JANUARY 1, 2022 – JUNE 30, 2022
COMPLIANCE PROGRESS:	COMPLIANCE PROGRESS:	COMPLIANCE PROGRESS:
None	None	None

Accountability and Transparency: ¶469

469. *The City, COPA, and CPD recognize the negative impact of actual bias or the appearance of bias on the legitimacy of administrative investigations. For that reason, conflicts of interest in administrative investigations will be identified and prohibited. The City, COPA, and CPD will ensure the following: a. COPA, BIA, and district personnel will not be assigned to conduct any investigation that could create a conflict of interest; b. an investigation may not be conducted by any supervisor or CPD member who allegedly authorized, engaged in conduct that led to, witnessed, or otherwise allegedly participated in the incident giving rise to the complaint, or who has a conflict of interest as defined by CPD policy or this Agreement. No such person may participate in making any disciplinary recommendations with respect to the investigation; c. no CPD member who has an external business relationship or close personal relationship with an involved CPD member or witness in an administrative investigation will conduct or review the administrative investigation. No such person may participate in making any disciplinary recommendations with respect to the misconduct investigation including in the determination of any applicable grievance or appeal arising from any discipline; and d. no CPD member will participate in making any disciplinary decisions or recommendations with respect to any person to whom he or she directly reports to in his or her chain of command. In cases where CPD is unable to meet this requirement, the investigation must be transferred to OIG.*

Compliance Progress

(Reporting Period: January 1, 2022, through June 30, 2022)

Preliminary:		***Not in Compliance***[121]
	CPD	***Not in Compliance***
	COPA	***In Compliance*** **(THIRD REPORTING PERIOD)**
Secondary:		***Not in Compliance***
	CPD	***Not Yet Assessed***
	COPA	***Not in Compliance***
Full:		***Not Yet Assessed***

[121] As referenced above, the Consent Decree requires actions by various City entities, including the CPD, COPA, the Police Board, and the Office of the Inspector General. Ultimately, the City is responsible for ensuring compliance. As a result, if a Consent Decree paragraph requires actions by multiple City entities, we will not find that the City has met Preliminary, Secondary, or Full compliance until all those entities have met the corresponding level of compliance. Nonetheless, for some paragraphs, we will clarify compliance assessments for each entity to demonstrate which benchmarks have been met.

The City did not reach Preliminary compliance with ¶469 in the sixth reporting period. The CPD has not finalized policy that covers all requirements of this paragraph. COPA has maintained Preliminary compliance but not yet provided evidence of Secondary compliance. Because all relevant City entities must reach levels of compliance to bring the City, as a whole, into compliance, the City has not yet reached Preliminary compliance.

To evaluate Preliminary compliance with ¶469, the IMT reviewed the CPD's and COPA's relevant policies and documents following the process described in the Consent Decree (¶¶626–41), which outlines applicable consultation, resolution, workout, and public comment periods.[122] To evaluate Secondary compliance, the IMT reviewed the entities' training development, implementation, and evaluation (¶286).

Progress before the Sixth Reporting Period

In previous reporting periods, the CPD produced a few draft policies that relate to the requirements of ¶469. Most recently, in the fifth reporting period, the CPD provided a draft of BIA's Unit Directive, *Initial Responsibilities in Assigned Log Number Investigations*, and draft of BIA's Unit Directive, *Conflicts of Interest*.[123] Together these draft Unit Directives addressed the requirements of this paragraph, but these Unit Directives were never posted for public comment and finalized as is required to achieve Preliminary Compliance. In addition to these Unit Directives, the CPD submitted, revised, publicly posted, and finalized General Order G08-01-03, *Conflict of Interest*. The finalization of G08-01-03 did not move the CPD into Preliminary Compliance, though, because while it addressed the requirements of ¶469(a), (c), and (d), G08-01-03 did not cover the requirements of ¶469(b).

COPA reached Preliminary compliance with ¶469 in the fifth reporting period by finalizing its *Conflict of Interest and Recusal* Policy, which addressed all requirements of ¶469.

[122] The OAG, the City, and the IMT agreed to a stipulation that provides a different review process for review of COPA policies and training materials. *See Stipulation Regarding the Policy and Training Review Process for COPA*, *Illinois v. Chicago*, Case No. 1:17-cv-06260 (Jan. 30, 2020). The review process in the Stipulation mirrors the review process under ¶¶626–41, but among other things, gives the OAG and the IMT a shorter timeframe for review of COPA policies and training materials.

[123] In the sixth reporting period, the CPD informed the IMT and the OAG that BIA would begin to move away from Unit Directives. Instead of Unit Directives, instruction will be provided in General Orders and Special Orders. This applies to the BIA Unit Directives that we reviewed, and in some instances provided no-objection notices to in previous reporting periods. This process of incorporating Unit Directives into General Orders and Special Orders is ongoing.

Progress in the Sixth Reporting Period

In the sixth reporting period, the CPD did not provide any additional policies related to ¶469. In particular, the CPD will need to include ¶469(b)'s requirements in policy to reach Preliminary compliance with this paragraph. Although finalized policies do not yet cover all of ¶469's requirements, the CPD began working on developing training relevant to ¶469. The CPD submitted draft BIA eLearning materials which were still in draft stage and not in final presentation form. We look forward to reviewing further developed BIA eLearning materials in the next reporting period. We hope that the CPD will include the requirements of ¶469(b) in finalized policy shortly and be sure to also train on these requirements in this training once it is in presentation-ready form.

COPA maintained Preliminary compliance with ¶469 in the sixth reporting period but did not provide materials in the sixth reporting period to demonstrate efforts toward Secondary compliance with this paragraph.

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The City did not reach Preliminary compliance with ¶469 in the sixth reporting period. The CPD will need to incorporate ¶469(b)'s requirements into policy. We also hope to see continued development of the BIA eLearning materials in the coming reporting period. As for COPA, we look forward to reviewing training materials instructing compliance with ¶469 and COPA's relevant policies.

Paragraph 469 Compliance Progress History

FIRST REPORTING PERIOD	SECOND REPORTING PERIOD	THIRD REPORTING PERIOD
SEPTEMBER 1, 2019 – AUGUST 31, 2019	SEPTEMBER 1, 2019 – FEBRUARY 29, 2020	MARCH 1, 2020 – DECEMBER 31, 2020
COMPLIANCE PROGRESS:	COMPLIANCE PROGRESS:	COMPLIANCE PROGRESS:
Not Applicable	Status Update	None

FOURTH REPORTING PERIOD	FIFTH REPORTING PERIOD	SIXTH REPORTING PERIOD
JANUARY 1, 2021 – JUNE 30, 2021	JULY 1, 2021 – DECEMBER 31, 2021	JANUARY 1, 2022 – JUNE 30, 2022
COMPLIANCE PROGRESS:	COMPLIANCE PROGRESS:	COMPLIANCE PROGRESS:
None	None	None

Accountability and Transparency: ¶470

470. *The City will ensure that COPA arrives at the investigative findings and recommendations within 180 days of the initiation of the investigation. Any request for an extension of time must be approved in writing by the Chief Administrator of COPA, or his or her designee, who must provide a short explanation of the reason(s) for granting or denying the extension.*

Compliance Progress

(Reporting Period: January 1, 2022, through June 30, 2022)

Preliminary:	***In Compliance*** **(FOURTH REPORTING PERIOD)**
Secondary:	***Not in Compliance***
Full:	***Not Yet Assessed***

The City and COPA maintained Preliminary compliance with ¶470 but did not reach Secondary compliance in the sixth reporting period.

To evaluate Preliminary compliance with ¶470, the IMT reviewed COPA's relevant policies and documents following the process described in the Consent Decree (¶¶626–41), which outlines applicable consultation, resolution, workout, and public comment periods.[124] To evaluate Secondary compliance, the IMT reviewed COPA's training development, implementation, and evaluation (¶286).

Progress before the Sixth Reporting Period

In the fourth reporting period, COPA produced for review and finalized 3.2.2, *Timeliness Benchmarks*. This policy completely covers the requirements of ¶470 and brought COPA into Preliminary compliance. COPA did not produce evidence of steps toward Secondary compliance with ¶470 in the fifth reporting period.

Progress in the Sixth Reporting Period

COPA maintained Preliminary compliance with ¶470 in the sixth reporting period but did not submit evidence of compliance toward Secondary compliance. We will look forward to receiving training materials for review that are relevant to ¶470's requirements in upcoming reporting periods.

[124] The OAG, the City, and the IMT agreed to a stipulation that provides a different review process for review of COPA policies and training materials. *See Stipulation Regarding the Policy and Training Review Process for COPA*, *Illinois v. Chicago*, Case No. 1:17-cv-06260 (Jan. 30, 2020). The review process in the Stipulation mirrors the review process under ¶¶626–41, but among other things, gives the OAG and the IMT a shorter timeframe for review of COPA policies and training materials.

Paragraph 470 Compliance Progress History

FIRST REPORTING PERIOD
SEPTEMBER 1, 2019 – AUGUST 31, 2019
COMPLIANCE PROGRESS:
Not Applicable

SECOND REPORTING PERIOD
SEPTEMBER 1, 2019 – FEBRUARY 29, 2020
COMPLIANCE PROGRESS:
Not Applicable

THIRD REPORTING PERIOD
MARCH 1, 2020 – DECEMBER 31, 2020
COMPLIANCE PROGRESS:
Not Applicable

FOURTH REPORTING PERIOD
JANUARY 1, 2021 – JUNE 30, 2021
COMPLIANCE PROGRESS:
Preliminary

FIFTH REPORTING PERIOD
JULY 1, 2021 – DECEMBER 31, 2021
COMPLIANCE PROGRESS:
Preliminary

SIXTH REPORTING PERIOD
JANUARY 1, 2022 – JUNE 30, 2022
COMPLIANCE PROGRESS:
Preliminary

Accountability and Transparency: ¶471

471. *The City and CPD will ensure that BIA arrives at the investigative findings and recommendations within 180 days of the initiation of the investigation. Any request for an extension of time must be approved in writing by the Chief of BIA or his or her designee.*

Compliance Progress (Reporting Period: January 1, 2022, through June 30, 2022)

Preliminary:	***In Compliance*** **(FIFTH REPORTING PERIOD)**
Secondary:	***Not in Compliance***
Full:	***Not Yet Assessed***

The City and the CPD maintained Preliminary compliance with ¶471 in the sixth reporting period. The City and the CPD made progress toward but did not reach Secondary compliance.

To evaluate Preliminary compliance with ¶471, the IMT reviewed the CPD's relevant policies and documents following the process described in the Consent Decree (¶¶626–41), which outlines applicable consultation, resolution, workout, and public comment periods. To evaluate Secondary compliance, the IMT reviewed the entities' training development, implementation, and evaluation (¶286).

Progress before the Sixth Reporting Period

In the fifth reporting period, the CPD reached Preliminary compliance with ¶471 when it revised, submitted for public comment, and finalized Special Order S08-01, which fully addressed ¶471. The CPD also produced BIA's *2020 Audit* in the fifth reporting period, which recognized that the CPD was not yet in operational compliance with the requirements of ¶471. We appreciated the honest self-assessment present in the *2020 Audit* and overall believed the *2020 Audit* was well done. We noted, however, that the *2020 Audit* was produced several months too late and encouraged the CPD to compile and produce these audits in a timelier manner not only for purposes of demonstrating compliance, but also to allow the CPD to identify areas on which it needs to focus its efforts and attention.

Progress in the Sixth Reporting Period

This reporting period the City and the CPD provided drafts of Special Order S08-01-02, *Investigation Timelines and Benchmarks*.[125] We submitted a no-objection

[125] In the sixth reporting period, the CPD informed the IMT and the OAG that BIA would begin to move away from Unit Directives. Instead of Unit Directives, instruction will be provided in General Orders and Special Orders. This applies to the BIA Unit Directives that we reviewed, and in some instances provided no-objection notices to in previous reporting periods. The CPD

notice with comments on June 3, 2022, and observed that the policy addressed the requirements of ¶471.[126] Thereafter, on June 15, 2022, the City and the CPD provided a revised draft of S08-01-02. This revised draft removed important language from the policy, and we pointed this out in additional comments provided to the CPD on June 29, 2022. On June 30, 2022, the last day of the reporting period, the CPD submitted a further revised version. Therefore, this policy remained in the collaborative review and revision process at the end of the sixth reporting period.

In addition to S08-01-02, the CPD also submitted Special Order S08-01-06, *Supervisor Responsibilities in Log Number Investigations*. But when this Special Order was submitted, the CPD indicated that this Special Order was not submitted "to demonstrate compliance with Consent Decree paragraphs, and the CPD is not seeking review of this policy at this time." Nonetheless, we reviewed the policy and provided comments on June 15, 2022, expressing our desire to receive a final draft of this policy for review under ¶627. We observed that Section IV.A.10 of the draft policy reinforces the principles of ¶471.

Beyond draft policies, the CPD also submitted draft BIA eLearning materials for review. These materials were still in draft stage and not in final presentation form. The IMT submitted feedback on May 6, 2022. We look forward to reviewing further developed BIA eLearning materials in the next reporting period.

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The CPD did not yet reach Secondary compliance, but made significant efforts related to this paragraph in the sixth reporting period. We anticipate that the CPD will be able to finalize its policies in the seventh reporting period to obtain Preliminary compliance. We also look forward to reviewing revised eLearning materials.

began this process in sixth reporting period, and incorporated instruction previously included in the BIA Directive *Investigative Timelines and Benchmarks* Unit Directive into S08-01-02. This process of incorporating Unit Directives into General Orders and Special Orders is ongoing.

[126] Under the Consent Decree policy review process, the City and the CPD consult with the IMT and the OAG to develop or revise policies in accordance with Consent Decree requirements. *See* ¶¶626–37. The City and the CPD provide the policy for review at least 30 days before the policy is scheduled to go into effect, and the IMT and the OAG have 30 days to comment on the policy. *See* ¶¶627–28. The City, the CPD, the IMT, and the OAG then work together to resolve comments. The IMT and the OAG will, separately and in writing, notify the City and the CPD that they no longer have any comments, which is referred to as a "no-objection notice." Once the City and the CPD receive a no-objection notice from both the IMT and the OAG, the City and the CPD will begin the process of finalizing the policy. Typically, this includes the CPD posting the policy on its website for public comment for at least 15 days. The City and the CPD must then consider those comments and make additional changes, as appropriate. *See* ¶633.

Paragraph 471 Compliance Progress History

FIRST REPORTING PERIOD
SEPTEMBER 1, 2019 – AUGUST 31, 2019
COMPLIANCE PROGRESS:
Not Applicable

SECOND REPORTING PERIOD
SEPTEMBER 1, 2019 – FEBRUARY 29, 2020
COMPLIANCE PROGRESS:
Not Applicable

THIRD REPORTING PERIOD
MARCH 1, 2020 – DECEMBER 31, 2020
COMPLIANCE PROGRESS:
Not Applicable

FOURTH REPORTING PERIOD
JANUARY 1, 2021 – JUNE 30, 2021
COMPLIANCE PROGRESS:
None

FIFTH REPORTING PERIOD
JULY 1, 2021 – DECEMBER 31, 2021
COMPLIANCE PROGRESS:
Preliminary

SIXTH REPORTING PERIOD
JANUARY 1, 2022 – JUNE 30, 2022
COMPLIANCE PROGRESS:
Preliminary

Accountability and Transparency: ¶472

472. *The City and CPD will ensure that the districts arrive at the investigative findings and recommendations within 90 days of the initiation of an investigation. Any request for an extension of time must be approved in writing by the appropriate District Commander.*

Compliance Progress (Reporting Period: January 1, 2022, through June 30, 2022)

Preliminary:	***In Compliance* (FIFTH REPORTING PERIOD)**
Secondary:	***Not in Compliance***
Full:	***Not Yet Assessed***

The City and the CPD maintained Preliminary compliance with ¶472 in the sixth reporting period but did not yet reach Secondary compliance.

To evaluate Preliminary compliance with ¶472, the IMT reviewed the CPD's relevant policies and documents following the process described in the Consent Decree (¶¶626–41), which outlines applicable consultation, resolution, workout, and public comment periods. To evaluate Secondary compliance, the IMT reviewed the CPD's training development, implementation, and evaluation (¶286).

Progress before the Sixth Reporting Period

In the fifth reporting period, the CPD reached Preliminary compliance by revising, submitting for public comment, and finalizing Special Order S08-01, *Complaint and Disciplinary Investigators and Investigations*, which fully addressed ¶472.[127] The CPD also produced BIA's *2020 Audit*, in which the CPD recognized that CPD was not yet in a place to reach operational compliance because the Case Management System did not yet have a field for the appropriate District Commander to approve requests for extensions of time in writing. We appreciated the CPD's honest self-assessment and encouraged the CPD to continue to produce high-quality audits, but in a more timely manner, not only for purposes of demonstrating compliance, but also to allow the CPD to identify areas in which it needs to focus its efforts and attention.

[127] In earlier reporting periods, the CPD had also produced a draft BIA Unit Directive, *Case Management System*. In the sixth reporting period, the CPD informed the IMT and the OAG that BIA would begin to move away from Unit Directives. Instead of Unit Directives, instruction will be provided in General Orders and Special Orders. This applies to the BIA Unit Directives that we reviewed, and in some instances provided no-objection notices to in previous reporting periods. The CPD began this process in the sixth reporting period. This process of incorporating Unit Directives into General Orders and Special Orders is ongoing.

The IMT also reviewed BIA Unit Directive, *Case Management System*, but this directive only partially addressed the requirements of ¶472 and remained in revision at the end of the fourth reporting period. The CPD also submitted training materials toward Secondary compliance, but the training provided lacked detail and was in need of further revision.

Progress in the Sixth Reporting Period

While the CPD reached Preliminary compliance with this paragraph by finalizing S08-01, the CPD produced additional draft policies this reporting period that are relevant to the requirements of ¶472. In particular, the City and the CPD provided drafts of S08-01-02, *Investigation Timelines and Benchmarks.*[128] We submitted a no-objection notice with comments on June 3, 2022, and observed that the policy addressed the requirements of ¶472.[129] The City and the CPD then provided a revised version on June 15, 2022, which removed important language from the policy. We provided comments on June 29, 2022. On June 30, 2022, the last day of the reporting period, the CPD submitted a further revised version. Therefore, this policy remained in the collaborative review and revision process at the end of the sixth reporting period. We appreciate the CPD incorporating the requirements of the Consent Decree into various policies as it reinforces Consent Decree principles, and we encourage the CPD to continue to track and indicate when draft policies relate to a Consent Decree principle or requirement.

Related to Secondary compliance, the CPD submitted draft BIA eLearning materials for review. These materials were still in draft stage and not in final presentation form. The IMT submitted feedback on May 6, 2022. We look forward to reviewing further developed BIA eLearning materials in the next reporting period.

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128 In the sixth reporting period, the CPD informed the IMT and the OAG that BIA would begin to move away from Unit Directives. Instead of Unit Directives, instruction will be provided in General Orders and Special Orders. This applies to the BIA Unit Directives that we reviewed, and in some instances provided no-objection notices to in previous reporting periods. The CPD began this process in the sixth reporting period, and incorporated instruction previously included in the BIA Directive Investigative Timelines and Benchmarks Unit Directive into S08-01-02. This process of incorporating Unit Directives into General Orders and Special Orders is ongoing.

129 Under the Consent Decree policy review process, the City and the CPD consult with the IMT and the OAG to develop or revise policies in accordance with Consent Decree requirements. See ¶¶626–37. The City and the CPD provide the policy for review at least 30 days before the policy is scheduled to go into effect, and the IMT and the OAG have 30 days to comment on the policy. See ¶¶627–28. The City, the CPD, the IMT, and the OAG then work together to resolve comments. The IMT and the OAG will, separately and in writing, notify the City and the CPD that they no longer have any comments, which is referred to as a "no-objection notice." Once the City and the CPD receive a no-objection notice from both the IMT and the OAG, the City and the CPD will begin the process of finalizing the policy. Typically, this includes the CPD posting the policy on its website for public comment for at least 15 days. The City and the CPD must then consider those comments and make additional changes, as appropriate. See ¶633.

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With this, the CPD maintained Preliminary compliance and began making efforts toward Secondary compliance. We look forward to reviewing revised BIA eLearning materials in the seventh reporting period.

Paragraph 472 Compliance Progress History

FIRST REPORTING PERIOD	SECOND REPORTING PERIOD	THIRD REPORTING PERIOD
SEPTEMBER 1, 2019 – AUGUST 31, 2019	SEPTEMBER 1, 2019 – FEBRUARY 29, 2020	MARCH 1, 2020 – DECEMBER 31, 2020
COMPLIANCE PROGRESS:	COMPLIANCE PROGRESS:	COMPLIANCE PROGRESS:
Not Applicable	Not Applicable	Status Update

FOURTH REPORTING PERIOD	FIFTH REPORTING PERIOD	SIXTH REPORTING PERIOD
JANUARY 1, 2021 – JUNE 30, 2021	JULY 1, 2021 – DECEMBER 31, 2021	JANUARY 1, 2022 – JUNE 30, 2022
COMPLIANCE PROGRESS:	COMPLIANCE PROGRESS:	COMPLIANCE PROGRESS:
None	Preliminary	Preliminary

Accountability and Transparency: ¶473

473. *The City will ensure that if COPA does not arrive at the investigative findings and recommendations within 180 days, the Chief Administrator of COPA, or his or her designee, will notify, within five days after the end of the 180-day period, the Mayor or his or her designee, the Superintendent, the Chairman of the City Council Committee on Public Safety, the complainant or his or her representative, and the involved CPD member, or his or her counsel (unless such notification would compromise the integrity of the investigation). Such notification will include the reasons the administrative investigation has not concluded within 180 days. COPA will update such notice every 180 days until the administrative investigation is completed.*

Compliance Progress (Reporting Period: January 1, 2022, through June 30, 2022)

Preliminary:	***In Compliance*** **(FOURTH REPORTING PERIOD)**
Secondary:	***Not in Compliance***
Full:	***Not Yet Assessed***

In the sixth reporting period, the City and COPA maintained Preliminary compliance with ¶473.

To evaluate Preliminary compliance with ¶473, the IMT reviewed COPA's relevant policies and documents following the process described in the Consent Decree (¶¶626–41), which outlines applicable consultation, resolution, workout, and public comment periods.[130] To evaluate Secondary compliance, the IMT reviewed COPA's training development, implementation, and evaluation (¶286).

Progress before the Sixth Reporting Period

In the fourth reporting period, COPA provided for review Policy 3.2.2, *Timeliness Benchmarks*. This policy completely addressed the requirements for ¶473. This policy was finalized at the end of the previous reporting period, which allowed COPA to achieve Preliminary compliance. COPA did not produce evidence of steps toward Secondary compliance with ¶473 in the fifth reporting period.

[130] The OAG, the City, and the IMT agreed to a stipulation that provides a different review process for review of COPA policies and training materials. *See Stipulation Regarding the Policy and Training Review Process for COPA*, *Illinois v. Chicago*, Case No. 1:17-cv-06260 (Jan. 30, 2020). The review process in the Stipulation mirrors the review process under ¶¶626–41, but among other things, gives the OAG and the IMT a shorter timeframe for review of COPA policies and training materials.

Progress in the Sixth Reporting Period

COPA did not submit any materials related to ¶473 in the sixth reporting period, but we understand that COPA is working toward producing its *Information Systems* standard operating procedure in the future to move COPA toward Secondary compliance.

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COPA maintained Preliminary compliance with ¶473. We look forward to reviewing training and instructional materials related to ¶473 in the coming reporting periods.

Paragraph 473 Compliance Progress History

FIRST REPORTING PERIOD SEPTEMBER 1, 2019 – AUGUST 31, 2019 COMPLIANCE PROGRESS: Not Applicable	SECOND REPORTING PERIOD SEPTEMBER 1, 2019 – FEBRUARY 29, 2020 COMPLIANCE PROGRESS: Not Applicable	THIRD REPORTING PERIOD MARCH 1, 2020 – DECEMBER 31, 2020 COMPLIANCE PROGRESS: Status Update
FOURTH REPORTING PERIOD JANUARY 1, 2021 – JUNE 30, 2021 COMPLIANCE PROGRESS: Preliminary	FIFTH REPORTING PERIOD JULY 1, 2021 – DECEMBER 31, 2021 COMPLIANCE PROGRESS: Preliminary	SIXTH REPORTING PERIOD JANUARY 1, 2022 – JUNE 30, 2022 COMPLIANCE PROGRESS: Preliminary

Accountability and Transparency: ¶474

474. *CPD will ensure that if BIA does not arrive at the investigative findings and recommendations within 180 days, or an Accountability Sergeant does not arrive at the investigative findings and recommendations within 90 days, BIA will notify, within five days of the end of the designated timeframe, the complainant or complainant representative, and the involved CPD member, or his or her counsel (unless such notification would compromise the integrity of the investigation). Such notification will include the reasons for the inability to complete the administrative investigation within the designated timeframe. BIA or the Accountability Sergeant will update such notice every 90 days until the administrative investigation is completed.*

Compliance Progress

(Reporting Period: January 1, 2022, through June 30, 2022)

Preliminary:	***In Compliance*** **(FIFTH REPORTING PERIOD)**
Secondary:	***Not in Compliance***
Full:	***Not Yet Assessed***

The City and the CPD maintained Preliminary compliance with ¶474 in the sixth reporting period. They also made progress toward but did not yet reach Secondary compliance with ¶474 this reporting period.

To evaluate Preliminary compliance with ¶474, the IMT reviewed CPD's relevant policies and documents following the process described in the Consent Decree (¶¶626–41), which outlines applicable consultation, resolution, workout, and public comment periods. To evaluate Secondary compliance, the IMT reviewed the CPD's training development, implementation, and evaluation (¶286).

Progress before the Sixth Reporting Period

In the fifth reporting period, the CPD reached Preliminary compliance by finalizing Special Order S08-01, *Complaint and Disciplinary Investigators and Investigations*, which addressed ¶474 in Sections V.2 and V.3. The CPD also produced BIA's *2020 Audit*, where the CPD acknowledged that additional work is necessary to reach Full compliance with ¶474. This audit was well done, but we noted that it was released several months too late. We explained that, moving forward, such audits need to be provided in a timelier manner not only for purposes of demonstrating compliance, but also to allow the CPD to identify areas in which it needs to focus its efforts and attention.

Progress in the Sixth Reporting Period

While the CPD reached Preliminary compliance with this paragraph by finalizing S08-01, the CPD produced additional draft policies this reporting period that are relevant to the requirements of ¶474. Specifically, the City and the CPD provided drafts of S08-01-02, *Investigation Timelines and Benchmarks*.[131] We submitted a no-objection notice with comments on June 3, 2022, and observed that the policy completely addressed the requirements of ¶474.[132] The City and the CPD then provided a revised version on June 15, 2022 which removed important language from the policy. We provided comments on June 29, 2022. On June 30, 2022, the last day of the reporting period, the CPD submitted a further revised version. Therefore, this policy remained in the collaborative review and revision process at the end of the sixth reporting period. We appreciate the CPD incorporating the requirements of the Consent Decree into various policies as it reinforces Consent Decree principles, and we encourage the CPD to continue to track and indicate when draft policies relate to a Consent Decree principle or requirement.

Moving toward Secondary compliance in the sixth reporting period, the CPD submitted draft BIA eLearning materials for review. These materials were still in draft stage and not in final presentation form. The IMT submitted feedback on May 6, 2022. We look forward to reviewing revised BIA eLearning training materials in the seventh reporting period.

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With this the City and the CPD maintained Preliminary compliance and made progress toward Secondary compliance with ¶474.

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131 In the sixth reporting period, the CPD informed the IMT and the OAG that BIA would begin to move away from Unit Directives. Instead of Unit Directives, instruction will be provided in General Orders and Special Orders. This applies to the BIA Unit Directives that we reviewed, and in some instances provided no-objection notices to in previous reporting periods. The CPD began this process in the sixth reporting period, and incorporated instruction previously included in the BIA Directive Investigative Timelines and Benchmarks Unit Directive into S08-01-02. This process of incorporating Unit Directives into General Orders and Special Orders is ongoing.

132 Under the Consent Decree policy review process, the City and the CPD consult with the IMT and the OAG to develop or revise policies in accordance with Consent Decree requirements. See ¶¶626–37. The City and the CPD provide the policy for review at least 30 days before the policy is scheduled to go into effect, and the IMT and the OAG have 30 days to comment on the policy. See ¶¶627–28. The City, the CPD, the IMT, and the OAG then work together to resolve comments. The IMT and the OAG will, separately and in writing, notify the City and the CPD that they no longer have any comments, which is referred to as a "no-objection notice." Once the City and the CPD receive a no-objection notice from both the IMT and the OAG, the City and the CPD will begin the process of finalizing the policy. Typically, this includes the CPD posting the policy on its website for public comment for at least 15 days. The City and the CPD must then consider those comments and make additional changes, as appropriate. See ¶633.

Paragraph 474 Compliance Progress History

FIRST REPORTING PERIOD	SECOND REPORTING PERIOD	THIRD REPORTING PERIOD
SEPTEMBER 1, 2019 – AUGUST 31, 2019	SEPTEMBER 1, 2019 – FEBRUARY 29, 2020	MARCH 1, 2020 – DECEMBER 31, 2020
COMPLIANCE PROGRESS:	COMPLIANCE PROGRESS:	COMPLIANCE PROGRESS:
Not Applicable	Not Applicable	Status Update

FOURTH REPORTING PERIOD	FIFTH REPORTING PERIOD	SIXTH REPORTING PERIOD
JANUARY 1, 2021 – JUNE 30, 2021	JULY 1, 2021 – DECEMBER 31, 2021	JANUARY 1, 2022 – JUNE 30, 2022
COMPLIANCE PROGRESS:	COMPLIANCE PROGRESS:	COMPLIANCE PROGRESS:
None	Preliminary	Preliminary

Accountability and Transparency: ¶475

475. *The City and CPD will undertake best efforts to ensure that the identities of complainants are not revealed to the involved CPD member prior to the CPD member's interrogation.*

Compliance Progress (Reporting Period: January 1, 2022, through June 30, 2022)

Preliminary:		***In Compliance*** **(FIFTH REPORTING PERIOD)**[133]
	CPD	***In Compliance*** **(FIFTH REPORTING PERIOD)**
	COPA	***In Compliance*** **(FIFTH REPORTING PERIOD)**
Secondary:		***Not in Compliance***
	CPD	***Not in Compliance***
	COPA	***Not in Compliance***
Full:		***Not Yet Assessed***

The City maintained Preliminary compliance through the efforts of the CPD and COPA. However, the City has not yet reached Secondary compliance with ¶475.

To evaluate Preliminary compliance with ¶475, the IMT reviewed the CPD's and COPA's relevant policies and documents following the process described in the Consent Decree (¶¶626–41), which outlines applicable consultation, resolution, workout, and public comment periods.[134] To evaluate Secondary compliance, the IMT reviewed the entities' training development, implementation, and evaluation (¶286).

Progress before the Sixth Reporting Period

In the fifth reporting period, the CPD reached Preliminary compliance with ¶475 provided revised drafts of Special Order S08-01, *Complaint and Disciplinary Investigators and Investigations*, which addressed the requirements of ¶475. The IMT provided a no-objection notice in December 2021.[135] Thereafter, the CPD posted

[133] As referenced above, the Consent Decree requires actions by various City entities, including the CPD, COPA, the Police Board, and the Office of the Inspector General. Ultimately, the City is responsible for ensuring compliance. As a result, if a Consent Decree paragraph requires actions by multiple City entities, we will not find that the City has met Preliminary, Secondary, or Full compliance until all those entities have met the corresponding level of compliance. Nonetheless, for some paragraphs, we will clarify compliance assessments for each entity to demonstrate which benchmarks have been met.

[134] The OAG, the City, and the IMT agreed to a stipulation that provides a different review process for review of COPA policies and training materials. *See Stipulation Regarding the Policy and Training Review Process for COPA*, *Illinois v. Chicago*, Case No. 1:17-cv-06260 (Jan. 30, 2020). The review process in the Stipulation mirrors the review process under ¶¶626–41, but among other things, gives the OAG and the IMT a shorter timeframe for review of COPA policies and training materials.

[135] Under the Consent Decree policy review process, the City and the CPD consult with the IMT and the OAG to develop or revise policies in accordance with Consent Decree requirements.

the S08-01 for public comment and, on the last day of the reporting period, finalized the S08-01, moving the CPD into Preliminary compliance.

COPA also reached Preliminary compliance with ¶475 in the fifth reporting period by finalizing its Policy 3.1.2(b) *COPA Interviews-Chicago Police Department Members*, which incorporated ¶475's mandate.

Progress before the Sixth Reporting Period

The CPD and COPA maintained Preliminary compliance with ¶475 in the sixth reporting period, but neither provided evidence of efforts toward Secondary compliance with this paragraph in the sixth reporting period. Moving forward, we will look for both the CPD and COPA to providing training materials that include instruction and outline processes to ensure the requirements of ¶475 are put into action. Beyond providing the training materials for review, the entities will have to provide their training to 95% of employees to reach Secondary compliance.

Paragraph 475 Compliance Progress History

FIRST REPORTING PERIOD	SECOND REPORTING PERIOD	THIRD REPORTING PERIOD
SEPTEMBER 1, 2019 – AUGUST 31, 2019	SEPTEMBER 1, 2019 – FEBRUARY 29, 2020	MARCH 1, 2020 – DECEMBER 31, 2020
COMPLIANCE PROGRESS:	COMPLIANCE PROGRESS:	COMPLIANCE PROGRESS:
Not Applicable	Status Update	None
FOURTH REPORTING PERIOD	**FIFTH REPORTING PERIOD**	**SIXTH REPORTING PERIOD**
JANUARY 1, 2021 – JUNE 30, 2021	JULY 1, 2021 – DECEMBER 31, 2021	JANUARY 1, 2022 – JUNE 30, 2022
COMPLIANCE PROGRESS:	COMPLIANCE PROGRESS:	COMPLIANCE PROGRESS:
None	Preliminary	Preliminary

See ¶¶626–37. The City and the CPD provide the policy for review at least 30 days before the policy is scheduled to go into effect, and the IMT and the OAG have 30 days to comment on the policy. *See* ¶¶627–28. The City, the CPD, the IMT, and the OAG then work together to resolve comments. The IMT and the OAG will, separately and in writing, notify the City and the CPD that they no longer have any comments, which is referred to as a "no-objection notice." Once the City and the CPD receive a no-objection notice from both the IMT and the OAG, the City and the CPD will begin the process of finalizing the policy. Typically, this includes the CPD posting the policy on its website for public comment for at least 15 days. The City and the CPD must then consider those comments and make additional changes, as appropriate. *See* ¶633.

Accountability and Transparency: ¶476

476. *The City, CPD, and COPA will require that COPA and BIA supervisors regularly communicate with the investigators under their supervision, including Accountability Sergeants, to evaluate the progress of administrative investigations.*

Compliance Progress (Reporting Period: January 1, 2022, through June 30, 2022)

Preliminary:		***In Compliance*** **(FIFTH REPORTING PERIOD)**[136]
	CPD	***In Compliance*** **(FIFTH REPORTING PERIOD)**
	COPA	***In Compliance*** **(FOURTH REPORTING PERIOD)**
Secondary:		***Not in Compliance***
	CPD	***Not in Compliance***
	COPA	***Not in Compliance***
Full:		***Not Yet Assessed***

In the sixth reporting period, the City maintained Preliminary compliance with ¶476.

To evaluate Preliminary compliance with ¶476, the IMT reviewed the CPD's and COPA's relevant policies and documents following the process described in the Consent Decree (¶¶626–41), which outlines applicable consultation, resolution, workout, and public comment periods.[137] To evaluate Secondary compliance, the IMT reviewed the entities' training development, implementation, and evaluation (¶286).

Progress before the Sixth Reporting Period

Through the efforts of the CPD and COPA, the City reached Preliminary compliance with ¶476 in the fifth reporting period. In the fifth reporting period, the CPD revised and finalized Special Order S08-01, *Complaint and Disciplinary Investigators and Investigations*. This Special Order incorporates the expectations set out by

[136] As referenced above, the Consent Decree requires actions by various City entities, including the CPD, COPA, the Police Board, and the Office of the Inspector General. Ultimately, the City is responsible for ensuring compliance. As a result, if a Consent Decree paragraph requires actions by multiple City entities, we will not find that the City has met Preliminary, Secondary, or Full compliance until all those entities have met the corresponding level of compliance. Nonetheless, for some paragraphs, we will clarify compliance assessments for each entity to demonstrate which benchmarks have been met.

[137] The OAG, the City, and the IMT agreed to a stipulation that provides a different review process for review of COPA policies and training materials. *See Stipulation Regarding the Policy and Training Review Process for COPA*, *Illinois v. Chicago*, Case No. 1:17-cv-06260 (Jan. 30, 2020). The review process in the Stipulation mirrors the review process under ¶¶626–41, but among other things, gives the OAG and the IMT a shorter timeframe for review of COPA policies and training materials.

¶476. Therefore, when the CPD finalized S08-01, it moved into Preliminary compliance. COPA had reached Preliminary compliance with this paragraph by finalizing Policy 3.2.2, *Timeliness Benchmarks* in the fourth reporting period. COPA maintained that Preliminary compliance in the fifth reporting period but did not submit evidence of additional efforts toward Secondary compliance.

Progress in the Sixth Reporting Period

While the CPD reached Preliminary compliance with this paragraph by finalizing S08-01, the CPD produced additional draft policies this reporting period that are relevant to the requirements of ¶476. Specifically, the City and the CPD provided S08-01-06, *Supervisor Responsibilities in Log Number Investigations*. While the CPD stated in its production letter that it was not submitting S08-01-06 "to demonstrate compliance with Consent Decree paragraphs, and the CPD is not seeking review of this policy at this time," we reviewed and submitted comments, noting that we looked forward to receiving a final draft of this policy for review under ¶627.

Multiple sections of this policy address the requirements of ¶476. For example, Section IV.C.9 directs the BIA Commander to regularly communicate with the BIA Supervising Lieutenant regarding the progress of administrative investigations, and Section IV.D.1 directs the BIA Supervising Lieutenant to communicate with investigators to evaluate the progress of investigations. By requiring the BIA Chief to regularly communicate with the BIA Lieutenant regarding the progress of administrative investigations and the BIA Lieutenant to communicate with the investigators regarding the progress of investigations, the CPD has established multiple levels of review and accountability to evaluate the progress of administrative investigations. We appreciate the CPD incorporating the requirements of the Consent Decree into various policies as it reinforces Consent Decree principles, and we encourage the CPD to continue to track and indicate when draft policies relate to a Consent Decree principle or requirement.

COPA maintained Preliminary compliance with ¶476 in the sixth reporting period, but did not submit any materials evidencing efforts toward Secondary compliance with ¶476.

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With this, both the CPD and COPA maintained Preliminary compliance. In future reporting periods, we will look for both entities to provide draft training materials that instruct compliance with ¶476 and the entities' relevant policies.

Paragraph 476 Compliance Progress History

FIRST REPORTING PERIOD SEPTEMBER 1, 2019 – AUGUST 31, 2019	SECOND REPORTING PERIOD SEPTEMBER 1, 2019 – FEBRUARY 29, 2020	THIRD REPORTING PERIOD MARCH 1, 2020 – DECEMBER 31, 2020
COMPLIANCE PROGRESS: Not Applicable	COMPLIANCE PROGRESS: Not Applicable	COMPLIANCE PROGRESS: Status Update
FOURTH REPORTING PERIOD JANUARY 1, 2021 – JUNE 30, 2021	**FIFTH REPORTING PERIOD** JULY 1, 2021 – DECEMBER 31, 2021	**SIXTH REPORTING PERIOD** JANUARY 1, 2022 – JUNE 30, 2022
COMPLIANCE PROGRESS: None	COMPLIANCE PROGRESS: Preliminary	COMPLIANCE PROGRESS: Preliminary

Accountability and Transparency: ¶477

477. *The City and CPD will undertake best efforts to ensure that all complaints, including anonymous complaints, can be the subject of a misconduct investigation.*

Compliance Progress (Reporting Period: January 1, 2022, through June 30, 2022)

Preliminary:		***In Compliance*** **(FOURTH REPORTING PERIOD)**[138]
	CPD	***In Compliance*** **(FOURTH REPORTING PERIOD)**
	COPA	***In Compliance*** **(FOURTH REPORTING PERIOD)**
Secondary:		***Not in Compliance***
	CPD	***Not in Compliance***
	COPA	***Not in Compliance***
Full:		***Not Yet Assessed***

The CPD and COPA maintained Preliminary compliance with ¶477 in the sixth reporting period, but did not reach Secondary compliance.

To evaluate Preliminary compliance with ¶477, the IMT reviewed the CPD's and COPA's relevant policies and documents following the process described in the Consent Decree (¶¶626–41), which outlines applicable consultation, resolution, workout, and public comment periods.[139] To evaluate Secondary compliance, the IMT reviewed the entities' training development, implementation, and evaluation (¶286).

Progress before the Sixth Reporting Period

In previous reporting periods, the CPD finalized General Order G08-01-02, *Complaint Initiation and Log Number Investigation Assignment,* which codified the requirements of ¶477.[140] The CPD also submitted BIA Unit Directives relevant to

[138] As referenced above, the Consent Decree requires actions by various City entities, including the CPD, COPA, the Police Board, and the Office of the Inspector General. Ultimately, the City is responsible for ensuring compliance. As a result, if a Consent Decree paragraph requires actions by multiple City entities, we will not find that the City has met Preliminary, Secondary, or Full compliance until all those entities have met the corresponding level of compliance. Nonetheless, for some paragraphs, we will clarify compliance assessments for each entity to demonstrate which benchmarks have been met.

[139] The OAG, the City, and the IMT agreed to a stipulation that provides a different review process for review of COPA policies and training materials. *See Stipulation Regarding the Policy and Training Review Process for COPA*, *Illinois v. Chicago*, Case No. 1:17-cv-06260 (Jan. 30, 2020). The review process in the Stipulation mirrors the review process under ¶¶626–41, but among other things, gives the OAG and the IMT a shorter timeframe for review of COPA policies and training materials.

[140] The name of this directive has changed twice during the collaborative review and revision process. The first draft was titled *Specific Responsibilities Regarding Allegations of Misconduct*,

¶477: *Requirements of a Complete Investigative File*, and *Administrative Misconduct*.[141] These efforts brought the CPD into Preliminary compliance.

In previous reporting periods, COPA provided for review *Anonymous Complaint Guidance*, which addresses the requirements of ¶477. COPA also finalized its Policy 3.1.2 *Fact Gathering and the Investigative Process*, which addressed the requirements of ¶477. These efforts brought COPA into Preliminary compliance with ¶477.

Progress in the Sixth Reporting Period

Both the CPD and COPA maintained Preliminary compliance in the sixth reporting periods as their policies related to the paragraph remained in place. However, neither the CPD nor COPA submitted evidence of their efforts toward Secondary compliance with ¶477. The CPD did not produce any materials that directly address ¶477 in the sixth reporting period. We look forward to receiving draft training materials that will provide instruction on how to comply with ¶477's mandate.

Paragraph 477 Compliance Progress History

FIRST REPORTING PERIOD SEPTEMBER 1, 2019 – AUGUST 31, 2019 COMPLIANCE PROGRESS: Not Applicable	SECOND REPORTING PERIOD SEPTEMBER 1, 2019 – FEBRUARY 29, 2020 COMPLIANCE PROGRESS: Status Update	THIRD REPORTING PERIOD MARCH 1, 2020 – DECEMBER 31, 2020 COMPLIANCE PROGRESS: None
FOURTH REPORTING PERIOD JANUARY 1, 2021 – JUNE 30, 2021 COMPLIANCE PROGRESS: Preliminary	FIFTH REPORTING PERIOD JULY 1, 2021 – DECEMBER 31, 2021 COMPLIANCE PROGRESS: Preliminary	SIXTH REPORTING PERIOD JANUARY 1, 2022 – JUNE 30, 2022 COMPLIANCE PROGRESS: Preliminary

and the second through the fourth drafts were titled *Initiation and Assignment of Investigations into Allegations of Misconduct*.

141 In the sixth reporting period, the CPD informed the IMT and the OAG that BIA would begin to move away from Unit Directives. Instead of Unit Directives, instruction will be provided in General Orders and Special Orders. This applies to the BIA Unit Directives that we reviewed, and in some instances provided no-objection notices to in previous reporting periods. The CPD began this process in the sixth reporting period and is ongoing.

Accountability and Transparency: ¶478

478. *Within 120 days of the Effective Date, CPD and COPA will each review and revise its policies regarding Preliminary investigations, including Preliminary investigations of anonymous complaints, and the process for seeking an override affidavit in the absence of a signed complainant affidavit.*

Compliance Progress

(Reporting Period: January 1, 2022, through June 30, 2022)

Preliminary:		***Under Assessment***[142]
	CPD	***Under Assessment***
	COPA	***In Compliance*** **(FOURTH REPORTING PERIOD)**
Secondary:		***Not in Compliance***
	CPD	***Not Yet Assessed***
	COPA	***Not in Compliance***
Full:		***Not Yet Assessed***

The City did not reach Preliminary compliance with ¶478 this reporting period. COPA maintained Preliminary compliance but the CPD did not yet reach Preliminary compliance.

To evaluate Preliminary compliance with ¶478, the IMT reviewed the CPD's and COPA's relevant policies and documents following the process described in the Consent Decree (¶¶626–41), which outlines applicable consultation, resolution, workout, and public comment periods.[143] To evaluate Secondary compliance, the IMT reviewed the entities' training development, implementation, and evaluation (¶286).

[142] As referenced above, the Consent Decree requires actions by various City entities, including the CPD, COPA, the Police Board, and the Office of the Inspector General. Ultimately, the City is responsible for ensuring compliance. As a result, if a Consent Decree paragraph requires actions by multiple City entities, we will not find that the City has met Preliminary, Secondary, or Full compliance until all those entities have met the corresponding level of compliance. Nonetheless, for some paragraphs, we will clarify compliance assessments for each entity to demonstrate which benchmarks have been met.

[143] The OAG, the City, and the IMT agreed to a stipulation that provides a different review process for review of COPA policies and training materials. *See Stipulation Regarding the Policy and Training Review Process for COPA*, *Illinois v. Chicago*, Case No. 1:17-cv-06260 (Jan. 30, 2020). The review process in the Stipulation mirrors the review process under ¶¶626–41, but among other things, gives the OAG and the IMT a shorter timeframe for review of COPA policies and training materials.

Progress before the Sixth Reporting Period

In previous reporting periods, the CPD and BIA developed a collection of policies that relate to ¶478. The IMT reviewed all relevant policies and provided no-objection notices to several policies, but these policies were not finalized following the process outlined in the Consent Decree.[144] In the fifth reporting period, the CPD provided revised drafts of Special Order S08-01, *Complaint and Disciplinary Investigators and Investigations*, which only partially addressed the requirements of ¶478. The IMT provided a no-objection notice in December 2021. The CPD posted the S08-01 for public comment and, on the last day of the reporting period, finalized the Special Order. Also in the fifth reporting period, the CPD submitted a draft Special Order S08-01-01, *Conducting Log Number Investigations*, under paragraph ¶478; this remained in the collaborative review and revision process at the end of the fifth reporting period.

COPA reached Preliminary compliance with ¶478 in the fourth reporting period by developing, revising, and finalizing various policies that instruct compliance with ¶478, such as the *Intake* policy.

Progress in the Sixth Reporting Period

Paragraph 478 requires that both the CPD and COPA revise their respective policies regarding and related to preliminary investigations. This implicates a number of policies including those related to complaint intake, preliminary investigations, assignment of investigations, the affidavit override process, and others.

This reporting period, the CPD continued to work on policies implicated by this paragraph. For example, the CPD submitted multiple revised versions of S08-01-04, *Initial Investigatory Responsibilities in Log Number Investigations.*[145] This policy remained in the review and revision process at the close of the sixth reporting

[144] Under the Consent Decree policy review process, the City and the CPD consult with the IMT and the OAG to develop or revise policies in accordance with Consent Decree requirements. *See* ¶¶626–37. The City and the CPD provide the policy for review at least 30 days before the policy is scheduled to go into effect, and the IMT and the OAG have 30 days to comment on the policy. *See* ¶¶627–28. The City, the CPD, the IMT, and the OAG then work together to resolve comments. The IMT and the OAG will, separately and in writing, notify the City and the CPD that they no longer have any comments, which is referred to as a "no-objection notice." Once the City and the CPD receive a no-objection notice from both the IMT and the OAG, the City and the CPD will begin the process of finalizing the policy. Typically, this includes the CPD posting the policy on its website for public comment for at least 15 days. The City and the CPD must then consider those comments and make additional changes, as appropriate. *See* ¶633.

[145] In the sixth reporting period, the CPD informed the IMT and the OAG that BIA would begin to move away from Unit Directives. Instead of Unit Directives, instruction will be provided in General Orders and Special Orders. This applies to the BIA Unit Directives that we reviewed, and in some instances provided no-objection notices to in previous reporting periods. The CPD began this process in sixth reporting period, and incorporated instruction previously included

period. Section III.A of S08-01-04 addresses the requirements of ¶478 in principle, but does not in and of itself address ¶478. But CPD is working on a suite of policies that together, and once finalized, will likely move the CPD into Preliminary compliance. With this policy suite in progress and S08-01 that the CPD finalized last reporting period, the CPD has made significant efforts toward compliance with this paragraph, which has expansive requirements.

Despite having reached Preliminary compliance previously, COPA further revised its *Affidavits, Affidavit Overrides, Exceptions to Affidavit Requirement* policy in the sixth reporting period. Earlier drafts of this policy had been submitted in previous reporting periods and remained in the collaborative review and revision process at the end of the fifth reporting period. The revised policy also addresses the requirements of ¶478. The IMT submitted a no-objection notice to *Affidavits, Affidavit Overrides, Exceptions to Affidavit Requirement* on May 24, 2022. But at the close of the sixth reporting period, this policy remained in the collaborative review and revision process.

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While the CPD made progress toward Preliminary compliance, at this time the CPD's compliance with this paragraph remains under assessment. COPA maintained Preliminary compliance. Moving forward both entities should ensure policies related to ¶478 are finalized and published. After that, trainings should be developed on these policies.

Paragraph 478 Compliance Progress History

FIRST REPORTING PERIOD	SECOND REPORTING PERIOD	THIRD REPORTING PERIOD
SEPTEMBER 1, 2019 – AUGUST 31, 2019	SEPTEMBER 1, 2019 – FEBRUARY 29, 2020	MARCH 1, 2020 – DECEMBER 31, 2020
COMPLIANCE PROGRESS:	COMPLIANCE PROGRESS:	COMPLIANCE PROGRESS:
None	None	None
FOURTH REPORTING PERIOD	**FIFTH REPORTING PERIOD**	**SIXTH REPORTING PERIOD**
JANUARY 1, 2021 – JUNE 30, 2021	JULY 1, 2021 – DECEMBER 31, 2021	JANUARY 1, 2022 – JUNE 30, 2022
COMPLIANCE PROGRESS:	COMPLIANCE PROGRESS:	COMPLIANCE PROGRESS:
None	None	Under Assessment

in the BIA *Initial Responsibilities in Assigned Log Number Investigations* Unit Directive (to which we submitted a no-objection in October 2021) into S08-01-04. This process of incorporating Unit Directives into General Orders and Special Orders is ongoing.

Accountability and Transparency: ¶479

479. *Within 120 days of the Effective Date, CPD and COPA will each adopt or review and, to the extent necessary, revise its policy establishing investigative timelines, benchmarks, and goals by which the progress of investigations will be measured.*

Compliance Progress (Reporting Period: January 1, 2022, through June 30, 2022)

Preliminary:		***Not in Compliance***[146]
	CPD	***Not in Compliance***
	COPA	***In Compliance*** **(FOURTH REPORTING PERIOD)**
Secondary:		***Not in Compliance***
	CPD	***Not Yet Assessed***
	COPA	***Not in Compliance***
Full:		***Not Yet Assessed***

The City made efforts toward but did not ultimately reach Preliminary compliance with ¶479 in the sixth reporting period.

To evaluate Preliminary compliance with ¶479, the IMT reviewed the CPD's and COPA's relevant policies and documents following the process described in the Consent Decree (¶¶626–41), which outlines applicable consultation, resolution, workout, and public comment periods.[147] To evaluate Secondary compliance, the IMT reviewed the entities' training development, implementation, and evaluation (¶286).

Progress before the Sixth Reporting Period

In the fifth reporting period, the CPD finalized Special Order S08-01, *Complaint and Disciplinary Investigators and Investigations*, which partially addressed the requirements of ¶479. The CPD also submitted a draft Special Order S08-01-01, *Con-*

[146] As referenced above, the Consent Decree requires actions by various City entities, including the CPD, COPA, the Police Board, and the Office of the Inspector General. Ultimately, the City is responsible for ensuring compliance. As a result, if a Consent Decree paragraph requires actions by multiple City entities, we will not find that the City has met Preliminary, Secondary, or Full compliance until all those entities have met the corresponding level of compliance. Nonetheless, for some paragraphs, we will clarify compliance assessments for each entity to demonstrate which benchmarks have been met.

[147] The OAG, the City, and the IMT agreed to a stipulation that provides a different review process for review of COPA policies and training materials. *See Stipulation Regarding the Policy and Training Review Process for COPA*, *Illinois v. Chicago*, Case No. 1:17-cv-06260 (Jan. 30, 2020). The review process in the Stipulation mirrors the review process under ¶¶626–41, but among other things, gives the OAG and the IMT a shorter timeframe for review of COPA policies and training materials.

ducting Log Number Investigations, which remained under the collaborative review and revision process at the end of the reporting period. Before the fifth reporting period, the CPD had also provided a draft BIA Unit Directive, *Investigative Timelines and Benchmarks*, which instructed compliance with ¶479. We submitted a no-objection notice to this Unit Directive, but by the end of the fifth reporting period, the CPD and BIA did not finalize this Unit Directive.[148]

In the fourth reporting period, COPA finalized its Policy 3.2.2, *Timeliness Benchmarks*, which addressed all requirements of ¶479. This allowed COPA to achieve Preliminary compliance. In the fifth reporting period, COPA did not produce evidence of steps toward Secondary compliance with ¶479.

Progress in the Sixth Reporting Period

This reporting period, the CPD submitted multiple revised versions of S08-01-05, *Conducting Log Number Investigations*.[149] In the sixth reporting period, the CPD renumbered the policy previously labeled S08-01-01, and it is now S08-01-05. The draft versions of this policy address the requirements of ¶479 by establishing investigative timelines, benchmarks, and goals for the administrative investigative process. Specific timelines are addressed for each step of the process. The CPD submitted a further revised version of S08-01-05 on June 30, 2022, the last day of the reporting period. Therefore, this policy remained in the collaborative review and revision process at the end of the sixth reporting period.

In addition to S08-01-05, the CPD also provided drafts of S08-01-02, *Investigation Timelines and Benchmarks*.[150] We submitted a no-objection notice with comments on June 3, 2022, as the policy completely addresses the requirements of ¶479 by

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148 Under the Consent Decree policy review process, the City and the CPD consult with the IMT and the OAG to develop or revise policies in accordance with Consent Decree requirements. *See* ¶¶626–37. The City and the CPD provide the policy for review at least 30 days before the policy is scheduled to go into effect, and the IMT and the OAG have 30 days to comment on the policy. *See* ¶¶627–28. The City, the CPD, the IMT, and the OAG then work together to resolve comments. The IMT and the OAG will, separately and in writing, notify the City and the CPD that they no longer have any comments, which is referred to as a "no-objection notice." Once the City and the CPD receive a no-objection notice from both the IMT and the OAG, the City and the CPD will begin the process of finalizing the policy. Typically, this includes the CPD posting the policy on its website for public comment for at least 15 days. The City and the CPD must then consider those comments and make additional changes, as appropriate. *See* ¶633.

149 The *Conducting Log Number Investigations* policy was produced in previous reporting periods as S08-01-01. The policy was re-numbered as S08-01-05 when it was produced May 5, 2022.

150 In the sixth reporting period, the CPD informed the IMT and the OAG that BIA would begin to move away from Unit Directives. Instead of Unit Directives, instruction will be provided in General Orders and Special Orders. This applies to the BIA Unit Directives that we reviewed, and in some instances provided no-objection notices to in previous reporting periods. The CPD began this process in sixth reporting period, and incorporated instruction previously included in the BIA Directive Investigative Timelines and Benchmarks Unit Directive into S08-01-02. This process of incorporating Unit Directives into General Orders and Special Orders is ongoing.

establishing investigative timelines, benchmarks, and goals for the administrative investigative process. The City and the CPD then provided a revised version on June 15, 2022, which removed important language from the policy. Thereafter, we provided additional comments on June 29, 2022. On June 30, 2022, the last day of the reporting period, the CPD submitted a further revised version, which remains under review.

COPA maintained Preliminary compliance during the sixth reporting period, but did not submit any materials related to ¶479. However, we anticipate that COPA will produce training materials related to investigative processes for review soon.

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With this, the City did not yet reach Preliminary compliance. Because both policies that incorporate the requirements of ¶479 (S08-01-05 and S08-01-02) remain in the collaborative review and revision process and have not been finalized, the CPD did not yet reach Preliminary compliance. COPA maintained Preliminary compliance but did not move into Secondary compliance.

Paragraph 479 Compliance Progress History

FIRST REPORTING PERIOD	SECOND REPORTING PERIOD	THIRD REPORTING PERIOD
SEPTEMBER 1, 2019 – AUGUST 31, 2019	SEPTEMBER 1, 2019 – FEBRUARY 29, 2020	MARCH 1, 2020 – DECEMBER 31, 2020
COMPLIANCE PROGRESS:	COMPLIANCE PROGRESS:	COMPLIANCE PROGRESS:
None	None	None
FOURTH REPORTING PERIOD	**FIFTH REPORTING PERIOD**	**SIXTH REPORTING PERIOD**
JANUARY 1, 2021 – JUNE 30, 2021	JULY 1, 2021 – DECEMBER 31, 2021	JANUARY 1, 2022 – JUNE 30, 2022
COMPLIANCE PROGRESS:	COMPLIANCE PROGRESS:	COMPLIANCE PROGRESS:
None	None	None

Accountability and Transparency: ¶480

480. *Within 120 days of the Effective Date, the City, CPD, and COPA will each develop a policy establishing procedures for COPA, BIA, and Accountability Sergeant's review and consideration of evidence from civil and criminal litigation.*

Compliance Progress

(Reporting Period: January 1, 2022, through June 30, 2022)

Preliminary:		***Not in Compliance***[151]
	CPD	***Not in Compliance***
	COPA	***Not in Compliance***
Secondary:		***Not Yet Assessed***
Full:		***Not Yet Assessed***

Neither the CPD nor COPA reached Preliminary compliance with ¶480 this reporting period.

To evaluate Preliminary compliance with ¶480, the IMT reviewed the development of the CPD's and COPA's relevant policies and documents following the process described in the Consent Decree (¶¶626–41).[152]

Progress before the Sixth Reporting Period

In previous reporting periods, the CPD provided a letter from BIA to the IMT indicating that work was "underway" related to addressing requirements of ¶480 through a draft policy entitled "City Policy Regarding Procedures for COPA, BIA and the Accountability Sergeant's Review and Consideration of Evidence from Civil and Criminal Litigation." This information was provided in February 2020. We received no additional information regarding the draft policy in the fifth reporting period. However, the CPD provided a draft Special Order S08-01-01, *Conducting Log Num-*

[151] As referenced above, the Consent Decree requires actions by various City entities, including the CPD, COPA, the Police Board, and the Office of the Inspector General. Ultimately, the City is responsible for ensuring compliance. As a result, if a Consent Decree paragraph requires actions by multiple City entities, we will not find that the City has met Preliminary, Secondary, or Full compliance until all those entities have met the corresponding level of compliance. Nonetheless, for some paragraphs, we will clarify compliance assessments for each entity to demonstrate which benchmarks have been met.

[152] The OAG, the City, and the IMT agreed to a stipulation that provides a different review process for review of COPA policies and training materials. *See Stipulation Regarding the Policy and Training Review Process for COPA*, *Illinois v. Chicago*, Case No. 1:17-cv-06260 (Jan. 30, 2020). The review process in the Stipulation mirrors the review process under ¶¶626–41, but among other things, gives the OAG and the IMT a shorter timeframe for review of COPA policies and training materials.

ber Investigations, which addressed ¶480. The IMT provided comments in September 2021 and S08-01-01 remained under the collaborative review and revision process at the end of the reporting period.

Also in the fifth reporting period, COPA finalized 3.2.2 *Timeliness Benchmarks* Policy. This policy provides general timelines related to COPA accomplishing the requirements of ¶480. In addition to this guidance, COPA submitted a draft revised *Civil/Criminal Complaint Review* Policy, which details how COPA personnel are to comply ¶480. By the end of the reporting period, this policy remained in the collaborative review and revision process. We explained that COPA would need to finalize this policy to achieve Preliminary compliance with ¶480.

Progress in the Sixth Reporting Period

The CPD did not produce any evidence of efforts toward compliance with ¶480 in the sixth reporting period.

This reporting period, COPA revised its policy relevant to ¶480: *Civil/Criminal Complaint Review* Policy. This policy details how COPA personnel are to comply ¶480. However this policy remained in the collaborative review and revision process at the end for the sixth reporting period. Therefore, COPA did not yet reach Preliminary compliance with this paragraph.

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Neither the CPD or COPA reached Preliminary compliance with ¶480 in the sixth reporting period. To reach Preliminary compliance, both entities will need to develop and finalize policy incorporating the requirements of ¶480.

Paragraph 480 Compliance Progress History

FIRST REPORTING PERIOD	SECOND REPORTING PERIOD	THIRD REPORTING PERIOD
SEPTEMBER 1, 2019 – AUGUST 31, 2019	SEPTEMBER 1, 2019 – FEBRUARY 29, 2020	MARCH 1, 2020 – DECEMBER 31, 2020
COMPLIANCE PROGRESS:	COMPLIANCE PROGRESS:	COMPLIANCE PROGRESS:
None	None	None
FOURTH REPORTING PERIOD	**FIFTH REPORTING PERIOD**	**SIXTH REPORTING PERIOD**
JANUARY 1, 2021 – JUNE 30, 2021	JULY 1, 2021 – DECEMBER 31, 2021	JANUARY 1, 2022 – JUNE 30, 2022
COMPLIANCE PROGRESS:	COMPLIANCE PROGRESS:	COMPLIANCE PROGRESS:
None	None	None

Accountability and Transparency: ¶481

481. *The City, CPD, and COPA will ensure that if CPD, COPA, or the OIG requests the Superintendent's authorization to open an investigation concerning incidents that allegedly occurred more than five years before the date that COPA, CPD, or the OIG became aware of the allegations, the Superintendent will respond within 30 days.*

Compliance Progress (Reporting Period: January 1, 2022, through June 30, 2022)

Preliminary:		***Not in Compliance***[153]
	CPD	***In Compliance*** **(FIFTH REPORTING PERIOD)**
	COPA	***Not in Compliance***
	OIG	***In Compliance*** **(THIRD REPORTING PERIOD)**
Secondary:		***Not in Compliance***
	CPD	***Not in Compliance***
	COPA	***Not Yet Assessed***
	OIG	***In Compliance*** **(FOURTH REPORTING PERIOD)**
Full:		***Not in Compliance***
	CPD	***Not Yet Assessed***
	COPA	***Not Yet Assessed***
	OIG	***In Compliance*** **(FOURTH REPORTING PERIOD)**

The City did not reach Preliminary compliance with ¶481 in the sixth reporting period because all relevant City entities must reach levels of compliance to bring the City, as a whole, into compliance. COPA has not yet reached Preliminary compliance. CPD maintained Preliminary compliance and the Deputy PSIG maintained Full compliance with ¶481.

To evaluate Preliminary compliance with ¶481, the IMT reviewed the CPD's, COPA's, and the Deputy PSIG's relevant policies and documents following the policy process described in the Consent Decree (¶¶626–41), which outlines applicable consultation, resolution, workout, and public comment periods.[154] For COPA

[153] As referenced above, the Consent Decree requires actions by various City entities, including the CPD, COPA, the Police Board, and the Office of the Inspector General. Ultimately, the City is responsible for ensuring compliance. As a result, if a Consent Decree paragraph requires actions by multiple City entities, we will not find that the City has met Preliminary, Secondary, or Full compliance until all those entities have met the corresponding level of compliance. Nonetheless, for some paragraphs, we will clarify compliance assessments for each entity to demonstrate which benchmarks have been met.

[154] The OAG, the City, and the IMT agreed to a stipulation that provides a different review process for review of COPA policies and training materials. *See Stipulation Regarding the Policy and Training Review Process for COPA*, *Illinois v. Chicago*, Case No. 1:17-cv-06260 (Jan. 30, 2020). The review process in the Stipulation mirrors the review process under ¶¶626–41, but among

specifically, we looked for a policy that explains the process for requesting the Superintendent to authorize opening an investigation for incidents alleged to have occurred more than five years ago.

To evaluate Secondary compliance, the IMT reviewed the entities' training development, implementation, and evaluation (¶286), specifically including training on drafting a request to the Superintendent and monitoring for timely response and feedback from the CPD, COPA, and the Office of the Inspector General regarding the Superintendent's responses to requests to open an investigation older than five years. For Full compliance, we looked for evidence that the entities implemented their policies and trainings such that they receive responses form the Superintendent within 30 days.

Progress before the Sixth Reporting Period

In previous reporting periods, the CPD provided drafts of G08-01, *Complaint and Disciplinary Procedures* and BIA Unit Directive*, Incidents occurring Five Years Prior to Complaint and Reopening Investigations Five Years After Initiation*. These polices were not posted for public comment or finalized at the end of the fourth reporting period.

In the fifth reporting period, the CPD finalized General Order G08-01, *Complaint and Disciplinary Procedures*, which addresses the requirements of ¶481. This brought the CPD into Preliminary compliance. Before this, in earlier reporting periods, the CPD also provided BIA Unit Directive*, Incidents occurring Five Years Prior to Complaint and Reopening Investigations Five Years After Initiation*.[155] This Unit Directive was never finalized.

In past reporting periods, COPA contended that it has no responsibility for ¶481. The IMT suggested that COPA develop a policy which explains the process for requesting that the Superintendent authorize the opening of "an investigation concerning incidents that allegedly occurred more than five years before the date that COPA, CPD, or the Office of the Inspector General became aware of the allegations," and explaining that the Superintendent, under ¶481, must respond within 30 days. In the fifth reporting period, COPA continued to work toward Preliminary compliance by submitting a revised draft of its *Civil/Criminal Complaint Review*

other things, gives the OAG and the IMT a shorter timeframe for review of COPA policies and training materials.

[155] In the sixth reporting period, the CPD informed the IMT and the OAG that BIA would begin to move away from Unit Directives. Instead of Unit Directives, instruction will be provided in General Orders and Special Orders. This applies to the BIA Unit Directives that we reviewed, and in some instances provided no-objection notices to in previous reporting periods. The CPD began this process in sixth reporting period and is ongoing.

Policy that instructs compliance with ¶481. By the end of the reporting period, this policy remained in the collaborative review and revision process.

The Deputy PSIG reached Full compliance in past reporting periods through its *Investigations Section Manual*, which explains the correct procedure for requesting the CPD Superintendent to reopen an investigation pursuant to ¶481. The Deputy PSIG has since maintained Full compliance through submission of its Five Year Letters that it submits to the Superintendent as well as information regarding the Superintendent's response.

Progress in the Sixth Reporting Period

In the sixth reporting period, the CPD maintained Preliminary compliance with ¶481, but did not submit evidence of efforts toward Secondary compliance.

COPA did not submit any further revised policies or other materials related to ¶481 in the sixth reporting period. We anticipate that COPA will continue to work toward finalization of its *Civil/Criminal Complaint Review* Policy in the upcoming reporting periods.

The Deputy PSIG reached Full compliance in past reporting periods through its *Investigations Section Manual*, which explains the correct procedure for requesting the CPD Superintendent to reopen an investigation pursuant to ¶481. The Deputy PSIG has since maintained Full compliance through submission of its Five Year Letters that it submits to the Superintendent, as well as information regarding the Superintendent's response.

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In the sixth reporting period, the City ultimately did not reach Preliminary compliance because COPA has not yet finalized a policy relevant to ¶481's requirements. However, the CPD maintained Preliminary compliance, and the Deputy PSIG maintained Full compliance.

Paragraph 481 Compliance Progress History

FIRST REPORTING PERIOD SEPTEMBER 1, 2019 – AUGUST 31, 2019 COMPLIANCE PROGRESS: None	SECOND REPORTING PERIOD SEPTEMBER 1, 2019 – FEBRUARY 29, 2020 COMPLIANCE PROGRESS: None	THIRD REPORTING PERIOD MARCH 1, 2020 – DECEMBER 31, 2020 COMPLIANCE PROGRESS: None
FOURTH REPORTING PERIOD JANUARY 1, 2021 – JUNE 30, 2021 COMPLIANCE PROGRESS: None	FIFTH REPORTING PERIOD JULY 1, 2021 – DECEMBER 31, 2021 COMPLIANCE PROGRESS: None	SIXTH REPORTING PERIOD JANUARY 1, 2022 – JUNE 30, 2022 COMPLIANCE PROGRESS: None

Accountability and Transparency: ¶482

482. *The City and CPD will ensure that BIA regularly conducts proactive investigations and integrity tests.*

Compliance Progress (Reporting Period: January 1, 2022, through June 30, 2022)

Preliminary:	***In Compliance*** **(FIFTH REPORTING PERIOD)**
Secondary:	***Not in Compliance***
Full:	***Not Yet Assessed***

The City and the CPD maintained Preliminary compliance but did not reach Secondary compliance with ¶482 this reporting period.

To evaluate Preliminary compliance with ¶482, the IMT reviewed the CPD's relevant policies and documents following the policy process described in the Consent Decree (¶¶626–41), which outlines applicable consultation, resolution, workout, and public comment periods. To evaluate Secondary compliance, the IMT reviewed the entities' training development, implementation, and evaluation (¶286), looking specifically for proof that the appropriate BIA staff are trained to conduct investigations and integrity tests in line with policy, and implementation of a system by the City and the CPD to monitor and ensure BIA is completing investigations and tests as required.

Progress before the Sixth Reporting Period

The IMT assessed the City's compliance with ¶482 for the first time in the fifth reporting period. The CPD finalized its General Order G08-01, *Complaint and Disciplinary System*.[156] With this, the CPD achieved Preliminary compliance with ¶482.

Progress in the Sixth Reporting Period

While the CPD maintained Preliminary compliance with ¶482 in the sixth reporting period, the CPD did not submit any materials demonstrating efforts toward Secondary compliance with the paragraph this reporting period. Moving forward, we look forward to reviewing the CPD's training materials that demonstrate that personnel are properly trained to comply with the paragraph's requirements.

[156] The CPD previously submitted this General Order as *Complaint and Disciplinary Procedures*.

Paragraph 482 Compliance Progress History

FIRST REPORTING PERIOD	SECOND REPORTING PERIOD	THIRD REPORTING PERIOD
SEPTEMBER 1, 2019 – AUGUST 31, 2019	SEPTEMBER 1, 2019 – FEBRUARY 29, 2020	MARCH 1, 2020 – DECEMBER 31, 2020
COMPLIANCE PROGRESS:	COMPLIANCE PROGRESS:	COMPLIANCE PROGRESS:
Not Applicable	Not Applicable	Not Applicable
FOURTH REPORTING PERIOD	**FIFTH REPORTING PERIOD**	**SIXTH REPORTING PERIOD**
JANUARY 1, 2021 – JUNE 30, 2021	JULY 1, 2021 – DECEMBER 31, 2021	JANUARY 1, 2022 – JUNE 30, 2022
COMPLIANCE PROGRESS:	COMPLIANCE PROGRESS:	COMPLIANCE PROGRESS:
Not Applicable	Preliminary	Preliminary

Accountability and Transparency: ¶483

483. *The City and CPD will ensure there are regularly conducted satisfaction surveys relating to the complaint intake and investigation processes. The City and CPD will evaluate trends and training opportunities identified as a result of information received from such quality control surveys.*

Compliance Progress (Reporting Period: January 1, 2022, through June 30, 2022)

Preliminary:	***In Compliance*** **(FIFTH REPORTING PERIOD)**
Secondary:	***Not in Compliance***
Full:	***Not Yet Assessed***

In the sixth reporting period, the City and the CPD maintained Preliminary compliance with ¶483 but did not reach Secondary compliance.

To evaluate Preliminary compliance with ¶483, the IMT reviewed the CPD's relevant policies and documents following the policy process described in the Consent Decree (¶¶626–41), which outlines applicable consultation, resolution, workout, and public comment periods. To evaluate Secondary compliance, the IMT reviewed various sources to determine whether individuals responsible for conducting surveys are aware of expectations set by policy and are provided the means to conduct surveys and identify additional training needs.

Progress before the Sixth Reporting Period

The IMT assessed the City's compliance with ¶483 for first time in the fifth reporting period. The CPD finalized Special Order S08-01-04, *Post Investigation Log Number Procedures* for review, which addresses ¶483.[157] With this, the CPD achieved Preliminary compliance.

Progress in the Sixth Reporting Period

In the sixth reporting period, the CPD maintained Preliminary compliance with ¶483. We note that the CPD has indicated its intention to renumber this policy to S08-01-08. We understand that this change has not yet occurred and in the meantime S08-01-04 remains published and in place. When this transition occurs the CPD should ensure that this change is clear to all members and the public. The CPD did not provide evidence relevant to Secondary compliance with ¶483. Moving forward, we will look for the CPD to provide training materials that include instruction to ensure personnel know how to comply with the requirements of ¶483.

[157] The CPD previously submitted this Special Order under the title *Documenting Log Number Investigations and Post Investigations Procedures*.

Paragraph 483 Compliance Progress History

FIRST REPORTING PERIOD	SECOND REPORTING PERIOD	THIRD REPORTING PERIOD
SEPTEMBER 1, 2019 – AUGUST 31, 2019	SEPTEMBER 1, 2019 – FEBRUARY 29, 2020	MARCH 1, 2020 – DECEMBER 31, 2020
COMPLIANCE PROGRESS:	COMPLIANCE PROGRESS:	COMPLIANCE PROGRESS:
Not Applicable	Not Applicable	Not Applicable
FOURTH REPORTING PERIOD	**FIFTH REPORTING PERIOD**	**SIXTH REPORTING PERIOD**
JANUARY 1, 2021 – JUNE 30, 2021	JULY 1, 2021 – DECEMBER 31, 2021	JANUARY 1, 2022 – JUNE 30, 2022
COMPLIANCE PROGRESS:	COMPLIANCE PROGRESS:	COMPLIANCE PROGRESS:
Not Applicable	Preliminary	Preliminary

Accountability and Transparency: ¶484

484. *If at any time during the intake or investigation of a complaint, COPA, BIA, or Accountability Sergeants find evidence indicating criminal conduct by any CPD member, the Chief Administrator of COPA or Chief of BIA will refer the investigation to the appropriate prosecuting agency.*

Compliance Progress (Reporting Period: January 1, 2022, through June 30, 2022)

Preliminary:		***Not in Compliance***[158]
	CPD	***Not in Compliance***
	COPA	***In Compliance*** **(FOURTH REPORTING PERIOD)**
Secondary:		***Not in Compliance***
	CPD	***Not Yet Assessed***
	COPA	***Not in Compliance***
Full:		***Not Yet Assessed***

In the sixth reporting period, the City did not reach Preliminary compliance with ¶484. The CPD continues to work toward Preliminary compliance. COPA maintained Preliminary compliance but did not reach Secondary compliance.

To evaluate Preliminary compliance with ¶484, the IMT reviewed the CPD's and COPA's relevant policies and documents following the process described in the Consent Decree (¶¶626–41), which outlines applicable consultation, resolution, workout, and public comment periods.[159] To evaluate Secondary compliance, we determined whether the entities have developed a means of tracking referrals to prosecuting agencies and developed written guidance guiding the referral and tracking process. To reach Secondary compliance, the entities must train on the developed guiding and tracking process.

[158] As referenced above, the Consent Decree requires actions by various City entities, including the CPD, COPA, the Police Board, and the Office of the Inspector General. Ultimately, the City is responsible for ensuring compliance. As a result, if a Consent Decree paragraph requires actions by multiple City entities, we will not find that the City has met Preliminary, Secondary, or Full compliance until all those entities have met the corresponding level of compliance. Nonetheless, for some paragraphs, we will clarify compliance assessments for each entity to demonstrate which benchmarks have been met.

[159] The OAG, the City, and the IMT agreed to a stipulation that provides a different review process for review of COPA policies and training materials. *See Stipulation Regarding the Policy and Training Review Process for COPA*, *Illinois v. Chicago*, Case No. 1:17-cv-06260 (Jan. 30, 2020). The review process in the Stipulation mirrors the review process under ¶¶626–41, but among other things, gives the OAG and the IMT a shorter timeframe for review of COPA policies and training materials.

Progress before the Sixth Reporting Period

In the fifth reporting period, the CPD provided draft Special Order S08-01-01, *Conducting Log Number Investigation* for review, which partially addressed the requirements of ¶484. The IMT provided comments in September 2021. By the end of the reporting period, this policy remained in the collaborative review and revision process. BIA also produced the Unit Directives *Investigative File Maintenance* and *Initiation of Log Numbers in the Case Management System* which addressed ¶484.[160] The Unit Directives were not finalized following the Consent Decree process by the end of the reporting period.

In the fourth reporting period, COPA finalized Policy 3.1.1, *Intake* and 3.1.2, *Fact Gathering and the Investigative Process*, which together addressed the requirements of ¶484 and brought COPA into Preliminary compliance. In the fifth reporting period, COPA provided its training titled *COPA Intake Unit: Overview of Policies and Procedures In-Service 2021*, which instructed compliance with the requirements of ¶484. COPA provided this training to more than 95% of its personnel. We explained that, to reach Secondary compliance, COPA should focus on developing written guidance and a means of directing and tracking referrals to prosecuting agencies, and that COPA would also need to train personnel on the policy and application of the referral tracking process.

Progress in the Sixth Reporting Period

This reporting period, the CPD renumbered the policy previously labeled S08-01-01; it is now S08-01-05, *Conducting Log Number Investigations*. The CPD submitted multiple revised versions of S08-01-05, including producing a further revised version of S08-01-05 on June 30, 2022, the last day of the reporting period, which remains under review. In the draft versions, sections III.B.10 and VI.B.5 addressed the requirements of ¶484. To move into Preliminary compliance, we hope that the CPD will continue to quickly revise this policy and in the seventh reporting period post for public comment and finalize S08-01-05.

COPA maintained Preliminary compliance but did not submit any materials related to ¶484 in the sixth reporting period.

[160] In the sixth reporting period, the CPD informed the IMT and the OAG that BIA would begin to move away from Unit Directives. Instead of Unit Directives, instruction will be provided in General Orders and Special Orders. This applies to the BIA Unit Directives that we reviewed, and in some instances provided no-objection notices to in previous reporting periods. The CPD began this process in sixth reporting period, and incorporated instruction previously included in the BIA Directive Initial Responsibilities in Assigned Log Number Investigations into S08-01-05. This process of incorporating Unit Directives into General Orders and Special Orders is ongoing.

***

The City made efforts toward Preliminary compliance but did not yet achieve it. The CPD must finalize S08-01-05 to obtain Preliminary compliance. Thereafter we will look for training materials relevant to ¶484 from both COPA and the CPD, including written guidance regarding making and tracking referrals to prosecuting agencies.

Paragraph 484 Compliance Progress History

FIRST REPORTING PERIOD	SECOND REPORTING PERIOD	THIRD REPORTING PERIOD
SEPTEMBER 1, 2019 – AUGUST 31, 2019	SEPTEMBER 1, 2019 – FEBRUARY 29, 2020	MARCH 1, 2020 – DECEMBER 31, 2020
COMPLIANCE PROGRESS:	COMPLIANCE PROGRESS:	COMPLIANCE PROGRESS:
Not Applicable	Status Update	None

FOURTH REPORTING PERIOD	FIFTH REPORTING PERIOD	SIXTH REPORTING PERIOD
JANUARY 1, 2021 – JUNE 30, 2021	JULY 1, 2021 – DECEMBER 31, 2021	JANUARY 1, 2022 – JUNE 30, 2022
COMPLIANCE PROGRESS:	COMPLIANCE PROGRESS:	COMPLIANCE PROGRESS:
None	None	None

Accountability and Transparency: ¶485

485. *The City will continue to provide the Chief Administrator of COPA the discretion to direct COPA to review and investigate the facts of individual civil lawsuits and criminal proceedings involving alleged misconduct in order to identify and investigate incidents of misconduct.*

Compliance Progress

(Reporting Period: January 1, 2022, through June 30, 2022)

Preliminary:	***In Compliance*** **(NEW)**
Secondary:	***In Compliance*** **(NEW)**
Full:	***In Compliance*** **(NEW)**
Sustainment Period Ends	***June 30, 2024***

The City reached Full compliance with ¶485 in the sixth reporting period.

To evaluate Preliminary compliance with ¶485, the IMT reviewed the City's and COPA's relevant policies and documents following the process described in the Consent Decree (¶¶626–41), which outlines applicable consultation, resolution, workout, and public comment periods.[161] As a threshold matter, we looked for an ordinance that provides discretion to direct COPA reviews and investigations to the Chief Administrator of COPA. To evaluate Secondary compliance we looked for evidence of intention to maintain the COPA Chief's discretion. For Full compliance, we looked for evidence to confirm whether the COPA Chief is to act within their discretion.

The IMT assessed compliance with ¶485 for the first time in the sixth reporting period. We note that Chicago Municipal Code 2-78-120, which has been on the books for several years, grants the COPA Chief Administrator the ability to "review lawsuits and claims against the Department or one or more of its members, or against the City, alleging police misconduct that falls within COPA's jurisdiction." Beyond this, on December 23, 2021, COPA provided the IMT with a revised version of its *Civil and Criminal Complaint Review* policy. This policy is well written and thorough, and provides useful instruction for COPA employees to fulfill the requirements of ¶485. Included with the policy, COPA compiled Civil and Criminal Complaint Review Guidance that not only sets out COPA's intention to comply with this paragraph but provides instruction in how COPA employees are to fulfill the requirements of the *Civil and Criminal Complaint Review* policy and this paragraph.

[161] The OAG, the City, and the IMT agreed to a stipulation that provides a different review process for review of COPA policies and training materials. *See Stipulation Regarding the Policy and Training Review Process for COPA*, *Illinois v. Chicago*, Case No. 1:17-cv-06260 (Jan. 30, 2020). The review process in the Stipulation mirrors the review process under ¶¶626–41, but among other things, gives the OAG and the IMT a shorter timeframe for review of COPA policies and training materials.

Finally, through conversations with COPA, the IMT has confirmed that the Chief Administrator of COPA has the ability to exercise the discretion granted the position.

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With this, the City has reached Full compliance with this paragraph. Moving forward we will continue to look for evidence that the Chief Administrator of COPA is afforded discretion and able to act under that discretion as is called for by ¶485.

Paragraph 485 Compliance Progress History

FIRST REPORTING PERIOD	SECOND REPORTING PERIOD	THIRD REPORTING PERIOD
SEPTEMBER 1, 2019 – AUGUST 31, 2019	SEPTEMBER 1, 2019 – FEBRUARY 29, 2020	MARCH 1, 2020 – DECEMBER 31, 2020
COMPLIANCE PROGRESS:	COMPLIANCE PROGRESS:	COMPLIANCE PROGRESS:
Not Applicable	Not Applicable	Not Applicable
FOURTH REPORTING PERIOD	**FIFTH REPORTING PERIOD**	**SIXTH REPORTING PERIOD**
JANUARY 1, 2021 – JUNE 30, 2021	JULY 1, 2021 – DECEMBER 31, 2021	JANUARY 1, 2022 – JUNE 30, 2022
COMPLIANCE PROGRESS:	COMPLIANCE PROGRESS:	COMPLIANCE PROGRESS:
Not Applicable	Not Applicable	Full

Accountability and Transparency: ¶486

486. *The City, CPD, and COPA will ensure that CPD and COPA maintain thorough and complete administrative investigative files. Such administrative investigative files will include: a. documentation of all evidence that was gathered, including names, phone numbers, and addresses of witnesses to the alleged misconduct. In situations in which there are no known witnesses, the file will specifically state this fact. In situations in which witnesses were present but circumstances prevented the investigator from collecting information from those witnesses, the investigative file will state the reasons why. The investigative file also will include all available identifying information for anyone who refuses to provide a statement; b. documentation of each interview conducted and the recording of those interviews, if available; c. the names of all CPD members who have been identified as witnesses to the alleged misconduct; d. COPA's, BIA's, or the district's narrative description and evaluation of the alleged misconduct, based on its review of the evidence gathered, including a determination of whether the CPD member's actions appear to be within CPD policy, procedure, regulations, orders, or other standards of conduct required of CPD members; e. in cases where material inconsistencies exist between complainant, CPD member, and witness statements, explicit identification of the inconsistencies, including a description of the evidence reviewed and written credibility findings; f. if a CPD member deployed a weapon, documentation of whether the CPD member's certification and training for the weapon were current; g. all CPD member original statements, as well as any amendments or clarifications to the original statement, and any subsequent statements; and h. an explicit identification of each allegation and the recommended finding for each allegation of misconduct in an investigation.*

Compliance Progress (Reporting Period: January 1, 2022, through June 30, 2022)

Preliminary:		***Not in Compliance*** [162]
	CPD	***Not in Compliance***
	COPA	***In Compliance*** **(NEW)**
Secondary:		***Not in Compliance***
Full:		***Not Yet Assessed***

The City made progress toward but did not reach Preliminary compliance with ¶486. COPA moved into Preliminary compliance, but the CPD did not yet reach Preliminary compliance by the close of the sixth reporting period.

To evaluate Preliminary compliance with ¶486, the IMT reviewed the CPD's and COPA's relevant policies and documents following the process described in the Consent Decree (¶¶626–41), which outlines applicable consultation, resolution, workout, and public comment periods.[163]

Progress before the Sixth Reporting Period

In the fifth reporting period, the CPD provided draft Special Order S08-01-01, *Conducting Log Number Investigations*, for review under this paragraph. But S08-01-01 remained in the collaborative review and revision process at the end of the reporting period. Also, in earlier reporting periods, the CPD produced BIA's Unit Directive, *Requirements of a Complete Investigative File*, *Photo Room Operations,* and *Administrative Misconduct Investigation* under ¶486. But these policies were not finalized by the end of the fifth reporting period and therefore did not bring the CPD into Preliminary compliance.

In the fifth reporting period, COPA provided drafts of COPA 3.1.9, *Investigative File Maintenance*, which addressed all subparagraphs of ¶486. The IMT provided a no-objection notice in late December 2021, but by the end of the reporting period the Policy had not been posted for public comment and finalized.

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[162] As referenced above, the Consent Decree requires actions by various City entities, including the CPD, COPA, the Police Board, and the Office of the Inspector General. Ultimately, the City is responsible for ensuring compliance. As a result, if a Consent Decree paragraph requires actions by multiple City entities, we will not find that the City has met Preliminary, Secondary, or Full compliance until all those entities have met the corresponding level of compliance. Nonetheless, for some paragraphs, we will clarify compliance assessments for each entity to demonstrate which benchmarks have been met.

[163] The OAG, the City, and the IMT agreed to a stipulation that provides a different review process for review of COPA policies and training materials. *See Stipulation Regarding the Policy and Training Review Process for COPA*, *Illinois v. Chicago*, Case No. 1:17-cv-06260 (Jan. 30, 2020). The review process in the Stipulation mirrors the review process under ¶¶626–41, but among other things, gives the OAG and the IMT a shorter timeframe for review of COPA policies and training materials.

Progress in the Sixth Reporting Period

This reporting period the CPD provided S08-01-09, *Requirements of a Complete Log Number Investigative File*, for review with ¶486–87. The IMT provided feedback and a no-objection notice on June 3, 2022. We suggested that the CPD add "regulations, orders, or other standards of conduct required of CPD members" to the first paragraph of Section III.H. to sufficiently address ¶486(d). If this revision is made, S08-01-09 will fully address the requirements of ¶486 and its subparagraphs. This policy was not finalized by the end of the sixth reporting period, but we expect that it will be finalized in the seventh reporting period.

COPA continued its efforts from the fifth reporting period related to its policy *Investigative File Maintenance*. This policy addresses the requirements of ¶486. With this, COPA moved into Preliminary compliance with ¶486.

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We expect that the CPD will be able to finalize S08-01-09 in the seventh reporting period, which will bring it into Preliminary compliance with this paragraph. Thereafter, both the CPD and COPA will need to develop training materials to instruct compliance with the paragraph and the related policies.

Paragraph 486 Compliance Progress History

FIRST REPORTING PERIOD	SECOND REPORTING PERIOD	THIRD REPORTING PERIOD
SEPTEMBER 1, 2019 – AUGUST 31, 2019	SEPTEMBER 1, 2019 – FEBRUARY 29, 2020	MARCH 1, 2020 – DECEMBER 31, 2020
COMPLIANCE PROGRESS:	COMPLIANCE PROGRESS:	COMPLIANCE PROGRESS:
Not Applicable	Status Update	Status Update
FOURTH REPORTING PERIOD	**FIFTH REPORTING PERIOD**	**SIXTH REPORTING PERIOD**
JANUARY 1, 2021 – JUNE 30, 2021	JULY 1, 2021 – DECEMBER 31, 2021	JANUARY 1, 2022 – JUNE 30, 2022
COMPLIANCE PROGRESS:	COMPLIANCE PROGRESS:	COMPLIANCE PROGRESS:
None	None	None

Accountability and Transparency: ¶487

487. *Investigators will consider all original statements, and any subsequent statements, including amended or modified statements, for purposes of determining whether a CPD member willfully made a false statement about a fact material to the incident under investigation.*

Compliance Progress (Reporting Period: January 1, 2022, through June 30, 2022)

Preliminary:		***Not in Compliance***[164]
	CPD	***Not in Compliance***
	COPA	***In Compliance*** **(FOURTH REPORTING PERIOD)**
Secondary:		***Not in Compliance***
	CPD	***Not Yet Assessed***
	COPA	***In Compliance*** **(FOURTH REPORTING PERIOD)**
Full:		***Not in Compliance***
	CPD	***Not Yet Assessed***
	COPA	***Not in Compliance***

Because all relevant City entities must reach levels of compliance to bring the City, as a whole, into compliance, the City has not yet reached Preliminary compliance with ¶487. While COPA maintained Preliminary compliance with ¶487, the CPD did not yet reach Preliminary compliance.

To evaluate Preliminary compliance with ¶487, the IMT reviewed the CPD's and COPA's relevant policies and documents following the process described in the Consent Decree (¶¶626–41), which outlines applicable consultation, resolution, workout, and public comment periods.[165] To evaluate Secondary compliance, the IMT reviewed the entities' development, implementation, and evaluation of training (¶286).

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[164] As referenced above, the Consent Decree requires actions by various City entities, including the CPD, COPA, the Police Board, and the Office of the Inspector General. Ultimately, the City is responsible for ensuring compliance. As a result, if a Consent Decree paragraph requires actions by multiple City entities, we will not find that the City has met Preliminary, Secondary, or Full compliance until all those entities have met the corresponding level of compliance. Nonetheless, for some paragraphs, we will clarify compliance assessments for each entity to demonstrate which benchmarks have been met.

[165] The OAG, the City, and the IMT agreed to a stipulation that provides a different review process for review of COPA policies and training materials. *See Stipulation Regarding the Policy and Training Review Process for COPA*, *Illinois v. Chicago*, Case No. 1:17-cv-06260 (Jan. 30, 2020). The review process in the Stipulation mirrors the review process under ¶¶626–41, but among other things, gives the OAG and the IMT a shorter timeframe for review of COPA policies and training materials.

Progress before the Sixth Reporting Period

In the fifth reporting period, the CPD provided a first draft of Special Order S08-01-01, *Conducting Log Number Investigations*, which addressed the requirements of ¶487. However, the policy remained in the collaborative review and revision process at the end of the reporting period. In addition the CPD has submitted BIA's Unit Directive, *Requirements of a Complete Investigative File*, which also speaks to ¶487's requirements.[166] However, the Unit Directive was not posted for public comment.

In the fifth reporting period, COPA provided a finalized Policy 3.1.2 *Fact Gathering and the Investigative Process*, which addresses the requirements of ¶487.

Progress in the Sixth Reporting Period

In the sixth reporting period, the CPD renumbered the policy previously labeled S08-01-01; it is now S08-01-05, *Conducting Log Number Investigations*. The CPD submitted multiple revised versions of S08-01-05 throughout the period. The most recent draft was produced on June 30, 2022, the last day of the reporting period. Therefore, this policy remained in the collaborative review and revision process at the end of the sixth reporting period. We anticipate that the CPD will continue to revise and ultimately finalize S08-01-05 in the sixth reporting period. If the CPD does so without making substantive changes to Section IV.A.3. of this policy, which in the draft version addresses the requirements of ¶487, the CPD should reach Preliminary compliance.

COPA maintained Preliminary compliance with ¶487 in the sixth reporting period but did not provide evidence of efforts toward Secondary compliance during this reporting period.

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The City did not reach Preliminary compliance because the CPD did not yet finalize a policy directing compliance with ¶487's requirements. Moving forward, we look forward to working with the CPD to finalize S08-01-05 and reviewing COPA's training materials providing instruction on how to comply with the requirements of ¶487 and COPA's related policies.

[166] In the sixth reporting period, the CPD informed the IMT and the OAG that BIA would begin to move away from Unit Directives. Instead of Unit Directives, instruction will be provided in General Orders and Special Orders. This applies to the BIA Unit Directives that we reviewed, and in some instances provided no-objection notices to in previous reporting periods. The CPD began this process in sixth reporting period, and efforts are ongoing.

Paragraph 487 Compliance Progress History

FIRST REPORTING PERIOD
SEPTEMBER 1, 2019 – AUGUST 31, 2019
COMPLIANCE PROGRESS:
Not Applicable

SECOND REPORTING PERIOD
SEPTEMBER 1, 2019 – FEBRUARY 29, 2020
COMPLIANCE PROGRESS:
Status Update

THIRD REPORTING PERIOD
MARCH 1, 2020 – DECEMBER 31, 2020
COMPLIANCE PROGRESS:
None

FOURTH REPORTING PERIOD
JANUARY 1, 2021 – JUNE 30, 2021
COMPLIANCE PROGRESS:
None

FIFTH REPORTING PERIOD
JULY 1, 2021 – DECEMBER 31, 2021
COMPLIANCE PROGRESS:
None

SIXTH REPORTING PERIOD
JANUARY 1, 2022 – JUNE 30, 2022
COMPLIANCE PROGRESS:
None

Accountability and Transparency: ¶488

488. *In addition to the general investigative requirements established in this Agreement, with respect to the investigation of officer-involved shootings and deaths, the City and CPD will ensure that: a. COPA investigators be provided the opportunity to participate in the Preliminary assessment during the immediate aftermath of an officer-involved shooting or death to the same extent as any CPD member or any other law enforcement agency investigating the incident; b. the Chief Administrator of COPA, or his or her designee, is present for the first viewing by CPD of available video or audio material related to the incident and when any audio or video material is collected and preserved at or near the scene from CPD or third-party surveillance systems. i. the requirements of subparagraph (b), above, will not apply if: (1) the Chief Administrator of COPA, or his or her designee, has been informed of the incident and is not available; and (2) COPA is not on scene and there is a public safety need to review or listen to certain available audio or video prior to the COPA arrival on scene. c. there is written documentation identifying each CPD member who viewed video evidence or listened to audio evidence at the scene; d. within 30 days of the Effective Date, CPD issues a policy providing that: i. involved and witness CPD members do not discuss the facts relating to the incident with any witness until interviewed by COPA, except to the extent necessary to ensure public safety, as instructed by counsel in relation to civil or criminal proceedings, or participating in CPD officer wellness programs; ii. COPA may extend the prohibition on discussion to the extent necessary to preserve the integrity of the investigation; and iii. in no event may this prohibition extend beyond the final disciplinary decision, if any. e. involved and witness CPD members will be separated, transported separately from the scene, and monitored to avoid contact or communications relating to the incident until released by the responding supervisor at or above the rank of Commander; f. administrative interviews of involved and witness CPD members will be audio recorded and, where possible, video recorded, with COPA investigators present, except that a member may speak with his or her attorney or union representative in private; and g. investigators will not delay interviewing involved and witness CPD members, and will conduct such interviews as soon as feasible, consistent with any applicable collective bargaining agreement. Investigators will document, and make part of the administrative investigative file, all*

requests made on behalf of involved or witness CPD members to reschedule an interview.

Compliance Progress (Reporting Period: January 1, 2022, through June 30, 2022)

Preliminary:		***Not in Compliance***[167]
	CPD	***Not in Compliance***
	COPA	***In Compliance*** **(NEW)**
Secondary:		***Not Yet Assessed***
Full:		***Not Yet Assessed***

COPA moved into Preliminary compliance, but the CPD did not yet meet Preliminary compliance. Because all relevant City entities must reach levels of compliance to bring the City, as a whole, into compliance, the City has not yet reached Preliminary compliance with ¶488.

To evaluate Preliminary compliance with ¶488, the IMT reviewed the CPD's and COPA's relevant policies and documents following the process described in the Consent Decree (¶¶626–41), which outlines applicable consultation, resolution, workout, and public comment periods.[168]

Progress before the Sixth Reporting Period

In past reporting periods the City has produced a number of items under ¶488, including a two-page Memorandum of Agreement between COPA and the CPD (MOA) and, in the fourth reporting period, the Illinois State Police, Division of Criminal Investigation, *CPD Officer Involved Death Investigation Proposal*, which relates to the requirements of ¶488. Additionally, the CPD implemented G03-06, *Firearms Discharge and Officer Involved Death Incident Response and Investigation*. But G03-06 was only intended as a temporary, emergency policy, and it was not intended to fully comply with the Consent Decree requirements. The CPD did not produce any documents relevant to this paragraph in the fifth reporting period.

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[167] As referenced above, the Consent Decree requires actions by various City entities, including the CPD, COPA, the Police Board, and the Office of the Inspector General. Ultimately, the City is responsible for ensuring compliance. As a result, if a Consent Decree paragraph requires actions by multiple City entities, we will not find that the City has met Preliminary, Secondary, or Full compliance until all those entities have met the corresponding level of compliance. Nonetheless, for some paragraphs, we will clarify compliance assessments for each entity to demonstrate which benchmarks have been met.

[168] The OAG, the City, and the IMT agreed to a stipulation that provides a different review process for review of COPA policies and training materials. *See Stipulation Regarding the Policy and Training Review Process for COPA*, *Illinois v. Chicago*, Case No. 1:17-cv-06260 (Jan. 30, 2020). The review process in the Stipulation mirrors the review process under ¶¶626–41, but among other things, gives the OAG and the IMT a shorter timeframe for review of COPA policies and training materials.

Although many of the requirements of ¶488 apply to the CPD, COPA went above and beyond to include such requirements in their draft *Major Incident Responses* Policy. This policy addresses every subparagraph of ¶488 and is a model policy for COPA. The IMT provided a no-objection notice, but by the end of the reporting period, the policy remained in the collaborative review and revision process.

Progress in the Sixth Reporting Period

In the sixth reporting period the City and the CPD provided a revised version of General Order G03-06, *Firearm Discharge and Officer-Involved Death Incident Response and Investigation*, for review with ¶¶488–91.[169] A previous version of this policy had been implemented but only as a temporary solution and we noted that the temporary version fell short of meeting Consent Decree requirements. As for the revised draft submitted in the sixth reporting period, we reviewed and provided extensive comments. G03-06 provides direction to the officer involved in a firearm discharge or incident, witness and responding officers, supervisors and responding supervisors and commanders, and the CPD has inserted some passages throughout in an attempt to satisfy the requirements of ¶¶488–91. However, this General Order lacks detail sufficient to adequately instruct investigators how to respond and conduct their work in coordination with COPA to ensure a smooth and complete investigation.

Much of the revised G03-06 is copied from the previous, temporary version of this policy. While the CPD has made some improvements—such as improving the Sanctity of Life Statement—additional efforts are necessary. For example, even the Sanctity of Life Statement should be further revised to provide a stand-alone section recognizing the sanctity of life and respect for a victim. This should occur before and separate from more specific instruction to officers. Another area of necessary improvement is making unequivocal statements and direction to ensure that COPA is granted access to participate in preliminary assessment in the immediate aftermath of an officer involved death or firearm discharge, just as CPD members are able to investigate. We have concerns that Section IV of the draft G03-06 includes various clauses on which the CPD could rely to deny COPA the access called for by ¶¶488–91.

G03-06 references procedures established by the Bureau of Detectives (also known as BoD) Chief. This raises the question of why these procedures are not simply included in this policy. Furthermore, these procedures, regardless of where

[169] The City and the CPD first provided a draft of G03-06, *Officer Involved Death Investigations*, for review with ¶488–92 on July 19, 2019, and this policy then underwent multiple rounds of revision, review, and comment in connection with ¶488–92 and other paragraphs (often alongside the Use of Force policy suite); its title changed to *Firearm Discharge and Officer-Involved Death Incident Response and Investigations*; and the City and the CPD issued temporary versions of the policy pursuant to ¶631 (extraordinary circumstances).

they are incorporated, will need to be produced for review. In addition to the concerns we have about G03-06, we also have concerns about the Bureau of Detectives Special Order 17-02, *Conduct of Investigations Regarding Officer Involved Shootings and Officer Involved Deaths*. The IMT has the October 2017 version of this SOP and does not have information regarding more recent revisions or the CPD's intentions of revisions of this policy. We have concerns that this Special Order and the General Order G03-06 contradict each other in areas relevant to ¶¶488–91. The IMT expects that the CPD will provide the IMT updated information about and future versions of BOD S017-02; the CPD is unlikely to reach compliance without doing so.

In short, significant revisions are necessary for G03-06 to meet the requirements of ¶¶488–91. We encourage the CPD to prioritize overhauling this policy and rethinking how to address the requirements of ¶¶488–91.

COPA finalized its *Major Incident Responses – Officer-Involved Shooting or Officer-Involved Death* policy in the sixth reporting period. This is a well-written policy which provides authority and direction to COPA investigators in officer-involved shooting and officer-involved death administrative investigations. This policy fully addresses the many requirements of ¶488 and its subparagraphs; with this COPA moved into Preliminary compliance.

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The City did not yet reach Preliminary compliance. COPA moved into Preliminary compliance. We will look forward to receiving training materials relevant to this paragraph in the coming reporting periods. CPD started toward, but has significant work ahead to reach Preliminary compliance. We hope that the CPD will continue to make consistent efforts to revise G03-06 and work with the IMT and the OAG to do so throughout the seventh reporting period.

Paragraph 488 Compliance Progress History

FIRST REPORTING PERIOD	SECOND REPORTING PERIOD	THIRD REPORTING PERIOD
SEPTEMBER 1, 2019 – AUGUST 31, 2019	SEPTEMBER 1, 2019 – FEBRUARY 29, 2020	MARCH 1, 2020 – DECEMBER 31, 2020
COMPLIANCE PROGRESS:	COMPLIANCE PROGRESS:	COMPLIANCE PROGRESS:
None	None	None
FOURTH REPORTING PERIOD	**FIFTH REPORTING PERIOD**	**SIXTH REPORTING PERIOD**
JANUARY 1, 2021 – JUNE 30, 2021	JULY 1, 2021 – DECEMBER 31, 2021	JANUARY 1, 2022 – JUNE 30, 2022
COMPLIANCE PROGRESS:	COMPLIANCE PROGRESS:	COMPLIANCE PROGRESS:
None	None	None

Accountability and Transparency: ¶489

489. *The City recognizes that officer-involved shootings are traumatic incidents. The City and CPD are committed to treating all impacted with dignity and respect.*

Compliance Progress (Reporting Period: January 1, 2022, through June 30, 2022)

Preliminary:		***Not in Compliance***[170]
	CPD	***Not in Compliance***
	COPA	***In Compliance*** **(NEW)**
Secondary:		***Not Yet Assessed***
Full:		***Not Yet Assessed***

The City made progress toward but did not meet Preliminary compliance with ¶489 in the sixth reporting period because all relevant City entities must reach levels of compliance to bring the City, as a whole, into compliance. For ¶489, COPA moved into Preliminary compliance, but the CPD did not yet meet Preliminary compliance.

To evaluate Preliminary compliance with ¶489, the IMT reviewed the CPD's and COPA's relevant policies and documents following the process described in the Consent Decree (¶¶626–41), which outlines applicable consultation, resolution, workout, and public comment periods.[171]

Progress before the Sixth Reporting Period

In the fourth reporting period, the City produced an updated suite of directives. The suite was designed to more closely align with the requirements of ¶¶488–92, but they were not submitted in time to be implemented following the requisite Consent Decree process. In the fifth reporting period, the CPD did not produce any documentation that demonstrated efforts related to ¶489.

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[170] As referenced above, the Consent Decree requires actions by various City entities, including the CPD, COPA, the Police Board, and the Office of the Inspector General. Ultimately, the City is responsible for ensuring compliance. As a result, if a Consent Decree paragraph requires actions by multiple City entities, we will not find that the City has met Preliminary, Secondary, or Full compliance until all those entities have met the corresponding level of compliance. Nonetheless, for some paragraphs, we will clarify compliance assessments for each entity to demonstrate which benchmarks have been met.

[171] The OAG, the City, and the IMT agreed to a stipulation that provides a different review process for review of COPA policies and training materials. *See Stipulation Regarding the Policy and Training Review Process for COPA*, *Illinois v. Chicago*, Case No. 1:17-cv-06260 (Jan. 30, 2020). The review process in the Stipulation mirrors the review process under ¶¶626–41, but among other things, gives the OAG and the IMT a shorter timeframe for review of COPA policies and training materials.

Also in the fifth reporting period, COPA produced a draft *Major Incident Responses* policy for review.[172] This policy remained in the collaborative review and revision process at the end of the fifth reporting period.

Progress in the Sixth Reporting Period

In the sixth reporting period the City and the CPD provided a revised version of General Order G03-06, *Firearm Discharge and Officer-Involved Death Incident Response and Investigation*, for review with ¶¶488–91.[173] A previous version of this policy had been implemented but only as a temporary solution and we noted that the temporary version fell short of meeting Consent Decree requirements. As for the revised draft submitted in the sixth reporting period, we reviewed and provided extensive comments. G03-06 provides direction to the officer involved in a firearm discharge or incident, witness and responding officers, supervisors and responding supervisors and commanders, and the CPD has inserted some passages throughout in an attempt to satisfy the requirements of ¶¶488–91. However this General Order lacks detail sufficient to adequately instruct investigators how to respond and conduct their work in coordination with COPA to ensure a smooth and complete investigation.

Much of the revised G03-06 is copied from the previous, temporary version of this policy. While the CPD has made some improvements—such as improving the Sanctity of Life Statement—additional efforts are necessary. While the Sanctity of Life Statement is improved and speaks to the requirements of ¶¶489-90, additional edits would result in strong policy and better direction. Another area of necessary improvement is making unequivocal statements and direction to ensure that COPA is granted access to participate in preliminary assessment in the immediate aftermath of an officer involved death or firearm discharge, just as CPD members are able to investigate. We have concerns that Section IV of the draft G03-06 includes various clauses on which the CPD could rely to deny COPA the access called for by ¶¶488–91.

G03-06 references procedures established by the Bureau of Detectives (also known as BoD) Chief. This raises the question of why these procedures are not simply included in this policy. Furthermore, these procedures, regardless of where they are incorporated, will need to be produced for review. In addition to the concerns we have about G03-06, we also have concerns about the Bureau of Detectives Special Order 17-02, *Conduct of Investigations Regarding Officer Involved*

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[172] Please refer to the discussion of ¶488 regarding COPA's *Major Incident Responses* Policy.

[173] The City and the CPD first provided a draft of G03-06, *Officer Involved Death Investigations*, for review with ¶488–92 on July 19, 2019, and this policy then underwent multiple rounds of revision, review, and comment in connection with ¶488–92 and other paragraphs (often alongside the Use of Force policy suite); its title changed to *Firearm Discharge and Officer-Involved Death Incident Response and Investigations*; and the City and the CPD issued temporary versions of the policy pursuant to ¶631 (extraordinary circumstances).

Shootings and Officer Involved Deaths. The IMT has the October 2017 version of this SOP and does not have information regarding more recent revisions or the CPD's intentions of revisions of this policy. We have concerns that this Special Order and the General Order G03-06 contradict each other in areas relevant to ¶¶488–91. The IMT expects that the CPD will provide the IMT updated information about and future versions of Bureau of Detectives Special Order 17-02; the CPD is unlikely to reach compliance without doing so.

In short, significant revisions are necessary for G03-06 to meet the requirements of ¶¶488–91. We encourage the CPD to prioritize overhauling this policy and rethinking how to address the requirements of ¶¶488–91.

COPA submitted its *Major Incident Responses – Officer-Involved Shooting or Officer-Involved Death* policy in the sixth reporting period. This is a well-written policy which provides authority and direction to COPA investigators in officer-involved shooting and officer-involved death administrative investigations. This policy fully addresses ¶489 by providing that all impacted by officer-involved shootings are treated with dignity and respect. The policy outlines specific expectations of COPA personnel to ensure that COPA's commitment is demonstrated through its adherence to this policy. Through the finalization of this policy, COPA moved into Preliminary compliance.

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With this, the City made progress toward but did not ultimately reach Preliminary compliance. Moving forward, we look forward to receiving and reviewing COPA training materials related to ¶489. Related to the CPD, we hope the CPD will make consistent concerted efforts to revise and produce G03-06 in the seventh reporting period to obtain as much feedback as possible throughout the reporting period and hopefully move toward finalizing the policy.

Paragraph 489 Compliance Progress History

FIRST REPORTING PERIOD	SECOND REPORTING PERIOD	THIRD REPORTING PERIOD
SEPTEMBER 1, 2019 – AUGUST 31, 2019	SEPTEMBER 1, 2019 – FEBRUARY 29, 2020	MARCH 1, 2020 – DECEMBER 31, 2020
COMPLIANCE PROGRESS:	COMPLIANCE PROGRESS:	COMPLIANCE PROGRESS:
Not Applicable	Not Applicable	Not Applicable
FOURTH REPORTING PERIOD	**FIFTH REPORTING PERIOD**	**SIXTH REPORTING PERIOD**
JANUARY 1, 2021 – JUNE 30, 2021	JULY 1, 2021 – DECEMBER 31, 2021	JANUARY 1, 2022 – JUNE 30, 2022
COMPLIANCE PROGRESS:	COMPLIANCE PROGRESS:	COMPLIANCE PROGRESS:
None	None	None

Accountability and Transparency: ¶490

490. *The City and CPD are committed to ensuring their actions do not unreasonably impede access to information for families of the injured and deceased.*

Compliance Progress (Reporting Period: January 1, 2022, through June 30, 2022)

Preliminary:		***Not in Compliance***[174]
	CPD	***Not in Compliance***
	COPA	***In Compliance*** **(NEW)**
Secondary:		***Not Yet Assessed***
Full:		***Not Yet Assessed***

The City made progress toward but did not meet Preliminary compliance with ¶490 in the sixth reporting period because all relevant City entities must reach levels of compliance to bring the City, as a whole, into compliance. For ¶490, COPA moved into Preliminary compliance, but the CPD did not yet meet Preliminary compliance.

To evaluate Preliminary compliance with ¶490, the IMT reviewed the CPD's and COPA's relevant policies and documents following the process described in the Consent Decree (¶¶626–41), which outlines applicable consultation, resolution, workout, and public comment periods.[175]

Progress before the Sixth Reporting Period

In the fourth reporting period, the City produced an updated suite of directives. The suite is designed to more closely align with the requirements of ¶¶488–92, but they were not submitted in time to be implemented under the requisite Consent Decree process. But the CPD did not produce any documentation in the fifth reporting period that demonstrated efforts related to ¶490.

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[174] As referenced above, the Consent Decree requires actions by various City entities, including the CPD, COPA, the Police Board, and the Office of the Inspector General. Ultimately, the City is responsible for ensuring compliance. As a result, if a Consent Decree paragraph requires actions by multiple City entities, we will not find that the City has met Preliminary, Secondary, or Full compliance until all those entities have met the corresponding level of compliance. Nonetheless, for some paragraphs, we will clarify compliance assessments for each entity to demonstrate which benchmarks have been met.

[175] The OAG, the City, and the IMT agreed to a stipulation that provides a different review process for review of COPA policies and training materials. *See Stipulation Regarding the Policy and Training Review Process for COPA*, *Illinois v. Chicago*, Case No. 1:17-cv-06260 (Jan. 30, 2020). The review process in the Stipulation mirrors the review process under ¶¶626–41, but among other things, gives the OAG and the IMT a shorter timeframe for review of COPA policies and training materials.

In the fifth reporting period, COPA produced a draft *Major Incident Responses* Policy for review.[176] This remained in the collaborative review and revision process at the end of the fifth reporting period.

Progress in the Sixth Reporting Period

In the sixth reporting period the City and the CPD provided a revised version of General Order G03-06, *Firearm Discharge and Officer-Involved Death Incident Response and Investigation*, for review with ¶¶488–91.[177] A previous version of this policy had been implemented but only as a temporary solution and we noted that the temporary version fell short of meeting Consent Decree requirements. As for the revised draft submitted in the sixth reporting period, we reviewed and provided extensive comments. G03-06 provides direction to the officer involved in a firearm discharge or incident, witness and responding officers, supervisors and responding supervisors and commanders, and the CPD has inserted some passages throughout in an attempt to satisfy the requirements of ¶¶488–91. However, this General Order lacks detail sufficient to adequately instruct investigators how to respond and conduct their work in coordination with COPA to ensure a smooth and complete investigation.

Much of the revised G03-06 is copied from the previous, temporary version of this policy. While the CPD has made some improvements—such as improving the Sanctity of Life Statement—additional efforts are necessary. While the Sanctity of Life Statement is improved and speaks to the requirements of ¶¶489–90, additional edits would result in strong policy and better direction. Another area of necessary improvement is making unequivocal statements and direction to ensure that COPA is granted access to participate in preliminary assessment in the immediate aftermath of an officer involved death or firearm discharge, just as CPD members are able to investigate. We have concerns that Section IV of the draft G03-06 includes various clauses on which the CPD could rely to deny COPA the access called for by ¶¶488–91.

G03-06 references procedures established by the Bureau of Detectives (also known as BoD) Chief. This raises the question of why these procedures are not simply included in this policy. Furthermore, these procedures, regardless of where they are incorporated, will need to be produced for review. In addition to the concerns we have about G03-06, we also have concerns about the Bureau of Detectives Special Order 17-02, *Conduct of Investigations Regarding Officer Involved*

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[176] Refer ¶488–89 for further discussion regarding COPA's *Major Incident Responses* Policy.

[177] The City and the CPD first provided a draft of G03-06, *Officer Involved Death Investigations*, for review with ¶488–92 on July 19, 2019, and this policy then underwent multiple rounds of revision, review, and comment in connection with ¶488–92 and other paragraphs (often alongside the Use of Force policy suite); its title changed to *Firearm Discharge and Officer-Involved Death Incident Response and Investigations*; and the City and the CPD issued temporary versions of the policy pursuant to ¶631 (extraordinary circumstances).

Shootings and Officer Involved Deaths. The IMT has the October 2017 version of this SOP and does not have information regarding more recent revisions or the CPD's intentions of revisions of this policy. We have concerns that this Special Order and the General Order G03-06 contradict each other in areas relevant to ¶¶488–91. The IMT expects that the CPD will provide the IMT updated information about and future versions of Bureau of Detectives S017-02; the CPD is unlikely to reach compliance without doing so.

In short, significant revisions are necessary for G03-06 to meet the requirements of ¶¶488–91. We encourage the CPD to prioritize overhauling this policy and rethinking how to address the requirements of ¶¶488–91.

In the sixth reporting period, COPA finalized its *Major Incident Responses – Officer-Involved Shooting or Officer-Involved Death* policy in the sixth reporting period. This is a well-written policy which provides authority and direction to COPA investigators in officer-involved shooting and officer-involved death administrative investigations. This policy addresses ¶490 in its Public Policy Statement, which provides that information regarding an officer-involved shooting or officer-involved death will be shared in a timely manner with the families of individuals who have been injured or are deceased. With this, COPA moved into Preliminary compliance with ¶490.

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The City made progress toward but did not ultimately reach Preliminary compliance. Moving forward, we look forward to receiving and reviewing COPA training materials related to ¶490 and its *Major Incident Responses – Officer-Involved Shooting or Officer-Involved Death* policy. Related to the CPD, we hope the CPD will make consistent concerted efforts to revise and produce G03-06 in the seventh reporting period to obtain as much feedback as possible throughout the reporting period and hopefully move toward finalizing the policy.

Paragraph 490 Compliance Progress History

FIRST REPORTING PERIOD	SECOND REPORTING PERIOD	THIRD REPORTING PERIOD
SEPTEMBER 1, 2019 – AUGUST 31, 2019	SEPTEMBER 1, 2019 – FEBRUARY 29, 2020	MARCH 1, 2020 – DECEMBER 31, 2020
COMPLIANCE PROGRESS:	COMPLIANCE PROGRESS:	COMPLIANCE PROGRESS:
Not Applicable	Not Applicable	Not Applicable
FOURTH REPORTING PERIOD	**FIFTH REPORTING PERIOD**	**SIXTH REPORTING PERIOD**
JANUARY 1, 2021 – JUNE 30, 2021	JULY 1, 2021 – DECEMBER 31, 2021	JANUARY 1, 2022 – JUNE 30, 2022
COMPLIANCE PROGRESS:	COMPLIANCE PROGRESS:	COMPLIANCE PROGRESS:
None	None	None

Accountability and Transparency: ¶491

491. *In addition to the investigative requirements set forth in this Agreement, with respect to officer-involved shootings and officer-involved deaths, the City and CPD will ensure that CPD members act in a manner that is consistent with CPD's commitment to the principle of the sanctity of life, and will treat the deceased with respect, including the prompt screening from public view or covering of the deceased and, following timely evidence collection procedures, removal of the deceased.*

Compliance Progress (Reporting Period: January 1, 2022, through June 30, 2022)

Preliminary:	***Not in Compliance***
Secondary:	***Not Yet Assessed***
Full:	***Not Yet Assessed***

The City and the CPD made efforts toward but did not meet Preliminary compliance with ¶490 in the sixth reporting period.

To evaluate Preliminary compliance with ¶491, the IMT reviewed the CPD's relevant policies and documents following the process described in the Consent Decree (¶¶626–41), which outlines applicable consultation, resolution, workout, and public comment periods.

Progress before the Sixth Reporting Period

In the fourth reporting period, the City produced an updated suite of directives. The suite was designed to more closely align with the requirements of ¶¶488–92, but they were not submitted in time to be implemented following the Consent Decree process. The CPD did not produce any documentation under ¶491 in the fifth reporting period.

Progress in the Sixth Reporting Period

In the sixth reporting period the City and the CPD provided a revised version of General Order G03-06, *Firearm Discharge and Officer-Involved Death Incident Response and Investigation*, for review with ¶¶488–91.[178] A previous version of this policy had been implemented but only as a temporary solution and we noted that

[178] The City and the CPD first provided a draft of G03-06, *Officer Involved Death Investigations*, for review with ¶488–92 on July 19, 2019, and this policy then underwent multiple rounds of revision, review, and comment in connection with ¶488–92 and other paragraphs (often alongside the Use of Force policy suite); its title changed to *Firearm Discharge and Officer-Involved Death Incident Response and Investigations*; and the City and the CPD issued temporary versions of the policy pursuant to ¶631 (extraordinary circumstances).

the temporary version fell short of meeting Consent Decree requirements. As for the revised draft submitted in the sixth reporting period, we reviewed and provided extensive comments. G03-06 provides direction to the officer involved in a firearm discharge or incident, witness and responding officers, supervisors and responding supervisors and commanders, and the CPD has inserted some passages throughout in an attempt to satisfy the requirements of ¶¶488–91. However, this General Order lacks detail sufficient to adequately instruct investigators how to respond and conduct their work in coordination with COPA to ensure a smooth and complete investigation.

Much of the revised G03-06 is copied from the previous, temporary version of this policy. While the CPD has made some improvements—such as improving the Sanctity of Life Statement—additional efforts are necessary. For example, even the Sanctity of Life Statement should be further revised to provide a stand-alone section recognizing the sanctity of life and respect for a victim. This should occur before and separate from more specific instruction to officer. Another area of necessary improvement is making unequivocal statements and direction to ensure that COPA is granted access to participate in preliminary assessment in the immediate aftermath of an officer involved death or firearm discharge, just as CPD personnel are able to investigate. We have concerns that Section IV of the draft G03-06 includes various clauses on which the CPD could rely to deny COPA the access called for by ¶¶488–91.

G03-06 references procedures established by the Bureau of Detectives (also known as BoD) Chief. This raises the question of why these procedures are not simply included in this policy. Furthermore, these procedures, regardless of where they are incorporated, will need to be produced for review. In addition to the concerns we have about G03-06, we also have concerns about the Bureau of Detectives Special Order 17-02, *Conduct of Investigations Regarding Officer Involved Shootings and Officer Involved Deaths*. The IMT has the October 2017 version of this SOP and does not have information regarding more recent revisions or the CPD's intentions of revisions of this policy. We have concerns that this Special Order and the General Order G03-06 contradict each other in areas relevant to ¶¶488–91. The IMT expects that the CPD will provide the IMT updated information about and future versions of Bureau of Detectives S017-02; the CPD is unlikely to reach compliance without doing so.

In short, significant revisions are necessary for G03-06 to meet the requirements of ¶¶488–91. We encourage the CPD to prioritize overhauling this policy and rethinking how to address the requirements of ¶¶488–91.

COPA finalized its *Major Incident Responses – Officer-Involved Shooting or Officer-Involved Death* policy early in the sixth reporting period. This is a well-written policy which provides authority and direction to COPA investigators in officer-involved

shooting and officer-involved death administrative investigations. This policy fully addresses the many requirements of ¶488 and its subparagraphs; with this COPA moved into Preliminary compliance.

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The City and the CPD began efforts toward, but have a significant amount of work ahead to reach Preliminary compliance with ¶488. We hope the CPD will make consistent concerted efforts to revise and produce G03-06 in the seventh reporting period to obtain as much feedback as possible throughout the reporting period to move toward finalizing the policy.

Paragraph 491 Compliance Progress History

FIRST REPORTING PERIOD	SECOND REPORTING PERIOD	THIRD REPORTING PERIOD
SEPTEMBER 1, 2019 – AUGUST 31, 2019	SEPTEMBER 1, 2019 – FEBRUARY 29, 2020	MARCH 1, 2020 – DECEMBER 31, 2020
COMPLIANCE PROGRESS:	COMPLIANCE PROGRESS:	COMPLIANCE PROGRESS:
Not Applicable	Not Applicable	Not Applicable
FOURTH REPORTING PERIOD	**FIFTH REPORTING PERIOD**	**SIXTH REPORTING PERIOD**
JANUARY 1, 2021 – JUNE 30, 2021	JULY 1, 2021 – DECEMBER 31, 2021	JANUARY 1, 2022 – JUNE 30, 2022
COMPLIANCE PROGRESS:	COMPLIANCE PROGRESS:	COMPLIANCE PROGRESS:
None	None	None

Accountability and Transparency: ¶492

492. *Criminal investigations into the actions of any CPD member relating to any "officer-involved death" will comply with the Police and Community Relations Improvement Act, 50 ILCS 727/1-1 et seq. ("PCRIA"). The City will use best efforts to ensure that a "law enforcement agency," as that term is defined under PCRIA, will conduct such investigations. The "law enforcement agency" conducting criminal investigations into the actions of any CPD member relating to any "officer-involved death" will have substantial experience and expertise in criminal homicide investigations.*

Compliance Progress (Reporting Period: January 1, 2022, through June 30, 2022)

Preliminary:	***Not in Compliance***
Secondary:	***Not Yet Assessed***
Full:	***Not Yet Assessed***

The City did not reach Preliminary compliance with ¶492 in the sixth reporting period because the CPD did not provide any documentation demonstrating efforts related to ¶492 in the period.

To evaluate Preliminary compliance with ¶492, the IMT reviewed the CPD's relevant policies and documents following the process described in the Consent Decree (¶¶626–41), which outlines applicable consultation, resolution, workout, and public comment periods.

Progress before the Sixth Reporting Period

In the fourth reporting period, the City produced an updated suite of directives. The suite was designed to more closely align with the requirements of ¶¶488–92, but they were not submitted in time to be implemented following the requisite Consent Decree process. In the fifth reporting period, the CPD did not produce any documentation related to efforts under ¶492.

Progress in the Sixth Reporting Period

The City and the CPD did not submit any materials related to ¶492 in the sixth reporting period. We note that compliance with this paragraph will required enlisting the help of an outside agency. We hope to work closely with the City and the CPD through this process.

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With this, the City did not reach Preliminary compliance.

Paragraph 492 Compliance Progress History

FIRST REPORTING PERIOD	SECOND REPORTING PERIOD	THIRD REPORTING PERIOD
SEPTEMBER 1, 2019 – AUGUST 31, 2019	SEPTEMBER 1, 2019 – FEBRUARY 29, 2020	MARCH 1, 2020 – DECEMBER 31, 2020
COMPLIANCE PROGRESS:	COMPLIANCE PROGRESS:	COMPLIANCE PROGRESS:
Not Applicable	Not Applicable	Not Applicable
FOURTH REPORTING PERIOD	**FIFTH REPORTING PERIOD**	**SIXTH REPORTING PERIOD**
JANUARY 1, 2021 – JUNE 30, 2021	JULY 1, 2021 – DECEMBER 31, 2021	JANUARY 1, 2022 – JUNE 30, 2022
COMPLIANCE PROGRESS:	COMPLIANCE PROGRESS:	COMPLIANCE PROGRESS:
None	None	None

Accountability and Transparency: ¶493

493. *OAG acknowledges that, in many districts, CPD has designated Accountability Sergeants whose responsibilities include receiving, processing, and investigating complaints made against CPD members, which are referred to the districts by BIA. Within 120 days of the Effective Date, CPD will develop a policy outlining the responsibilities of Accountability Sergeants, their respective Commanders, and the BIA Lieutenants responsible for supervising the Accountability Sergeant's investigations ("BIA Lieutenants"). The policy will provide, among other things, a process by which: a. within 72 hours of receiving a complaint from BIA for investigation, an immediate supervisor will be provided a summary of the complaint allegations concerning the involved CPD member; b. within seven days of the final disciplinary decision, the Commander and an immediate supervisor will be provided with the investigative findings, recommended discipline or corrective action, if any; and c. an immediate supervisor of the involved CPD member and the Accountability Sergeant will meet with the involved CPD member regarding the investigative findings, recommended discipline or corrective action, if any, unless the CPD member declines to meet.*

Compliance Progress

(Reporting Period: January 1, 2022, through June 30, 2022)

Preliminary:	***In Compliance*** **(FIFTH REPORTING PERIOD)**
Secondary:	***Not in Compliance***
Full:	***Not Yet Assessed***

The City and the CPD maintained Preliminary compliance with ¶493 in the sixth reporting period and also made progress toward Secondary compliance. Because training materials remain in the development stage, the CPD has not yet reached Secondary compliance, which required an approved training be provided to at least 95% of required personnel.

To evaluate Preliminary compliance with ¶493, the IMT reviewed the CPD's relevant policies and documents following the process described in the Consent Decree (¶¶626–41), which outlines applicable consultation, resolution, workout, and public comment periods. To evaluate Secondary compliance, the IMT reviewed the entities' development, implementation, and evaluation of training (¶286).

Progress before the Sixth Reporting Period

In the fifth reporting period, the CPD revised and ultimately finalized Special Order S08-01, *Complaint and Disciplinary Investigators and Investigations*, which addresses the requirements of ¶493(a). The CPD also finalized Special Order S08-01-04, *Post Investigation Log Number Procedures*, which addresses ¶493(b) and (c) on the final day of the fifth reporting period, moving the CPD into Preliminary compliance with ¶493.

Progress in the Sixth Reporting Period

This reporting period, the CPD submitted draft BIA eLearning materials for review. These materials were still in draft stage and not in final presentation form. We reviewed and provided the CPD feedback on the materials. We look forward to reviewing further developed BIA eLearning materials in the next reporting period.

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The CPD maintained Preliminary compliance with ¶493 and made progress toward Secondary compliance. We look forward to reviewing further revised materials in the coming reporting period.

Paragraph 493 Compliance Progress History

FIRST REPORTING PERIOD SEPTEMBER 1, 2019 – AUGUST 31, 2019 COMPLIANCE PROGRESS: None	SECOND REPORTING PERIOD SEPTEMBER 1, 2019 – FEBRUARY 29, 2020 COMPLIANCE PROGRESS: None	THIRD REPORTING PERIOD MARCH 1, 2020 – DECEMBER 31, 2020 COMPLIANCE PROGRESS: None
FOURTH REPORTING PERIOD JANUARY 1, 2021 – JUNE 30, 2021 COMPLIANCE PROGRESS: None	FIFTH REPORTING PERIOD JULY 1, 2021 – DECEMBER 31, 2021 COMPLIANCE PROGRESS: Preliminary	SIXTH REPORTING PERIOD JANUARY 1, 2022 – JUNE 30, 2022 COMPLIANCE PROGRESS: Preliminary

Accountability and Transparency: ¶494

494. *CPD will require that: a. investigations completed by Accountability Sergeants are held to the same investigative standards as those completed by BIA; b. beginning in 2020, and by January 31, 2022, each District Commander designates at least two Accountability Sergeants who will report to the District Commander, and whose primary responsibility is receiving, processing, and investigating complaints against CPD members; c. before a Sergeant is designated an Accountability Sergeant, his or her name will be provided by his or her District Commander to BIA for BIA's review; d. each Accountability Sergeant is provided with the name of and contact information for the BIA Lieutenant responsible for reviewing the Accountability Sergeant's work; e. BIA Lieutenants provide regular case-related and overall performance feedback to each of the Accountability Sergeants and his or her respective District Commander; f. BIA Lieutenants review and approve all of the Accountability Sergeant's proposed investigative findings and disciplinary recommendations; g. all Accountability Sergeants and BIA Lieutenants have access to the PRS or any system replacing the PRS; h. all Accountability Sergeants have access to BIA policies, directives, protocols, and training materials; and i. all Accountability Sergeants receive the initial and in-service training provided to BIA investigators as provided for in this Agreement.*

Compliance Progress

(Reporting Period: January 1, 2022, through June 30, 2022)

Deadline:	April 4, 2022*	☐ **Met**	☑ **Missed**
	*Extended from January 31, 2022, due to COVID-19		
Preliminary:	***Not in Compliance***		
Secondary:	***Not Yet Assessed***		
Full:	***Not Yet Assessed***		

The City and the CPD have made efforts toward both Preliminary and Secondary compliance, but did not ultimately reach compliance by the end of the sixth reporting period. The CPD also missed the April 4, 2022 deadline.

To evaluate Preliminary compliance with ¶494, the IMT reviewed the CPD's relevant policies and documents following the process described in the Consent Decree (¶¶626–41), which outlines applicable consultation, resolution, workout, and public comment periods.

Progress before the Sixth Reporting Period

In the fifth reporting period, the CPD finalized S08-01, *Complaint and Disciplinary Investigations*, which addresses ¶494(a), (c), (d), (e), (f), (g), (h), and (i). The CPD also submitted for review BIA's Unit Directive, *Training Unit*, in the fifth reporting period, which addresses ¶494(i). Before the fifth reporting period, the CPD had produced other BIA Unit Directives under ¶494 such as *Accountability* Sergeants, which we found addressed the requirements of ¶494. However these Unit Directives were never posted for public comment and finalized.[179]

Additionally, the CPD submitted for review the *Fiscal Year 2022 BIA Staffing and Equipment Needs Assessment Implementation Plan*. This plan included concerning information that seemed to indicate that while ¶494(b) of the Consent Decree requires two Accountability Sergeants, BIA does not require both to be full time investigators. During site visits in the fall of 2021, we learned that the Accountability Sergeants were required to fill other supervisory responsibilities that often prevented them from being able to complete their investigations in a timely manner. We explained that we expected to have ongoing discussions related to this issue, and urged the CPD to update the policy to ensure that two Accountability Sergeants are full time investigators, per the requirements of ¶494(b).

Progress in the Sixth Reporting Period

This reporting period the City and the CPD provided Special Order S08-01-06, *Supervisor Responsibilities in Log Number Investigations*, but stated in its production letter that S08-01-06 was not submitted S08-01-06 "to demonstrate compliance with Consent Decree paragraphs, and the CPD is not seeking review of this policy at this time." Nonetheless, we reviewed the draft S08-01-06 and submitted comments, noting our expectation that we receive final draft of this policy for review under ¶627. In the meantime, we suggested that the CPD consider changing the title of S08-01-06 to "BIA Supervisor Responsibilities in Log Number Investigations" for clarity, since the policy only addresses the responsibilities of BIA personnel. We observed that Sections IV.A.15 and IV.B.9 addressed the requirements of ¶494(i).

Although we encourage the CPD to produce and revise S08-01-06 per the Consent Decree process, we note that finalization of S08-01-06 as it is now written will not bring the CPD into compliance with ¶494 because subparagraph (b) will still not

[179] In the sixth reporting period, the CPD informed the IMT and the OAG that BIA would begin to move away from Unit Directives. Instead of Unit Directives, instruction will be provided in General Orders and Special Orders. This applies to the BIA Unit Directives that we reviewed, and in some instances provided no-objection notices to in previous reporting periods. The CPD began this process in sixth reporting period, and the process is ongoing.

be addressed by CPD policy. We encourage the CPD to consider how this requirement can be incorporated into current policy, and then urge the CPD to assure that positions are adequately staffed to allow for compliance with subparagraph (b).

Also in the sixth reporting period, the CPD submitted draft BIA eLearning materials for review. These materials were still in draft stage and not in final presentation form. We reviewed these materials and provided feedback. The draft training materials addressed most of the requirements of ¶494 and its subparagraphs. We look forward to reviewing further revised versions of this training and encourage the CPD to revise the materials with an eye toward instructing compliance with all of ¶494's requirements.

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With this, the City and the CPD made some effort toward Preliminary compliance and also Secondary compliance. However, the CPD must focus its attention on incorporating into policy the requirements of ¶494(b) to move forward with compliance with this paragraph.

Paragraph 494 Compliance Progress History

FIRST REPORTING PERIOD	SECOND REPORTING PERIOD	THIRD REPORTING PERIOD
SEPTEMBER 1, 2019 – AUGUST 31, 2019	SEPTEMBER 1, 2019 – FEBRUARY 29, 2020	MARCH 1, 2020 – DECEMBER 31, 2020
COMPLIANCE PROGRESS:	COMPLIANCE PROGRESS:	COMPLIANCE PROGRESS:
Not Applicable	Not Applicable	None

FOURTH REPORTING PERIOD	FIFTH REPORTING PERIOD	SIXTH REPORTING PERIOD
JANUARY 1, 2021 – JUNE 30, 2021	JULY 1, 2021 – DECEMBER 31, 2021	JANUARY 1, 2022 – JUNE 30, 2022
COMPLIANCE PROGRESS:	COMPLIANCE PROGRESS:	COMPLIANCE PROGRESS:
None	None	None

Accountability and Transparency: ¶495

495. *Supervisory reviews of investigations will be conducted as follows: (a) Accountability Sergeants will forward the administrative investigative file through his or her chain of command to the BIA Lieutenant: (i) the Accountability Sergeant's chain of command will ensure that the proposed investigative findings and recommendations are complete, meet the requirements of law, CPD policy, and this Agreement, and that findings are supported by the appropriate standard of proof; (ii) BIA Lieutenants will review the proposed investigative findings and recommendations for accuracy and completeness, and will order additional investigation when it appears that there is additional relevant evidence that may assist in resolving inconsistencies or improving the reliability or credibility of the findings; and (iii) whenever a higher ranking officer orders additional investigation, it will be documented in writing. (b) all investigations conducted by COPA or BIA, once complete, will be forwarded through the investigator's chain of supervision/command to the Chief Administrator of COPA or the Chief of BIA, respectively: (i) COPA and BIA will each ensure that their respective administrative investigative files are complete, meet the requirements of law, COPA and CPD policy, and this Agreement; and that findings are supported by the appropriate standard of proof; (ii) the Chief Administrator or the Chief of BIA, or his or her designee, will order additional investigation when it appears that there is additional relevant evidence that may assist in resolving inconsistencies or improving the reliability or credibility of the findings; and (iii) whenever COPA and BIA orders additional investigation, the request and resulting investigation will be documented in writing.*

Compliance Progress (Reporting Period: January 1, 2022, through June 30, 2022)

Preliminary:		***Not in Compliance***[180]
	CPD	***Not in Compliance***
	COPA	***In Compliance*** **(FIFTH REPORTING PERIOD)**
Secondary:		***Not in Compliance***
	CPD	***Not Yet Assessed***
	COPA	***Not in Compliance***
Full:		***Not Yet Assessed***

The City did not reach Preliminary compliance with ¶495 in the sixth reporting period. But COPA maintained Preliminary compliance with this paragraph in the sixth reporting period. Because all relevant City entities must reach levels of compliance to bring the City, as a whole, into compliance, the City has not yet reached Preliminary compliance.

To evaluate Preliminary compliance with ¶495, the IMT reviewed the CPD's relevant policies and documents following the process described in the Consent Decree (¶¶626–41), which outlines applicable consultation, resolution, workout, and public comment periods. To evaluate Secondary compliance, the IMT reviewed COPA's training development, implementation, and evaluation (¶286).

Progress before the Sixth Reporting Period

In previous reporting periods, the CPD produced for review several draft policies that relate to ¶495's requirements. This included S08-01, *Complaint and Disciplinary Investigators and Investigations* and BIA's Unit Directive, *Requirements of a Complete Investigative File*.[181] In the fifth reporting period, the CPD provided revised drafts of Special Order S08-01, *Complaint and Disciplinary Investigators and Investigations*, which addressed ¶495(a)(i) and (a)(iii) but did not fully address ¶495(a)(ii). We submitted a no-objection notice.[182] Thereafter, the CPD posted the

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[180] As referenced above, the Consent Decree requires actions by various City entities, including the CPD, COPA, the Police Board, and the Office of the Inspector General. Ultimately, the City is responsible for ensuring compliance. As a result, if a Consent Decree paragraph requires actions by multiple City entities, we will not find that the City has achieved Preliminary, Secondary, or Full compliance until all those entities have achieved the corresponding level of compliance. Nonetheless, for some paragraphs, we will clarify compliance assessments for each entity to demonstrate which benchmarks have been achieved.

[181] In the sixth reporting period, the CPD informed the IMT and the OAG that BIA would begin to move away from Unit Directives. Instead of Unit Directives, instruction will be provided in General Orders and Special Orders. This applies to the BIA Unit Directives that we reviewed, and in some instances provided no-objection notices to in previous reporting periods. The CPD began this process in sixth reporting period, and efforts are ongoing.

[182] Under the Consent Decree policy review process, the City and the CPD consult with the IMT and the OAG to develop or revise policies in accordance with Consent Decree requirements. *See* ¶¶626–37. The City and the CPD provide the policy for review at least 30 days before the

Special Order for public comment and, on the last day of the reporting period, finalized the Special Order. In addition, the CPD produced S08-01-01, *Conducting Log Number Investigations*, which partially addresses ¶495(a)(i) and fully addresses ¶495(a)(ii). However, this policy did not address ¶495(b), and at the end of the fifth reporting period, it remained in the collaborative review and revision process.

COPA, in the fourth reporting period, provided Policy 3.1.3, *Final Summary Report*, which addressed ¶495. In the fifth reporting period, COPA continued to work toward Preliminary compliance, and eventually finalized Policy 3.1.3 *Final Summary Report*. This policy completely addresses ¶495(b).

Progress in the Sixth Reporting Period

This reporting period, the City and the CPD provided S08-01-06, *Supervisor Responsibilities in Log Number Investigations*. But when this Special Order was submitted, the CPD indicated that this Special Order was not submitted "to demonstrate compliance with Consent Decree paragraphs, and the CPD is not seeking review of this policy at this time." Nonetheless, we reviewed the policy and provided comments on June 15, 2022, expressing our expectation that we receive a final draft of this policy for review under ¶627. We observed that Section IV.A.8 of the draft policy addresses the requirements of ¶495(a)(i), and Section VI.A.9. addresses the requirements of ¶495(a)(ii).

Additionally, the CPD submitted multiple revised versions of S08-01-05, *Conducting Log Number Investigations*.[183] The draft versions of this policy address the requirements of ¶495(a)(i), ¶495(a)(ii), and ¶495(b) by outlining the process by which supervisory reviews of investigations will be conducted. The CPD submitted a further revised version of S08-01-05 on June 30, 2022, the last day of the reporting period. Therefore, this policy remained in the collaborative review and revision process at the end of the sixth reporting period.

policy is scheduled to go into effect, and the IMT and the OAG have 30 days to comment on the policy. *See* ¶¶627–28. The City, the CPD, the IMT, and the OAG then work together to resolve comments. The IMT and the OAG will, separately and in writing, notify the City and the CPD that they no longer have any comments, which is referred to as a "no-objection notice." Once the City and the CPD receive a no-objection notice from both the IMT and the OAG, the City and the CPD will begin the process of finalizing the policy. Typically, this includes the CPD posting the policy on its website for public comment for at least 15 days. The City and the CPD must then consider those comments and make additional changes, as appropriate. *See* ¶633.

[183] The *Conducting Log Number Investigations* policy was produced in previous reporting periods as S08-01-01. The policy was re-numbered as S08-01-05 when it was produced May 5, 2022.

While COPA maintained Preliminary compliance with ¶495 in the sixth reporting period, COPA did not submit any materials to demonstrate Secondary compliance with ¶495 in the sixth reporting period.

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The CPD did not yet reach Preliminary compliance, but made significant efforts related to this paragraph in the sixth reporting period. We anticipate that the CPD will be able to finalize its policies in the seventh reporting period to obtain Preliminary compliance. For COPA, we will look for COPA to develop training related to the requirements of ¶495 and COPA's related policy.

Paragraph 495 Compliance Progress History

FIRST REPORTING PERIOD	SECOND REPORTING PERIOD	THIRD REPORTING PERIOD
SEPTEMBER 1, 2019 – AUGUST 31, 2019	SEPTEMBER 1, 2019 – FEBRUARY 29, 2020	MARCH 1, 2020 – DECEMBER 31, 2020
COMPLIANCE PROGRESS:	COMPLIANCE PROGRESS:	COMPLIANCE PROGRESS:
Not Applicable	Not Applicable	Status Update
FOURTH REPORTING PERIOD	**FIFTH REPORTING PERIOD**	**SIXTH REPORTING PERIOD**
JANUARY 1, 2021 – JUNE 30, 2021	JULY 1, 2021 – DECEMBER 31, 2021	JANUARY 1, 2022 – JUNE 30, 2022
COMPLIANCE PROGRESS:	COMPLIANCE PROGRESS:	COMPLIANCE PROGRESS:
None	None	None

Accountability and Transparency: ¶496

496. *The City and CPD will ensure that interfering with an administrative investigation, including being untruthful in an investigation into misconduct or colluding with other individuals to undermine such an investigation, or intentionally withholding requested evidence or information from an investigator, will result in disciplinary action and/or criminal prosecution based on the seriousness of the conduct.*

Compliance Progress (Reporting Period: January 1, 2022, through June 30, 2022)

Preliminary:		***In Compliance*** **(FIFTH REPORTING PERIOD)**[184]
	CPD	***In Compliance*** **(FIFTH REPORTING PERIOD)**
	COPA	***In Compliance*** **(FIFTH REPORTING PERIOD)**
Secondary:		***Not in Compliance***
	CPD	***Not in Compliance***
	COPA	***Not in Compliance***
Full:		***Not Yet Assessed***

The CPD and COPA maintained Preliminary compliance with ¶496 in the sixth reporting period, but neither entity moved into Secondary compliance. With this the City maintained Preliminary compliance with ¶496 in the sixth reporting period, but did not reach Secondary compliance.

To evaluate Preliminary compliance with ¶496, the IMT reviewed the CPD's and COPA's relevant policies and documents following the process described in the Consent Decree (¶¶626–41), which outlines applicable consultation, resolution, workout, and public comment periods.[185] To evaluate Secondary compliance, the IMT reviewed the entities' training development, implementation, and evaluation (¶286).

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[184] As referenced above, the Consent Decree requires actions by various City entities, including the CPD, COPA, the Police Board, and the Office of the Inspector General. Ultimately, the City is responsible for ensuring compliance. As a result, if a Consent Decree paragraph requires actions by multiple City entities, we will not find that the City has met Preliminary, Secondary, or Full compliance until all those entities have met the corresponding level of compliance. Nonetheless, for some paragraphs, we will clarify compliance assessments for each entity to demonstrate which benchmarks have been met.

[185] The OAG, the City, and the IMT agreed to a stipulation that provides a different review process for review of COPA policies and training materials. *See Stipulation Regarding the Policy and Training Review Process for COPA*, *Illinois v. Chicago*, Case No. 1:17-cv-06260 (Jan. 30, 2020). The review process in the Stipulation mirrors the review process under ¶¶626–41, but among other things, gives the OAG and the IMT a shorter timeframe for review of COPA policies and training materials.

Progress before the Sixth Reporting Period

In the fifth reporting period, the CPD revised and finalized General Order G08-01, *Complaint and Disciplinary Procedures*, which addressed ¶496. This brought the CPD into Preliminary compliance.

In the fifth reporting period, COPA finalized Policy 3.1.2, *Fact Gathering and the Investigative Process*, which addresses ¶496 in the Quality Assurance section of the policy. With this, COPA achieved Preliminary compliance.

Progress in the Sixth Reporting Period

This reporting period, the CPD submitted draft BIA eLearning materials for review. We reviewed and provided the CPD feedback on the materials. We look forward to reviewing further developed BIA eLearning materials in the next reporting period.

While COPA maintained Preliminary compliance with ¶496 in the sixth reporting period, COPA did not submit any materials to demonstrate Secondary compliance with ¶496 in the sixth reporting period.

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The City maintained Preliminary compliance with ¶496. We look forward to reviewing CPD's further revised training materials in the coming reporting period. We also expect COPA will develop training to instruct compliance with ¶496 and COPA's relevant policy.

Paragraph 496 Compliance Progress History

FIRST REPORTING PERIOD	SECOND REPORTING PERIOD	THIRD REPORTING PERIOD
SEPTEMBER 1, 2019 – AUGUST 31, 2019	SEPTEMBER 1, 2019 – FEBRUARY 29, 2020	MARCH 1, 2020 – DECEMBER 31, 2020
COMPLIANCE PROGRESS:	COMPLIANCE PROGRESS:	COMPLIANCE PROGRESS:
Not Applicable	Not Applicable	None
FOURTH REPORTING PERIOD	**FIFTH REPORTING PERIOD**	**SIXTH REPORTING PERIOD**
JANUARY 1, 2021 – JUNE 30, 2021	JULY 1, 2021 – DECEMBER 31, 2021	JANUARY 1, 2022 – JUNE 30, 2022
COMPLIANCE PROGRESS:	COMPLIANCE PROGRESS:	COMPLIANCE PROGRESS:
None	Preliminary	Preliminary

Accountability and Transparency: ¶497

497. *COPA and CPD will review and revise, as necessary, the policies governing COPA and CPD to ensure the processes for prevention of CPD member collusion and witness contamination comply with the terms of this agreement.*

Compliance Progress (Reporting Period: January 1, 2022, through June 30, 2022)

Preliminary:		***In Compliance*** **(FIFTH REPORTING PERIOD)**[186]
	CPD	***In Compliance*** **(FIFTH REPORTING PERIOD)**
	COPA	***In Compliance*** **(FIFTH REPORTING PERIOD)**
Secondary:		***Not in Compliance***
	CPD	***Not in Compliance***
	COPA	***Not in Compliance***
Full:		***Not Yet Assessed***

The CPD and COPA maintained Preliminary compliance with ¶496 in the sixth reporting period, but neither entity moved into Secondary compliance. With this the City maintained Preliminary compliance with ¶496 in the sixth reporting period.

To evaluate Preliminary compliance with ¶497, the IMT reviewed the CPD's and COPA's relevant policies and documents following the process described in the Consent Decree (¶¶626–41), which outlines applicable consultation, resolution, workout, and public comment periods.[187] To evaluate Secondary compliance, the IMT reviewed the entities' training development, implementation, and evaluation (¶286).

Progress before the Sixth Reporting Period

In the fifth reporting period, the CPD finalized General Order G08-01, *Complaint and Disciplinary Procedures*, which addressed ¶497. Additionally, the CPD provided various policies that contribute to setting the standards aimed to prevent

[186] As referenced above, the Consent Decree requires actions by various City entities, including the CPD, COPA, the Police Board, and the Office of the Inspector General. Ultimately, the City is responsible for ensuring compliance. As a result, if a Consent Decree paragraph requires actions by multiple City entities, we will not find that the City has met Preliminary, Secondary, or Full compliance until all those entities have met the corresponding level of compliance. Nonetheless, for some paragraphs, we will clarify compliance assessments for each entity to demonstrate which benchmarks have been met.

[187] The OAG, the City, and the IMT agreed to a stipulation that provides a different review process for review of COPA policies and training materials. *See Stipulation Regarding the Policy and Training Review Process for COPA*, *Illinois v. Chicago*, Case No. 1:17-cv-06260 (Jan. 30, 2020). The review process in the Stipulation mirrors the review process under ¶¶626–41, but among other things, gives the OAG and the IMT a shorter timeframe for review of COPA policies and training materials.

CPD member collusion and witness contamination.[188] These efforts brought the CPD into Preliminary compliance.

In the fifth reporting period, COPA finalized Policy 3.1.2, *Fact Gathering and the Investigative Process*, which addresses ¶497. With this, COPA achieved Preliminary compliance.

Progress in the Sixth Reporting Period

While both the CPD and COPA maintained Preliminary compliance with ¶497, neither entity produced materials to demonstrate Secondary compliance with ¶497 in the sixth reporting period.

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In the seventh reporting period, we will look for both entities to develop trainings related to the requirements of ¶497 and each entities' related policies.

Paragraph 497 Compliance Progress History

FIRST REPORTING PERIOD	SECOND REPORTING PERIOD	THIRD REPORTING PERIOD
SEPTEMBER 1, 2019 – AUGUST 31, 2019	SEPTEMBER 1, 2019 – FEBRUARY 29, 2020	MARCH 1, 2020 – DECEMBER 31, 2020
COMPLIANCE PROGRESS:	COMPLIANCE PROGRESS:	COMPLIANCE PROGRESS:
Not Applicable	Status Update	None
FOURTH REPORTING PERIOD	**FIFTH REPORTING PERIOD**	**SIXTH REPORTING PERIOD**
JANUARY 1, 2021 – JUNE 30, 2021	JULY 1, 2021 – DECEMBER 31, 2021	JANUARY 1, 2022 – JUNE 30, 2022
COMPLIANCE PROGRESS:	COMPLIANCE PROGRESS:	COMPLIANCE PROGRESS:
None	Preliminary	Preliminary

[188] Policies referenced include G08-01-02, S08-01-01, and S08-01.

Accountability and Transparency: ¶498

498. *The City and CPD will ensure that any command channel review conducted is complete within 30 days. Within 30 days of the Effective Date, CPD may draft a policy that provides, for the most serious administrative investigations, the circumstances under which up to 45 days will be provided for command channel review. The draft policy will be provided to the Monitor for review and approval.*

Compliance Progress

(Reporting Period: January 1, 2022, through June 30, 2022)

Preliminary:	***In Compliance*** **(SECOND REPORTING PERIOD)**
Secondary:	***In Compliance*** **(THIRD REPORTING PERIOD)**
Full:	***Not in Compliance***

The City and the CPD maintained Secondary compliance with ¶498 in the sixth reporting period. The CPD made efforts toward, but ultimately did not reach Full compliance with ¶498 in the sixth reporting period.

To evaluate Preliminary compliance with ¶498, the IMT reviewed the CPD's relevant policies and documents following the process described in the Consent Decree (¶¶626–41), which outlines applicable consultation, resolution, workout, and public comment periods. To evaluate Secondary compliance, the IMT reviewed the entities' training development, implementation, and evaluation (¶286). To evaluate Full compliance, we consulted various data sources to ensure that the City and the CPD have sufficiently implemented their policies and training associated with ¶498. More specifically, the IMT sought out timelines of all command channel reviews to ensure they are conducted within 30 days and in a manner in accordance with ¶498.

Progress before the Sixth Reporting Period

In prior reporting periods, the IMT reviewed and approved the CPD's Special Order S08-01-03, *Command Channel Review (CCR)*, as well as BIA's related training materials—including lesson plans and slide decks—which were sufficient to demonstrate Preliminary and Secondary compliance with ¶498. In the fourth reporting period, BIA maintained Secondary compliance due to its policy and continued training of the appropriate CPD command staff and officers. To further strengthen the Command Channel Review process, the CPD produced BIA's S08-01, *Complaint and Disciplinary Investigators and Investigations*.

In the fifth reporting period, the CPD provided for review BIA's Unit Directive, *Advocate Section Command Channel Review Procedures*. This directive did not address ¶498, because it did not state that a Command Channel Review must be

completed in 45 days, as required by the Consent Decree. We provided comments in September 2021, but we did not receive further information regarding the posting of the Unit Directive for public comment and finalization.[189] The CPD also produced BIA's *2020 Audit*, where the CPD stated that it was not in operational compliance with the requirements of ¶498. While this audit was well done, we received the *2020 Audit* on December 28, 2021—several months too late. We explained that, moving forward, such audits need to be provided in a timelier manner to demonstrate compliance and to allow the CPD to identify areas on which it needs to focus its efforts and attention.

Progress in the Sixth Reporting Period

This reporting period, the City and the CPD provided drafts of Special Order S08-01-07, *Command Channel Review*.[190] On June 30, 2022, the last day of the reporting period, the CPD submitted a further revised draft of S08-01-07. Therefore, this policy remained in the collaborative review and revision process at the end of the sixth reporting period. While the CPD did not specifically reference ¶498 in their submission of S08-01-07, a draft policy focused on the Command Channel Review process. Section III.B.3 of the draft policy appears to partially, but not fully, address the requirements of ¶498. For example, the policy states that "any *two-level* Command Channel Review process will be concluded within thirty days," whereas ¶498 provides that "*any* command channel review conducted is complete within 30 days" (emphases added). Further, Section III.B.4 does not specify tracking or discipline for those command staff who do not fulfill their responsibilities in the Command Channel Review process. This is relevant because, as noted in the BIA 2020 Audit, nearly half of the Command Channel Review cases did not meet the thirty-day policy requirement.

Furthermore, Section III.B.5 of S08-01-07 includes a fundamental requirement of ¶498—that more serious allegations will require a third level of Command Channel

[189] In the sixth reporting period, the CPD informed the IMT and the OAG that BIA would begin to move away from Unit Directives. Instead of Unit Directives, instruction will be provided in General Orders and Special Orders. This applies to the BIA Unit Directives that we reviewed, and in some instances provided no-objection notices to in previous reporting periods. The CPD began this process in sixth reporting period, and the effort is ongoing.

[190] The IMT previously reviewed multiple drafts of S08-01-03, *Command Channel Review* (previously titled *Complaint Summary Reporting and Review Procedures*). The IMT also previously reviewed Unit Directives regarding Command Channel review procedures. In the sixth reporting period, the CPD informed the IMT and the OAG that BIA would begin to move away from Unit Directives. Instead of Unit Directives, instruction will be provided in General Orders and Special Orders. This applies to the BIA Unit Directives that we reviewed, and in some instances provided no-objection notices to in previous reporting periods. The CPD began this process in sixth reporting period, and incorporated instruction previously included in the BIA Directive *Advocate Section Command Channel Review Procedures* (previously titled *Command Channel Review*) into S08-01-07. This process of incorporating Unit Directives into General Orders and Special Orders is ongoing.

Review within forty-five days. Again, the BIA 2020 Audit indicates that none of the 1,406 BIA cases closed in 2020 underwent a third-level of review because the Case Management System was not able to identify those cases. The IMT is concerned that command personnel may not be fully aware of the Command Channel Review directives, or may not follow the policy. CPD commanders must follow these policies and procedures and meet the required deadlines to set the proper standard for BIA investigators and Accountability Sergeants.

We note that with updated policy instructing compliance with ¶498, the CPD should revisit training relevant to the paragraph to determine whether updates are necessary. We also note that the training related to ¶498 began being provided over a year ago, yet the CPD has not shown that it has implemented its training such that it is in Full compliance. We encourage the CPD to critically consider not only this training but all training if the desired outcomes are not realized through the training.

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In the coming reporting periods, we look forward to receiving a further revised version of S08-01-07, and to receiving materials to determine whether the City and the CPD have sufficiently implemented their policies and training relevant to the requirements of ¶498, including the review of records from multiple sources reflecting timelines.

Paragraph 498 Compliance Progress History

FIRST REPORTING PERIOD	SECOND REPORTING PERIOD	THIRD REPORTING PERIOD
SEPTEMBER 1, 2019 – AUGUST 31, 2019	SEPTEMBER 1, 2019 – FEBRUARY 29, 2020	MARCH 1, 2020 – DECEMBER 31, 2020
COMPLIANCE PROGRESS:	COMPLIANCE PROGRESS:	COMPLIANCE PROGRESS:
None	Preliminary	Secondary

FOURTH REPORTING PERIOD	FIFTH REPORTING PERIOD	SIXTH REPORTING PERIOD
JANUARY 1, 2021 – JUNE 30, 2021	JULY 1, 2021 – DECEMBER 31, 2021	JANUARY 1, 2022 – JUNE 30, 2022
COMPLIANCE PROGRESS:	COMPLIANCE PROGRESS:	COMPLIANCE PROGRESS:
Secondary	Secondary	Secondary

Accountability and Transparency: ¶499

499. *When COPA, BIA, or the investigating district has arrived at the investigative findings and recommendations, it will promptly finalize a summary report ("Administrative Summary Report"). The Administrative Summary Report will include: a. a description of the CPD members and individuals involved in the alleged misconduct; b. the date, time, and location of the alleged misconduct; c. a description of the allegations and applicable policies; d. a narrative summary of the alleged misconduct; e. a narrative summary of the investigation; and f. the investigating body's findings and conclusions for each allegation of misconduct, including any discipline recommended.*

Compliance Progress (Reporting Period: January 1, 2022, through June 30, 2022)

Preliminary:		***In Compliance*** **(FIFTH REPORTING PERIOD)**[191]
	CPD	***In Compliance*** **(FIFTH REPORTING PERIOD)**
	COPA	***In Compliance*** **(FOURTH REPORTING PERIOD)**
Secondary:		***Not in Compliance***
	CPD	***Not in Compliance***
	COPA	***Not in Compliance***
Full:		***Not Yet Assessed***

Through the efforts of the CPD and COPA, the City maintained Preliminary compliance with ¶499 in the sixth reporting period, but did not reach Secondary compliance.

To evaluate Preliminary compliance with ¶499, the IMT reviewed the CPD's and COPA's relevant policies and documents following the process described in the Consent Decree (¶¶626–41), which outlines applicable consultation, resolution, workout, and public comment periods.[192] To evaluate Secondary compliance, the

[191] As referenced above, the Consent Decree requires actions by various City entities, including the CPD, COPA, the Police Board, and the Office of the Inspector General. Ultimately, the City is responsible for ensuring compliance. As a result, if a Consent Decree paragraph requires actions by multiple City entities, we will not find that the City has met Preliminary, Secondary, or Full compliance until all those entities have met the corresponding level of compliance. Nonetheless, for some paragraphs, we will clarify compliance assessments for each entity to demonstrate which benchmarks have been met.

[192] The OAG, the City, and the IMT agreed to a stipulation that provides a different review process for review of COPA policies and training materials. *See Stipulation Regarding the Policy and Training Review Process for COPA*, *Illinois v. Chicago*, Case No. 1:17-cv-06260 (Jan. 30, 2020). The review process in the Stipulation mirrors the review process under ¶¶626–41, but among other things, gives the OAG and the IMT a shorter timeframe for review of COPA policies and training materials.

IMT reviewed the entities' training development, implementation, and evaluation (¶286).

Progress before the Sixth Reporting Period

The CPD reached Preliminary compliance with ¶499 in the fifth reporting period, when it posted for public comment and finalized Special Order S08-01-04, *Documenting Log Number Investigations and Post-Investigation Procedures*.[193] The CPD also provided in previous reporting periods BIA's draft *Administrative Summary Report* Packet, which specifically addressed the requirements of ¶499.

COPA reached Preliminary compliance with ¶499 in the fourth reporting period when it finalized Policy 3.1.3, *Final Summary Report (FSR)*, which addressed ¶499(a)–(f) in detail. COPA maintained compliance but did not provide any documentation related to efforts under ¶499 in the fifth reporting period.

Progress in the Sixth Reporting Period

This reporting period, the CPD submitted draft BIA eLearning materials for review. These materials were still in draft stage and not in final presentation form. The draft training materials addressed the requirements of ¶499 and its subparagraphs. We look forward to reviewing further developed BIA eLearning materials in the next reporting period.

While COPA maintained compliance with ¶499, COPA did not submit materials related to ¶499 in the sixth reporting period.

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The City maintained Preliminary compliance with ¶499 in the sixth reporting period. We look forward to reviewing the CPD's further revised materials in the coming reporting period. We will also look for COPA to develop and provide training materials relevant to ¶499 in the coming reporting periods.

Paragraph 499 Compliance Progress History

FIRST REPORTING PERIOD	SECOND REPORTING PERIOD	THIRD REPORTING PERIOD
SEPTEMBER 1, 2019 – AUGUST 31, 2019	SEPTEMBER 1, 2019 – FEBRUARY 29, 2020	MARCH 1, 2020 – DECEMBER 31, 2020
COMPLIANCE PROGRESS:	COMPLIANCE PROGRESS:	COMPLIANCE PROGRESS:
None	Status Update	Status Update
FOURTH REPORTING PERIOD	**FIFTH REPORTING PERIOD**	**SIXTH REPORTING PERIOD**
JANUARY 1, 2021 – JUNE 30, 2021	JULY 1, 2021 – DECEMBER 31, 2021	JANUARY 1, 2022 – JUNE 30, 2022
COMPLIANCE PROGRESS:	COMPLIANCE PROGRESS:	COMPLIANCE PROGRESS:
None	Preliminary	Preliminary

[193] In the sixth reporting period, this finalized policy was renumbered and retitled as Special Order S08-01-08, *Post-Investigation Log Number Procedures*.

Accountability and Transparency: ¶500

500. *For all misconduct investigations, BIA or COPA will publish the Administrative Summary Report within 60 days of the final disciplinary decision.*

Compliance Progress (Reporting Period: January 1, 2022, through June 30, 2022)

Preliminary:		***In Compliance* (FIFTH REPORTING PERIOD)**[194]
	CPD	***In Compliance* (FIFTH REPORTING PERIOD)**
	COPA	***In Compliance* (FOURTH REPORTING PERIOD)**
Secondary:		***Not in Compliance***
	CPD	***Not in Compliance***
	COPA	***Not in Compliance***
Full:		***Not Yet Assessed***

Through the efforts of the CPD and COPA, the City maintained Preliminary compliance with ¶500 in the sixth reporting period, but did not achieve Secondary compliance.

To evaluate Preliminary compliance with ¶500, we reviewed the CPD's and COPA's relevant policies and documents following the process described in the Consent Decree (¶¶626–41).[195] To evaluate Secondary compliance, we reviewed the entities' training development, implementation, and evaluation.

Progress before the Sixth Reporting Period

The CPD achieved Preliminary compliance with ¶500 in the fifth reporting period with the finalization of S08-01-04, *Post-Investigation Log Number Procedures*.[196] Additionally, in the fifth reporting period, the CPD submitted BIA's *Administrative Summary Report Section* Unit Directive. We submitted a no-objection notice to this

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194 As referenced above, the Consent Decree requires actions by various City entities, including the CPD, COPA, the Police Board, and the Office of the Inspector General. Ultimately, the City is responsible for ensuring compliance. As a result, if a Consent Decree paragraph requires actions by multiple City entities, we will not find that the City has met Preliminary, Secondary, or Full compliance until all those entities have met the corresponding level of compliance. Nonetheless, for some paragraphs, we will clarify compliance assessments for each entity to demonstrate which benchmarks have been met.

195 The OAG, the City, and the IMT agreed to a stipulation that provides a different review process for review of COPA policies and training materials. *See Stipulation Regarding the Policy and Training Review Process for COPA*, *Illinois v. Chicago*, Case No. 1:17-cv-06260 (Jan. 30, 2020). The review process in the Stipulation mirrors the review process under ¶¶626–41, but among other things, gives the OAG and the IMT a shorter timeframe for review of COPA policies and training materials.

196 In the sixth reporting period, we were informed that this finalized policy would be renumbered as Special Order S08-01-08, *Post-Investigation Log Number Procedures*.

Unit Directive in January 2021.[197] However, the CPD did not submit this Unit Directive for public comment. Therefore, it was not finalized per the Consent Decree Review process. The CPD also produced BIA's *2020 Audit* in the fifth reporting period, in which the CPD recognized that, while there were 16 cases that received a final disciplinary decision in 2020, the BIA did not publish any Administrative Summary Reports for these cases within 60 days of the decisions. We appreciated the CPD's honest self-assessment and encouraged the CPD to continue to produce high-quality audits, but in a more timely manner. These audits will not only help in demonstrating compliance, but also to allow the CPD to identify areas on which it needs to focus its efforts and attention.

COPA reached Preliminary compliance with ¶500 in the fourth reporting period by finalizing its Policy 3.1.3, *Final Summary Report*, which addresses all requirements of the paragraph. COPA maintained Preliminary compliance but did not provide evidence of additional efforts toward Secondary compliance in the fifth reporting period.

Progress in the Sixth Reporting Period

This reporting period, the CPD submitted draft BIA eLearning materials for review. These materials were still in draft stage and not in final presentation form. The draft training materials addressed the requirements of ¶500 and its subparagraphs. We look forward to reviewing further developed BIA eLearning materials in the next reporting period.

While COPA maintained Preliminary compliance, COPA did not submit materials related to ¶500 in the sixth reporting period.

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With this, the CPD made steps toward Secondary compliance but did not yet reach it. COPA maintained Preliminary compliance with ¶500 in the sixth reporting period, but did not achieve Secondary compliance. Moving forward, we will look for

[197] Under the Consent Decree policy review process, the City and the CPD consult with the IMT and the OAG to develop or revise policies in accordance with Consent Decree requirements. *See* ¶¶626–37. The City and the CPD provide the policy for review at least 30 days before the policy is scheduled to go into effect, and the IMT and the OAG have 30 days to comment on the policy. *See* ¶¶627–28. The City, the CPD, the IMT, and the OAG then work together to resolve comments. The IMT and the OAG will, separately and in writing, notify the City and the CPD that they no longer have any comments, which is referred to as a "no-objection notice." Once the City and the CPD receive a no-objection notice from both the IMT and the OAG, the City and the CPD will begin the process of finalizing the policy. Typically, this includes the CPD posting the policy on its website for public comment for at least 15 days. The City and the CPD must then consider those comments and make additional changes, as appropriate. *See* ¶633.

both COPA and the CPD to produce information demonstrating that personnel are properly trained to comply with ¶500.

Paragraph 500 Compliance Progress History

FIRST REPORTING PERIOD SEPTEMBER 1, 2019 – AUGUST 31, 2019	SECOND REPORTING PERIOD SEPTEMBER 1, 2019 – FEBRUARY 29, 2020	THIRD REPORTING PERIOD MARCH 1, 2020 – DECEMBER 31, 2020
COMPLIANCE PROGRESS: None	COMPLIANCE PROGRESS: Status Update	COMPLIANCE PROGRESS: Status Update
FOURTH REPORTING PERIOD JANUARY 1, 2021 – JUNE 30, 2021	**FIFTH REPORTING PERIOD** JULY 1, 2021 – DECEMBER 31, 2021	**SIXTH REPORTING PERIOD** JANUARY 1, 2022 – JUNE 30, 2022
COMPLIANCE PROGRESS: None	COMPLIANCE PROGRESS: Preliminary	COMPLIANCE PROGRESS: Preliminary

Accountability and Transparency: ¶501

501. *Within 60 days of the final disposition, the City will publish: the charges filed and the discipline recommended; the written decision(s), if any, related to the final disposition; and the discipline imposed. When available, the City will publish the date on which the discipline is scheduled to be imposed.*

Compliance Progress

(Reporting Period: January 1, 2022, through June 30, 2022)

Preliminary:	***Not in Compliance***
Secondary:	***Not Yet Assessed***
Full:	***Not Yet Assessed***

The City did not reach Preliminary compliance with ¶501 in the sixth reporting period.

To evaluate Preliminary compliance with ¶501, we reviewed the City's relevant policies and documents following the process described in the Consent Decree (¶¶626–41).

Progress before the Sixth Reporting Period

In the third reporting period, the City indicated that it would be directly responsible for policy creation related to ¶501 as well as corresponding compliance efforts with this paragraph. Although we had reviewed some COPA and BIA materials related to ¶501 in previous reporting periods, we received nothing from the City. Therefore, the City did not provide any evidence of efforts toward compliance with ¶501.

In the fifth reporting period, the City did not provide evidence of efforts it has made toward Preliminary compliance with ¶501. While the City pointed to Police Board findings and decisions, ¶501 calls for certain information to be posted "within 60 days of the final disposition." We noted that the scope of ¶501 is broader than dispositions arising from the Police Board only. Because the City did not produce evidence of policy, procedure, or other written guidance to direct compliance with ¶501, it did not reach Preliminary compliance in the fifth reporting period.

Progress in the Sixth Reporting Period

Because the City did not produce evidence of policy, procedure, or other written guidance to direct compliance with ¶501, it has not yet reached Preliminary compliance. We look forward to the City producing such material in the coming reporting periods to direct compliance with this paragraph.

Paragraph 501 Compliance Progress History

FIRST REPORTING PERIOD
SEPTEMBER 1, 2019 – AUGUST 31, 2019
COMPLIANCE PROGRESS:
None

SECOND REPORTING PERIOD
SEPTEMBER 1, 2019 – FEBRUARY 29, 2020
COMPLIANCE PROGRESS:
Status Update

THIRD REPORTING PERIOD
MARCH 1, 2020 – DECEMBER 31, 2020
COMPLIANCE PROGRESS:
Status Update

FOURTH REPORTING PERIOD
JANUARY 1, 2021 – JUNE 30, 2021
COMPLIANCE PROGRESS:
None

FIFTH REPORTING PERIOD
JULY 1, 2021 – DECEMBER 31, 2021
COMPLIANCE PROGRESS:
None

SIXTH REPORTING PERIOD
JANUARY 1, 2022 – JUNE 30, 2022
COMPLIANCE PROGRESS:
None

Accountability and Transparency: ¶502

502. *Information contained in the Administrative Summary Report that is legally exempt from disclosure for privacy or other purposes will be redacted prior to electronic publication.*

Compliance Progress (Reporting Period: January 1, 2022, through June 30, 2022)

Preliminary:		***In Compliance*** **(FIFTH REPORTING PERIOD)**[198]
	CPD	***In Compliance*** **(FIFTH REPORTING PERIOD)**
	COPA	***In Compliance*** **(FOURTH REPORTING PERIOD)**
Secondary:		***Not in Compliance***
	CPD	***Not in Compliance***
	COPA	***Not in Compliance***
Full:		***Not Yet Assessed***

Through COPA and the CPD, the City maintained Preliminary compliance with ¶502 in the sixth reporting period.

To evaluate Preliminary compliance with ¶502, we reviewed the CPD's and COPA's relevant policies and documents following the process described in the Consent Decree (¶¶626–41).[199] To evaluate Secondary compliance, we reviewed the entities' training development, implementation, and evaluation.

Progress before the Sixth Reporting Period

The City reached Preliminary compliance with ¶502 when all implicated City entities reached Preliminary compliance. The CPD reached Preliminary compliance in the fifth reporting period by finalizing Special Order S08-01-04, *Post-Investigation Log Number Procedures.*[200]

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198 As referenced above, the Consent Decree requires actions by various City entities, including the CPD, COPA, the Police Board, and the Office of the Inspector General. Ultimately, the City is responsible for ensuring compliance. As a result, if a Consent Decree paragraph requires actions by multiple City entities, we will not find that the City has met Preliminary, Secondary, or Full compliance until all those entities have met the corresponding level of compliance. Nonetheless, for some paragraphs, we will clarify compliance assessments for each entity to demonstrate which benchmarks have been met.

199 The OAG, the City, and the IMT agreed to a stipulation that provides a different review process for review of COPA policies and training materials. *See Stipulation Regarding the Policy and Training Review Process for COPA*, *Illinois v. Chicago*, Case No. 1:17-cv-06260 (Jan. 30, 2020). The review process in the Stipulation mirrors the review process under ¶¶626–41, but among other things, gives the OAG and the IMT a shorter timeframe for review of COPA policies and training materials.

200 In the sixth reporting period, we were informed that this policy will be renumbered S08-01-08, *Post-Investigation Log Number Procedures*.

COPA reached Preliminary compliance with ¶502 in the fourth reporting period by finalizing Policy 3.1.3, *Final Summary Report*. COPA maintained Preliminary compliance with ¶502 in the fifth reporting period, but did not reach additional levels of compliance because it did not produce evidence that instructs compliance with this paragraph.

Progress in the Sixth Reporting Period

This reporting period, the CPD submitted draft BIA eLearning materials for review. These materials were still in draft stage and not in final presentation form. The draft training materials addressed ¶502's requirement that information contained in the Administrative Summary Report that is legally exempt from disclosure for privacy or other purposes will be redacted prior to electronic publication. We look forward to reviewing further developed BIA eLearning materials in the next reporting period.

While COPA maintained compliance with ¶502, COPA did not submit materials related to ¶502 in the sixth reporting period.

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With this, both the CPD and COPA maintained Preliminary compliance and the CPD began steps toward Secondary compliance. In the coming reporting periods, we will look for evidence from the CPD and COPA that personnel are trained to comply with ¶502 and the entities' related policies.

Paragraph 502 Compliance Progress History

FIRST REPORTING PERIOD	SECOND REPORTING PERIOD	THIRD REPORTING PERIOD
SEPTEMBER 1, 2019 – AUGUST 31, 2019	SEPTEMBER 1, 2019 – FEBRUARY 29, 2020	MARCH 1, 2020 – DECEMBER 31, 2020
COMPLIANCE PROGRESS:	COMPLIANCE PROGRESS:	COMPLIANCE PROGRESS:
Not Applicable	Not Applicable	Not Applicable
FOURTH REPORTING PERIOD	**FIFTH REPORTING PERIOD**	**SIXTH REPORTING PERIOD**
JANUARY 1, 2021 – JUNE 30, 2021	JULY 1, 2021 – DECEMBER 31, 2021	JANUARY 1, 2022 – JUNE 30, 2022
COMPLIANCE PROGRESS:	COMPLIANCE PROGRESS:	COMPLIANCE PROGRESS:
None	Preliminary	Preliminary

Accountability and Transparency: ¶503

503. *When an allegation of misconduct contains multiple separate potential policy violations, all applicable violations will be identified and investigated. Exoneration for the most serious allegations of misconduct will not preclude the recommendation of discipline, training, or other corrective measures for less serious misconduct stemming from the same set of allegations.*

Compliance Progress

(Reporting Period: January 1, 2022, through June 30, 2022)

Preliminary:		***Not in Compliance***
	CPD	***Not in Compliance***
	COPA	***In Compliance*** (FIFTH REPORTING PERIOD)
Secondary:		***Not in Compliance***
	CPD	***Not Yet Assessed***
	COPA	***Not in Compliance***
Full:		***Not Yet Assessed***

This reporting period, the CPD continued to work on developing and finalizing policy relevant to ¶503. COPA maintained Preliminary compliance but did not achieve Secondary compliance with ¶503. Because all relevant City entities must reach levels of compliance to bring the City, as a whole, into compliance, the City has not yet reached Preliminary compliance.

We assessed compliance with ¶503 for the first time in the fifth reporting period. To evaluate Preliminary compliance with ¶503, we reviewed the CPD's and COPA's relevant policies and documents following the process described in the Consent Decree (¶¶626–41).[201] To evaluate Secondary compliance, the IMT reviewed the entities' training development, implementation, and evaluation (¶286).

Progress before the Sixth Reporting Period

The CPD made efforts related to ¶503 during the fifth reporting period, but did not reach Preliminary compliance. In August 2021, the CPD submitted Special Order S08-01-01, *Conducting Log Number Investigations*. We provided comments in September 2021, but did not receive a revised draft. Nonetheless, we noted that the first draft of S08-01-01 addressed many requirements of the Consent Decree, including the mandates of ¶503. Additionally, we were encouraged by the fact that

[201] The OAG, the City, and the IMT agreed to a stipulation that provides a different review process for review of COPA policies and training materials. *See Stipulation Regarding the Policy and Training Review Process for COPA*, *Illinois v. Chicago*, Case No. 1:17-cv-06260 (Jan. 30, 2020). The review process in the Stipulation mirrors the review process under ¶¶626–41, but among other things, gives the OAG and the IMT a shorter timeframe for review of COPA policies and training materials.

S08-01-01 went beyond specific Consent Decree requirements, which we noted reflects an effort to revise and reform policy beyond the minimum mandates of the Consent Decree.

In the fifth reporting period, COPA reached Preliminary compliance with ¶503 through its finalized Policy 3.2.1, *Disciplinary and Remedial Recommendations*. COPA submitted multiple drafts to the IMT and the OAG, and made revisions based on that collaboration. After receiving a no-objection notice,[202] COPA received comments from the COPA Community Working Group, and thereafter finalized the policy.[203] Section I.B. of the policy incorporates the requirements of ¶503, verbatim.

Progress in the Sixth Reporting Period

In the sixth reporting period, the CPD submitted multiple revised versions of S08-01-05, *Conducting Log Number Investigations*, which was previously numbered S08-01-01. This policy addresses ¶503, but it remained in the collaborative review and revision process at the close of the sixth reporting period. Once the IMT and the OAG submit no-objection notices to S08-01-05, the CPD will need to post for public comment and implement the policy to reach Preliminary compliance.

This reporting period, COPA maintained Preliminary compliance with ¶503 by submitting its *Disciplinary and Remedial Recommendations In-Service Lesson Plan*. This lesson plan addresses ¶503 verbatim. Members of the IMT attended the *Disciplinary and Remedial Recommendations In-Service Training* class on June 22,

[202] Under the Consent Decree policy review process, the City and the CPD consult with the IMT and the OAG to develop or revise policies in accordance with Consent Decree requirements. *See* ¶¶626–37. The City and the CPD provide the policy for review at least 30 days before the policy is scheduled to go into effect, and the IMT and the OAG have 30 days to comment on the policy. *See* ¶¶627–28. The City, the CPD, the IMT, and the OAG then work together to resolve comments. The IMT and the OAG will, separately and in writing, notify the City and the CPD that they no longer have any comments, which is referred to as a "no-objection notice." Once the City and the CPD receive a no-objection notice from both the IMT and the OAG, the City and the CPD will begin the process of finalizing the policy. Typically, this includes the CPD posting the policy on its website for public comment for at least 15 days. The City and the CPD must then consider those comments and make additional changes, as appropriate. *See* ¶633.

[203] Under the Consent Decree policy review process, the City and the CPD consult with the IMT and the OAG to develop or revise policies in accordance with Consent Decree requirements. *See* ¶¶626–37. The City and the CPD provide the policy for review at least 30 days before the policy is scheduled to go into effect, and the IMT and the OAG have 30 days to comment on the policy. *See* ¶¶627–28. The City, the CPD, the IMT, and the OAG then work together to resolve comments. The IMT and the OAG will, separately and in writing, notify the City and the CPD that they no longer have any comments, which is referred to as a "no-objection notice." Once the City and the CPD receive a no-objection notice from both the IMT and the OAG, the City and the CPD will begin the process of finalizing the policy. Typically, this includes the CPD posting the policy on its website for public comment for at least 15 days. The City and the CPD must then consider those comments and make additional changes, as appropriate. *See* ¶633.

2022. The class instructor covered the lesson plan material completely and appropriately, provided examples to illustrate the instruction material, and allowed for class interaction. To achieve Secondary compliance, COPA will need to provide this training to at least 95% of its personnel.

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The CPD made progress toward but did not reach Preliminary compliance with ¶503 in the sixth reporting period. We expect that the CPD will finalize S08-01-05 early in the next reporting period. COPA maintained Preliminary compliance and made progress toward Secondary compliance, but will need to demonstrate that at least 95% of its personnel have completed the *Disciplinary and Remedial Recommendations In-Service Training* in order to receive Secondary compliance.

Paragraph 503 Compliance Progress History

FIRST REPORTING PERIOD	SECOND REPORTING PERIOD	THIRD REPORTING PERIOD
SEPTEMBER 1, 2019 – AUGUST 31, 2019	SEPTEMBER 1, 2019 – FEBRUARY 29, 2020	MARCH 1, 2020 – DECEMBER 31, 2020
COMPLIANCE PROGRESS:	COMPLIANCE PROGRESS:	COMPLIANCE PROGRESS:
Not Applicable	Not Applicable	Not Applicable
FOURTH REPORTING PERIOD	**FIFTH REPORTING PERIOD**	**SIXTH REPORTING PERIOD**
JANUARY 1, 2021 – JUNE 30, 2021	JULY 1, 2021 – DECEMBER 31, 2021	JANUARY 1, 2022 – JUNE 30, 2022
COMPLIANCE PROGRESS:	COMPLIANCE PROGRESS:	COMPLIANCE PROGRESS:
Not Applicable	None	None

Accountability and Transparency: ¶504

> ***504.*** *As soon as feasible, but by no later than January 2020, upon arriving at the final disciplinary decision, CPD and COPA will ensure that the Administrative Summary Report is provided to the involved CPD member and the Department. CPD will ensure that the Administrative Summary Report is provided to the involved CPD member's District or Unit Commander and immediate supervisor.*

Compliance Progress		(Reporting Period: January 1, 2022, through June 30, 2022)
Preliminary:		***In Compliance*** **(FIFTH REPORTING PERIOD)**[204]
	CPD	***In Compliance*** **(FIFTH REPORTING PERIOD)**
	COPA	***In Compliance*** **(FOURTH REPORTING PERIOD)**
Secondary:		***Not in Compliance***
	CPD	***Not in Compliance***
	COPA	***Not in Compliance***
Full:		***Not Yet Assessed***

Through the efforts of the CPD and COPA, the City maintained Preliminary compliance with ¶504 in the sixth reporting period, but did not reach Secondary compliance.

To evaluate Preliminary compliance with ¶504, we reviewed the CPD's and COPA's relevant policies and documents following the process described in the Consent Decree (¶¶626–41).[205] To evaluate Secondary compliance, we reviewed the entities' training development, implementation, and evaluation.

Progress before the Sixth Reporting Period

The City reached Preliminary compliance with ¶504 when all implicated City entities reached Preliminary compliance. The CPD achieved Preliminary compliance

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[204] As referenced above, the Consent Decree requires actions by various City entities, including the CPD, COPA, the Police Board, and the Office of the Inspector General. Ultimately, the City is responsible for ensuring compliance. As a result, if a Consent Decree paragraph requires actions by multiple City entities, we will not find that the City has met Preliminary, Secondary, or Full compliance until all those entities have met the corresponding level of compliance. Nonetheless, for some paragraphs, we will clarify compliance assessments for each entity to demonstrate which benchmarks have been met.

[205] The OAG, the City, and the IMT agreed to a stipulation that provides a different review process for review of COPA policies and training materials. *See Stipulation Regarding the Policy and Training Review Process for COPA*, *Illinois v. Chicago*, Case No. 1:17-cv-06260 (Jan. 30, 2020). The review process in the Stipulation mirrors the review process under ¶¶626–41, but among other things, gives the OAG and the IMT a shorter timeframe for review of COPA policies and training materials.

with ¶504 in the fifth reporting period by finalizing Special Order S08-01-04, *Post-Investigation Log Number Procedures*.[206] COPA reached Preliminary compliance with ¶504 in the fourth reporting period by finalizing Policy 3.2.2, *Timeliness Benchmarks.* COPA maintained Preliminary compliance in the fifth reporting period, but did not otherwise submit evidence of additional efforts under ¶504 that would bring COPA into Secondary compliance.

Progress in the Sixth Reporting Period

This reporting period, the CPD submitted draft BIA eLearning materials for review. These materials were still in draft stage and not in final presentation form. The draft training materials addressed the requirements of ¶504. We look forward to reviewing further developed BIA eLearning materials in the next reporting period.

COPA did not produce evidence of efforts relevant to reaching secondary compliance with ¶504 in the sixth reporting period.

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With this, the CPD and COPA maintained Preliminary compliance with ¶504 in the sixth reporting period, but did not reach Secondary compliance. Moving forward, we will look for evidence that COPA and the CPD are developing sufficient training to instruct compliance with the requirements of ¶504 and each entities' related policies.

Paragraph 504 Compliance Progress History

FIRST REPORTING PERIOD	SECOND REPORTING PERIOD	THIRD REPORTING PERIOD
SEPTEMBER 1, 2019 – AUGUST 31, 2019	SEPTEMBER 1, 2019 – FEBRUARY 29, 2020	MARCH 1, 2020 – DECEMBER 31, 2020
COMPLIANCE PROGRESS:	COMPLIANCE PROGRESS:	COMPLIANCE PROGRESS:
Not Applicable	None	None
FOURTH REPORTING PERIOD	**FIFTH REPORTING PERIOD**	**SIXTH REPORTING PERIOD**
JANUARY 1, 2021 – JUNE 30, 2021	JULY 1, 2021 – DECEMBER 31, 2021	JANUARY 1, 2022 – JUNE 30, 2022
COMPLIANCE PROGRESS:	COMPLIANCE PROGRESS:	COMPLIANCE PROGRESS:
None	Preliminary	Preliminary

[206] In the sixth reporting period, this policy was renumbered S08-01-08, *Post-Investigation Log Number Procedures*.

Accountability and Transparency: ¶505

505. *The CMS will have the following capacities: a. maintain accurate and reliable data regarding the number, nature, and status of all complaints and administrative notifications, from the intake process to final disposition; b. identify the status of administrative investigations; c. identify caseloads for investigators; and d. maintain all documents and investigative materials—including audio and video—in a digital format, accessible via the CMS.*

Compliance Progress (Reporting Period: January 1, 2022, through June 30, 2022)

Preliminary:		***Not in Compliance***[207]
	CPD	***Not in Compliance***
	COPA	***In Compliance*** **(FOURTH REPORTING PERIOD)**
Secondary:		***Not in Compliance***
	CPD	***Not Yet Assessed***
	COPA	***Not in Compliance***
Full:		***Not Yet Assessed***

In the sixth reporting period, COPA maintained Preliminary compliance with ¶505. The CPD made progress toward but did not ultimately reach Preliminary compliance with this paragraph. Because all relevant City entities must reach levels of compliance to bring the City as a whole into compliance, the City has not yet reached Preliminary compliance.

To evaluate Preliminary compliance with ¶505, we reviewed the CPD's and COPA's relevant policies and documents following the process described in the Consent Decree (¶¶626–41).[208] To evaluate Secondary compliance, we reviewed the entities' training development, implementation, and evaluation.

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[207] As referenced above, the Consent Decree requires actions by various City entities, including the CPD, COPA, the Police Board, and the Office of the Inspector General. Ultimately, the City is responsible for ensuring compliance. As a result, if a Consent Decree paragraph requires actions by multiple City entities, we will not find that the City has met Preliminary, Secondary, or Full compliance until all those entities have met the corresponding level of compliance. Nonetheless, for some paragraphs, we will clarify compliance assessments for each entity to demonstrate which benchmarks have been met.

[208] The OAG, the City, and the IMT agreed to a stipulation that provides a different review process for review of COPA policies and training materials. *See Stipulation Regarding the Policy and Training Review Process for COPA*, *Illinois v. Chicago*, Case No. 1:17-cv-06260 (Jan. 30, 2020). The review process in the Stipulation mirrors the review process under ¶¶626–41, but among other things, gives the OAG and the IMT a shorter timeframe for review of COPA policies and training materials.

Progress before the Sixth Reporting Period

The CPD made progress toward but did not reach Preliminary compliance in the fifth reporting period. While BIA's *Case Management System* Unit Directive, which was originally submitted at the end of the fourth reporting period, touches on all ¶505 requirements, the CPD did not provide further revised drafts of this Unit Directive during the fifth reporting period.[209] The CPD made other efforts related to ¶505 in the fifth reporting period through its draft of S08-01-01, *Conducting Log Number Investigations*,[210] which was produced to the IMT and the OAG for review in August 2021. The IMT provided comments in September 2021. We noted in the fifth reporting period that we had not since received a revised draft of S08-01-01, but that in the initial draft of S08-01-01, all subparagraphs of ¶505 were addressed.

COPA achieved Preliminary compliance with ¶505 in the fourth reporting period by finalizing its Policy 3.1.6, *Clear and Column Case Management Systems* (COPA 3.1.6), which addressed all requirements of ¶505. COPA maintained Preliminary compliance in the fifth reporting period and made efforts toward Secondary compliance. COPA submitted for review training materials for its training *Case Management System: Overview of Policy and Procedures*. We noted that these materials were well organized and provided instruction to mobilize efforts compliant with ¶505's mandates, and COPA's policy. We submitted a no-objection notice to these training materials.[211] We noted our understanding that COPA hoped to provide this training to its personnel in January 2022, and explained that it would need to provide this training to at least 95% of its staff to obtain Secondary compliance.

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[209] In the sixth reporting period, the CPD informed the IMT and the OAG that BIA would begin to move away from Unit Directives. Instead of Unit Directives, instruction will be provided in General Orders and Special Orders. This applies to the BIA Unit Directives that we reviewed, and in some instances provided no-objection notices to in previous reporting periods. The CPD began this process in sixth reporting period, and incorporated instruction previously included in the BIA Directive *Initial Responsibilities in Assigned Log Number Investigations* into S08-01-05. This process of incorporating Unit Directives into General Orders and Special Orders is ongoing.

[210] In the sixth reporting period, the CPD renumbered the policy previously labeled S08-01-01, and it is now S08-01-05, *Conducting Log Number Investigations*.

[211] Under the Consent Decree policy review process, the City and the CPD consult with the IMT and the OAG to develop or revise policies in accordance with Consent Decree requirements. *See* ¶¶626–37. The City and the CPD provide the policy for review at least 30 days before the policy is scheduled to go into effect, and the IMT and the OAG have 30 days to comment on the policy. *See* ¶¶627–28. The City, the CPD, the IMT, and the OAG then work together to resolve comments. The IMT and the OAG will, separately and in writing, notify the City and the CPD that they no longer have any comments, which is referred to as a "no-objection notice." Once the City and the CPD receive a no-objection notice from both the IMT and the OAG, the City and the CPD will begin the process of finalizing the policy. Typically, this includes the CPD posting the policy on its website for public comment for at least 15 days. The City and the CPD must then consider those comments and make additional changes, as appropriate. *See* ¶633.

Progress in the Sixth Reporting Period

This reporting period, the City and the CPD provided a new Special Order S08-01-01, *Log Number Case Management System*, for review with ¶505. The IMT submitted a no-objection notice with comments on June 3, 2022. This policy completely addresses ¶505 and its subparagraphs. However, this policy remained in the collaborative review and revision process at the end of the sixth reporting period.

While COPA maintained Preliminary compliance with ¶505 in the sixth reporting period, COPA did not submit any materials related to ¶505 in the sixth reporting period instructing Secondary compliance.

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While COPA maintained Preliminary compliance with ¶505, the CPD—although it made efforts toward it—did not reach Preliminary compliance with this paragraph. We look forward to the CPD finalizing S08-01-01, *Log Number Case Management System*. We will look for COPA to provide evidence that it has provided its *Case Management System: Overview of Policy and Procedures* training to at least 95% of its personnel.

Paragraph 505 Compliance Progress History

FIRST REPORTING PERIOD SEPTEMBER 1, 2019 – AUGUST 31, 2019 COMPLIANCE PROGRESS: Not Applicable	SECOND REPORTING PERIOD SEPTEMBER 1, 2019 – FEBRUARY 29, 2020 COMPLIANCE PROGRESS: Not Applicable	THIRD REPORTING PERIOD MARCH 1, 2020 – DECEMBER 31, 2020 COMPLIANCE PROGRESS: Status Update
FOURTH REPORTING PERIOD JANUARY 1, 2021 – JUNE 30, 2021 COMPLIANCE PROGRESS: None	FIFTH REPORTING PERIOD JULY 1, 2021 – DECEMBER 31, 2021 COMPLIANCE PROGRESS: None	SIXTH REPORTING PERIOD JANUARY 1, 2022 – JUNE 30, 2022 COMPLIANCE PROGRESS: None

Accountability and Transparency: ¶506

506. *COPA, BIA, and the Accountability Sergeants will have access to the CMS as necessary to undertake their respective duties.*

Compliance Progress (Reporting Period: January 1, 2022, through June 30, 2022)

Preliminary:		***In Compliance* (FIFTH REPORTING PERIOD)**[212]
	CPD	***In Compliance* (FIFTH REPORTING PERIOD)**
	COPA	***In Compliance* (FOURTH REPORTING PERIOD)**
Secondary:		***Not In Compliance***
	CPD	***Not in Compliance***
	COPA	***Not in Compliance***
Full:		***Not Yet Assessed***

Through the efforts of the CPD and COPA, the City maintained Preliminary compliance with ¶506 in the sixth reporting period.

To evaluate Preliminary compliance with ¶506, we reviewed the CPD's and COPA's relevant policies and documents following the process described in the Consent Decree (¶¶626–41).[213] To evaluate Secondary compliance, we reviewed the entities' training development, implementation, and evaluation.

Progress before the Sixth Reporting Period

In previous reporting periods, the CPD made efforts toward Preliminary compliance with ¶506 by drafting two policies that remained in the collaborative review and revision process at the end of the fourth reporting period: BIA's *Case Management System* Unit Directive, and the CPD's Special Order S08-01, *Complaint and Disciplinary Investigators and Investigations*. The CPD reached Preliminary

[212] As referenced above, the Consent Decree requires actions by various City entities, including the CPD, COPA, the Police Board, and the Office of the Inspector General. Ultimately, the City is responsible for ensuring compliance. As a result, if a Consent Decree paragraph requires actions by multiple City entities, we will not find that the City has met Preliminary, Secondary, or Full compliance until all those entities have met the corresponding level of compliance. Nonetheless, for some paragraphs, we will clarify compliance assessments for each entity to demonstrate which benchmarks have been met.

[213] The OAG, the City, and the IMT agreed to a stipulation that provides a different review process for review of COPA policies and training materials. *See Stipulation Regarding the Policy and Training Review Process for COPA*, *Illinois v. Chicago*, Case No. 1:17-cv-06260 (Jan. 30, 2020). The review process in the Stipulation mirrors the review process under ¶¶626–41, but among other things, gives the OAG and the IMT a shorter timeframe for review of COPA policies and training materials.

compliance with ¶506 in the fifth reporting period by finalizing Special Order S08-01, *Complaint and Disciplinary Investigators and Investigations*.

In the fourth reporting period, COPA reached Preliminary compliance with ¶506 through finalization of its Policy 3.1.6, *Clear and Column Case Management Systems*. COPA maintained Preliminary compliance in the fifth reporting period and made efforts toward Secondary compliance. COPA submitted for review training materials for its training *Case Management System: Overview of Policy and Procedures*. We submitted a no-objection notice to these training materials in September 2021,[214] and we explained that COPA would need to provide this training to at least 95% of its staff to obtain Secondary compliance.

Progress in the Sixth Reporting Period

This reporting period, the City and the CPD provided S08-01-01, *Log Number Case Management System*,[215] for review. The IMT submitted a no-objection notice with comments on June 3, 2022. This policy addresses ¶506 and includes command staff and auditing and technology personnel as having permissions to access the Case Management System. This policy also provides the process for granting such permissions, and the process for conducting audits to ensure the integrity of the access to the system. This policy remained in the collaborative review and revision process at the end of the sixth reporting period.

COPA provided its *Case Management System: Overview of Policy and Procedures* training materials in the sixth reporting period. These training materials address ¶506 by providing that COPA employees will have access to the Case Management System and the CLEAR System to undertake their duties. The lesson plan is very comprehensive and goes beyond the requirements of ¶506 by not only explaining

[214] Under the Consent Decree policy review process, the City and the CPD consult with the IMT and the OAG to develop or revise policies in accordance with Consent Decree requirements. *See* ¶¶626–37. The City and the CPD provide the policy for review at least 30 days before the policy is scheduled to go into effect, and the IMT and the OAG have 30 days to comment on the policy. *See* ¶¶627–28. The City, the CPD, the IMT, and the OAG then work together to resolve comments. The IMT and the OAG will, separately and in writing, notify the City and the CPD that they no longer have any comments, which is referred to as a "no-objection notice." Once the City and the CPD receive a no-objection notice from both the IMT and the OAG, the City and the CPD will begin the process of finalizing the policy. Typically, this includes the CPD posting the policy on its website for public comment for at least 15 days. The City and the CPD must then consider those comments and make additional changes, as appropriate. *See* ¶633.

[215] In the sixth reporting period, the CPD informed the IMT and the OAG that BIA would begin to move away from Unit Directives. Instead of Unit Directives, instruction will be provided in General Orders and Special Orders. This applies to the BIA Unit Directives that we reviewed, and in some instances provided no-objection notices to in previous reporting periods. The CPD began this process in sixth reporting period, and incorporated instruction previously included in the BIA Directive *Case Management System* into S08-01-01. This process of incorporating Unit Directives into General Orders and Special Orders is ongoing.

that COPA investigators will have access to the Case Management System, but also by explaining the responsibility that comes with the Case Management System access. The lesson plan explains who will issue credentials and how the systems may be audited to ensure no misuse occurs, and explains that misuse or improper use is strictly prohibited and may be subject to misconduct investigations that may include disciplinary action to include discharge. On January 12, 2022, the IMT observed the two-hour mandatory *In-Service Case Management System* training. The lesson plan was presented as written, and the instructors were knowledgeable. The IMT provided suggestions regarding delivery of the instruction. To achieve Secondary compliance, COPA will need to provide this training to at least 95% of its personnel.

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The City and COPA maintained Preliminary compliance with ¶506 in the sixth reporting period. Moving forward, we look forward to the CPD finalizing S08-01-01, *Log Number Case Management System*, and to begin developing training relevant to ¶506 and the CPD's policies. We will look for COPA to provide evidence demonstrating that it has provided the *Case Management System: Overview of Policy and Procedures* training to at least 95% of its personnel.

Paragraph 506 Compliance Progress History

FIRST REPORTING PERIOD SEPTEMBER 1, 2019 – AUGUST 31, 2019 COMPLIANCE PROGRESS: Not Applicable	SECOND REPORTING PERIOD SEPTEMBER 1, 2019 – FEBRUARY 29, 2020 COMPLIANCE PROGRESS: Not Applicable	THIRD REPORTING PERIOD MARCH 1, 2020 – DECEMBER 31, 2020 COMPLIANCE PROGRESS: Status Update
FOURTH REPORTING PERIOD JANUARY 1, 2021 – JUNE 30, 2021 COMPLIANCE PROGRESS: None	FIFTH REPORTING PERIOD JULY 1, 2021 – DECEMBER 31, 2021 COMPLIANCE PROGRESS: Preliminary	SIXTH REPORTING PERIOD JANUARY 1, 2022 – JUNE 30, 2022 COMPLIANCE PROGRESS: Preliminary

Accountability and Transparency: ¶507

507. *Administrative investigative files will be electronically preserved within the CMS.*

Compliance Progress		(Reporting Period: January 1, 2022, through June 30, 2022)
Preliminary:		***In Compliance*** **(FIFTH REPORTING PERIOD)**[216]
	CPD	***In Compliance*** **(FIFTH REPORTING PERIOD)**
	COPA	***In Compliance*** **(FOURTH REPORTING PERIOD)**
Secondary:		***Not in Compliance***
	CPD	***Not in Compliance***
	COPA	***Not in Compliance***
Full:		***Not Yet Assessed***

The CPD and COPA maintained Preliminary compliance with ¶507 in the sixth reporting period.

To evaluate Preliminary compliance with ¶507, we reviewed the CPD's and COPA's relevant policies and documents following the process described in the Consent Decree (¶¶626–41).[217] To evaluate Secondary compliance, we reviewed the entities' training development, implementation, and evaluation.

Progress before the Sixth Reporting Period

In previous reporting periods, the CPD made efforts toward Preliminary compliance with ¶507 by drafting two policies that remained in the in the collaborative review and revision process at the end of the fourth reporting period: BIA's *Case Management System* Unit Directive, and the CPD's Special Order S08-01, *Complaint and Disciplinary Investigators and Investigations*. The CPD reached Preliminary compliance with ¶507 in the fifth reporting period by finalizing Special Order S08-01, *Complaint and Disciplinary Investigators and Investigations*.

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[216] As referenced above, the Consent Decree requires actions by various City entities, including the CPD, COPA, the Police Board, and the Office of the Inspector General. Ultimately, the City is responsible for ensuring compliance. As a result, if a Consent Decree paragraph requires actions by multiple City entities, we will not find that the City has met Preliminary, Secondary, or Full compliance until all those entities have met the corresponding level of compliance. Nonetheless, for some paragraphs, we will clarify compliance assessments for each entity to demonstrate which benchmarks have been met.

[217] The OAG, the City, and the IMT agreed to a stipulation that provides a different review process for review of COPA policies and training materials. *See Stipulation Regarding the Policy and Training Review Process for COPA*, *Illinois v. Chicago*, Case No. 1:17-cv-06260 (Jan. 30, 2020). The review process in the Stipulation mirrors the review process under ¶¶626–41, but among other things, gives the OAG and the IMT a shorter timeframe for review of COPA policies and training materials.

In the fourth reporting period, COPA reached Preliminary compliance with ¶507 through finalization of its Policy 3.1.6, *Clear and Column Case Management Systems*. COPA maintained Preliminary compliance in the fifth reporting period and made efforts toward Secondary compliance. COPA submitted for review training materials for its training *Case Management System: Overview of Policy and Procedures*. We submitted a no-objection notice to these training materials in September 2021,[218] and explained that COPA would need to provide this training to at least 95% of its staff to obtain Secondary compliance.

Progress in the Sixth Reporting Period

This reporting period, the City and the CPD provided S08-01-01, *Log Number Case Management System*, for review.[219] The IMT submitted a no-objection notice with comments on June 3, 2022. Section IV.B. of this policy completely addresses ¶507's requirement that administrative investigative files be electronically preserved within the Case Management System, although the CPD did not submit the policy under this paragraph. We encourage the CPD to submit this policy for review with ¶507. This policy remained in the collaborative review and revision process at the end of the sixth reporting period.

COPA provided its *Case Management System: Overview of Policy and Procedures* training materials in the sixth reporting period. These training materials address ¶507. On January 12, 2022, the IMT observed the two-hour mandatory *In-Service Case Management System* training. The lesson plan was presented as written, and the instructors appeared knowledgeable. The IMT provided suggestions regarding delivery of the instruction, which COPA took into consideration for future trainings.

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[218] Under the Consent Decree policy review process, the City and the CPD consult with the IMT and the OAG to develop or revise policies in accordance with Consent Decree requirements. *See* ¶¶626–37. The City and the CPD provide the policy for review at least 30 days before the policy is scheduled to go into effect, and the IMT and the OAG have 30 days to comment on the policy. *See* ¶¶627–28. The City, the CPD, the IMT, and the OAG then work together to resolve comments. The IMT and the OAG will, separately and in writing, notify the City and the CPD that they no longer have any comments, which is referred to as a "no-objection notice." Once the City and the CPD receive a no-objection notice from both the IMT and the OAG, the City and the CPD will begin the process of finalizing the policy. Typically, this includes the CPD posting the policy on its website for public comment for at least 15 days. The City and the CPD must then consider those comments and make additional changes, as appropriate. *See* ¶633.

[219] In the sixth reporting period, the CPD informed the IMT and the OAG that BIA would begin to move away from Unit Directives. Instead of Unit Directives, instruction will be provided in General Orders and Special Orders. This applies to the BIA Unit Directives that we reviewed, and in some instances provided no-objection notices to in previous reporting periods. The CPD began this process in sixth reporting period, and incorporated instruction previously included in the BIA Directive *Case Management System* into S08-01-01. This process of incorporating Unit Directives into General Orders and Special Orders is ongoing.

To achieve Secondary compliance, COPA will need to provide this training to at least 95% of its personnel.

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With this, the CPD and COPA maintained Preliminary compliance with ¶507 in the sixth reporting period. Moving forward, we look forward to the CPD finalizing S08-01-01, *Log Number Case Management System*, and to developing training relevant to ¶507 and the CPD's related policies. We will look for COPA to provide evidence demonstrating that it has provided the *Case Management System: Overview of Policy and Procedures* training to at least 95% of its personnel.

Paragraph 507 Compliance Progress History

FIRST REPORTING PERIOD	SECOND REPORTING PERIOD	THIRD REPORTING PERIOD
SEPTEMBER 1, 2019 – AUGUST 31, 2019	SEPTEMBER 1, 2019 – FEBRUARY 29, 2020	MARCH 1, 2020 – DECEMBER 31, 2020
COMPLIANCE PROGRESS:	COMPLIANCE PROGRESS:	COMPLIANCE PROGRESS:
Not Applicable	Not Applicable	Status Update
FOURTH REPORTING PERIOD	**FIFTH REPORTING PERIOD**	**SIXTH REPORTING PERIOD**
JANUARY 1, 2021 – JUNE 30, 2021	JULY 1, 2021 – DECEMBER 31, 2021	JANUARY 1, 2022 – JUNE 30, 2022
COMPLIANCE PROGRESS:	COMPLIANCE PROGRESS:	COMPLIANCE PROGRESS:
None	Preliminary	Preliminary

Accountability and Transparency: ¶508

508. *The City and CPD will undertake best efforts to ensure that all administrative investigation files, disciplinary history card entries, COPA and BIA disciplinary records, and any other disciplinary record or summary of such record, are retained electronically, and indefinitely, for purposes of historical trend analysis, non-disciplinary EIS, and public transparency.*

Compliance Progress (Reporting Period: January 1, 2022, through June 30, 2022)

Preliminary:		***Not in Compliance***[220]
	CPD	***Not in Compliance***
	COPA	***In Compliance*** **(FOURTH REPORTING PERIOD)**
Secondary:		***Not in Compliance***
	CPD	***Not Yet Assessed***
	COPA	***Not in Compliance***
Full:		***Not Yet Assessed***

The CPD did not reach Preliminary compliance with ¶508 in the sixth reporting period. COPA maintained Preliminary compliance with ¶508 in the sixth reporting period. Because all relevant City entities must reach levels of compliance to bring the City, as a whole, into compliance, the City has not yet reached Preliminary compliance.

To evaluate Preliminary compliance with ¶508, we reviewed the CPD's and COPA's relevant policies and documents following the process described in the Consent Decree (¶¶626–41).[221] To evaluate Secondary compliance, we reviewed the entities' training development, implementation, and evaluation.

[220] As referenced above, the Consent Decree requires actions by various City entities, including the CPD, COPA, the Police Board, and the Office of the Inspector General. Ultimately, the City is responsible for ensuring compliance. As a result, if a Consent Decree paragraph requires actions by multiple City entities, we will not find that the City has met Preliminary, Secondary, or Full compliance until all those entities have met the corresponding level of compliance. Nonetheless, for some paragraphs, we will clarify compliance assessments for each entity to demonstrate which benchmarks have been met.

[221] The OAG, the City, and the IMT agreed to a stipulation that provides a different review process for review of COPA policies and training materials. *See Stipulation Regarding the Policy and Training Review Process for COPA*, *Illinois v. Chicago*, Case No. 1:17-cv-06260 (Jan. 30, 2020). The review process in the Stipulation mirrors the review process under ¶¶626–41, but among other things, gives the OAG and the IMT a shorter timeframe for review of COPA policies and training materials.

Progress before the Sixth Reporting Period

In previous reporting periods, the CPD made efforts toward Preliminary compliance by drafting and providing BIA's *Case Management System* Unit Directive. However, by the close of the fourth reporting period, this Unit Directive remained in the collaborative review and revision process. The CPD provided BIA's *Case Management System* Unit Directive at the end of the fourth reporting period. This draft Unit Directive speaks to the requirements of ¶508. We provided feedback on this Unit Directive in September 2021. We did not receive a further revised draft of this Unit Directive and the CPD did not post this Unit Directive for public comment.[222] Therefore, the CPD did not made any additional steps toward compliance with ¶508 in the fifth reporting period.

COPA reached Preliminary compliance with ¶508 by finalizing Policy 3.1.6, *Clear and Column Case Management Systems*. COPA maintained Preliminary compliance in the fifth reporting period and made efforts toward Secondary compliance. COPA submitted for review training materials for its training *Case Management System: Overview of Policy and Procedures*. We submitted a no-objection notice to these training materials[223] and explained that COPA would need to provide this training to at least 95% of its staff to obtain Secondary compliance.

Progress in the Sixth Reporting Period

This reporting period, the City and the CPD provided S08-01-01, *Log Number Case Management System*, for review.[224] The IMT submitted a no-objection notice with comments on June 3, 2022. Section IV.C.1–3 of this policy addresses ¶508. However, this policy remained in the collaborative review and revision process at the end of the sixth reporting period.

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[222] In the sixth reporting period, the CPD informed the IMT and the OAG that BIA would begin to move away from Unit Directives. Instead of Unit Directives, instruction will be provided in General Orders and Special Orders. This applies to the BIA Unit Directives that we reviewed, and in some instances provided no-objection notices to in previous reporting periods. The CPD began this process in sixth reporting period.

[223] Under the Consent Decree policy review process, the City and the CPD consult with the IMT and the OAG to develop or revise policies in accordance with Consent Decree requirements. *See* ¶¶626–37. The City and the CPD provide the policy for review at least 30 days before the policy is scheduled to go into effect, and the IMT and the OAG have 30 days to comment on the policy. *See* ¶¶627–28. The City, the CPD, the IMT, and the OAG then work together to resolve comments. The IMT and the OAG will, separately and in writing, notify the City and the CPD that they no longer have any comments, which is referred to as a "no-objection notice." Once the City and the CPD receive a no-objection notice from both the IMT and the OAG, the City and the CPD will begin the process of finalizing the policy. Typically, this includes the CPD posting the policy on its website for public comment for at least 15 days. The City and the CPD must then consider those comments and make additional changes, as appropriate. *See* ¶633.

[224] The CPD incorporated instruction previously included in the BIA Directive *Case Management System* into S08-01-01.

COPA provided its *Case Management System: Overview of Policy and Procedures* training materials in the sixth reporting period. These training materials provide instruction relevant to compliance with ¶508. On January 12, 2022, the IMT observed the two-hour mandatory *In-Service Case Management System* training. The lesson plan was presented as written, and the instructors were knowledgeable. The IMT provided suggestions regarding delivery of the instruction, which COPA took into consideration for future trainings. To achieve Secondary compliance, COPA will need to provide this training to at least 95% of its personnel.

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The CPD did not reach Preliminary compliance with ¶508 in the sixth reporting period. To achieve Preliminary compliance we will look for the CPD to finalize S08-01-01, *Log Number Case Management System* early in the seventh reporting period. COPA maintained Preliminary compliance with ¶508 in the sixth reporting period and made progress toward Secondary compliance. We expect that COPA will provide records demonstrating that at least 95% of its personnel have completed the relevant training.

Paragraph 508 Compliance Progress History

FIRST REPORTING PERIOD SEPTEMBER 1, 2019 – AUGUST 31, 2019 COMPLIANCE PROGRESS: Not Applicable	SECOND REPORTING PERIOD SEPTEMBER 1, 2019 – FEBRUARY 29, 2020 COMPLIANCE PROGRESS: Status Update	THIRD REPORTING PERIOD MARCH 1, 2020 – DECEMBER 31, 2020 COMPLIANCE PROGRESS: Status Update
FOURTH REPORTING PERIOD JANUARY 1, 2021 – JUNE 30, 2021 COMPLIANCE PROGRESS: None	FIFTH REPORTING PERIOD JULY 1, 2021 – DECEMBER 31, 2021 COMPLIANCE PROGRESS: None	SIXTH REPORTING PERIOD JANUARY 1, 2022 – JUNE 30, 2022 COMPLIANCE PROGRESS: None

Accountability and Transparency: ¶509

509. *For each complaint, the CMS will separately track, and have capacity to conduct searches and generate reports sufficient to identify and analyze trends relating to, at a minimum, the following: a. allegations of discriminatory policing based on an individual's membership or perceived membership in an identifiable group, based upon, but not limited to: race, physical or mental disability, gender, gender identity, sexual orientation, religion, and age; b. allegations of unlawful stop, search, citation, or arrest practices; c. allegations of excessive force; d. allegations of misconduct arising during an interaction with individuals in crisis; e. allegations of retaliation against non-CPD members; f. allegations of conduct alleged to have occurred in retaliation for engaging in First Amendment protected activities, such as lawful demonstrations, protected speech, observing or filming police activity, or criticizing an officer or the officer's conduct; g. allegations of officer-involved gender-based violence, domestic violence, or sexual misconduct; h. allegations of CPD member substance and/or alcohol abuse; and i. the self-reported demographic information of complainants, including race, physical or mental disability, gender, gender identity, sexual orientation, religion, and age.*

Compliance Progress (Reporting Period: January 1, 2022, through June 30, 2022)

Preliminary:		***Not in Compliance***[225]
	CPD	***Not in Compliance***
	COPA	***In Compliance*** **(FOURTH REPORTING PERIOD)**
Secondary:		***Not in Compliance***
	CPD	***Not Yet Assessed***
	COPA	***Not In Compliance***
Full:		***Not Yet Assessed***

The CPD did not reach Preliminary compliance with ¶509 in the sixth reporting period. COPA maintained Preliminary compliance with ¶509 in the sixth reporting period. Because all relevant City entities must reach levels of compliance to bring

[225] As referenced above, the Consent Decree requires actions by various City entities, including the CPD, COPA, the Police Board, and the Office of the Inspector General. Ultimately, the City is responsible for ensuring compliance. As a result, if a Consent Decree paragraph requires actions by multiple City entities, we will not find that the City has met Preliminary, Secondary, or Full compliance until all those entities have met the corresponding level of compliance. Nonetheless, for some paragraphs, we will clarify compliance assessments for each entity to demonstrate which benchmarks have been met.

the City, as a whole, into compliance, the City has not yet reached Preliminary compliance.

To evaluate Preliminary compliance with ¶509, we reviewed the CPD's and COPA's relevant policies and documents following the process described in the Consent Decree (¶¶626–41).[226] To evaluate Secondary compliance, we reviewed the entities' training development, implementation, and evaluation.

Progress before the Sixth Reporting Period

In previous reporting periods, the CPD made efforts toward Preliminary compliance by drafting BIA's *Case Management System* Unit Directive. However, by the close of the fourth reporting period, this Unit Directive was not finalized, preventing the CPD from reaching Preliminary compliance. In the fifth reporting period, the CPD provided a draft of Special Order S08-01-01, *Conducting Log Number Investigations*, which addressed all the requirements of ¶509.[227] We provided feedback on this policy in September 2021, but we did not receive a further revised draft of S08-01-01. We also did not receive a further revised draft of BIA's draft *Case Management System* Unit Directive, which we provided comments on in September 2021, by the end of the fifth reporting period. Because both S08-01-01 and the Unit Directive remained in the collaborative review and revision process, the CPD did not reach Preliminary compliance in the fifth reporting period.

COPA reached Preliminary compliance with ¶509 in the fourth reporting period by finalizing Policy 3.1.6, *Clear and Column Case Management System*. COPA maintained Preliminary compliance in the fifth reporting period and made efforts toward Secondary compliance. COPA submitted for review training materials for its training *Case Management System: Overview of Policy and Procedures*. We submitted a no-objection notice to these training materials[228] and explained that

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[226] The OAG, the City, and the IMT agreed to a stipulation that provides a different review process for review of COPA policies and training materials. *See Stipulation Regarding the Policy and Training Review Process for COPA*, *Illinois v. Chicago*, Case No. 1:17-cv-06260 (Jan. 30, 2020). The review process in the Stipulation mirrors the review process under ¶¶626–41, but among other things, gives the OAG and the IMT a shorter timeframe for review of COPA policies and training materials.

[227] In the sixth reporting period, the CPD renumbered the policy previously labeled S08-01-01, and it is now S08-01-05, *Conducting Log Number Investigations*.

[228] Under the Consent Decree policy review process, the City and the CPD consult with the IMT and the OAG to develop or revise policies in accordance with Consent Decree requirements. *See* ¶¶626–37. The City and the CPD provide the policy for review at least 30 days before the policy is scheduled to go into effect, and the IMT and the OAG have 30 days to comment on the policy. *See* ¶¶627–28. The City, the CPD, the IMT, and the OAG then work together to resolve comments. The IMT and the OAG will, separately and in writing, notify the City and the CPD that they no longer have any comments, which is referred to as a "no-objection notice." Once the City and the CPD receive a no-objection notice from both the IMT and the OAG, the City and the CPD will begin the process of finalizing the policy. Typically, this includes the CPD

COPA would need to provide this training to at least 95% of its staff to obtain Secondary compliance.

Progress in the Sixth Reporting Period

This reporting period, the City and the CPD provided a new Special Order S08-01-01, *Log Number Case Management System*, for review.[229] The IMT submitted a no-objection notice with comments on June 3, 2022.[230] Section IV.E.1–9 of this policy addresses the requirements of ¶509(a–i) verbatim. However, this policy remained in the collaborative review and revision process at the end of the sixth reporting period.

COPA provided its *Disciplinary and Remedial Recommendations In-Service Lesson Plan* in the sixth reporting period. COPA also provided its *Case Management System: Overview of Policy and Procedures* training materials in the sixth reporting period. These training materials completely address ¶509 and its subparagraphs. Additionally, the training materials provide information on the types of allegations to which a tracking number will be assigned. On January 12, 2022, the IMT observed the two-hour mandatory *In-Service Case Management System* training. The lesson plan was presented as written, and the instructors were knowledgeable. The IMT provided suggestions regarding delivery of the instruction, which COPA took into consideration for future trainings. To achieve Secondary compliance, COPA will need to provide this training to at least 95% of its personnel.

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posting the policy on its website for public comment for at least 15 days. The City and the CPD must then consider those comments and make additional changes, as appropriate. *See* ¶633.

[229] In the sixth reporting period, the CPD informed the IMT and the OAG that BIA would begin to move away from Unit Directives. Instead of Unit Directives, instruction will be provided in General Orders and Special Orders. This applies to the BIA Unit Directives that we reviewed, and in some instances provided no-objection notices to in previous reporting periods. The CPD began this process in sixth reporting period, and incorporated instruction previously included in the BIA Directive *Case Management System* into S08-01-01. This process of incorporating Unit Directives into General Orders and Special Orders is ongoing.

[230] Under the Consent Decree policy review process, the City and the CPD consult with the IMT and the OAG to develop or revise policies in accordance with Consent Decree requirements. *See* ¶¶626–37. The City and the CPD provide the policy for review at least 30 days before the policy is scheduled to go into effect, and the IMT and the OAG have 30 days to comment on the policy. *See* ¶¶627–28. The City, the CPD, the IMT, and the OAG then work together to resolve comments. The IMT and the OAG will, separately and in writing, notify the City and the CPD that they no longer have any comments, which is referred to as a "no-objection notice." Once the City and the CPD receive a no-objection notice from both the IMT and the OAG, the City and the CPD will begin the process of finalizing the policy. Typically, this includes the CPD posting the policy on its website for public comment for at least 15 days. The City and the CPD must then consider those comments and make additional changes, as appropriate. *See* ¶633.

In the coming reporting periods, we expect the CPD will prioritize finalizing S08-01-01, *Log Number Case Management System*. As for COPA, we will look for evidence demonstrating that it has provided the *Disciplinary and Remedial Recommendations In-Service Lesson Plan* and *Case Management System: Overview of Policy and Procedures* trainings to at least 95% of its personnel.

Paragraph 509 Compliance Progress History

FIRST REPORTING PERIOD SEPTEMBER 1, 2019 – AUGUST 31, 2019 COMPLIANCE PROGRESS: Not Applicable	SECOND REPORTING PERIOD SEPTEMBER 1, 2019 – FEBRUARY 29, 2020 COMPLIANCE PROGRESS: Not Applicable	THIRD REPORTING PERIOD MARCH 1, 2020 – DECEMBER 31, 2020 COMPLIANCE PROGRESS: Status Update
FOURTH REPORTING PERIOD JANUARY 1, 2021 – JUNE 30, 2021 COMPLIANCE PROGRESS: None	FIFTH REPORTING PERIOD JULY 1, 2021 – DECEMBER 31, 2021 COMPLIANCE PROGRESS: None	SIXTH REPORTING PERIOD JANUARY 1, 2022 – JUNE 30, 2022 COMPLIANCE PROGRESS: None

Accountability and Transparency: ¶511

511. *In order to develop a new mediation policy governing the resolution of disciplinary actions by the agreement of the CPD member and non-CPD member complainant, the City will solicit public input, through community engagement efforts, regarding the methods by which mediation will most effectively build trust between community members and police and foster mutual respect.*

Compliance Progress

(Reporting Period: January 1, 2022, through June 30, 2022)

Preliminary:	***In Compliance*** **(FOURTH REPORTING PERIOD)**
Secondary:	***Not in Compliance*** **(NEW: LOST COMPLIANCE)**
Full:	***Not Yet Assessed***

In the sixth reporting period, the City lost Secondary compliance with ¶511.

To assess Preliminary compliance with ¶511, we looked for a policy or plan that could be followed to actively engage the community input to inform a new mediation policy. To evaluate Secondary compliance, we looked for evidence that the City acted upon its plan and received significant community feedback relevant to the new mediation policy. To reach Full compliance, the City must demonstrate that it has incorporated this public input, as appropriate, in the development of the new mediation policy.

Progress before the Sixth Reporting Period

In previous reporting periods, the City reached Secondary compliance with ¶511 after demonstrating that it engaged an outside expert to assist with community engagement efforts under ¶511. In addition to providing information about the engaged expert, the City provided notes regarding community feedback it received during two learning sessions.

At the end of the fifth reporting period, the City produced its *Interagency* Policy, IAP 11-01, *Community-Policy Mediation Pilot Program*. This document is better understood as an outline for a temporary program. We reviewed a *City Mediation* Policy in November 2020 and provided comments in January 2021. The December 30, 2022 version we received was the first time we had reviewed the policy in this new form.

In its production letter, the City indicated that after receiving comments from the IMT and the OAG regarding the mediation policy it produced in November of 2020, "the City decided to rewrite its mediation pilot policy to better address these comments and concerns and to better incorporate community feedback." The City also

specified that to incorporate the community feedback the City "reinforced themes of the community feedback, including transparency, accountability, timeliness, types of complaints, and member history, during its development discussions with COPA and BIA and has more clearly set forth and reiterated these themes throughout the policy."

We noted our appreciation of the City's efforts. However, because the *Interagency* Policy sets out a temporary, six-month pilot program, the City did not reach Full compliance in the fifth reporting period. We encouraged the City as it launches the pilot program to continue to gain community feedback to evaluate the pilot program on an ongoing basis. We noted that we looked forward to the City developing a mediation policy incorporating not only the feedback the City has received to date, but any additional community input it receives during the pilot program.

We explained that, since the City has chosen to undertake a pilot program related to the Consent Decree requirement that the City develop a Mediation Program, we hoped the City would utilize the six-month program as a means to obtain real-time feedback regarding the effectiveness of the proposed program. We noted our expectation that the City critically analyze this pilot program on an ongoing basis, and that the City provide the IMT with monthly updates regarding the progress of the pilot program during the sixth reporting period. We explained that such real-time assessment and responsive modification will allow the city to create a mediation program that is "a valuable tool for expending the resolution of complaints, building trust between community members and police, and fostering mutual respect." ¶510.

With this, the City maintained Preliminary and Secondary compliance in the fifth reporting period, but did not move into Full compliance.

Progress in the Sixth Reporting Period

Early in the sixth reporting period, the City met with the IMT to describe its intentions to roll out the Mediation Pilot Program. At that time we voiced concerns that the program appeared to be designed for evaluation only once the sixth-month pilot period was completed. We asked for regular updates on the progress of the program throughout the pilot, which the City agreed to provide. We also urged that the City continue to consider the real-time feedback it received regarding the Mediation Pilot Program. However, we received no updates regarding the Mediation Pilot Program in the sixth reporting period.

Secondary compliance with this paragraph requires demonstration the City received significant community feedback relevant to the new mediation policy and is acting upon its plans in order to develop a community-informed mediation policy. Because we have received no updates regarding the extent to which the Mediation Pilot Program has been implemented, nor have we received any assurance

that the City is capturing real-time feedback from the community regarding the Pilot Program, the City has lost Secondary Compliance.

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Moving forward we will look for the City to provide evidence that it is considering and, when appropriate, implementing the community feedback it has already received to develop and effectuate a mediation policy. If the City intends to initially roll out a pilot program, we encourage the City to ensure that feedback loops and support for the program are robust. Otherwise, the pilot program will not provide the type of information most helpful to developing a city-wide mediation policy and program.

Paragraph 511 Compliance Progress History

FIRST REPORTING PERIOD	SECOND REPORTING PERIOD	THIRD REPORTING PERIOD
SEPTEMBER 1, 2019 – AUGUST 31, 2019	SEPTEMBER 1, 2019 – FEBRUARY 29, 2020	MARCH 1, 2020 – DECEMBER 31, 2020
COMPLIANCE PROGRESS:	COMPLIANCE PROGRESS:	COMPLIANCE PROGRESS:
Not Applicable	Not Applicable	Status Update

FOURTH REPORTING PERIOD	FIFTH REPORTING PERIOD	SIXTH REPORTING PERIOD
JANUARY 1, 2021 – JUNE 30, 2021	JULY 1, 2021 – DECEMBER 31, 2021	JANUARY 1, 2022 – JUNE 30, 2022
COMPLIANCE PROGRESS:	COMPLIANCE PROGRESS:	COMPLIANCE PROGRESS:
Secondary	Secondary	Preliminary

Accountability and Transparency: ¶512

512. *The City will ensure that within 365 days of the Effective Date, COPA and BIA have developed parallel policies regarding the mediation of misconduct complaints by non-CPD members. The policies will govern mediation of misconduct complaints involving non-CPD member complainants. The policies will specify, at a minimum, (a) the criteria for determining incidents eligible for resolution through mediation; (b) the goals of mediation, including efficiency, transparency, procedural justice, restorative justice, and strengthening public trust; (c) the steps in the mediation process; and (d) methods of communication with complainants regarding the mediation process and the opportunity to participate. Items (a) through (d) above will be consistent between the CPD and COPA mediation policies.*

Compliance Progress (Reporting Period: January 1, 2022, through June 30, 2022)

Preliminary:		***Not in Compliance***[231]
	CPD	***Not in Compliance***
	COPA	***Not in Compliance***
Secondary:		***Not Yet Assessed***
Full:		***Not Yet Assessed***

Neither the CPD nor COPA reached Preliminary compliance with ¶512 in the sixth reporting period.

To evaluate Preliminary compliance with ¶512, we reviewed the CPD's and COPA's relevant policies and documents following the process described in the Consent Decree (¶¶626–41).[232]

[231] As referenced above, the Consent Decree requires actions by various City entities, including the CPD, COPA, the Police Board, and the Office of the Inspector General. Ultimately, the City is responsible for ensuring compliance. As a result, if a Consent Decree paragraph requires actions by multiple City entities, we will not find that the City has met Preliminary, Secondary, or Full compliance until all those entities have met the corresponding level of compliance. Nonetheless, for some paragraphs, we will clarify compliance assessments for each entity to demonstrate which benchmarks have been met.

[232] The OAG, the City, and the IMT agreed to a stipulation that provides a different review process for review of COPA policies and training materials. *See Stipulation Regarding the Policy and Training Review Process for COPA*, *Illinois v. Chicago*, Case No. 1:17-cv-06260 (Jan. 30, 2020). The review process in the Stipulation mirrors the review process under ¶¶626–41, but among other things, gives the OAG and the IMT a shorter timeframe for review of COPA policies and training materials.

Progress before the Sixth Reporting Period

In previous reporting periods we reviewed BIA's *Community Mediation* Unit Directive and a draft of the City's Mediation Policy, *Complaints against the CPD*. We received both of these in the third reporting period and provided multiple rounds of comments. By the end of the fourth reporting period, we did not receive additional revised drafts of these policies. We did not receive any documents or evidence of efforts toward compliance with ¶512 from COPA. In the fifth reporting period, neither the CPD nor COPA produced any documentation related to efforts under ¶512.

However, at the end of the fifth reporting period the City provided its Interagency Policy, IAP 11-01, *Community-Police Mediation Pilot Program*. This document is better understood as an outline for a temporary program. We reviewed a *City Mediation Policy* in November 2020 and provided comments in January 2021. The City indicated that it rewrote the policy after receiving our comments and feedback from the community. The December 30, 2022 version we received was the first time we had reviewed the policy in this new form. Therefore, we explained in the fifth reporting period that we were not able to engage in collaborative review and revision. Notwithstanding this fact, the City indicated that all entities implicated by the Interagency Policy have signed onto the pilot program, and the City indicated that it will launch the six-month mediation pilot program on January 15, 2022.

We noted that the City's steps toward the development of the mediation program were positive; however, we expressed concerns with the pilot program policy. We explained that the pilot program lacked specificity in many areas and did not include methods to measure success of the program. Perhaps most concerning was an indication that the City will provide an assessment of the program 60 days after the six-month pilot program ends. We explained that a delayed assessment like this will not allow the City to make modifications to the pilot program during its six-month time frame to address concerns and test solutions. We urged the City to consider performing ongoing or regular assessments to more effectively and efficiently develop a mediation program under ¶511 and ¶512.

We noted in the fifth reporting period that the City's Interagency Policy did not fulfill ¶512's requirements for a variety of reasons. Most notably, we explained, it gives the City sole authority to revise or replace the Interagency Policy "in the event that the City determines the requirements are better accomplished by other means."

With this, the City did not reach Preliminary compliance in the fifth reporting period. We noted that we would look for the CPD and COPA to provide draft policies related to ¶512's mandates in the sixth reporting period.

Progress in the Sixth Reporting Period

The City and the CPD did not provide any information related to the pilot mediation program in the sixth reporting period, as the City and the CPD had agreed to provide. As such, the IMT currently has no information about the status of the Mediation Pilot Program. The IMT continues to be concerned that the pilot program lacks the necessary structure and support it needs to be an informative and beneficial pilot. Because the City did not provide a status update and because no documentation was provided to the IMT during the sixth reporting period, the City did not reach Preliminary compliance with ¶512.

This reporting period, the City and the CPD provided S08-01-06, *Supervisor Responsibilities in Log Number Investigations*. But when this Special Order was submitted, the CPD indicated that this Special Order was not submitted "to demonstrate compliance with Consent Decree paragraphs, and the CPD is not seeking review of this policy at this time." Nonetheless, we reviewed the policy and provided comments June 15, 2022, expressing our desire to receive a final draft of this policy for review under ¶627. We observed that Section IV.A.13 of the policy directs the BIA Chief to ensure that BIA is engaged in mediation practices. While this direction is important, it does not include the specific requirements of ¶512.a–c.

COPA did not submit materials related to ¶512 in the sixth reporting period.

Progress in the Sixth Reporting Period

With this, the City did not reach Preliminary compliance with ¶512 in the sixth reporting period. We will look for the CPD and COPA to provide draft policies related to ¶512's mandates in the next reporting period.

Paragraph 512 Compliance Progress History

FIRST REPORTING PERIOD	SECOND REPORTING PERIOD	THIRD REPORTING PERIOD
SEPTEMBER 1, 2019 – AUGUST 31, 2019	SEPTEMBER 1, 2019 – FEBRUARY 29, 2020	MARCH 1, 2020 – DECEMBER 31, 2020
COMPLIANCE PROGRESS:	COMPLIANCE PROGRESS:	COMPLIANCE PROGRESS:
Not Applicable	None	None

FOURTH REPORTING PERIOD	FIFTH REPORTING PERIOD	SIXTH REPORTING PERIOD
JANUARY 1, 2021 – JUNE 30, 2021	JULY 1, 2021 – DECEMBER 31, 2021	JANUARY 1, 2022 – JUNE 30, 2022
COMPLIANCE PROGRESS:	COMPLIANCE PROGRESS:	COMPLIANCE PROGRESS:
None	None	None

Accountability and Transparency: ¶513

513. *COPA will ensure that the recommended level of discipline for findings is consistently applied in a fair, thorough, and timely fashion, based on the nature of the misconduct. COPA and CPD will also ensure that mitigating and aggravating factors are identified, consistently applied, and documented.*

Compliance Progress (Reporting Period: January 1, 2022, through June 30, 2022)

Preliminary:		***Not in Compliance***[233]
	CPD	***Not in Compliance***
	COPA	***In Compliance*** **(FOURTH REPORTING PERIOD)**
Secondary:		***Not in Compliance***
	CPD	***Not Yet Assessed***
	COPA	***Not in Compliance***
Full:		***Not Yet Assessed***

The CPD has made efforts toward but has not reached Preliminary compliance because it has not finalized a policy related to ¶513's requirements. COPA maintained Preliminary compliance with ¶513 in the sixth reporting period. Because all relevant City entities must reach levels of compliance to bring the City, as a whole, into compliance, the City has not yet reached Preliminary compliance.

To evaluate Preliminary compliance with ¶513, we reviewed the CPD's and COPA's relevant policies and documents following the process described in the Consent Decree (¶¶626–41).[234] To evaluate Secondary compliance, we reviewed the entities' training development, implementation, and evaluation.

[233] As referenced above, the Consent Decree requires actions by various City entities, including the CPD, COPA, the Police Board, and the Office of the Inspector General. Ultimately, the City is responsible for ensuring compliance. As a result, if a Consent Decree paragraph requires actions by multiple City entities, we will not find that the City has met Preliminary, Secondary, or Full compliance until all those entities have met the corresponding level of compliance. Nonetheless, for some paragraphs, we will clarify compliance assessments for each entity to demonstrate which benchmarks have been met.

[234] The OAG, the City, and the IMT agreed to a stipulation that provides a different review process for review of COPA policies and training materials. *See Stipulation Regarding the Policy and Training Review Process for COPA*, *Illinois v. Chicago*, Case No. 1:17-cv-06260 (Jan. 30, 2020). The review process in the Stipulation mirrors the review process under ¶¶626–41, but among other things, gives the OAG and the IMT a shorter timeframe for review of COPA policies and training materials.

Progress before the Sixth Reporting Period

In previous reporting periods, the CPD provided consultation drafts of BIA's *Advocate Section Command Channel Review Procedures* Unit Directive. This Unit Directive had not been finalized by the end of the fourth reporting period, therefore, the CPD did not reach Preliminary compliance. In the fifth reporting period, the CPD provided a draft of Special Order S08-01-01, *Conducting Log Number Investigations*, which addressed ¶513's requirements.[235] We provided feedback on this policy in September 2021. We did not receive a further revised draft of S08-01-01 by the end of the fifth reporting period. In addition, we provided consultation feedback to BIA's *Advocate Section Command Channel Review Procedures* Unit Directive. We noted that the latest version of the Unit Directive, which was provided in June 2021, demonstrated great improvement. We encouraged the CPD to provide a final draft of this Unit Directive for review under ¶627. We noted our anticipation in the fifth reporting period that the BIA would receive a no-objection notice from us with minimal additional revisions and then be able to post this Unit Directive for public comment.[236] Without finalizing any policy speaking to ¶513's requirements, the CPD did not reach Preliminary compliance in the fifth reporting period.

In the fourth reporting period, COPA finalized its Policy 3.2.1, *Disciplinary and Remedial Recommendations*, which fulfills the requirements of ¶513. This brought COPA into Preliminary compliance. COPA did not produce evidence of steps toward Secondary compliance with ¶513 in the fifth reporting period.

Progress in the Sixth Reporting Period

In the sixth reporting period, the CPD renumbered the policy previously labeled S08-01-01; it is now S08-01-05. This reporting period, the CPD submitted multiple revised versions of S08-01-05, *Conducting Log Number Investigations*. The draft version of this policy completely addresses the requirements of ¶513. The CPD submitted a further revised version of S08-01-05 on June 30, 2022, the last day of

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235 In the sixth reporting period, the CPD renumbered the policy previously labeled S08-01-01; it is now S08-01-05, *Conducting Log Number Investigations*.

236 Under the Consent Decree policy review process, the City and the CPD consult with the IMT and the OAG to develop or revise policies in accordance with Consent Decree requirements. *See* ¶¶626–37. The City and the CPD provide the policy for review at least 30 days before the policy is scheduled to go into effect, and the IMT and the OAG have 30 days to comment on the policy. *See* ¶¶627–28. The City, the CPD, the IMT, and the OAG then work together to resolve comments. The IMT and the OAG will, separately and in writing, notify the City and the CPD that they no longer have any comments, which is referred to as a "no-objection notice." Once the City and the CPD receive a no-objection notice from both the IMT and the OAG, the City and the CPD will begin the process of finalizing the policy. Typically, this includes the CPD posting the policy on its website for public comment for at least 15 days. The City and the CPD must then consider those comments and make additional changes, as appropriate. *See* ¶633.

the reporting period. Therefore, this policy remained in the collaborative review and revision process at the end of the sixth reporting period.

The CPD also provided drafts of S08-01-07, *Command Channel Review*.[237] On June 30, 2022, the last day of the reporting period, the CPD submitted a further revised version. While this policy also addresses the requirements of ¶513, it too remained in the collaborative review and revision process at the end of the sixth reporting period.

This reporting period, COPA maintained Preliminary compliance with ¶513. COPA also worked toward Secondary compliance by submitting its *Disciplinary and Remedial Recommendations In-Service Lesson Plan*. This lesson plan fully addresses ¶513 and provides more depth than is required by the paragraph. Several members of the IMT attended the *Disciplinary and Remedial Recommendations In-Service Training* class on June 22, 2022. The class instructor covered the lesson plan material completely and appropriately, provided examples to illustrate the instruction material, and allowed for class interaction. To achieve Secondary compliance, COPA will need to provide this training to at least 95% of its personnel.

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With this, the CPD has made efforts toward but has not reached Preliminary compliance because it has not finalized a policy related to ¶513's requirements. COPA maintained Preliminary compliance with ¶513 in the sixth reporting period.

In the next reporting period, we will look for the CPD to finalize its policies S08-01-05, *Conducting Log Number Investigations*, and S08-01-07, *Command Channel Review*. For COPA, we will look for evidence demonstrating that it has provided the *Disciplinary and Remedial Recommendations In-Service Lesson Plan* training to at least 95% of its personnel.

[237] The IMT previously reviewed multiple drafts of S08-01-03, *Command Channel Review* (previously titled *Complaint Summary Reporting and Review Procedures*). The IMT also previously reviewed Unit Directives regarding Command Channel review procedures. In the sixth reporting period, the CPD informed the IMT and the OAG that BIA would begin to move away from Unit Directives. Instead of Unit Directives, instruction will be provided in General Orders and Special Orders. This applies to the BIA Unit Directives that we reviewed, and in some instances provided no-objection notices to in previous reporting periods. The CPD began this process in sixth reporting period, and incorporated instruction previously included in the BIA Directive *Advocate Section Command Channel Review Procedures* (previously titled *Command Channel Review*) into S08-01-07. This process of incorporating Unit Directives into General Orders and Special Orders is ongoing.

Paragraph 513 Compliance Progress History

FIRST REPORTING PERIOD
SEPTEMBER 1, 2019 – AUGUST 31, 2019
COMPLIANCE PROGRESS:
Not Applicable

SECOND REPORTING PERIOD
SEPTEMBER 1, 2019 – FEBRUARY 29, 2020
COMPLIANCE PROGRESS:
Not Applicable

THIRD REPORTING PERIOD
MARCH 1, 2020 – DECEMBER 31, 2020
COMPLIANCE PROGRESS:
Not Applicable

FOURTH REPORTING PERIOD
JANUARY 1, 2021 – JUNE 30, 2021
COMPLIANCE PROGRESS:
None

FIFTH REPORTING PERIOD
JULY 1, 2021 – DECEMBER 31, 2021
COMPLIANCE PROGRESS:
None

SIXTH REPORTING PERIOD
JANUARY 1, 2022 – JUNE 30, 2022
COMPLIANCE PROGRESS:
None

Accountability and Transparency: ¶514

514. *The City, COPA, and CPD will use best efforts to ensure that the level of discipline recommended for sustained findings is applied consistently across CPD districts and without regard for the race of the complainant or the race of the involved CPD member.*

Compliance Progress (Reporting Period: January 1, 2022, through June 30, 2022)

Preliminary:		***Not in Compliance***[238]
	CPD	***Not in Compliance***
	COPA	***In Compliance*** **(FOURTH REPORTING PERIOD)**
Secondary:		***Not in Compliance***
	CPD	***Not Yet Assessed***
	COPA	***Not in Compliance***
Full:		***Not Yet Assessed***

The CPD has made efforts toward but has not reached Preliminary compliance with ¶514 because it has not finalized a policy related to ¶514's requirements. COPA maintained Preliminary compliance with ¶514 in the sixth reporting period. Because all relevant City entities must reach levels of compliance to bring the City, as a whole, into compliance, the City has not yet reached Preliminary compliance.

To evaluate Preliminary compliance with ¶514, we reviewed the CPD's and COPA's relevant policies and documents following the process described in the Consent Decree (¶¶626–41).[239] To evaluate Secondary compliance, we reviewed the entities' training development, implementation, and evaluation.

Progress before the Sixth Reporting Period

In past reporting periods, the CPD's BIA provided onboarding and annual training scenarios, which relate to ¶514, but as BIA has acknowledged, additional efforts

[238] As referenced above, the Consent Decree requires actions by various City entities, including the CPD, COPA, the Police Board, and the Office of the Inspector General. Ultimately, the City is responsible for ensuring compliance. As a result, if a Consent Decree paragraph requires actions by multiple City entities, we will not find that the City has met Preliminary, Secondary, or Full compliance until all those entities have met the corresponding level of compliance. Nonetheless, for some paragraphs, we will clarify compliance assessments for each entity to demonstrate which benchmarks have been met.

[239] The OAG, the City, and the IMT agreed to a stipulation that provides a different review process for review of COPA policies and training materials. *See Stipulation Regarding the Policy and Training Review Process for COPA*, *Illinois v. Chicago*, Case No. 1:17-cv-06260 (Jan. 30, 2020). The review process in the Stipulation mirrors the review process under ¶¶626–41, but among other things, gives the OAG and the IMT a shorter timeframe for review of COPA policies and training materials.

are necessary to comply with ¶514. The CPD did not provide records to demonstrate additional efforts toward compliance with ¶514 in the fifth reporting period.

In the fourth reporting period, COPA finalized its Policy 3.2.1, *Disciplinary and Remedial Recommendations*, which fulfills the requirements of ¶514. This brought COPA into Preliminary compliance. COPA did not provide records to demonstrate additional efforts toward compliance with ¶514 in the fifth reporting period.

Progress in the Sixth Reporting Period

This reporting period, the CPD submitted multiple revised versions of Special Order S08-01-05, *Conducting Log Number Investigations*.[240] Section IV.B.6.a–b of the draft version of this policy completely addresses ¶514 and provides additional detail which guides the Advocate Section. The CPD submitted a further revised version of S08-01-05 on June 30, 2022, the last day of the reporting period. Therefore, this policy remained in the collaborative review and revision process at the end of the sixth reporting period.

The CPD also provided drafts of Special Order S08-01-07, *Command Channel Review*.[241] On June 30, 2022, the last day of the reporting period, the CPD submitted a further revised draft of this policy. Therefore, this policy remained in the collaborative review and revision process at the end of the sixth reporting period. Sections II.B and II.C.2.b of this draft policy completely address ¶514 by ensuring that every CPD investigation will be conducted consistently, with the level of discipline recommended for sustained findings applied regardless of the member's assignment or the race of the complainant or the accused member.

This reporting period, COPA maintained Preliminary compliance with ¶514 by submitting its *Disciplinary and Remedial Recommendations In-Service Lesson Plan*. This lesson plan addresses ¶514 verbatim. Members of the IMT attended the *Disciplinary and Remedial Recommendations In-Service Training* class on June 22, 2022. The class instructor covered the lesson plan materials completely and appropriately, provided examples to illustrate the instruction material, and allowed

[240] The *Conducting Log Number Investigations* policy was produced in previous reporting periods as S08-01-01. The policy was re-numbered as S08-01-05 when it was produced May 5, 2022.

[241] The IMT previously reviewed multiple drafts of S08-01-03, *Command Channel Review* (previously titled *Complaint Summary Reporting and Review Procedures*). The IMT also previously reviewed Unit Directives regarding Command Channel review procedures. In the sixth reporting period, the CPD informed the IMT and the OAG that BIA would begin to move away from Unit Directives. Instead of Unit Directives, instruction will be provided in General Orders and Special Orders. This applies to the BIA Unit Directives that we reviewed, and in some instances provided no-objection notices to in previous reporting periods. The CPD began this process in sixth reporting period, and incorporated instruction previously included in the BIA Directive *Advocate Section Command Channel Review Procedures* (previously titled *Command Channel Review*) into S08-01-07. This process of incorporating Unit Directives into General Orders and Special Orders is ongoing.

for class interaction. To achieve Secondary compliance, COPA will need to provide this training to at least 95% of its personnel.

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The City did not reach Preliminary compliance with ¶514 in the sixth reporting period. The CPD has made efforts toward but has not reached Preliminary compliance because it has not finalized a policy related to ¶514's requirements. COPA maintained Preliminary compliance with ¶514 in the sixth reporting period.

In the next reporting period, we will look for the CPD to finalize its policies S08-01-05, *Conducting Log Number Investigations*, and S08-01-07, *Command Channel Review*. For COPA, we will look for evidence demonstrating that it has provided the *Disciplinary and Remedial Recommendations In-Service Lesson Plan* training to at least 95% of its personnel.

Paragraph 514 Compliance Progress History

FIRST REPORTING PERIOD	SECOND REPORTING PERIOD	THIRD REPORTING PERIOD
SEPTEMBER 1, 2019 – AUGUST 31, 2019	SEPTEMBER 1, 2019 – FEBRUARY 29, 2020	MARCH 1, 2020 – DECEMBER 31, 2020
COMPLIANCE PROGRESS:	COMPLIANCE PROGRESS:	COMPLIANCE PROGRESS:
Not Applicable	Status Update	Status Update

FOURTH REPORTING PERIOD	FIFTH REPORTING PERIOD	SIXTH REPORTING PERIOD
JANUARY 1, 2021 – JUNE 30, 2021	JULY 1, 2021 – DECEMBER 31, 2021	JANUARY 1, 2022 – JUNE 30, 2022
COMPLIANCE PROGRESS:	COMPLIANCE PROGRESS:	COMPLIANCE PROGRESS:
None	None	None

Accountability and Transparency: ¶515

515. *All disciplinary decisions and discipline imposed will be documented in writing, maintained in the administrative investigative file and the CPD member's disciplinary history, and reported within the CMS consistent with CPD policy and this Agreement.*

Compliance Progress (Reporting Period: January 1, 2022, through June 30, 2022)

Preliminary:	***In Compliance*** **(FIFTH REPORTING PERIOD)**
Secondary:	***Not in Compliance***
Full:	***Not Yet Assessed***

The CPD maintained Preliminary compliance with ¶515 in the sixth reporting period, but did not reach Secondary compliance.

To evaluate Preliminary compliance with ¶515, we reviewed the CPD's relevant policies and documents following the process described in the Consent Decree (¶¶626–41). To evaluate Secondary compliance, we reviewed the CPD's training development, implementation, and evaluation.

Progress in the Sixth Reporting Period

The CPD reached Preliminary compliance with ¶515 in the fifth reporting period by finalizing Special Order S08-01-04, *Post-Investigation Log Number Procedures*.[242] Section IX, *Records Retention*, of this Special Order completely address the requirements of ¶515.

Progress in the Sixth Reporting Period

In the sixth reporting period, the CPD submitted draft BIA eLearning materials for review. These materials were still in draft stage and not in final presentation form. We reviewed and provided the CPD feedback on the materials. We look forward to reviewing further developed BIA eLearning materials in the next reporting period.

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The CPD maintained Preliminary compliance with ¶515 and made progress toward Secondary compliance. We look forward to reviewing further revised materials in the coming reporting period.

[242] In the sixth reporting period, the CPD informed us that this policy will be renumbered S08-01-08, *Post-Investigation Log Number Procedures*.

Paragraph 515 Compliance Progress History

FIRST REPORTING PERIOD
SEPTEMBER 1, 2019 – AUGUST 31, 2019
COMPLIANCE PROGRESS:
Not Applicable

SECOND REPORTING PERIOD
SEPTEMBER 1, 2019 – FEBRUARY 29, 2020
COMPLIANCE PROGRESS:
Status Update

THIRD REPORTING PERIOD
MARCH 1, 2020 – DECEMBER 31, 2020
COMPLIANCE PROGRESS:
Status Update

FOURTH REPORTING PERIOD
JANUARY 1, 2021 – JUNE 30, 2021
COMPLIANCE PROGRESS:
None

FIFTH REPORTING PERIOD
JULY 1, 2021 – DECEMBER 31, 2021
COMPLIANCE PROGRESS:
Preliminary

SIXTH REPORTING PERIOD
JANUARY 1, 2022 – JUNE 30, 2022
COMPLIANCE PROGRESS:
Preliminary

Accountability and Transparency: ¶516

516. *Each sustained finding contained within a CPD member's disciplinary history will be considered for the purposes of recommending discipline for a subsequent sustained finding for a period of up to five years after the date of the incident or the date on which the violation is discovered, whichever is later.*

Compliance Progress (Reporting Period: January 1, 2022, through June 30, 2022)

Preliminary:		***Not in Compliance***[243]
	CPD	***Not in Compliance***
	COPA	***In Compliance*** **(FOURTH REPORTING PERIOD)**
Secondary:		***Not in Compliance***
	CPD	***Not in Compliance***
	COPA	***Not in Compliance***
Full:		***Not Yet Assessed***

The CPD has made efforts toward but has not reached Preliminary compliance because it has not finalized a policy related to ¶516's requirements. COPA maintained Preliminary compliance with ¶516 in the sixth reporting period. Because all relevant City entities must reach levels of compliance to bring the City, as a whole, into compliance, the City has not yet reached Preliminary compliance.

To evaluate Preliminary compliance with ¶516, we reviewed the CPD's and COPA's relevant policies and documents following the process described in the Consent Decree (¶¶626–41).[244] To evaluate Secondary compliance, we reviewed the entities' training development, implementation, and evaluation.

Progress before the Sixth Reporting Period

In the fifth reporting period, the CPD provided a draft of S08-01-01, *Conducting Log Number Investigations*. This draft policy addressed the requirements of ¶516,

[243] As referenced above, the Consent Decree requires actions by various City entities, including the CPD, COPA, the Police Board, and the Office of the Inspector General. Ultimately, the City is responsible for ensuring compliance. As a result, if a Consent Decree paragraph requires actions by multiple City entities, we will not find that the City has met Preliminary, Secondary, or Full compliance until all those entities have met the corresponding level of compliance. Nonetheless, for some paragraphs, we will clarify compliance assessments for each entity to demonstrate which benchmarks have been met.

[244] The OAG, the City, and the IMT agreed to a stipulation that provides a different review process for review of COPA policies and training materials. *See Stipulation Regarding the Policy and Training Review Process for COPA*, *Illinois v. Chicago*, Case No. 1:17-cv-06260 (Jan. 30, 2020). The review process in the Stipulation mirrors the review process under ¶¶626–41, but among other things, gives the OAG and the IMT a shorter timeframe for review of COPA policies and training materials.

verbatim. We provided feedback on this policy in September 2021 but did not receive a further revised draft thereafter. Because S08-01-01 remained in the collaborative review and revision process at the close of the fifth reporting period, the CPD did not reach Preliminary compliance with ¶516.

COPA reached Preliminary compliance with ¶516 in the fourth reporting period by finalizing its Policy 3.2.1, *Disciplinary and Remedial Recommendations*, which completely addresses the requirements of ¶516. COPA did not produce evidence of steps toward Secondary compliance with ¶516 in the fifth reporting period.

Progress in the Sixth Reporting Period

In the sixth reporting period, the CPD renumbered the Special Order previously labeled S08-01-01; it is now S08-01-05, *Conducting Log Number Investigations*. The CPD submitted multiple revised versions of Special Order S08-01-05, *Conducting Log Number Investigations* this reporting period. Section V.B of the draft version of the S08-01-05 addresses ¶516 and goes beyond the up-to-five-year period required by ¶516, which we commend. The CPD submitted a further revised version of S08-01-05 on June 30, 2022, the last day of the reporting period. Therefore, this policy remained in the collaborative review and revision process at the end of the sixth reporting period.

This reporting period, COPA maintained Preliminary compliance with ¶516 by submitting its *Disciplinary and Remedial Recommendations In-Service Lesson Plan*. This lesson plan addresses ¶516 verbatim and provides additional detail and examples of the final summary report narrative in order to address the requirements of this paragraph. Members of the IMT attended the *Disciplinary and Remedial Recommendations In-Service Training* class on June 22, 2022. The class instructor covered the lesson plan material completely and appropriately, provided examples to illustrate the instruction material, and allowed for class interaction. To achieve Secondary compliance, COPA will need to provide this training to at least 95% of its personnel.

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With this, the CPD has made efforts toward but has not reached Preliminary compliance, and COPA maintained Preliminary compliance with ¶516 in the sixth reporting period.

In the next reporting period, we will look for the CPD to finalize its policy S08-01-05, *Conducting Log Number Investigations*. For COPA, we will look for evidence demonstrating that it has provided the *Disciplinary and Remedial Recommendations In-Service Lesson Plan* training to at least 95% of its personnel.

Paragraph 516 Compliance Progress History

FIRST REPORTING PERIOD
SEPTEMBER 1, 2019 – AUGUST 31, 2019
COMPLIANCE PROGRESS:
Not Applicable

SECOND REPORTING PERIOD
SEPTEMBER 1, 2019 – FEBRUARY 29, 2020
COMPLIANCE PROGRESS:
Status Update

THIRD REPORTING PERIOD
MARCH 1, 2020 – DECEMBER 31, 2020
COMPLIANCE PROGRESS:
Status Update

FOURTH REPORTING PERIOD
JANUARY 1, 2021 – JUNE 30, 2021
COMPLIANCE PROGRESS:
None

FIFTH REPORTING PERIOD
JULY 1, 2021 – DECEMBER 31, 2021
COMPLIANCE PROGRESS:
Preliminary

SIXTH REPORTING PERIOD
JANUARY 1, 2022 – JUNE 30, 2022
COMPLIANCE PROGRESS:
None

Accountability and Transparency: ¶517

517. *The City, CPD, and COPA will ensure that findings of "Sustained – Violation Noted, No Disciplinary Action": a. may not be used in any investigation in which the conduct resulted in injury to any person; and b. will only be used for investigations that warrant a sustained finding, but were a result of unintentional violations of policy or law.*

Compliance Progress (Reporting Period: January 1, 2022, through June 30, 2022)

Preliminary:		***Not in Compliance***[245]
	CPD	***Not in Compliance***
	COPA	***In Compliance*** **(FOURTH REPORTING PERIOD)**
Secondary:		***Not in Compliance***
	CPD	***Not Yet Assessed***
	COPA	***Not in Compliance***
Full:		***Not Yet Assessed***

The CPD did not reach Preliminary compliance with ¶517 in the sixth reporting period. COPA maintained Preliminary compliance with ¶517 in the sixth reporting period. Because all relevant City entities must reach levels of compliance to bring the City, as a whole, into compliance, the City has not yet reached Preliminary compliance.

To evaluate Preliminary compliance with ¶517, we reviewed the CPD's and COPA's relevant policies and documents following the process described in the Consent Decree (¶¶626–41).[246] To evaluate Secondary compliance, we reviewed the entities' training development, implementation, and evaluation.

[245] As referenced above, the Consent Decree requires actions by various City entities, including the CPD, COPA, the Police Board, and the Office of the Inspector General. Ultimately, the City is responsible for ensuring compliance. As a result, if a Consent Decree paragraph requires actions by multiple City entities, we will not find that the City has met Preliminary, Secondary, or Full compliance until all those entities have met the corresponding level of compliance. Nonetheless, for some paragraphs, we will clarify compliance assessments for each entity to demonstrate which benchmarks have been met.

[246] The OAG, the City, and the IMT agreed to a stipulation that provides a different review process for review of COPA policies and training materials. *See Stipulation Regarding the Policy and Training Review Process for COPA*, *Illinois v. Chicago*, Case No. 1:17-cv-06260 (Jan. 30, 2020). The review process in the Stipulation mirrors the review process under ¶¶626–41, but among other things, gives the OAG and the IMT a shorter timeframe for review of COPA policies and training materials.

Progress before the Sixth Reporting Period

We assessed compliance with ¶517 for the first time in the fourth reporting period. That reporting period, the CPD did not produce evidence of efforts toward compliance with ¶517. However, in the fifth reporting period, the CPD provided a draft of S08-01-01, *Conducting Log Number Investigations*. This draft policy addressed the requirements of ¶517 verbatim. We provided feedback on this policy in September 2021. We did not receive a further revised draft of S08-01-01 thereafter. Because S08-01-01 remained in the collaborative review and revision process at the close of the fifth reporting period, the CPD did not reach Preliminary compliance with ¶517.

COPA reached Preliminary compliance with ¶517 in the fourth reporting period by finalizing its Policy 3.2.1, *Disciplinary and Remedial Recommendations*, which completely covers the requirements of ¶517. COPA did not produce evidence of steps toward Secondary compliance with ¶517 in the fifth reporting period.

Progress in the Sixth Reporting Period

In the sixth reporting period, the CPD renumbered the policy previously labeled S08-01-01; it is now S08-01-05. This reporting period, the CPD submitted multiple revised versions of S08-01-05, *Conducting Log Number Investigations*. Section V.C.1.a of the draft S08-01-05 attempts to address ¶517; however, Section V.C.1.c appears to limit consideration of the sustained violations to only one year when making disciplinary determinations, which may be inconsistent with the requirements of ¶516 ("Each sustained finding contained within a CPD member's disciplinary history will be considered for the purposes of recommending discipline for a subsequent sustained finding *for a period of up to five years* after the date of the incident or the date on which the violation is discovered, whichever is later." (emphasis added)). We requested clarification of Section V.C.1.c. in our comments on June 29, 2022. The CPD submitted a further revised version of S08-01-05 on June 30, 2022, the last day of the reporting period. Therefore, this policy remained in the collaborative review and revision process at the end of the sixth reporting period.

This reporting period, COPA maintained Preliminary compliance with ¶517 by submitting its *Disciplinary and Remedial Recommendations In-Service Lesson Plan*. This lesson plan addresses the requirements ¶517. Several members of the IMT attended the *Disciplinary and Remedial Recommendations In-Service Training* class on June 22, 2022. The class instructor covered the lesson plan material completely and appropriately, provided examples to illustrate the instruction material, and allowed for class interaction. To achieve Secondary compliance, COPA will need to provide this training to at least 95% of its personnel.

***

With this, the CPD continued in efforts toward but has not reached Preliminary compliance because it has not finalized a policy related to ¶517's requirements. COPA maintained Preliminary compliance with ¶517 in the sixth reporting period.

In the next reporting period, we will look for the CPD to finalize its policy S08-01-05, *Conducting Log Number Investigations*. For COPA, we will look for evidence demonstrating that it has provided the *Disciplinary and Remedial Recommendations In-Service Lesson Plan* training to at least 95% of its personnel.

Paragraph 517 Compliance Progress History

FIRST REPORTING PERIOD SEPTEMBER 1, 2019 – AUGUST 31, 2019 COMPLIANCE PROGRESS: Not Applicable	SECOND REPORTING PERIOD SEPTEMBER 1, 2019 – FEBRUARY 29, 2020 COMPLIANCE PROGRESS: Not Applicable	THIRD REPORTING PERIOD MARCH 1, 2020 – DECEMBER 31, 2020 COMPLIANCE PROGRESS: Not Applicable
FOURTH REPORTING PERIOD JANUARY 1, 2021 – JUNE 30, 2021 COMPLIANCE PROGRESS: None	FIFTH REPORTING PERIOD JULY 1, 2021 – DECEMBER 31, 2021 COMPLIANCE PROGRESS: None	SIXTH REPORTING PERIOD JANUARY 1, 2022 – JUNE 30, 2022 COMPLIANCE PROGRESS: None

Accountability and Transparency: ¶518

518. *CPD will provide the required notice regarding disciplinary matters to the Illinois Law Enforcement Training and Standards Board, including when an officer resigns while a misconduct investigation or disciplinary charges are pending.*

Compliance Progress

(Reporting Period: January 1, 2022, through June 30, 2022)

Preliminary:	***In Compliance*** **(FIFTH REPORTING PERIOD)**
Secondary:	***Not in Compliance***
Full:	***Not Yet Assessed***

The City and the CPD maintained Preliminary compliance with ¶518 in the sixth reporting period, but did not reach Secondary compliance.

To evaluate Preliminary compliance with ¶518, we reviewed the CPD's relevant policies and documents following the process described in the Consent Decree (¶¶626–41). To evaluate Secondary compliance, the IMT reviewed the CPD's training development, implementation, and evaluation (¶286).

Progress before the Sixth Reporting Period

In the fifth reporting period, the CPD finalized Special Order S08-01-04, *Post-Investigation Log Number Procedures*. We noted that Section VII, *Notification to the Illinois Law Enforcement Training Standards Board* completely addressed the requirements of ¶518. With this, the CPD moved into Preliminary compliance.

Progress in the Sixth Reporting Period

In the sixth reporting period, the CPD submitted draft BIA eLearning materials for review. At the time of our review, these materials were still in draft stage and not in final presentation form. The draft training materials contained instruction relevant to ¶518. We reviewed and provided the CPD feedback on the materials. We look forward to reviewing further developed BIA eLearning materials in the next reporting period.

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The CPD maintained Preliminary compliance with ¶518 and made progress toward Secondary compliance. We look forward to reviewing further revised materials in the coming reporting period.

Paragraph 518 Compliance Progress History

FIRST REPORTING PERIOD
SEPTEMBER 1, 2019 – AUGUST 31, 2019
COMPLIANCE PROGRESS:
Not Applicable

SECOND REPORTING PERIOD
SEPTEMBER 1, 2019 – FEBRUARY 29, 2020
COMPLIANCE PROGRESS:
Not Applicable

THIRD REPORTING PERIOD
MARCH 1, 2020 – DECEMBER 31, 2020
COMPLIANCE PROGRESS:
Not Applicable

FOURTH REPORTING PERIOD
JANUARY 1, 2021 – JUNE 30, 2021
COMPLIANCE PROGRESS:
None

FIFTH REPORTING PERIOD
JULY 1, 2021 – DECEMBER 31, 2021
COMPLIANCE PROGRESS:
Preliminary

SIXTH REPORTING PERIOD
JANUARY 1, 2022 – JUNE 30, 2022
COMPLIANCE PROGRESS:
Preliminary

Accountability and Transparency: ¶519

519. *The failure to complete an administrative investigation within the timeframes set forth in this Agreement will not invalidate, impair, or otherwise negatively impact CPD's ability to issue discipline for sustained findings.*

Compliance Progress

(Reporting Period: January 1, 2022, through June 30, 2022)

Preliminary:	***Not in Compliance***
Secondary:	***Not Yet Assessed***
Full:	***Not Yet Assessed***

The City did not reach Preliminary compliance with ¶519 in the sixth reporting period because, while the CPD has provided a draft policy that relates to the requirements of ¶519, the CPD has yet to finalize such a policy.

To evaluate Preliminary compliance with ¶519, we reviewed the CPD's relevant policies and documents following the process described in the Consent Decree (¶¶626–41).

Progress before the Sixth Reporting Period

In the fourth reporting period—the first reporting period that we assessed compliance with ¶519—the CPD did not produce evidence of efforts toward compliance with ¶519. However, in the fifth reporting period, the CPD provided a draft of S08-01-01, *Conducting Log Number Investigations*. We noted that this draft policy addressed the requirements of ¶519, verbatim. We provided feedback on this policy in September 2021. We did not receive a further revised draft of S08-01-01 thereafter. Because S08-01-01 remained in the collaborative review and revision process at the close of the fifth reporting period, the CPD did not reach Preliminary compliance with ¶519.

Progress in the Sixth Reporting Period

In the sixth reporting period, the CPD renumbered the policy previously labeled S08-01-01; it is now S08-01-05. This reporting period, the CPD submitted multiple revised versions of S08-01-05, *Conducting Log Number Investigations*. Section V.D of this draft version of the policy addresses ¶519, verbatim. The CPD submitted a further revised version of S08-01-05 on June 30, 2022, the last day of the reporting period. Therefore, this policy remained in the collaborative review and revision process at the end of the sixth reporting period.

***

While the CPD continued to make efforts toward Preliminary compliance with ¶519, it has not yet reached Preliminary compliance because it has not finalized a policy related to ¶519's requirements.

In the next reporting period, we will look for the CPD to finalize its policy S08-01-05, *Conducting Log Number Investigations*.

Paragraph 519 Compliance Progress History

FIRST REPORTING PERIOD SEPTEMBER 1, 2019 – AUGUST 31, 2019 COMPLIANCE PROGRESS: Not Applicable	SECOND REPORTING PERIOD SEPTEMBER 1, 2019 – FEBRUARY 29, 2020 COMPLIANCE PROGRESS: Not Applicable	THIRD REPORTING PERIOD MARCH 1, 2020 – DECEMBER 31, 2020 COMPLIANCE PROGRESS: Not Applicable
FOURTH REPORTING PERIOD JANUARY 1, 2021 – JUNE 30, 2021 COMPLIANCE PROGRESS: None	FIFTH REPORTING PERIOD JULY 1, 2021 – DECEMBER 31, 2021 COMPLIANCE PROGRESS: None	SIXTH REPORTING PERIOD JANUARY 1, 2022 – JUNE 30, 2022 COMPLIANCE PROGRESS: None

Accountability and Transparency: ¶521

521. *The City, CPD, and COPA will continue to build on these critical efforts by ensuring that BIA, COPA, the Police Board, and the Deputy PSIG have sufficient funding and an adequate number of qualified staff to fulfill their respective missions as required by law, each entity's policies, and this Agreement.*

Compliance Progress

(Reporting Period: January 1, 2022, through June 30, 2022)

Preliminary:		***Not in Compliance***
	CPD	***Not in Compliance***
	COPA	***Not in Compliance***
Secondary:		***Not Yet Assessed***
Full:		***Not Yet Assessed***

The City did not achieve Preliminary compliance with ¶521 in the sixth reporting period.

To evaluate Preliminary compliance with ¶521 we reviewed various data sources to determine whether the City, the CPD, and COPA have reviewed and considered, as appropriate, staffing and needs assessments of BIA, COPA, the Police Board, and the Deputy PSIG to determine whether the entities have sufficient funding and staff to fulfill their obligations.

The IMT assessed compliance with ¶521 for the first time in the sixth reporting period. During site visits in June 2022, the IMT met with several groups of BIA Investigators and Accountability Sergeants to discuss their experiences. Through these conversations we learned about some of the realities on the ground and challenges Investigators and Accountability Sergeants face when performing their duties.

For example, ¶494(b) of the Consent Decree requires two Accountability Sergeants for each district and unit within CPD. However, the CPD consistently and uniformly does not adhere to this standard. Most districts have allocated only one sergeant as the Accountability Sergeant and the district or unit may or may not have designated a "backup sergeant" for case assignment when the primary Accountability Sergeant is away from duty. The backup Accountability Sergeant performs other assignments in the district and only has cases assigned during the absence of the "Primary Accountability Sergeant." This creates a very high caseload for the one designated Accountability Sergeant.

Of additional concern, the primary Accountability Sergeants also fill other assignments, such as serving as the Administrative Sergeant for the district or the Unit, and therefore are only able to conduct Administrative Investigations when other

duties permit. The Accountability Sergeants are routinely assigned to cover patrol shifts due to shift supervisor's absences, which causes delays in investigations.

Further, Accountability Sergeants and BIA Investigators do not have the proper technology to allow them to fulfill their responsibilities. Accountability Sergeants share outdated desktop computers with other district personnel, which does not provide administrative investigative security or the ability to efficiently enter data and information into the Case Management System. Accountability Sergeants do not have the proper locations to interview complainants, witness employees, or officers, which frequently requires them to schedule around office space that might become available.

The IMT is greatly concerned that these factors, among others, are setting up Accountability Sergeants and BIA Investigators to violate the new directives that CPD will soon implement. It is also apparent that Accountability Sergeants and BIA Investigators have not been sufficiently informed of the upcoming Administrative Investigative directives and have not been consulted in policy development that directs their work. In conversations with Accountability Sergeants, many still refer to themselves as "CR Sergeants," which indicates that CPD leadership is not leading the cultural change necessary to reform the CPD.

To comply with ¶521, it is imperative that the CPD honestly assess where it falls short in allotting necessary resources to ensure that Accountability Sergeants and BIA Investigators are properly equipped and supported to adequately perform their duties as required by the Consent Decree and the CPD's policies.

COPA did not provide any materials related to ¶521 in the sixth reporting period.

The Police Board, in a letter to the IMT dated April 14, 2022, indicated that the Police Board currently has adequate physical, equipment, and personnel resources to adequately perform its assigned duties. The Police Board further explained that it will provide a Needs Assessment to the City, which will be provided to the IMT in the next reporting period.

***

The City did not achieve Preliminary compliance with ¶521 in the sixth reporting period.

In the next reporting period, we will look for evidence demonstrating that the City, the CPD, and COPA have reviewed and considered staffing and needs assessments of BIA, COPA, the Police Board, and the Deputy PSIG to determine whether the entities have sufficient funding and staff to fulfill their obligations.

Paragraph 521 Compliance Progress History

FIRST REPORTING PERIOD
SEPTEMBER 1, 2019 – AUGUST 31, 2019
COMPLIANCE PROGRESS:
Not Applicable

SECOND REPORTING PERIOD
SEPTEMBER 1, 2019 – FEBRUARY 29, 2020
COMPLIANCE PROGRESS:
Not Applicable

THIRD REPORTING PERIOD
MARCH 1, 2020 – DECEMBER 31, 2020
COMPLIANCE PROGRESS:
Not Applicable

FOURTH REPORTING PERIOD
JANUARY 1, 2021 – JUNE 30, 2021
COMPLIANCE PROGRESS:
Not Applicable

FIFTH REPORTING PERIOD
JULY 1, 2021 – DECEMBER 31, 2021
COMPLIANCE PROGRESS:
Not Applicable

SIXTH REPORTING PERIOD
JANUARY 1, 2022 – JUNE 30, 2022
COMPLIANCE PROGRESS:
None

Accountability and Transparency: ¶522

522. *Within 365 days of the Effective Date, COPA, the Deputy PSIG, and BIA will create separate staffing and equipment-needs plans. Such plans will include analyses setting forth the basis for the plans' staffing requirements and equipment needs assessments. CPD will implement the staffing and equipment-needs plans in accordance with the specified timeline for implementation.*

Compliance Progress (Reporting Period: January 1, 2022, through June 30, 2022)

Preliminary:	***In Compliance*** **(FIFTH REPORTING PERIOD)**[247]
CPD	***In Compliance*** **(FIFTH REPORTING PERIOD)**
COPA	***In Compliance*** **(THIRD REPORTING PERIOD)**
Deputy PSIG	***In Compliance*** **(SECOND REPORTING PERIOD)**
Secondary:	***Not in Compliance***
CPD	***Not in Compliance***
COPA	***In Compliance*** **(FOURTH REPORTING PERIOD)**
Deputy PSIG	***In Compliance*** **(THIRD REPORTING PERIOD)**
Full:	***Not in Compliance***
CPD	***Not Yet Assessed***
COPA	***In Compliance*** **(FOURTH REPORTING PERIOD)**
Deputy PSIG	***In Compliance*** **(FOURTH REPORTING PERIOD)**

In the sixth reporting period, the Deputy PSIG and COPA maintained Full compliance with ¶522. The CPD maintained Preliminary compliance with ¶522, but did not reach Secondary compliance.

To evaluate Preliminary compliance with ¶522 we reviewed various data sources—including any plans developed under ¶522—to determine whether COPA, the Deputy PSIG, and BIA each created separate staffing and equipment needs plans. To assess Secondary compliance, we reviewed the produced plans to determine whether the plans were complete and sufficiently addressed the needs identified by the needs assessments. For Full compliance, we looked for evidence that COPA,

[247] As referenced above, the Consent Decree requires actions by various City entities, including the CPD, COPA, the Police Board, and the Office of the Inspector General. Ultimately, the City is responsible for ensuring compliance. As a result, if a Consent Decree paragraph requires actions by multiple City entities, we will not find that the City has met Preliminary, Secondary, or Full compliance until all those entities have met the corresponding level of compliance. Nonetheless, for some paragraphs, we will clarify compliance assessments for each entity to demonstrate which benchmarks have been met.

the Deputy PSIG, and BIA communicated their needs plans to the appropriate entities. We also looked at whether the CPD implemented the staffing and equipment needs plans provided by BIA.

Progress before the Sixth Reporting Period

Paragraph 522 sets out a one-time obligation requiring the entities to submit sufficient staffing and equipment-needs plans. In past reporting periods, we reviewed the Deputy PSIG's *Staffing and Equipment Needs Assessment* and *OIG Budget Request FY2021*. We also reviewed COPA's *Staffing and Equipment Needs Plan* for 2020 and 2021. With these efforts, we found that COPA and the Deputy PSIG reached Full compliance. Given the one-time nature of this paragraph, these entities have since remained in Full compliance.

In the third reporting period, the CPD provided the *Staffing and Equipment Needs Plan Annual Assessment*, but it contained little detail regarding specific personnel and equipment needs. As a result, BIA did not reach Preliminary compliance. In the fifth reporting period, the CPD BIA provided its *Staffing and Equipment Needs Assessment and Implementation Plan for Fiscal Year 2022*. In developing this plan, BIA took into account feedback we provided to its plan for the previous year. We noted that BIA's 2022 plan was much improved because it included conclusions for staffing, technology, and equipment needs to allow BIA to adequately complete its responsibilities. We noted our belief that these requests would be bolstered by BIA's inclusion of additional data to support its requests. We encouraged BIA to consider what additional tasks non-sworn personnel can take on to allow sworn personnel to handle the investigative responsibilities for BIA. With this, we found CPD and BIA reached Preliminary compliance with ¶522 in the fifth reporting period, but encouraged the BIA to build upon this plan in the future by including more data to support its requests. *See* ¶522 ("Such plans will include analyses setting forth the basis for the plans' staffing requirements and equipment needs assessments.").

While COPA and the Deputy PSIG previously fully complied with ¶522, in the fifth reporting period we highlighted their continued, relevant efforts. COPA provided its *2021-22 Staffing and Equipment Needs Plan*. We noted that COPA's plan followed a consistent format from previous years' plans which allows a reader to easily understand the report and compare changes in staffing levels from year to year. In addition to informing the reader about changes in positions, the plan also provides explanations for changes. We explained that this plan demonstrates that COPA has a detailed understanding of its operational needs. Additionally, the Deputy PSIG provided an update to its Staffing and Needs Assessment.

Progress in the Sixth Reporting Period

Given the one-time nature of this paragraph, PSIG and COPA maintained full compliance with ¶522 in past reporting periods.

The CPD did not produce materials relevant to ¶522 in the sixth reporting period, and therefore maintained Preliminary compliance but did not reach Secondary compliance. We will expect to receive an assessment that includes data-informed requests in the seventh reporting period.

Paragraph 522 Compliance Progress History

FIRST REPORTING PERIOD	SECOND REPORTING PERIOD	THIRD REPORTING PERIOD
SEPTEMBER 1, 2019 – AUGUST 31, 2019	SEPTEMBER 1, 2019 – FEBRUARY 29, 2020	MARCH 1, 2020 – DECEMBER 31, 2020
COMPLIANCE PROGRESS:	COMPLIANCE PROGRESS:	COMPLIANCE PROGRESS:
Not Applicable	None	None
FOURTH REPORTING PERIOD	**FIFTH REPORTING PERIOD**	**SIXTH REPORTING PERIOD**
JANUARY 1, 2021 – JUNE 30, 2021	JULY 1, 2021 – DECEMBER 31, 2021	JANUARY 1, 2022 – JUNE 30, 2022
COMPLIANCE PROGRESS:	COMPLIANCE PROGRESS:	COMPLIANCE PROGRESS:
None	Preliminary	Preliminary

Accountability and Transparency: ¶523

523. *On an annual basis, COPA, the Deputy PSIG, and BIA will review and revise, if needed, each entity's respective staffing and equipment-needs plans.*

Compliance Progress (Reporting Period: January 1, 2022, through June 30, 2022)

Recurring Schedule: Annually ☑ **Not Yet Applicable**

Preliminary:	***In Compliance*** **(FIFTH REPORTING PERIOD)**[248]
CPD	***In Compliance*** **(FIFTH REPORTING PERIOD)**
COPA	***In Compliance*** **(THIRD REPORTING PERIOD)**
Deputy PSIG	***In Compliance*** **(THIRD REPORTING PERIOD)**
Secondary:	***Not in Compliance***
CPD	***Not in Compliance***
COPA	***In Compliance*** **(FIFTH REPORTING PERIOD)**
Deputy PSIG	***In Compliance*** **(THIRD REPORTING PERIOD)**
Full:	***Not in Compliance***
CPD	***Not Yet Assessed***
COPA	***In Compliance*** **(FIFTH REPORTING PERIOD)**
Deputy PSIG	***In Compliance*** **(FOURTH REPORTING PERIOD)**

In the sixth reporting period, the CPD, COPA, and the Deputy PSIG maintained Preliminary compliance with ¶523. COPA and the Deputy PSIG maintained Full compliance with ¶523. Because all three entities maintained at least Preliminary compliance, the City, as a whole, is in Preliminary compliance.

To evaluate Preliminary compliance with ¶523 we reviewed various data sources—including any plans developed under ¶523—to determine whether COPA, the Deputy PSIG, and BIA each created separate staffing and equipment needs assessments. To assess Secondary compliance, we reviewed the produced plans to determine whether the plans were complete and sufficiently addressed the needs identified by thorough needs assessments. For Full compliance, we looked for evidence that COPA, the Deputy PSIG, and BIA have developed processes for assessing their staffing and equipment needs on an annual basis, and after assessing needs, that they communicate those needs to the appropriate entity.

[248] As referenced above, the Consent Decree requires actions by various City entities, including the CPD, COPA, the Police Board, and the Office of the Inspector General. Ultimately, the City is responsible for ensuring compliance. As a result, if a Consent Decree paragraph requires actions by multiple City entities, we will not find that the City has met Preliminary, Secondary, or Full compliance until all those entities have met the corresponding level of compliance. Nonetheless, for some paragraphs, we will clarify compliance assessments for each entity to demonstrate which benchmarks have been met.

Progress before the Sixth Reporting Period

In past reporting periods, as required by ¶522, COPA, the Deputy PSIG, and the CPD submitted staffing and equipment-needs plans.

The Deputy PSIG not only provided a report but showed a recurring effort to revise its assessments and plans, allowing it to reach Full compliance in the fourth reporting period. The Deputy PSIG provided an update to its Staffing and Needs assessment, allowing the Deputy PSIG to maintain Full Compliance in the fifth reporting period.

In the fifth reporting period, COPA provided its *2021-22 Staffing and Equipment Needs Plan*. This plan demonstrated that COPA had a detailed understanding of its operational needs and has mechanisms in place to assess those needs on an annual basis. With this, COPA reached Full compliance.

For the CPD, the fifth reporting period marked the first year it provided a staffing and equipment needs plan sufficient to reach Preliminary compliance. The CPD BIA provided its *Staffing and Equipment Needs Assessment and Implementation Plan for Fiscal Year 2022*. In developing this plan, BIA took into account feedback we provided to its plan for the previous year. We noted in the fifth reporting period that BIA's 2022 plan was much improved. It included conclusions for staffing, technology, and equipment needs to allow BIA to adequately complete its responsibilities. With this, BIA reached Preliminary compliance. We explained in the fifth reporting period that, to reach additional levels of compliance, BIA must have mechanisms in place to complete a review of its assessment and plan and make revisions as needed on an annual basis, and must use feedback received on its plan to bolster future assessments and plans with data.

Progress in the Sixth Reporting Period

This paragraph sets out an annual requirement. The parties submitted materials relevant to ¶523 in the fifth reporting period, and we expect that they will produce additional information in the seventh reporting period.

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In the sixth reporting period, the CPD maintained Preliminary compliance, and COPA and the Deputy PSIG maintained Full compliance with ¶523.

In the coming reporting periods, we will look for COPA and the Deputy PSIG to provide evidence that they have reviewed and revised their staffing and equipment needs to demonstrate maintained compliance. For the City and the CPD to reach additional levels of compliance, we will need to see that BIA has mechanisms

in place to complete a review of its assessment and to plan and make revisions as needed on an annual basis.

Paragraph 523 Compliance Progress History

FIRST REPORTING PERIOD SEPTEMBER 1, 2019 – AUGUST 31, 2019	SECOND REPORTING PERIOD SEPTEMBER 1, 2019 – FEBRUARY 29, 2020	THIRD REPORTING PERIOD MARCH 1, 2020 – DECEMBER 31, 2020
COMPLIANCE PROGRESS: Not Applicable	COMPLIANCE PROGRESS: Not Applicable	COMPLIANCE PROGRESS: None
FOURTH REPORTING PERIOD JANUARY 1, 2021 – JUNE 30, 2021	**FIFTH REPORTING PERIOD** JULY 1, 2021 – DECEMBER 31, 2021	**SIXTH REPORTING PERIOD** JANUARY 1, 2022 – JUNE 30, 2022
COMPLIANCE PROGRESS: None	COMPLIANCE PROGRESS: Preliminary	COMPLIANCE PROGRESS: Preliminary

Accountability and Transparency: ¶524

524. *BIA's staffing and equipment-needs plans will include the investigation staffing and equipment needs of the districts.*

Compliance Progress (Reporting Period: January 1, 2022, through June 30, 2022)

Preliminary:	***In Compliance* (FIFTH REPORTING PERIOD)**
Secondary:	***Not in Compliance***
Full:	***Not Yet Assessed***

The City and the CPD maintained compliance with ¶524 in the sixth reporting period, but did not reach additional levels of compliance.

To evaluate Preliminary compliance with ¶524 we reviewed BIA's staffing and equipment-needs plan to determine whether it includes investigation staffing and equipment needs of the districts. To evaluate Secondary compliance, we assessed whether the plan sections addressing investigation staffing and equipment needs of the districts were complete and sufficient.

Progress before the Sixth Reporting Period

We assessed BIA's compliance with ¶524 for the first time in the fourth reporting period. The City and the CPD did not reach compliance at that time because BIA's *Staffing and Equipment Needs Plan Annual Assessment* (submitted in the third reporting period) did not include specific details about investigation staffing and equipment needs of the districts as required by the paragraph. In the fifth reporting period, BIA provided its *Staffing and Equipment Needs Assessment and Implementation Plan for Fiscal Year 2022*. This plan includes information relating to staffing and equipment needs for District and Unit Accountability Sergeants. With this, BIA reached Preliminary compliance.

However, in discussing the needs related to District and Unit Accountability Sergeants, the plan asserts that the two Accountability Sergeants are not "both expected to be full-time investigators." *See Staffing and Equipment Needs Assessment and Implementation Plan for Fiscal Year 2022* at 9. This is in conflict with the requirements of ¶494(b), which requires that "each District Commander designates at least two Accountability Sergeants who will report to the District Commander, and whose **primary responsibility** is receiving, processing, and investigating complaints against CPD members." (Emphasis added). We noted that this assertion is all the more concerning given that, during site visits in the fifth reporting period, we learned that Accountability Sergeants are required to fill supervisory responsibilities that often prevent them from completing their investigations in a timely manner.

Because the *Staffing and Equipment Needs Assessment and Implementation Plan for Fiscal Year 2022* incorporated a misunderstanding of the requirements of ¶494(b) and did not seem to account for the difficulties experienced by the Accountability Sergeants, we noted that the plan did not yet sufficiently include investigation staffing and equipment needs of the districts.

With this, the CPD reached Preliminary compliance with ¶524 in the fifth reporting period, but did not reach Secondary compliance.

Progress in the Sixth Reporting Period

The needs assessment plans are typically completed annually. The CPD did not submit materials related to ¶524 in the sixth reporting period, but we expect materials to be submitted in the seventh reporting period.

***

The City and the CPD maintained compliance with ¶524 in the sixth reporting period, but did not reach additional levels of compliance. We look forward to ongoing discussions regarding the designation of Accountability Sergeants in the districts and reviewing a plan that better addresses the requirements of the Consent Decree and the Districts' Accountability Sergeants.

Paragraph 524 Compliance Progress History

FIRST REPORTING PERIOD	SECOND REPORTING PERIOD	THIRD REPORTING PERIOD
SEPTEMBER 1, 2019 – AUGUST 31, 2019	SEPTEMBER 1, 2019 – FEBRUARY 29, 2020	MARCH 1, 2020 – DECEMBER 31, 2020
COMPLIANCE PROGRESS:	COMPLIANCE PROGRESS:	COMPLIANCE PROGRESS:
Not Applicable	Not Applicable	Status Update
FOURTH REPORTING PERIOD	**FIFTH REPORTING PERIOD**	**SIXTH REPORTING PERIOD**
JANUARY 1, 2021 – JUNE 30, 2021	JULY 1, 2021 – DECEMBER 31, 2021	JANUARY 1, 2022 – JUNE 30, 2022
COMPLIANCE PROGRESS:	COMPLIANCE PROGRESS:	COMPLIANCE PROGRESS:
None	Preliminary	Preliminary

Accountability and Transparency: ¶525

525. *Within 60 days of the Effective Date, the City will propose a permanent method of selecting the Chief Administrator of COPA. In creating the permanent selection method for COPA's Chief Administrator, the City will consider the views and recommendations of community stakeholders.*

Compliance Progress

(Reporting Period: January 1, 2022, through June 30, 2022)

Preliminary:	***In Compliance*** **(SECOND REPORTING PERIOD)**
Secondary:	***Not in Compliance***
Full:	***Not Yet Assessed***

The City maintained Preliminary compliance but did not reach Secondary compliance with ¶525 in the sixth reporting period.

To evaluate Preliminary compliance with ¶525, the IMT reviewed the CPD's relevant policies and documents following the process described in the Consent Decree (¶¶626–41). To evaluate Secondary compliance with ¶525, we considered a variety of data sources including documentation detailing the screening and hiring process that was used to fill the COPA Chief Administrator vacancy to determine whether the set method for selecting the Chief Administrator of COPA is understandable to those involved in the selection process.

Progress before the Sixth Reporting Period

The City reached Preliminary compliance with ¶525 in the second reporting period based on its February 28, 2020 *Selection Method for Chief Administrator of COPA* memorandum. At that time, the City had informed us of its negotiations related to a proposed ordinance that would include a permanent process for selecting the COPA Chief Administrator. We reiterated that the City should ensure that opinions and recommendations of community stakeholders be incorporated into future changes of the temporary selection method. In the fourth reporting period, we noted that there was a vacancy for the COPA Chief Administrator, and we reiterated our understanding that the City would follow the Selection Method memorandum.

On December 9, 2021, the City submitted Chief Selection Materials related to the recent appointment of a new COPA Chief Administrator, including but not limited to community engagement materials, the COPA Chief Administrator Job Description, and selection committee materials. Upon review of the Selection Materials, we asked the City if it had a followed a more detailed process than what was outlined in the February 2020 memorandum. The City informed the IMT that a Standard Operating Procedure had been created. We received this Standard Operating

Procedure, *COPA Chief Administrator Selection Process*, on December 30, 2021. This Standard Operating Procedure raised some concerns, including questions as to whether this Standard Operating Procedure was created prior to the selection process for a COPA Chief Administrator occurred or after the appointment.

Having a clear appointment process is important for purposes of transparency and accountability. We noted that we would like to see improved clarity surrounding the appointment process in the future. The City recognized that the Standard Operating Procedure submitted December 9, 2021 is only a temporary solution, stating "[t]he City has recently codified a permanent selection method for selection of the Chief Administrator of COPA via City Council." We expressed our expectation that a more permanent selection process will be created and submitted to us for review as ¶525 calls for a *permanent* method for selecting the Chief Administrator of COPA.

Because the City did not have a more permanent selection method in place, it did not reach additional level of compliance with ¶525 in the fifth reporting period.

Progress in the Sixth Reporting Period

The CPD did not submit materials related to ¶525 in the sixth reporting period.

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Without submitting materials for review that demonstrate a more permanent selection method, the City did not reach additional levels of compliance with ¶525 in the sixth reporting period.

Paragraph 525 Compliance Progress History

FIRST REPORTING PERIOD	SECOND REPORTING PERIOD	THIRD REPORTING PERIOD
SEPTEMBER 1, 2019 – AUGUST 31, 2019	SEPTEMBER 1, 2019 – FEBRUARY 29, 2020	MARCH 1, 2020 – DECEMBER 31, 2020
COMPLIANCE PROGRESS:	COMPLIANCE PROGRESS:	COMPLIANCE PROGRESS:
None	Preliminary	Preliminary
FOURTH REPORTING PERIOD	**FIFTH REPORTING PERIOD**	**SIXTH REPORTING PERIOD**
JANUARY 1, 2021 – JUNE 30, 2021	JULY 1, 2021 – DECEMBER 31, 2021	JANUARY 1, 2022 – JUNE 30, 2022
COMPLIANCE PROGRESS:	COMPLIANCE PROGRESS:	COMPLIANCE PROGRESS:
Preliminary	Preliminary	Preliminary

Accountability and Transparency: ¶526

526. *Within 180 days of being assigned to BIA or being hired by COPA, all new BIA personnel and COPA employees will receive initial on-boarding training that is adequate in quality, quantity, scope, and type. Within 120 days of the Effective Date, COPA and BIA will verify that all existing personnel received training that is consistent with this Agreement.*

Compliance Progress (Reporting Period: January 1, 2022, through June 30, 2022)

Preliminary:		***Not in Compliance***[249]
	CPD	***Not in Compliance***
	COPA	***In Compliance*** **(THIRD REPORTING PERIOD)**
Secondary:		***Not in Compliance***
	CPD	***Not Yet Assessed***
	COPA	***In Compliance*** **(FOURTH REPORTING PERIOD)**
Full:		***Not in Compliance***
	CPD	***Not Yet Assessed***
	COPA	***In Compliance*** **(FIFTH REPORTING PERIOD)**

The City did not reach Preliminary compliance with ¶526 because the CPD has not yet provided evidence of a training plan that will allow it to comply with ¶526. COPA reached Full compliance with ¶526 in the fifth reporting period and maintained Full compliance in the sixth reporting period. Because all relevant City entities must reach levels of compliance to bring the City, as a whole, into compliance, the City has not yet reached Preliminary compliance.

To evaluate Preliminary compliance with ¶526, the IMT reviewed the CPD's and COPA's relevant policies and documents following the process described in the Consent Decree (¶¶626–41).[250] To evaluate Secondary compliance, we reviewed the entities' training development, implementation, and evaluation. To evaluate

[249] As referenced above, the Consent Decree requires actions by various City entities, including the CPD, COPA, the Police Board, and the Office of the Inspector General. Ultimately, the City is responsible for ensuring compliance. As a result, if a Consent Decree paragraph requires actions by multiple City entities, we will not find that the City has met Preliminary, Secondary, or Full compliance until all those entities have met the corresponding level of compliance. Nonetheless, for some paragraphs, we will clarify compliance assessments for each entity to demonstrate which benchmarks have been met.

[250] The OAG, the City, and the IMT agreed to a stipulation that provides a different review process for review of COPA policies and training materials. *See Stipulation Regarding the Policy and Training Review Process for COPA*, *Illinois v. Chicago*, Case No. 1:17-cv-06260 (Jan. 30, 2020). The review process in the Stipulation mirrors the review process under ¶¶626–41, but among other things, gives the OAG and the IMT a shorter timeframe for review of COPA policies and training materials.

Full compliance, we reviewed various data sources to determine whether the entities have appropriate training and systems in place to ensure all new personnel and employees receive adequate on-boarding training within 180 days of assignment.

Progress before the Sixth Reporting Period

In earlier reporting periods, the CPD provided drafts of BIA's *Training* Unit Directive. Sections of this Unit Directive speak to the requirements of ¶526, but this Unit Directive remained in the collaborative review and revision process at the end of the fourth reporting period. In the fourth reporting period, we reviewed BIA's draft of its onboarding training materials. We provided feedback but did not receive revised materials by the end of the reporting period. Therefore, the CPD did not reach Preliminary compliance.

In the fifth reporting period, BIA did not provide any additional drafts of its *Training* Unit Directive or its onboarding training materials that had been provided in earlier reporting periods and to which we provided feedback. Instead, the CPD focused on revising Special Order S08-01, *Complaint and Disciplinary Investigators and Investigations*. This Directive copied verbatim the requirements set out in ¶526. But as we discussed with CPD during the fifth reporting period, we noted that mere recitation of the requirements stated in ¶526 is not sufficient to reach Preliminary compliance. Instead, we explained that the CPD must show that it has a detailed, written plan for actually providing the training required by the paragraph. Because the CPD did not provide us evidence of a plan to develop and complete training in accordance with ¶526, the CPD did not reach Preliminary compliance in the fifth reporting period.

COPA met Preliminary compliance in the third reporting period by revising and ultimately receiving a no-objection notice on its Training Plan, which fully addressed the requirements of ¶526.[251] In the fourth reporting period, COPA provided for review training academy attendance records for *New Hire Onboarding Orientations* which showed that all 15 trainees attended and completed 29.5 hours of on-

[251] Under the Consent Decree policy review process, the City and the CPD consult with the IMT and the OAG to develop or revise policies in accordance with Consent Decree requirements. *See* ¶¶626–37. The City and the CPD provide the policy for review at least 30 days before the policy is scheduled to go into effect, and the IMT and the OAG have 30 days to comment on the policy. *See* ¶¶627–28. The City, the CPD, the IMT, and the OAG then work together to resolve comments. The IMT and the OAG will, separately and in writing, notify the City and the CPD that they no longer have any comments, which is referred to as a "no-objection notice." Once the City and the CPD receive a no-objection notice from both the IMT and the OAG, the City and the CPD will begin the process of finalizing the policy. Typically, this includes the CPD posting the policy on its website for public comment for at least 15 days. The City and the CPD must then consider those comments and make additional changes, as appropriate. *See* ¶633.

boarding training. This training included Implicit Bias, Procedural Justice training, and a variety of other topics. With this, COPA reached Secondary compliance.

COPA, in the fifth reporting period, provided records that tracked the provision and completion of training to and by COPA employees. We noted that this tracker showed that COPA was providing training in accordance with the *Training and Professional Development Department Training Plan* which COPA provided in the third reporting period. These efforts demonstrated that the COPA has the necessary systems in place to meet the requirements of ¶526 and follow its own training plan. With this, COPA reached Full compliance with ¶526.

Progress in the Sixth Reporting Period

The CPD did not submit materials related to ¶526 in the sixth reporting period.

COPA did not submit materials related to ¶526 in the sixth reporting period, however we attended a training and were provided verbal updates regarding COPA's continued training efforts. We expect to receive detailed training attendance records in the seventh reporting period.

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Because the CPD has not yet provided evidence of a training plan that will allow it to comply with ¶526, the CPD has not yet reached Preliminary compliance. COPA maintained Full compliance in the sixth reporting period.

Paragraph 526 Compliance Progress History

FIRST REPORTING PERIOD	SECOND REPORTING PERIOD	THIRD REPORTING PERIOD
SEPTEMBER 1, 2019 – AUGUST 31, 2019	SEPTEMBER 1, 2019 – FEBRUARY 29, 2020	MARCH 1, 2020 – DECEMBER 31, 2020
COMPLIANCE PROGRESS:	COMPLIANCE PROGRESS:	COMPLIANCE PROGRESS:
None	None	None
FOURTH REPORTING PERIOD	**FIFTH REPORTING PERIOD**	**SIXTH REPORTING PERIOD**
JANUARY 1, 2021 – JUNE 30, 2021	JULY 1, 2021 – DECEMBER 31, 2021	JANUARY 1, 2022 – JUNE 30, 2022
COMPLIANCE PROGRESS:	COMPLIANCE PROGRESS:	COMPLIANCE PROGRESS:
None	None	None

Accountability and Transparency: ¶527

527. *Within 180 days of the Effective Date, COPA and BIA will begin providing all investigation staff members with at least eight hours of annual, comprehensive, in-service training.*

Compliance Progress (Reporting Period: January 1, 2022, through June 30, 2022)

Preliminary:		***Not in Compliance***[252]
	CPD	***Not in Compliance***
	COPA	***In Compliance*** **(THIRD REPORTING PERIOD)**
Secondary:		***Not in Compliance***
	CPD	***Not Yet Assessed***
	COPA	***In Compliance*** **(FIFTH REPORTING PERIOD)**
Full:		***Not in Compliance***
	CPD	***Not Yet Assessed***
	COPA	***In Compliance*** **(FIFTH REPORTING PERIOD)**

The City did not reach any level of compliance in the sixth reporting period because the CPD has not yet provided a plan as to how it will comply with ¶527. COPA reached Full compliance in the fifth reporting period and maintained Full compliance in the sixth reporting period.

To evaluate Preliminary compliance with ¶527, the IMT reviewed the CPD's and COPA's relevant policies and documents following the process described in the Consent Decree (¶¶626–41).[253] To evaluate Secondary compliance, we reviewed the entities' training development, implementation, and evaluation. To evaluate Full compliance, we reviewed various data sources to determine whether the entities have systems in place to ensure that staff members are provided with eight hours of comprehensive, in-service training on an annual basis.

[252] As referenced above, the Consent Decree requires actions by various City entities, including the CPD, COPA, the Police Board, and the Office of the Inspector General. Ultimately, the City is responsible for ensuring compliance. As a result, if a Consent Decree paragraph requires actions by multiple City entities, we will not find that the City has met Preliminary, Secondary, or Full compliance until all those entities have met the corresponding level of compliance. Nonetheless, for some paragraphs, we will clarify compliance assessments for each entity to demonstrate which benchmarks have been met.

[253] The OAG, the City, and the IMT agreed to a stipulation that provides a different review process for review of COPA policies and training materials. *See Stipulation Regarding the Policy and Training Review Process for COPA*, *Illinois v. Chicago*, Case No. 1:17-cv-06260 (Jan. 30, 2020). The review process in the Stipulation mirrors the review process under ¶¶626–41, but among other things, gives the OAG and the IMT a shorter timeframe for review of COPA policies and training materials.

Progress before the Sixth Reporting Period

BIA did not reach Preliminary compliance with ¶527 in past reporting periods, though we reviewed numerous materials produced under this paragraph, including BIA's in-service training plan, BIA's *Training* Unit Directive, and BIA's annual training plan. In the fifth reporting period, BIA did not provide any additional drafts of its *Training* Unit Directive or revised training plans. Instead, the CPD focused on revising Special Order S08-01, *Complaint and Disciplinary Investigators and Investigations*. This Directive copied verbatim the requirements set out in ¶527. But as we discussed with CPD during the fifth reporting period, mere recitation of the requirements stated in ¶527 is not sufficient to reach Preliminary compliance. Instead, we explained that the CPD must show that it has a detailed, written plan for actually providing the training required by the paragraph.

COPA reached Preliminary compliance with ¶527 in the third reporting period by drafting and revising a comprehensive *Training Plan*. In the fifth reporting period, COPA provided records demonstrating that 99% of its personnel completed its 2021 In-Service Training which included instruction blocks on procedural justice, implicit bias, witness reliability, and intake. COPA provided all of these training materials to the IMT prior to delivering these trainings and we ultimately provided no-objection notices to each. We commended COPA on developing comprehensive and professional trainings and for keeping such detailed and clear records which not only allow COPA to demonstrate compliance but keep track of personnel training histories for its own records. With this, COPA reached Full compliance with ¶527.

Progress in the Sixth Reporting Period

The CPD did not submit materials related to ¶527 in the sixth reporting period.

COPA did not submit materials related to ¶527 in the sixth reporting period, however we attended a training and were provided verbal updates regarding COPA's continued training efforts. We expect to receive detailed training attendance records in the seventh reporting period.

***

COPA maintained Full compliance with ¶527. In the next reporting period, we will look for COPA to continue to provide evidence that it is fully complying with ¶527's requirements.

The CPD has not yet reached Preliminary compliance with ¶527. Moving forward, we will look for a plan that details how the CPD will comply with ¶527's training requirements.

Paragraph 527 Compliance Progress History

FIRST REPORTING PERIOD
SEPTEMBER 1, 2019 – AUGUST 31, 2019
COMPLIANCE PROGRESS:
Not Applicable

SECOND REPORTING PERIOD
SEPTEMBER 1, 2019 – FEBRUARY 29, 2020
COMPLIANCE PROGRESS:
None

THIRD REPORTING PERIOD
MARCH 1, 2020 – DECEMBER 31, 2020
COMPLIANCE PROGRESS:
None

FOURTH REPORTING PERIOD
JANUARY 1, 2021 – JUNE 30, 2021
COMPLIANCE PROGRESS:
None

FIFTH REPORTING PERIOD
JULY 1, 2021 – DECEMBER 31, 2021
COMPLIANCE PROGRESS:
None

SIXTH REPORTING PERIOD
JANUARY 1, 2022 – JUNE 30, 2022
COMPLIANCE PROGRESS:
None

Accountability and Transparency: ¶528

528. *The initial and annual in-service training for COPA and BIA investigators will include instruction in: a. how to properly handle complaint intake, and the consequences for failing to take complaints; b. best practices in procedural justice, including techniques for communicating with complainants and members of the public; c. the collection of objective verifiable evidence; d. the process for seeking an override affidavit in the absence of a signed complainant affidavit; e. for COPA investigators, techniques for conducting impartial investigations of domestic violence and sexual misconduct; f. for BIA investigators, techniques for conducting impartial investigations of sexual misconduct; g. investigative skills, including proper interrogation and interview techniques, gathering and objectively analyzing evidence, and data and case management; h. the challenges of law enforcement administrative investigations, including identifying alleged misconduct that is not clearly stated in the complaint or that becomes apparent during the investigation; i. properly weighing the credibility of witnesses against CPD members; j. using objective evidence to identify and resolve inconsistent statements; k. implicit bias; l. the proper application of the relevant standards of proof; m. relevant COPA and CPD rules, policies, and protocols including the requirements of this Agreement; n. relevant state and federal law; o. relevant CPD Rules of Conduct, including Rules 14, 21, and 22; p. the CMS; q. the applicable collective bargaining agreements; and r. how to access and use the PRS or information available on the PRS.*

Compliance Progress (Reporting Period: January 1, 2022, through June 30, 2022)

Preliminary:		***Not in Compliance***[254]
	CPD	***Not in Compliance***
	COPA	***In Compliance*** **(SECOND REPORTING PERIOD)**
Secondary:		***Not in Compliance***
	CPD	***Not Yet Assessed***
	COPA	***Not in Compliance***
Full:		***Not Yet Assessed***

[254] As referenced above, the Consent Decree requires actions by various City entities, including the CPD, COPA, the Police Board, and the Office of the Inspector General. Ultimately, the City is responsible for ensuring compliance. As a result, if a Consent Decree paragraph requires actions by multiple City entities, we will not find that the City has met Preliminary, Secondary, or Full compliance until all those entities have met the corresponding level of compliance. Nonetheless, for some paragraphs, we will clarify compliance assessments for each entity to demonstrate which benchmarks have been met.

The CPD did not reach Preliminary compliance with ¶528 in the sixth reporting period. COPA maintained Preliminary compliance with ¶528. Because all relevant City entities must reach levels of compliance to bring the City, as a whole, into compliance, the City has not yet reached Preliminary compliance.

To evaluate Preliminary compliance with ¶528, the IMT reviewed the CPD's and COPA's relevant policies and training plans following the process described in the Consent Decree (¶¶626–41).[255] To evaluate Secondary compliance, we reviewed the entities' training development to determine whether COPA and BIA have sufficient initial and annual in-service training curriculum that meets the requirements of ¶528. To evaluate Full compliance, we reviewed relevant training materials and consulted various data sources to determine whether COPA and BIA provided the training required by ¶528.

Progress before the Sixth Reporting Period

BIA did not reach Preliminary compliance with ¶528 in past reporting periods, though we reviewed numerous materials produced under this paragraph. We reviewed BIA's *Training* Unit Directive, BIA's *Accountability Sergeants* Unit Directive, BIA's *BIA Investigators* Unit Directive, and a variety of training materials that relate to the training requirements listed in ¶528. We urged BIA to address comments and suggestions that the IMT and the OAG provided BIA on the blocks of instructions submitted to further refine the trainings.

BIA did not provide revised training materials for any of its Unit Directives previously submitted under this paragraph in the fifth reporting period. Nor did BIA post any of its Unit Directives related to ¶528 for public comment. Instead, during the fifth reporting period, the CPD focused on revising Special Order S08-01, *Complaint and Disciplinary Investigators and Investigations*, which speaks to ¶528. But as we discussed with CPD during the fifth reporting period, mere recitation of the requirements stated in ¶528 is not sufficient to reach Preliminary compliance. Instead, we explained that the CPD must show that it has a detailed, written plan for actually providing the training required by the paragraph. The CPD did not reach Preliminary compliance.

COPA reached Preliminary Compliance by compiling and revising its *Training and Professional Department Training Plan*. This Training Plan is comprehensive, meeting and exceeding all requirements listed in ¶528. In the fourth reporting period, COPA produced a variety of training lesson plans relevant to the requirements of

[255] The OAG, the City, and the IMT agreed to a stipulation that provides a different review process for review of COPA policies and training materials. *See Stipulation Regarding the Policy and Training Review Process for COPA*, *Illinois v. Chicago*, Case No. 1:17-cv-06260 (Jan. 30, 2020). The review process in the Stipulation mirrors the review process under ¶¶626–41, but among other things, gives the OAG and the IMT a shorter timeframe for review of COPA policies and training materials.

¶528. This included the training regarding witness reliability (relating to ¶528(i)), procedural justice (relating to ¶528(b)), implicit bias (¶528(k)), and the CPD Rules and Directives (¶528(o)). In the fifth reporting period, COPA provided its materials for its *Intake* in-service training. We submitted a no-objection notice to this training.[256] We noted that this well-presented and comprehensive training covers the requirements of ¶528(a). Toward the end of the reporting period, COPA provided training attendance records showing that 99% of its personnel completed the trainings related to intake (¶528(a)), procedural justice (¶528(b)), implicit bias (¶528(k)), and witness reliability (¶528(j)). We noted that this demonstrated great progress toward additional levels of compliance with ¶528. But because COPA had not yet provided training materials covering all listed topics, COPA did not reach Secondary compliance. With this, COPA maintained Preliminary compliance but did not reach Secondary compliance.

Progress in the Sixth Reporting Period

The CPD did not submit materials related to ¶528 in the sixth reporting period.

COPA provided its Forensic Experiential Trauma Interviews (FETI) Training in the sixth reporting period. This training addresses the In-Service Training for conducting impartial investigations of sexual misconduct as directed by ¶528(e); proper interview and interrogation techniques and objectively analyzing evidence and data and case management as directed by ¶528(g); and identifying alleged misconduct that is not clearly stated in the complaint or that becomes apparent during the investigation as directed by ¶528(h). COPA also provided certification for the FETI training that is provided to its investigators responsible for investigating sexual misconduct and domestic violence cases involving CPD members. This certification demonstrates that COPA has provided the required training for its investigative staff to meet the requirements of ¶528(e). The IMT has requested to audit the FETI Training to determine compliance levels, and hopes to have the opportunity to observe the FETI Training in the next reporting period.

[256] Under the Consent Decree policy review process, the City and the CPD consult with the IMT and the OAG to develop or revise policies in accordance with Consent Decree requirements. *See* ¶¶626–37. The City and the CPD provide the policy for review at least 30 days before the policy is scheduled to go into effect, and the IMT and the OAG have 30 days to comment on the policy. *See* ¶¶627–28. The City, the CPD, the IMT, and the OAG then work together to resolve comments. The IMT and the OAG will, separately and in writing, notify the City and the CPD that they no longer have any comments, which is referred to as a "no-objection notice." Once the City and the CPD receive a no-objection notice from both the IMT and the OAG, the City and the CPD will begin the process of finalizing the policy. Typically, this includes the CPD posting the policy on its website for public comment for at least 15 days. The City and the CPD must then consider those comments and make additional changes, as appropriate. *See* ¶633.

COPA also provided its *Case Management System: Overview of Policy and Procedures* training materials in the sixth reporting period. These training materials include instruction in the Case Management System, per the requirement of ¶528(p), and provide that COPA employees will have access to the Case Management System and the CLEAR System to undertake their duties. The lesson plan is very comprehensive and explains not only that COPA investigators will have access to the Case Management System, but also the responsibility that comes with the Case Management System access. The lesson plan explains who will issue credentials and how the systems may be audited to ensure no misuse occurs, and explains that misuse or improper use is strictly prohibited and may be subject to misconduct investigations that may include disciplinary action to include discharge. On January 12, 2022, the IMT observed the two-hour mandatory *In-Service Case Management System Training*. The lesson plan was presented as written, and the instructors appeared knowledgeable. The IMT provided suggestions regarding delivery of the instruction, which COPA took into consideration for future trainings. To achieve Secondary compliance, COPA will need to provide this training to at least 95% of its personnel.

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Because the CPD has not yet provided a plan for accomplishing the training required by ¶528, the City did not reach Preliminary compliance with ¶528 in the sixth reporting period. COPA maintained Preliminary compliance with ¶528 in the sixth reporting period.

We continue to recognize that many of the training topics required by ¶528 are complex and require significant time and resources to ensure that BIA Investigators, COPA Investigators, and Accountability Sergeants have a comprehensive understanding of the material. These topics largely involve new processes, procedures, directives, and technology. Additionally, many of the topics will require the CPD and COPA to engage with subject matter experts to sufficiently develop and deliver the trainings. We are encouraged by COPA's progress, and look forward to seeing BIA develop trainings related to the topics outlined in ¶528.

Paragraph 528 Compliance Progress History

FIRST REPORTING PERIOD	SECOND REPORTING PERIOD	THIRD REPORTING PERIOD
SEPTEMBER 1, 2019 – AUGUST 31, 2019	SEPTEMBER 1, 2019 – FEBRUARY 29, 2020	MARCH 1, 2020 – DECEMBER 31, 2020
COMPLIANCE PROGRESS:	COMPLIANCE PROGRESS:	COMPLIANCE PROGRESS:
None	None	None
FOURTH REPORTING PERIOD	**FIFTH REPORTING PERIOD**	**SIXTH REPORTING PERIOD**
JANUARY 1, 2021 – JUNE 30, 2021	JULY 1, 2021 – DECEMBER 31, 2021	JANUARY 1, 2022 – JUNE 30, 2022
COMPLIANCE PROGRESS:	COMPLIANCE PROGRESS:	COMPLIANCE PROGRESS:
None	None	None

Accountability and Transparency: ¶529

529. *Within 180 days of the Effective Date, CPD will begin providing training to all CPD members on the terms of this Agreement and COPA's and CPD's revised or new policies related to administrative investigations and discipline. To the extent appropriate and necessary based upon a CPD member's duties, and contact with members of the public and/or individuals in custody, this training will include instruction on: a. identifying and reporting misconduct, the consequences for failing to report misconduct, and the consequences for retaliating against a person for reporting misconduct or participating in an investigation; b. use of the City's anonymous reporting website; c. for CPD supervisors: i. the proper initiation of the intake process, including providing COPA's contact information and the consequences for failing to initiate the intake process; and ii. techniques for turning the initiation of a complaint into a positive police-community member interaction.*

Compliance Progress

(Reporting Period: January 1, 2022, through June 30, 2022)

Preliminary:	***Not in Compliance***
Secondary:	***Not Yet Assessed***
Full:	***Not Yet Assessed***

The City and the CPD did not reach Preliminary compliance with ¶529 in the sixth reporting period.

To evaluate Preliminary compliance with ¶529, the IMT reviewed the CPD's relevant policies and other data sources to determine whether CPD is committed to training members as required by ¶529.

Progress before the Sixth Reporting Period

The CPD did not reach Preliminary compliance in past reporting periods. We reviewed a variety of materials related to this paragraph including meeting agendas of the BIA Education and Training Division demonstrating that discussion of items related to ¶529 occurred, various BIA training materials, and BIA's *Training* Unit Directive. At the end of the fourth reporting period, we noted that the *Training* Unit Directive did not meet the requirements of ¶529 because it did not commit the entire CPD to training its members per ¶529.

We did not receive any revised or new materials related to ¶529 in the fifth reporting period. At that time, we expressed our discouragement that the CPD had not yet reached any level of compliance with ¶529. We stated that, moving forward,

we hoped to see a policy or other training commitment and timeline that demonstrates that the CPD will provide training as outlined in ¶529.

Progress in the Sixth Reporting Period

This reporting period, the CPD submitted draft BIA eLearning materials for review. These materials were still in draft stage and not in final presentation form. The draft training materials begin to address the requirements of ¶529 and its subparagraphs by providing department-wide training regarding administrative investigations and discipline. However, as previously noted, this training is still in draft form and will require further revision for the IMT to review. This training addresses multiple directives that are new to the CPD. The IMT notes that this training should not replace or supplant the requirement that every CPD employee read, sign, and understand the information in each of the directives. The IMT looks forward to learning more about this training and how it will provide critical information regarding administrative investigations and discipline to the entire department in a consistent manner.

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The City and the CPD made efforts toward but did not reach Preliminary compliance with ¶529 in the sixth reporting period. We look forward to receiving further developed BIA eLearning materials in the coming reporting period.

Paragraph 529 Compliance Progress History

FIRST REPORTING PERIOD	SECOND REPORTING PERIOD	THIRD REPORTING PERIOD
SEPTEMBER 1, 2019 – AUGUST 31, 2019	SEPTEMBER 1, 2019 – FEBRUARY 29, 2020	MARCH 1, 2020 – DECEMBER 31, 2020
COMPLIANCE PROGRESS:	COMPLIANCE PROGRESS:	COMPLIANCE PROGRESS:
Not Applicable	None	None
FOURTH REPORTING PERIOD	**FIFTH REPORTING PERIOD**	**SIXTH REPORTING PERIOD**
JANUARY 1, 2021 – JUNE 30, 2021	JULY 1, 2021 – DECEMBER 31, 2021	JANUARY 1, 2022 – JUNE 30, 2022
COMPLIANCE PROGRESS:	COMPLIANCE PROGRESS:	COMPLIANCE PROGRESS:
None	None	None

Accountability and Transparency: ¶530

530. *Within 90 days of the Effective Date, COPA and BIA will create separate initial and in-service training plans.*

Compliance Progress

(Reporting Period: January 1, 2022, through June 30, 2022)

Preliminary:		***Not in Compliance***[257]
	CPD	***Not in Compliance***
	COPA	***In Compliance*** **(THIRD REPORTING PERIOD)**
Secondary:		***Not in Compliance***
	CPD	***Not in Compliance***
	COPA	***In Compliance*** **(THIRD REPORTING PERIOD)**
Full:		***Not in Compliance***

The City did not meet Preliminary compliance with ¶530 in the sixth reporting period. COPA maintained Secondary compliance with ¶530 in the sixth reporting period. Because all relevant City entities must reach levels of compliance to bring the City, as a whole, into compliance, the City has not yet reached Preliminary compliance.

To evaluate Preliminary compliance with ¶530, we reviewed various data sources to determine whether the CPD and COPA allocated sufficient resources to create separate initial and in-service training plans. To evaluate Secondary compliance, we reviewed the entities' plans, where available, to determine whether the plans are sufficient. To evaluate Full compliance, we reviewed various data sources including training materials and attendance records to determine whether COPA and the CPD implemented their training plans.

Progress before the Sixth Reporting Period

COPA reached Preliminary and Secondary compliance in the third reporting period by providing and revising its *Training and Professional Development Training Plan*. COPA's *Training and Professional Development Training Plan* is a three-year plan. Therefore, we were not able to assess in the fifth reporting period whether COPA had fully implemented its plan. COPA remained in Secondary compliance in the

[257] As referenced above, the Consent Decree requires actions by various City entities, including the CPD, COPA, the Police Board, and the Office of the Inspector General. Ultimately, the City is responsible for ensuring compliance. As a result, if a Consent Decree paragraph requires actions by multiple City entities, we will not find that the City has met Preliminary, Secondary, or Full compliance until all those entities have met the corresponding level of compliance. Nonetheless, for some paragraphs, we will clarify compliance assessments for each entity to demonstrate which benchmarks have been met.

fifth reporting period because it continued to provide training in accordance with its plans.

The CPD reached Preliminary compliance in the third reporting period. We reviewed BIA's *In-Service Training Plan*, and *Investigator and Accountability Sergeant On-Boarding Training Schedule* and Course Description. We found that BIA reached Preliminary compliance by creating initial and in-service training plans. It demonstrated the CPD allocated sufficient resources to create separate initial and in-service training plans. By the end of the fourth reporting period, we were awaiting revisions to the *BIA Investigators' and Accountability Sergeant's Annual Training Plan*.

BIA did not provide any materials under ¶530 in the fifth reporting period. With this, we noted that the last draft plan BIA provided related to training was in late 2020. BIA did not finalize a plan to address the requirements of ¶530 or the other training paragraphs (*i.e.*, ¶¶526–29). Because of this, we found that the CPD was no longer in Preliminary compliance with this paragraph in the fifth reporting period.

Progress before the Sixth Reporting Period

Neither the CPD nor COPA submitted materials related to ¶530 in the sixth reporting period.

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With this, the CPD did not meet Preliminary compliance with ¶530 in the sixth reporting period. COPA maintained Secondary compliance with ¶530 in the sixth reporting period.

In the next reporting period we will look forward to continuing to review training materials developed and delivered by COPA. We hope to see an updated training plan for BIA that demonstrates a renewed commitment to allocating resources to provide the requisite initial and in-service trainings.

Paragraph 530 Compliance Progress History

FIRST REPORTING PERIOD SEPTEMBER 1, 2019 – AUGUST 31, 2019	SECOND REPORTING PERIOD SEPTEMBER 1, 2019 – FEBRUARY 29, 2020	THIRD REPORTING PERIOD MARCH 1, 2020 – DECEMBER 31, 2020
COMPLIANCE PROGRESS: None	COMPLIANCE PROGRESS: None	COMPLIANCE PROGRESS: Preliminary
FOURTH REPORTING PERIOD **JANUARY 1, 2021 – JUNE 30, 2021**	**FIFTH REPORTING PERIOD** **JULY 1, 2021 – DECEMBER 31, 2021**	**SIXTH REPORTING PERIOD** **JANUARY 1, 2022 – JUNE 30, 2022**
COMPLIANCE PROGRESS: **Preliminary**	**COMPLIANCE PROGRESS:** **None**	**COMPLIANCE PROGRESS:** **None**

Accountability and Transparency: ¶531

531. *In order to function effectively, CPD's accountability system must protect the due process rights of involved CPD members. In order to build public trust and credibility, CPD must provide opportunities for meaningful community engagement that extends beyond the complaint process. The Police Board strives to play the important dual roles of protecting CPD members' due process rights and providing a platform for regular community feedback. The City will ensure that the Police Board has adequate resources, training, and institutional support to fulfill its important duties.*

Compliance Progress

(Reporting Period: January 1, 2022, through June 30, 2022)

Preliminary:	***Under Assessment***
CPD	***Under Assessment***
Police Board	***In Compliance*** (NEW)
Secondary:	***Not in Compliance***
CPD	***Under Assessment***
Police Board	***In Compliance*** (NEW)
Full:	***Under Assessment***
CPD	***Under Assessment***
Police Board	***In Compliance*** (NEW)

The IMT evaluated compliance with ¶531 for the first time this reporting period. We found that the Police Board is in Secondary compliance. The CPD's compliance with this paragraph remains Under Assessment because further discussion is required between the City, the CPD, the Police Board, the Office of the Illinois Attorney General, and the IMT.

To evaluate Preliminary compliance with ¶531, the IMT reviewed the CPD's and Police Board's policies and written guidance following the policy process described in the Consent Decree (¶¶626–41). Specific to the Police Board, we considered whether the Police Board regularly assesses its needs. For the CPD we looked for policies aimed (1) at maintaining an accountability system that protects members' due process rights and builds community trust and (2) creating opportunities for meaningful community engagement beyond the complaint process. To evaluate Secondary compliance with ¶531, the IMT looked at whether the CPD provided training regarding the policies related to ¶531, and we looked at whether the Police Board was making its needs known to the City, requesting resources necessary to ensure it can fulfill its dual roles. To evaluate Full compliance, we looked for evidence that the CPD has implemented its policy and training such that its accountability system operates to protect officers' due process rights and build pub-

lic trust, including through opportunities for community members to provide feedback. Related to the Police Board, we seek to determine whether the Police Board has developed a system to continually assess and identify needs to the City and ultimately determine whether the Police Board is serving the dual roles of protecting CPD members' due process rights and providing a platform for community feedback.

We reviewed evidence that the City has a plan to provide the Police Board adequate resources to fulfill its duties, as identified by the Police Board. To evaluate Full compliance with ¶531, the IMT evaluated whether the Police Board has developed a system to continually assess and identify needs so the City can ensure that adequate resources are provided.

The Police Board completed needs assessments and, in a letter to the IMT dated April 14, 2022, the Police Board indicated that it currently has adequate physical, equipment, and personnel resources to adequately perform its assigned duties. The letter also stated that the City provides training to Police Board employees on a variety of topics that support the Police Board's efforts to fulfill its duties. The Police Board further explained that it provides an in-depth assessment of the Police Board's resources and needs on an annual basis as part of the City's annual budget process to ensure that the Police Board has sufficient resources for each upcoming year. This needs assessment will be provided to the IMT in the next reporting period. In addition to confirming that the City is providing the needs that the Police Board identifies after thoughtful assessment, the Police Board has also provided ample evidence that it is serving its dual roles.

The Police Board strives to protect CPD's members' due process rights. The Police Board has a hearing officer preside over disciplinary hearings and ensures that all hearings are videotaped in full. *See* ¶534 assessment. The Police Board has developed strong *Rules of Procedure*, which among other things requires that Police Board members are required to watch the entire evidentiary hearing recording and are provided a complete record for the case before the Police Board can take any vote following a disciplinary hearing. *See* ¶535 assessment. The Police Board also ensures that the CPD member involved in a Police Board case has access to the CPD member's complete discovery file and has the opportunity to enter relevant evidence therefrom into the record. *See* ¶536 assessment.

The Police Board also plays an important function by creating a platform for regular community feedback. The Police Board regularly holds meetings open to the public. Community members are afforded the opportunity to provide feedback and raise concerns. *See* ¶537 assessment. Furthermore, the Police Board has a policy and procedure for collecting, documenting, and responding to community feedback it receives. *See* ¶538 assessment. With all of this, the Police Board has achieved Full compliance with ¶531.

The CPD remains under assessment this reporting period. Additional conversations with the Parties are necessary to ascertain the measurable requirements set out by this paragraph and how the CPD should begin to move toward compliance. We expect this conversation to occur in the seventh reporting period. With this, the CPD's compliance is Under Assessment.

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With this, the Police Board achieved Full compliance with ¶531 in the sixth reporting period. The CPD remained Under Assessment.

Paragraph 531 Compliance Progress History

FIRST REPORTING PERIOD	SECOND REPORTING PERIOD	THIRD REPORTING PERIOD
SEPTEMBER 1, 2019 – AUGUST 31, 2019	SEPTEMBER 1, 2019 – FEBRUARY 29, 2020	MARCH 1, 2020 – DECEMBER 31, 2020
COMPLIANCE PROGRESS:	COMPLIANCE PROGRESS:	COMPLIANCE PROGRESS:
Not Applicable	Not Applicable	Not Applicable
FOURTH REPORTING PERIOD	**FIFTH REPORTING PERIOD**	**SIXTH REPORTING PERIOD**
JANUARY 1, 2021 – JUNE 30, 2021	JULY 1, 2021 – DECEMBER 31, 2021	JANUARY 1, 2022 – JUNE 30, 2022
COMPLIANCE PROGRESS:	COMPLIANCE PROGRESS:	COMPLIANCE PROGRESS:
Not Applicable	Not Applicable	Under Assessment

Accountability and Transparency: ¶532

532. *Within 180 days of the Effective Date, the City will draft selection criteria for Police Board members with the objective of identifying individuals who possess sufficient experience, judgment, and impartiality to perform the duties of members of the Police Board. Selection criteria may include prior work in law or law enforcement, and service with Chicago-based community and non-profit organizations. The draft selection criteria will be published on the Police Board's website for a period of 30 days for public review and comment. Following the 30-day public review and comment period, the City will provide the draft criteria to OAG for review and comment. The final selection criteria will be published and maintained on the Police Board's website. The City will ensure that the selection criteria are the basis for future selection of Police Board members.*

Compliance Progress

(Reporting Period: January 1, 2022, through June 30, 2022)

Preliminary:	***In Compliance*** **(SECOND REPORTING PERIOD)**
Secondary:	***Not in Compliance***
Full:	***Not Yet Assessed***

The City maintained Preliminary compliance with ¶532 but did not reach Secondary compliance.

To evaluate Preliminary compliance with ¶532, the IMT reviewed the City's policies following the policy process described in the Consent Decree (¶¶626–41). To evaluate Secondary compliance, we reviewed various data sources and plans to determine whether the City developed a process for properly applying the selection criteria should a vacancy on the Police Board occur.

Progress before the Sixth Reporting Period

In the second reporting period, the City reached Preliminary compliance with its *Police Board Member Selection Criteria*. The City provided an initial draft and made subsequent revisions after receiving feedback from the IMT and the OAG. After revisions were made, we determined that the *Police Board Member Selection Criteria* allowed the City to move into Preliminary compliance. We did not receive additional evidence of compliance in the third or fourth reporting periods.

In the fifth reporting period, the City submitted the Mayor's Office's *Policy Governing Police Board Member Selection* ("Selection Process") and supporting Police Board Candidate Screen Questions ("Screen Questions"). We provided feedback

on these materials on December 29, 2021. We detailed our concern that the Selection Process did not provide much guidance to "ensure that the selection criteria are the basis for future selection of Police Board members." *See* ¶532. Because the Selection Process did not sufficiently ensure that "the selection criteria are the basis for future selection of Police Board members," the City did not reach Secondary compliance with ¶532 in the fifth reporting period.

Progress in the Sixth Reporting Period

The City did not submit any materials related to ¶532 in the sixth reporting period.

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With this, the City maintained Preliminary compliance with ¶532 but did not reach Secondary compliance. Moving forward, we will look for the City to revise and refine its Selection Process to ensure that "the selection criteria are the basis for future selection of Police Board members" as required by ¶532.

Paragraph 532 Compliance Progress History

FIRST REPORTING PERIOD	SECOND REPORTING PERIOD	THIRD REPORTING PERIOD
SEPTEMBER 1, 2019 – AUGUST 31, 2019	SEPTEMBER 1, 2019 – FEBRUARY 29, 2020	MARCH 1, 2020 – DECEMBER 31, 2020
COMPLIANCE PROGRESS:	COMPLIANCE PROGRESS:	COMPLIANCE PROGRESS:
None	Preliminary	Preliminary
FOURTH REPORTING PERIOD	**FIFTH REPORTING PERIOD**	**SIXTH REPORTING PERIOD**
JANUARY 1, 2021 – JUNE 30, 2021	JULY 1, 2021 – DECEMBER 31, 2021	JANUARY 1, 2022 – JUNE 30, 2022
COMPLIANCE PROGRESS:	COMPLIANCE PROGRESS:	COMPLIANCE PROGRESS:
Preliminary	Preliminary	Preliminary

Accountability and Transparency: ¶533

533. *Within 180 days of the Effective Date, the Police Board will submit selection criteria for Police Board hearing officers to the Monitor and OAG for review and comment. The criteria will be drafted to help identify individuals who possess sufficient competence, impartiality, and legal expertise to serve as hearing officers. The selection criteria will be published on the Police Board's website. The City and the Police Board will ensure that the selection criteria are the basis for future selection of Police Board hearing officers.*

Compliance Progress

(Reporting Period: January 1, 2022, through June 30, 2022)

Preliminary:	***In Compliance*** **(SECOND REPORTING PERIOD)**
Secondary:	***In Compliance*** **(FOURTH REPORTING PERIOD)**
Full:	***In Compliance*** **(FOURTH REPORTING PERIOD)**
Sustainment Period Ends	***June 30, 2023***

The Police Board maintained Full compliance with ¶533 during the sixth reporting period.

To evaluate Preliminary compliance with ¶533 we reviewed Police Board's relevant policies and documents following the process described in the Consent Decree (¶¶626–41). To evaluate Secondary compliance with ¶533, we considered whether the *Police Board Hearing Officer Selection Criteria*—which enabled the City and Police Board to reach Preliminary compliance with ¶533—had been sufficiently disseminated and explained to ensure that the Police Board Hearing Officer Selection Criteria would be appropriately followed. For Full compliance, we looked for evidence that the City and the Police Board follow the selection criteria set forth to assess Full compliance with ¶533.

In the second reporting period, the Police Board reached Preliminary compliance by submitting *Police Board Hearing Office Selection Criteria*. In the fourth reporting period, the Police Board reached Secondary and Full compliance by demonstrating that the *Police Board Hearing Officer Selection Criteria* had been disseminated and followed in the Police Board's search for and hiring of a new Police Board Hearing Officer. Throughout the hiring process, the Police Board provided the IMT and the OAG updates that demonstrated an awareness of the *Police Board Hearing Officer Selection Criteria* and a commitment to following that guidance. In the fifth reporting period, there were no Police Board Hearing Officer vacancies. We requested that, if a vacancy occurs in future reporting periods, the Police Board notify the IMT and provide the same level of detail and transparency into its search and hiring process in order to maintain Full compliance.

In the sixth reporting period, the Police Board submitted a letter dated April 14, 2022 indicating that the Police Board continued to follow the process for Hearing Officer selection and reporting that the Police Board had no vacant hearing officer positions and did not conduct a hearing officer search during the sixth reporting period.

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The Police Board maintained Full compliance with ¶533 during the sixth reporting period.

Paragraph 533 Compliance Progress History

FIRST REPORTING PERIOD	SECOND REPORTING PERIOD	THIRD REPORTING PERIOD
SEPTEMBER 1, 2019 – AUGUST 31, 2019	SEPTEMBER 1, 2019 – FEBRUARY 29, 2020	MARCH 1, 2020 – DECEMBER 31, 2020
COMPLIANCE PROGRESS:	COMPLIANCE PROGRESS:	COMPLIANCE PROGRESS:
None	Preliminary	Preliminary
FOURTH REPORTING PERIOD	**FIFTH REPORTING PERIOD**	**SIXTH REPORTING PERIOD**
JANUARY 1, 2021 – JUNE 30, 2021	JULY 1, 2021 – DECEMBER 31, 2021	JANUARY 1, 2022 – JUNE 30, 2022
COMPLIANCE PROGRESS:	COMPLIANCE PROGRESS:	COMPLIANCE PROGRESS:
Full	Full	Full

Accountability and Transparency: ¶534

534. *In any disciplinary action requiring the vote of the Police Board, the City will ensure: a. a hearing officer will preside over the disciplinary proceedings; and b. disciplinary hearings will be videotaped in their entirety.*

Compliance Progress

(Reporting Period: January 1, 2022, through June 30, 2022)

Preliminary:	***In Compliance*** **(FOURTH REPORTING PERIOD)**
Secondary:	***In Compliance*** **(FOURTH REPORTING PERIOD)**
Full:	***In Compliance*** **(FOURTH REPORTING PERIOD)**
Sustainment Period Ends	***June 30, 2023***

The City and the Police Board maintained Full compliance with ¶534 in the sixth reporting period.

To assess Preliminary compliance, we reviewed the City's relevant policies and records following the process described in the Consent Decree (¶¶626–41), which outlines applicable consultation, resolution, workout, and public comment periods. To evaluate Secondary compliance, we reviewed, among other things, the City's development, implementation, and evaluation of training. To assess Full compliance, the IMT determined whether the City and Police Board had sufficiently implemented their policies and training.

Progress before the Sixth Reporting Period

In the fourth reporting period, the Police Board reached Full compliance with ¶534 after providing several documents for review: (1) Section 2-8-030 of the Municipal Code of Chicago, which authorizes hearing officers to preside over Police Board disciplinary hearings and requires the hearing officers to conduct disciplinary hearings in accordance with the provisions of the Code and the Board's Rules of Procedure; (2) the Police Board's *Rules of Procedure*, which among other things, requires each disciplinary case to be assigned to a hearing officer and mandates that the hearing be video recorded in its entirety; and (3) links to video recorded disciplinary hearings for the three most recent cases decided by the Police Board.

These documents demonstrated that the Police Board not only has policies in place to instruct compliance with ¶534, but that the Police Board follows those policies and procedures, putting the mandates of ¶534 into action.

In the fifth reporting period, the Police board provided links to recorded hearings that occurred via Zoom. These recordings confirmed that the Police Board continued to have a hearing officer presiding over disciplinary hearings and that the hearings were video recorded in their entirety. With this evidence, the Police Board remained in Full compliance with ¶534 in the fifth reporting period.

Progress in the Sixth Reporting Period

In the sixth reporting period, the Police Board provided transcripts and videos of recorded hearings. These recordings confirm that the Police Board continues to have a hearing officer presiding over disciplinary hearings and that the hearings were video recorded in their entirety.

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With this, the Police Board maintained Full compliance with ¶534 in the sixth reporting period.

Paragraph 534 Compliance Progress History

FIRST REPORTING PERIOD	SECOND REPORTING PERIOD	THIRD REPORTING PERIOD
SEPTEMBER 1, 2019 – AUGUST 31, 2019	SEPTEMBER 1, 2019 – FEBRUARY 29, 2020	MARCH 1, 2020 – DECEMBER 31, 2020
COMPLIANCE PROGRESS:	COMPLIANCE PROGRESS:	COMPLIANCE PROGRESS:
Not Applicable	Not Applicable	Not Applicable
FOURTH REPORTING PERIOD	**FIFTH REPORTING PERIOD**	**SIXTH REPORTING PERIOD**
JANUARY 1, 2021 – JUNE 30, 2021	JULY 1, 2021 – DECEMBER 31, 2021	JANUARY 1, 2022 – JUNE 30, 2022
COMPLIANCE PROGRESS:	COMPLIANCE PROGRESS:	COMPLIANCE PROGRESS:
Full	Full	Full

Accountability and Transparency: ¶535

535. *Prior to any vote by the Police Board following any disciplinary hearing, the City will ensure: a. all Police Board members are required to watch and certify that they have watched the videotape of the entire evidentiary hearing; b. all Police Board members are provided copies of the complete record, including demonstrative exhibits; c. hearing officers will prepare a written report that sets forth evidence presented at the hearing: (i) in support of the charges filed; (ii) in defense or mitigation; and (iii) in rebuttal, including evidence and aggravation, if any; the hearing officer's report will also include information relating to witness credibility; d. the Police Board may, at its discretion, ask a hearing officer to additionally prepare a written report and recommendation that sets forth findings of fact and conclusions of law, including any findings relating to witness credibility; e. the parties before the Police Board will have 14 days to review the hearing officer's report, and recommendation, and file any written objections; and f. all Police Board members will review de novo the hearing officer's report and any recommendation, and the parties' written objections to the same.*

Compliance Progress

(Reporting Period: January 1, 2022, through June 30, 2022)

Preliminary:	***In Compliance*** **(FOURTH REPORTING PERIOD)**
Secondary:	***In Compliance*** **(FOURTH REPORTING PERIOD)**
Full:	***In Compliance*** **(FOURTH REPORTING PERIOD)**
Sustainment Period Ends	***June 30, 2023***

The City and the Police Board maintained Full compliance with ¶535 in the sixth reporting period.

To assess Preliminary compliance with ¶535, we reviewed the City's relevant policies and records following the process described in the Consent Decree (¶¶626–41), which outlines applicable consultation, resolution, workout, and public comment periods. To evaluate Secondary compliance, we reviewed, among other things, the City's training development, implementation, and evaluation. To assess Full compliance, the IMT determined whether the City and Police Board had sufficiently implemented their policies and training.

Progress before the Sixth Reporting Period

The Police Board reached Full compliance with ¶535 in the fourth reporting period. In May 2021, the Police Board provided us with its *Rules of Procedure*. These rules addressed the requirements of ¶535's subsections (a) and (c)–(f). The Police

Board also provided a written transcript that included exhibits which demonstrated that Police Board members receive complete records for review before a Police Board vote, as required by subsection (b). These documents demonstrated that the Police Board not only had policies and procedures in place instructing compliance with ¶535's requirements, but that the Police Board follows those policies and procedures. With this, the Police Board reached Full compliance.

In the fifth reporting period, the Police Board provided three Police Board hearing transcripts that demonstrated that Police Board members continued to comply with ¶535's requirements. With this evidence, the Police Board maintained Full compliance with ¶535 in the fifth reporting period.

Progress in the Sixth Reporting Period

In the sixth reporting period, the Police Board provided two Police Board hearing transcripts and related case materials that demonstrated that Police Board members continued to comply with ¶535's requirements. The Police Board's actions included but were not limited to watching video recordings of evidentiary hearings, receiving and reviewing complete records from the hearings, and receiving and reviewing the hearing officers' written reports—all prior to any Police Board vote.

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With this evidence, the Police Board maintained Full compliance with ¶535 in the sixth reporting period.

Paragraph 534 Compliance Progress History

FIRST REPORTING PERIOD	SECOND REPORTING PERIOD	THIRD REPORTING PERIOD
SEPTEMBER 1, 2019 – AUGUST 31, 2019	SEPTEMBER 1, 2019 – FEBRUARY 29, 2020	MARCH 1, 2020 – DECEMBER 31, 2020
COMPLIANCE PROGRESS:	COMPLIANCE PROGRESS:	COMPLIANCE PROGRESS:
Not Applicable	Not Applicable	Not Applicable
FOURTH REPORTING PERIOD	**FIFTH REPORTING PERIOD**	**SIXTH REPORTING PERIOD**
JANUARY 1, 2021 – JUNE 30, 2021	JULY 1, 2021 – DECEMBER 31, 2021	JANUARY 1, 2022 – JUNE 30, 2022
COMPLIANCE PROGRESS:	COMPLIANCE PROGRESS:	COMPLIANCE PROGRESS:
Full	Full	Full

Accountability and Transparency: ¶536

536. *As part of the Police Board proceedings, the parties to the Police Board case (the Superintendent and the involved CPD member) will be given access to the CPD member's complete disciplinary file and will have the opportunity to move for entry into the record of proceedings any relevant aspect of the CPD member's disciplinary file, as permitted by law and any applicable collective bargaining agreements.*

Compliance Progress

(Reporting Period: January 1, 2022, through June 30, 2022)

Preliminary:	***In Compliance*** **(FOURTH REPORTING PERIOD)**
Secondary:	***In Compliance*** **(FOURTH REPORTING PERIOD)**
Full:	***In Compliance*** **(FOURTH REPORTING PERIOD)**
Sustainment Period Ends	***June 30, 2023***

The City and the Police Board maintained Full compliance with ¶536 in the sixth reporting period.

To assess Preliminary compliance, we reviewed the City's relevant policies and records following the process described in the Consent Decree (¶¶626–41), which outlines applicable consultation, resolution, workout, and public comment periods. To evaluate Secondary compliance, we reviewed, among other things, the City's training development, implementation, and evaluation. To assess Full compliance, the IMT determined whether the City and Police Board had sufficiently implemented their policies and training.

Progress before the Sixth Reporting Period

The Police Board reached Full compliance with ¶536 in the fourth reporting period. In May 2021, the Police Board provided us with its *Rules of Procedures.* The *Rules of Procedures* ensure that parties in a Police Board case are provided access to the CPD member's disciplinary files and are able to move to enter relevant aspects of a CPD member's disciplinary file into the proceeding records. In the fifth reporting period, the Police Board provided materials from police disciplinary cases filed with the Board that showed that Police Board members were given access to the CPD member's complete disciplinary file. This demonstrated that the Police Board continued to follow its procedures, acting in accordance with ¶536.

Progress in the Sixth Reporting Period

In the sixth reporting period, the Police Board provided materials from three police disciplinary cases filed with the Board that showed that Police Board members

were given access to the CPD member's complete disciplinary file. This demonstrated that the Police Board continued to follow its procedures, acting in accordance with ¶536.

***

With this evidence, the Police Board maintained Full compliance with ¶536 in the fifth reporting period.

Paragraph 536 Compliance Progress History

FIRST REPORTING PERIOD	SECOND REPORTING PERIOD	THIRD REPORTING PERIOD
SEPTEMBER 1, 2019 – AUGUST 31, 2019	SEPTEMBER 1, 2019 – FEBRUARY 29, 2020	MARCH 1, 2020 – DECEMBER 31, 2020
COMPLIANCE PROGRESS:	COMPLIANCE PROGRESS:	COMPLIANCE PROGRESS:
Not Applicable	Not Applicable	Not Applicable
FOURTH REPORTING PERIOD	**FIFTH REPORTING PERIOD**	**SIXTH REPORTING PERIOD**
JANUARY 1, 2021 – JUNE 30, 2021	JULY 1, 2021 – DECEMBER 31, 2021	JANUARY 1, 2022 – JUNE 30, 2022
COMPLIANCE PROGRESS:	COMPLIANCE PROGRESS:	COMPLIANCE PROGRESS:
Full	Full	Full

Accountability and Transparency: ¶537

537. *All regular meetings convened by the Police Board that are open to the public will be attended by the CPD Superintendent or his or her designee; the Chief Administrator of COPA or his or her designee; the Deputy PSIG or his or her designee; and the Chief of BIA or his or her designee.*

Compliance Progress

(Reporting Period: January 1, 2022, through June 30, 2022)

Preliminary:	***In Compliance*** **(FOURTH REPORTING PERIOD)**
Secondary:	***In Compliance*** **(FOURTH REPORTING PERIOD)**
Full:	***In Compliance*** **(FOURTH REPORTING PERIOD)**
Sustainment Period Ends	***June 30, 2023***

Through the efforts of the Police Board, the CPD Superintendent, the COPA Chief Administrator, the Deputy PSIG, and the BIA Chief, the City maintained Full compliance with ¶537 in the sixth reporting period.

To assess Preliminary compliance we reviewed the City's relevant policies and records to determine whether information is provided to all entities implicated by ¶537 so that they may attend Police Board public regular meetings. To evaluate Secondary compliance, we reviewed records to show that all entities had sufficient personnel and have allocated sufficient resources to allow compliance with ¶537's mandate. To evaluate Full compliance, we reviewed data sources to show that all necessary entities attended Police Board meetings that are open to the public as required by ¶537.

Progress before the Sixth Reporting Period

The City reached Full compliance with ¶537 in the fourth reporting period. At that time, the IMT attended public Police Board meetings virtually. Each meeting was attended by the CPD Superintendent or designee, the COPA Chief Administrator or designee, the Deputy PSIG or designee and the BIA Chief. In fact, in very few meetings were the respective heads not personally in attendance. Based on this, the City reached Full compliance.

In the fourth reporting period, we acknowledged the PSIG for its additional efforts ensuring compliance. The Office of Inspector General *Public Safety Section Policies Manual* includes a policy that ensures attendance of the PSIG at the Police Board meetings.

In the fifth reporting period, the Police Board submitted attendance records from its public meetings that demonstrated that the individuals (or their designees) required to attend these meetings under ¶537 attended all public meetings. With this, the City maintained Full compliance.

Progress in the Sixth Reporting Period

In the sixth reporting period, the Police Board again submitted attendance records and meeting minutes from its public meetings that demonstrated that the individuals (or their designees) required to attend these meetings under ¶537 attended all public meetings.

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With this, the City maintained Full compliance with ¶537 in the sixth reporting period.

Paragraph 537 Compliance Progress History

FIRST REPORTING PERIOD	SECOND REPORTING PERIOD	THIRD REPORTING PERIOD
SEPTEMBER 1, 2019 – AUGUST 31, 2019	SEPTEMBER 1, 2019 – FEBRUARY 29, 2020	MARCH 1, 2020 – DECEMBER 31, 2020
COMPLIANCE PROGRESS:	COMPLIANCE PROGRESS:	COMPLIANCE PROGRESS:
Not Applicable	Not Applicable	Not Applicable
FOURTH REPORTING PERIOD	**FIFTH REPORTING PERIOD**	**SIXTH REPORTING PERIOD**
JANUARY 1, 2021 – JUNE 30, 2021	JULY 1, 2021 – DECEMBER 31, 2021	JANUARY 1, 2022 – JUNE 30, 2022
COMPLIANCE PROGRESS:	COMPLIANCE PROGRESS:	COMPLIANCE PROGRESS:
Full	Full	Full

Accountability and Transparency: ¶538

538. *Within 90 days of the Effective Date, the City will create a policy for collecting, documenting, classifying, tracking, and responding to community input received during the Police Board's regular community meetings. The policy will outline the methods for: (a) directing community input to the appropriate responding entity, agency, or office; and (b) documenting and making public, all responses to community input.*

Compliance Progress

(Reporting Period: January 1, 2022, through June 30, 2022)

Preliminary:	***In Compliance*** **(FIRST REPORTING PERIOD)**
Secondary:	***In Compliance*** **(FOURTH REPORTING PERIOD)**
Full:	***In Compliance*** **(FOURTH REPORTING PERIOD)**
Sustainment Period Ends	***June 30, 2023***

The City and the Police Board maintained Full compliance with ¶538 in the sixth reporting period.

To assess Preliminary compliance, we reviewed the City's relevant policies and records following the process described in the Consent Decree (¶¶626–41), which outlines applicable consultation, resolution, workout, and public comment periods. To evaluate Secondary compliance, we reviewed, among other things, the City's training development, implementation, and evaluation. To assess Full compliance, the IMT determined whether the City and Police Board had sufficiently implemented their policies and training.

Progress before the Sixth Reporting Period

In previous reporting periods, we found the Police Board in Full compliance with ¶538. The Police Board's adopted *Policy Regarding the Attendance of and Participation by the Public at Board Meetings* (Participation Policy) and *Response Policy,* which work together to create a framework that addresses the requirements of ¶538. The *Participation Policy* governs requirements for speakers who require some immediate action on the part of the CPD, COPA, or the Police Board, and the *Response Policy* directs the expectations of response from the CPD, COPA, or the Police Board. In addition to attending meetings where we saw the CPD, COPA, and Police Board representatives assume responsibility for concerns or issues raised, we also reviewed materials showing responses or actions resulting from these meetings (which is normally posted on the Police Board's website in accordance with the Response Policy). With these efforts, the Police Board reached Full compliance.

The City maintained Full compliance with ¶538 in the fifth reporting period by providing a variety of materials, including but not limited to video and transcripts of Police Board meetings and community input reports. These reports tracked community input and responses from each agency. These records showed that complaints and issues raised during meetings are followed up on in accordance with ¶538 and the policies created by the Police Board related to ¶538's requirements. With this, the City maintained Full compliance with ¶538 in the fifth reporting period.

Progress in the Sixth Reporting Period

The City maintained Full compliance with ¶538 in the sixth reporting period by providing a variety of materials, including but not limited to video and transcripts of Police Board meetings and community input reports. These reports tracked community input and responses from each agency. These records showed that complaints and issues raised during meetings are followed up on in accordance with ¶538 and the policies created by the Police Board related to ¶538's requirements. Complaints and issues identified during each meeting are assigned to one of the four agencies for action and follow-up, and each issue is documented and made public on the Police Board website.

***

With this, the City maintained Full compliance with ¶538 in the fifth reporting period.

Paragraph 538 Compliance Progress History

FIRST REPORTING PERIOD SEPTEMBER 1, 2019 – AUGUST 31, 2019 COMPLIANCE PROGRESS: Preliminary	SECOND REPORTING PERIOD SEPTEMBER 1, 2019 – FEBRUARY 29, 2020 COMPLIANCE PROGRESS: Preliminary	THIRD REPORTING PERIOD MARCH 1, 2020 – DECEMBER 31, 2020 COMPLIANCE PROGRESS: Preliminary
FOURTH REPORTING PERIOD JANUARY 1, 2021 – JUNE 30, 2021 COMPLIANCE PROGRESS: Full	FIFTH REPORTING PERIOD JULY 1, 2021 – DECEMBER 31, 2021 COMPLIANCE PROGRESS: Full	SIXTH REPORTING PERIOD JANUARY 1, 2022 – JUNE 30, 2022 COMPLIANCE PROGRESS: Full

Accountability and Transparency: ¶539

539. *The Police Board will make best efforts to streamline discovery efforts in all pending proceedings.*

Compliance Progress

(Reporting Period: January 1, 2022, through June 30, 2022)

Preliminary:	***In Compliance*** **(FOURTH REPORTING PERIOD)**
Secondary:	***In Compliance*** **(FOURTH REPORTING PERIOD)**
Full:	***In Compliance*** **(FOURTH REPORTING PERIOD)**
Sustainment Period Ends	***June 30, 2023***

The City and the Police Board maintained Full compliance with ¶539 in the sixth reporting period.

To assess Preliminary compliance, we reviewed the City's relevant policies and records following the process described in the Consent Decree (¶¶626–41), which outlines applicable consultation, resolution, workout, and public comment periods. To evaluate Secondary compliance, we reviewed, among other things, the City's training development, implementation, and evaluation. To assess Full compliance, the IMT determined whether the City and Police Board had sufficiently implemented their policies and training using "best efforts" as defined by ¶729.

Progress before the Sixth Reporting Period

In the fourth reporting period, the Police Board produced to the IMT the *Police Board Rules of Procedure*. Section II.A of the Police Board Rules of Procedures addresses ¶539 and includes additional information to further explain the process. In the fifth reporting period, the Police Board provided materials from three Police Board Hearings that demonstrated a streamlined discovery process. In addition, the Police Board provided a letter summarizing its efforts to streamline the discovery process. The letter indicated that the process had been changed to allow the Complaint Register file to be produced at the time of the initial status hearing or within a few days after. This had resulted in the accused officer's attorney receiving discovery materials about 30 days sooner than they would have under the previous process. This change allowed the parties to prepare for and schedule the discipline hearing more quickly. With this, the Police Board maintained Full compliance with ¶539 in the fifth reporting period.

Progress in the Sixth Reporting Period

In the sixth reporting period, the Police Board provided materials from two Police Board Hearings that demonstrated a streamlined discovery process. In addition, the Police Board provided a letter summarizing its efforts to streamline the discovery process, which reiterated its efforts taken during the fifth reporting period.

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With this, the Police Board maintained Full compliance with ¶539 in the sixth reporting period.

Paragraph 539 Compliance Progress History

FIRST REPORTING PERIOD SEPTEMBER 1, 2019 – AUGUST 31, 2019 COMPLIANCE PROGRESS: Not Applicable	SECOND REPORTING PERIOD SEPTEMBER 1, 2019 – FEBRUARY 29, 2020 COMPLIANCE PROGRESS: Not Applicable	THIRD REPORTING PERIOD MARCH 1, 2020 – DECEMBER 31, 2020 COMPLIANCE PROGRESS: Not Applicable
FOURTH REPORTING PERIOD JANUARY 1, 2021 – JUNE 30, 2021 COMPLIANCE PROGRESS: Full	FIFTH REPORTING PERIOD JULY 1, 2021 – DECEMBER 31, 2021 COMPLIANCE PROGRESS: Full	SIXTH REPORTING PERIOD JANUARY 1, 2022 – JUNE 30, 2022 COMPLIANCE PROGRESS: Full

Accountability and Transparency: ¶540

540. *Within 180 days of the Effective Date, Police Board members and hearing officers will receive initial and annual training that is adequate in quality, quantity, scope, and type and will cover, at minimum, the following topics: a. constitutional and other relevant law on police-community encounters, including law on the use of force and stops, searches, and arrests; b. police tactics; c. investigations of police conduct; d. impartial policing; e. policing individuals in crisis; f. CPD policies, procedures, and disciplinary rules; g. procedural justice; and h. community outreach.*

Compliance Progress

(Reporting Period: January 1, 2022, through June 30, 2022)

Recurring Schedule: Annually ☑ **Not Yet Applicable**

Preliminary: ***In Compliance*** **(FIFTH REPORTING PERIOD)**
Secondary: ***Not in Compliance***
Full: ***Not Yet Assessed***

The City and the Police Board maintained Preliminary compliance with ¶540 in the sixth reporting period.

To evaluate Preliminary compliance with ¶540, the IMT reviewed training materials to determine if trainings were developed to sufficiently address requirements listed in ¶540. To evaluate Secondary compliance, we reviewed, among other things, the Police Board's training development, implementation, and evaluation. To assess Full compliance, we reviewed various data sources to determine whether the Police Board has mechanisms and processes in place to ensure that Police Board members are provided annual training as required by ¶540.

Progress before the Sixth Reporting Period

In previous reporting periods, the Police Board worked with a local law firm that agreed to provide training development to the Police Board at no cost. We commended the Police Board's decision to seek outside assistance in developing appropriate training since the Police Board does not have staff to help develop and deliver training. The Police Board provided training regarding Police Boards in other major U.S. cities and the Consent Decree. We noted that neither of these trainings covered the requirements of ¶540, but we recognized that these trainings were valuable.

At the end of the fourth reporting period, the Police Board produced a "training agenda" that detailed the training the Police Board hoped to accomplish. We reviewed the Police Board's training agenda in the fifth reporting period. These proposed trainings outlined all substantive topics of training required by ¶540. With this, the Police Board reached Preliminary compliance in the fifth reporting period.

During the fifth reporting period, Police Board members and hearing officers attended a one-hour block of training regarding responding to calls with a mental health component. This training was presented by NAMI Chicago and related to the requirements set out in ¶540(e). The Police Board also submitted training materials for its training *Policing First Amendment Activity*. We submitted a no-objection notice to this training.[258] The Police Board also provided other trainings beyond those required by ¶540.

We explained in the fifth reporting period that to reach Secondary compliance the Police Board would need to provide training materials and ultimately provide trainings that touched on all listed training topics for ¶540.

Progress in the Sixth Reporting Period

During the sixth reporting period, Police Board members and hearing officers attended the training *Policing First Amendment Activity*, which speaks to subsection ¶540(a)—though it doesn't complete satisfy ¶540(a). The IMT observed this training and found the training to be excellent in terms of its material, its instruction, and its presentation. The training was presented by attorneys from a local law firm, with each attorney providing instruction in specific areas of expertise, and was both engaging and effective. The training concluded with a question and answer session, and the instructors were able to answer questions and provide additional context.

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With this, the City and the Police Board maintained Preliminary compliance with ¶540 in the sixth reporting period. To reach Secondary compliance, the Police

[258] Under the Consent Decree policy review process, the City and the CPD consult with the IMT and the OAG to develop or revise policies in accordance with Consent Decree requirements. *See* ¶¶626–37. The City and the CPD provide the policy for review at least 30 days before the policy is scheduled to go into effect, and the IMT and the OAG have 30 days to comment on the policy. *See* ¶¶627–28. The City, the CPD, the IMT, and the OAG then work together to resolve comments. The IMT and the OAG will, separately and in writing, notify the City and the CPD that they no longer have any comments, which is referred to as a "no-objection notice." Once the City and the CPD receive a no-objection notice from both the IMT and the OAG, the City and the CPD will begin the process of finalizing the policy. Typically, this includes the CPD posting the policy on its website for public comment for at least 15 days. The City and the CPD must then consider those comments and make additional changes, as appropriate. *See* ¶633.

Board will need to provide training materials and ultimately provide trainings that touch on all listed training topics for ¶540.

Paragraph 540 Compliance Progress History

FIRST REPORTING PERIOD SEPTEMBER 1, 2019 – AUGUST 31, 2019	SECOND REPORTING PERIOD SEPTEMBER 1, 2019 – FEBRUARY 29, 2020	THIRD REPORTING PERIOD MARCH 1, 2020 – DECEMBER 31, 2020
COMPLIANCE PROGRESS: Not Applicable	COMPLIANCE PROGRESS: None	COMPLIANCE PROGRESS: None
FOURTH REPORTING PERIOD JANUARY 1, 2021 – JUNE 30, 2021	**FIFTH REPORTING PERIOD** JULY 1, 2021 – DECEMBER 31, 2021	**SIXTH REPORTING PERIOD** JANUARY 1, 2022 – JUNE 30, 2022
COMPLIANCE PROGRESS: Under Assessment	COMPLIANCE PROGRESS: Preliminary	COMPLIANCE PROGRESS: Preliminary

Accountability and Transparency: ¶541

541. *The trainings [referenced in ¶540] will be provided by sources both inside and outside of CPD, as needed, to provide high quality training on investigative techniques, and CPD policies, procedures, and disciplinary rules.*

Compliance Progress (Reporting Period: January 1, 2022, through June 30, 2022)

Preliminary: ***In Compliance*** **(FIFTH REPORTING PERIOD)**
Secondary: ***Not in Compliance***
Full: ***Not Yet Assessed***

The City and Police Board maintained Preliminary compliance with ¶541 in the sixth reporting period.

To evaluate Preliminary compliance with ¶541, the IMT reviewed the Police Board's policies following the policy process described in the Consent Decree (¶¶626–41). Paragraph 626, for example, requires policies to be "plainly written, logically organized, and use clearly defined terms." To evaluate Secondary compliance, we reviewed, among other things, the City's training development, implementation, and evaluation.

Progress before the Sixth Reporting Period

In previous reporting periods, the Police Board worked with a local law firm that agreed to provide training development to the Police Board at no cost. We commended the Police Board's decision to seek outside assistance in developing appropriate training. The Police Board also provided training regarding Police Boards in other major U.S. cities and training regarding the Consent Decree. We noted that neither of these trainings covered the requirements of ¶540 and ¶541 but recognized that these trainings were valuable.

At the end of the fourth reporting period, the Police Board produced a training agenda that detailed the training the Police Board hoped to accomplish. In the fifth reporting period, the Police Board provided members and hearing officers a one-hour training regarding responding to calls with a mental health component. This training was presented by NAMI Chicago and addressed the requirements of ¶540(e). The Police Board also provided trainings beyond that required in ¶540 and ¶541, such as *Reflecting on the Holocaust: Defining Moments for Police*. Although this and other trainings are beyond those mentioned in ¶540 (and referenced in ¶541), the Police Board leadership believed that providing such blocks of instruction were essential for the work they perform and would provide greater meaning and context to the trainings required by ¶540 and ¶541. Additionally, the Police Board provided some trainings in accordance with its training agenda and

demonstrated its willingness and ability to seek out and engage appropriate individuals to provide its trainings. With this, the Police Board reached Preliminary compliance in the fifth reporting period.

Progress in the Sixth Reporting Period

During the sixth reporting period, Police Board members and hearing officers attended the training *Policing First Amendment Activity*. The IMT observed this training and found the training to be excellent in terms of its material, its instruction, and its presentation. The training was presented by attorneys from a local law firm, with each attorney providing instruction in specific areas of expertise, and was both engaging and effective. The training concluded with a question and answer session, and the instructors were able to answer questions and provide additional context.

Although this training alone does not fulfill the requirements of ¶541, it further demonstrates the Police Board's commitment to methodically addressing the requirements of ¶540 while not burdening the Police Board and staff with a great number of training blocks. This high quality, meaningful training was developed and delivered at no cost to the City.

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With this, the City and Police Board maintained Preliminary compliance with ¶541 in the sixth reporting period. Moving forward we will look for the Police Board to provide training materials relating to the topics set out in ¶541.

Paragraph 541 Compliance Progress History

FIRST REPORTING PERIOD	SECOND REPORTING PERIOD	THIRD REPORTING PERIOD
SEPTEMBER 1, 2019 – AUGUST 31, 2019	SEPTEMBER 1, 2019 – FEBRUARY 29, 2020	MARCH 1, 2020 – DECEMBER 31, 2020
COMPLIANCE PROGRESS:	COMPLIANCE PROGRESS:	COMPLIANCE PROGRESS:
Not Applicable	Not Applicable	Status Update
FOURTH REPORTING PERIOD	**FIFTH REPORTING PERIOD**	**SIXTH REPORTING PERIOD**
JANUARY 1, 2021 – JUNE 30, 2021	JULY 1, 2021 – DECEMBER 31, 2021	JANUARY 1, 2022 – JUNE 30, 2022
COMPLIANCE PROGRESS:	COMPLIANCE PROGRESS:	COMPLIANCE PROGRESS:
Under Assessment	Preliminary	Preliminary

Accountability and Transparency: ¶542

542. *Within 90 days of the Effective Date, the City will create a training policy for Police Board members and hearing officers.*

Compliance Progress

(Reporting Period: January 1, 2022, through June 30, 2022)

Preliminary:	***In Compliance* (FIFTH REPORTING PERIOD)**
Secondary:	***Not in Compliance***
Full:	***Not Yet Assessed***

The City maintained Preliminary compliance with ¶542 in the sixth reporting period.

To evaluate Preliminary compliance with ¶542, the IMT reviewed the Police Board's policies following the policy process described in the Consent Decree (¶¶626–41), which details applicable consultation, resolution, workout, and public comment periods. To evaluate Secondary compliance, we reviewed, among other things, the City's training development, implementation, and evaluation.

Progress before the Sixth Reporting Period

In previous reporting periods, the Police Board worked with a local law firm that agreed to provide training development to the Police Board at no cost. We commended the Police Board's decision to seek outside assistance in developing appropriate training since the Police Board does not have staff to help develop and deliver training. The Police Board provided training regarding Police Boards in other major U.S. cities and the Consent Decree. At the end of the fourth reporting period, the Police Board produced a training agenda that detailed the training the Police Board hoped to accomplish.

During the fifth reporting period, we reviewed the training agenda the Police Board provided us at the end of the fourth reporting period. We provided feedback regarding the planned and contemplated training blocks. The Police Board provided an updated training agenda in December 2021. This updated draft captured the training blocks the Police Board provided during the fifth reporting period, such as the *Policing Individuals in Crisis*, presented by NAMI Chicago. It demonstrated the trainings the Police Board intended to provide next, *Consideration for Policing of First Amendment Activity*, and other trainings under the Police Board.

We noted in the fifth reporting period that the training blocks of instruction already provided to Police Board members and hearing officers demonstrated adherence to this training plan. With this detailed training agenda that the Police Board had adhered to, the Police Board reached Preliminary compliance in the fifth reporting period.

Progress in the Sixth Reporting Period

The Police Board did not provide additional materials related to ¶542 in the sixth reporting period, but maintained Preliminary compliance by continuing to develop its training materials.

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With this, the City maintained Preliminary compliance with ¶542 in the sixth reporting period. Moving forward, we will look for the Police Board to continue to adhere to and update its training agenda. For Full compliance the Police Board will need to provide evidence that it has created a system to ensure continued training will be provided in the years to come.

Paragraph 542 Compliance Progress History

FIRST REPORTING PERIOD	SECOND REPORTING PERIOD	THIRD REPORTING PERIOD
SEPTEMBER 1, 2019 – AUGUST 31, 2019	SEPTEMBER 1, 2019 – FEBRUARY 29, 2020	MARCH 1, 2020 – DECEMBER 31, 2020
COMPLIANCE PROGRESS:	COMPLIANCE PROGRESS:	COMPLIANCE PROGRESS:
None	None	None

FOURTH REPORTING PERIOD	FIFTH REPORTING PERIOD	SIXTH REPORTING PERIOD
JANUARY 1, 2021 – JUNE 30, 2021	JULY 1, 2021 – DECEMBER 31, 2021	JANUARY 1, 2022 – JUNE 30, 2022
COMPLIANCE PROGRESS:	COMPLIANCE PROGRESS:	COMPLIANCE PROGRESS:
Under Assessment	Preliminary	Preliminary

Accountability and Transparency: ¶543

543. *With regard to the promulgation or adoption of CPD rules and regulations, the Police Board's authority will be limited to issuing policy recommendations in the manner set forth in this Agreement.*

Compliance Progress

(Reporting Period: January 1, 2022, through June 30, 2022)

Preliminary:	***In Compliance*** **(NEW)**
Secondary:	***In Compliance*** **(NEW)**
Full:	***Under Assessment***

The City reached Preliminary and Secondary compliance with ¶543 in the sixth reporting period.

The fifth reporting period marked the first time the IMT assessed compliance with ¶543. During this reporting period the Police Board raised that this paragraph could inadvertently be in tension with the municipal code. By the end of the fifth reporting period, the Parties remained in discussions regarding the objectives and intentions of ¶543. Therefore, compliance with ¶543 remained Under Assessment.

To evaluate Preliminary compliance in the sixth reporting period, the IMT considered whether the Police Board's proposed rule changes conflicted with the Consent Decree. To evaluate Secondary compliance, the IMT reviewed the Police Board's policies following the policy process described in the Consent Decree (¶¶626–41), which details applicable consultation, resolution, workout, and public comment periods. To achieve Full compliance, the City and the Office of the Attorney General will need to reach an agreement that solidifies the requirements of this paragraph for the life of the Consent Decree.

During the sixth reporting period, the City and the CPD provided a draft *Policy on Adopting Chicago Police Department Rules and Regulations* for review with ¶543. The IMT submitted a no-objection notice on May 10, 2022.[259] On June 2, 2022, the

[259] Under the Consent Decree policy review process, the City and the CPD consult with the IMT and the OAG to develop or revise policies in accordance with Consent Decree requirements. *See* ¶¶626–37. The City and the CPD provide the policy for review at least 30 days before the policy is scheduled to go into effect, and the IMT and the OAG have 30 days to comment on the policy. *See* ¶¶627–28. The City, the CPD, the IMT, and the OAG then work together to resolve comments. The IMT and the OAG will, separately and in writing, notify the City and the CPD that they no longer have any comments, which is referred to as a "no-objection notice." Once the City and the CPD receive a no-objection notice from both the IMT and the OAG, the City and the CPD will begin the process of finalizing the policy. Typically, this includes the CPD posting the policy on its website for public comment for at least 15 days. The City and the CPD must then consider those comments and make additional changes, as appropriate. *See* ¶633.

City and Police Board provided a revised draft of the policy. We submitted a second no-objection notice on June 15, 2022, and noted that the policy addresses the Police Board's authority regarding policy issuance and recommendations, which is relevant to the requirements of ¶543 by creating guidelines and processes for policy recommendations. Still we recognized that, while we appreciated the goals, format, and instruction of the *Policy on Adopting Chicago Police Department Rules and Regulations*, ¶543 is potentially in tension with the Police Board's authority under the municipal code, which is the subject of the policy, and that the City of Chicago and Office of the Illinois Attorney General would continue to work through this issue. During subsequent discussions between the Parties, the City agreed to revise the *Policy on Adopting Chicago Police Department Rules and Regulations* to provide the Office of the Attorney General and the Independent Monitoring Team an opportunity to review and approve proposed rule changes before implementation in order to ensure compliance with ¶543. With these efforts, the City achieved Preliminary and Secondary compliance with this paragraph.

To achieve Full compliance, the IMT will look for the City and the Office of the Attorney General to reach an agreement that solidifies the requirements of this paragraph for the life of the Consent Decree. Because the Parties remain in discussions about what such an agreement might look like, compliance with ¶543 remains Under Assessment.

Paragraph 543 Compliance Progress History

FIRST REPORTING PERIOD	SECOND REPORTING PERIOD	THIRD REPORTING PERIOD
SEPTEMBER 1, 2019 – AUGUST 31, 2019	SEPTEMBER 1, 2019 – FEBRUARY 29, 2020	MARCH 1, 2020 – DECEMBER 31, 2020
COMPLIANCE PROGRESS:	COMPLIANCE PROGRESS:	COMPLIANCE PROGRESS:
Not Applicable	Not Applicable	Not Applicable
FOURTH REPORTING PERIOD	**FIFTH REPORTING PERIOD**	**SIXTH REPORTING PERIOD**
JANUARY 1, 2021 – JUNE 30, 2021	JULY 1, 2021 – DECEMBER 31, 2021	JANUARY 1, 2022 – JUNE 30, 2022
COMPLIANCE PROGRESS:	COMPLIANCE PROGRESS:	COMPLIANCE PROGRESS:
Not Applicable	Under Assessment	Secondary

Accountability and Transparency: ¶544

544. *The City, CPD, and COPA recognize the importance of transparency to improving CPD-community relations, and the City, CPD, and COPA have taken important steps to increase transparency about their operations, including how they conduct investigations into CPD member misconduct. The City, CPD, and COPA will continue to take steps to increase transparency, including the implementation of the requirements set forth below.*

Compliance Progress

(Reporting Period: January 1, 2022, through June 30, 2022)

Preliminary:		***Not in Compliance***
	CPD	***Not in Compliance***
	COPA	***In Compliance*** (NEW)
Secondary:		***Not Yet Assessed***
	CPD	***Not in Compliance***
	COPA	***In Compliance*** (NEW)
Full:		***Not Yet Assessed***

We assessed the City's, the CPD's, and COPA's compliance with ¶544 for the first time in the sixth reporting period. The entities did not each submit materials related to ¶544, so the City did not reach Preliminary compliance.

To evaluate Preliminary compliance with ¶544, the IMT reviewed the City's, the CPD's, and COPA's policies following the policy process described in the Consent Decree (¶¶626–41), which details applicable consultation, resolution, workout, and public comment periods.[260] For Secondary compliance, we reviewed various data sources, including Quarterly and Annual Reports to determine if those reports comply with the policies aimed at promoting transparency, and determined whether the entities are engaging with the community related to their policies and directives. For Full compliance we sought to determine whether the entities continued to prioritize and take steps toward increasing transparency, including but not limited to continuing efforts to timely produce reports, providing information to the community, and identifying on their own means to increase transparency.

The CPD has not yet provided materials related to ¶544.

[260] The OAG, the City, and the IMT agreed to a stipulation that provides a different review process for review of COPA policies and training materials. *See Stipulation Regarding the Policy and Training Review Process for COPA*, *Illinois v. Chicago*, Case No. 1:17-cv-06260 (Jan. 30, 2020). The review process in the Stipulation mirrors the review process under ¶¶626–41, but among other things, gives the OAG and the IMT a shorter timeframe for review of COPA policies and training materials.

In the fifth reporting period, COPA revised and finalized its *Transparency Initiatives – Release of Video and Related Materials* policy. This policy requires COPA to make public the results of its investigations, and complete and post quarterly and annual reports that summarize data including information on complaint intake and investigation resolutions. In addition, COPA's *Quality Assurance* policy, which was finalized in the fourth reporting period, further strengthens COPA's preliminary compliance with ¶544 by requiring that COPA receive comments from its public working group regarding policies, post policies for public comment, and publish quarterly and annual reports on aggregate investigative data. With these policies, COPA reached Preliminary compliance.

As discussed in more detail in the assessment of ¶550, COPA has consistently produced timely quarterly and annual reports that provide agency background information, agency goals, information on policies and training, and extensive data regarding intake of complaint, investigation processes and timelines and investigation outcomes. In addition, COPA has consistently used its community working group to review and refine draft polices. Once policies are drafted and revised, COPA has consistently posted policies for further public comment. These efforts demonstrate a commitment to transparency, and move COPA into Secondary compliance.

Moving forward, we will look for the CPD to develop policies that instruct compliance with the goals set out in ¶544. For COPA we will look for evidence that it continues to prioritize transparency by timely providing information to the public, and self-assessing how it can further improve transparency with the public.

Paragraph 544 Compliance Progress History

FIRST REPORTING PERIOD	SECOND REPORTING PERIOD	THIRD REPORTING PERIOD
SEPTEMBER 1, 2019 – AUGUST 31, 2019	SEPTEMBER 1, 2019 – FEBRUARY 29, 2020	MARCH 1, 2020 – DECEMBER 31, 2020
COMPLIANCE PROGRESS:	COMPLIANCE PROGRESS:	COMPLIANCE PROGRESS:
Not Applicable	Not Applicable	Not Applicable
FOURTH REPORTING PERIOD	**FIFTH REPORTING PERIOD**	**SIXTH REPORTING PERIOD**
JANUARY 1, 2021 – JUNE 30, 2021	JULY 1, 2021 – DECEMBER 31, 2021	JANUARY 1, 2022 – JUNE 30, 2022
COMPLIANCE PROGRESS:	COMPLIANCE PROGRESS:	COMPLIANCE PROGRESS:
Not Applicable	Not Applicable	None

Accountability and Transparency: ¶545

545. *To the extent permissible by law, within 60 days of its implementation, each CPD policy and directive, including those created pursuant to this Agreement, will be posted online and otherwise made publicly available. Any exception will be limited to documents that must remain confidential to protect public safety, and as approved by the Superintendent.*

Compliance Progress (Reporting Period: January 1, 2022, through June 30, 2022)

Preliminary:	***Not in Compliance***
Secondary:	***Not Yet Assessed***
Full:	***Not Yet Assessed***

The City and the CPD did not reach Preliminary compliance with ¶545 in the sixth reporting period.

To evaluate Preliminary compliance with ¶545, the IMT reviewed the City's, the CPD's policies following the policy process described in the Consent Decree (¶¶626–41), which details applicable consultation, resolution, workout, and public comment periods.[261]

Progress before the Sixth Reporting Period

The City and the CPD did not reach any level of compliance with ¶545 in previous reporting periods. In the fourth reporting period, the CPD provided General Order G01-03, *Department Directives Systems*, which the CPD contended supports compliance with ¶545. We noted that the CPD did not consistently solicit, receive, or incorporate public comment into its various types of policies across units. While G01-03 directs the CPD to make some policies publicly available, G01-03 does not currently require the CPD to make each CPD policy and directive—including those created pursuant to the Consent Decree—publicly available. At the end of the fourth reporting period the collaborative review and revision process remained ongoing.

In the fifth reporting period, General Order G01-03, *Department Directives System*, remained in the collaborative review and revision process. We provided written comments to this policy and had extensive conversations with the CPD regarding

[261] The OAG, the City, and the IMT agreed to a stipulation that provides a different review process for review of COPA policies and training materials. *See Stipulation Regarding the Policy and Training Review Process for COPA*, *Illinois v. Chicago*, Case No. 1:17-cv-06260 (Jan. 30, 2020). The review process in the Stipulation mirrors the review process under ¶¶626–41, but among other things, gives the OAG and the IMT a shorter timeframe for review of COPA policies and training materials.

the policy. We noted our expectation that, per ¶545, each policy and directive, including but not limited to General Orders, Special Orders, Unit Directives, Standard Operating Procedures, or any other document or direction developed pursuant to the Consent Decree would be posted online and made public. We further stated our expectation that the CPD will develop a policy or directive that identifies the different policy and directive categories and specifies how each will be posted for public review to foster ongoing understanding of CPD operations. Because the CPD did not finalize such a policy, it did not reach Preliminary compliance with ¶545 in the fifth reporting period.

Progress in the Sixth Reporting Period

The CPD has 96 separate department directives listed on its website in a section titled "Draft Policy - Review and Comment." It is commendable that the CPD is currently placing its directives on its website for public review and comment in accordance with ¶545.

General Order G01-03, *Department Directives System*, directs the publishing of the policies and directives pursuant to the requirements of ¶545. However, while reviewing G01-03, the IMT observed that the policy is outdated in many areas and requires revisions to ensure that it reflects current practices. For example, G01-03 contains a section on Unit-Level directives—which are no longer used by the CPD—and does not include definitions for several levels of directives. While G01-03 addresses ¶545 by directing the publication of CPD policies and directives, the IMT strongly encourages the CPD to revise G01-03 in the next reporting period to bring the policy up-to-date. Furthermore, as we stated in the fifth reporting period, we expect CPD will develop a policy or directive that identifies the different policy and directive categories and specifies how each will be posted for public review to foster ongoing understanding of CPD operations.

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The City and the CPD did not reach Preliminary compliance with ¶545 in the sixth reporting period. In the next reporting period, we will look for the CPD to further revise and finalize G01-03, *Department Directives System*, to address the requirements of ¶545.

Paragraph 545 Compliance Progress History

FIRST REPORTING PERIOD
SEPTEMBER 1, 2019 – AUGUST 31, 2019
COMPLIANCE PROGRESS:
Not Applicable

SECOND REPORTING PERIOD
SEPTEMBER 1, 2019 – FEBRUARY 29, 2020
COMPLIANCE PROGRESS:
Not Applicable

THIRD REPORTING PERIOD
MARCH 1, 2020 – DECEMBER 31, 2020
COMPLIANCE PROGRESS:
Status Update

FOURTH REPORTING PERIOD
JANUARY 1, 2021 – JUNE 30, 2021
COMPLIANCE PROGRESS:
None

FIFTH REPORTING PERIOD
JULY 1, 2021 – DECEMBER 31, 2021
COMPLIANCE PROGRESS:
None

SIXTH REPORTING PERIOD
JANUARY 1, 2022 – JUNE 30, 2022
COMPLIANCE PROGRESS:
None

Accountability and Transparency: ¶546

546. *Within 180 days following the expiration of each calendar year of the term of this Agreement, the City will produce and publish an annual report describing CPD activity during the previous calendar year ("CPD Annual Report"). The purpose of the CPD Annual Report will be to inform the public of the City's law enforcement achievements and challenges, as well as new programs and steps taken to address challenges and build on successes. The CPD Annual Report will further provide information regarding the City's implementation and status of this Agreement. The CPD Annual Report will not include any specific information or data by law that may not be disclosed. Subject to applicable law, the CPD Annual Report will provide data and program updates analyzing: a. community engagement and problem-solving policing efforts, identifying successes, challenges, and recommendations for future improvement; b. stop, search, and arrest data and any analysis of that data that was undertaken; c. use-of-force data and associated analyses; d. CPD responses to requests for service from individuals in crisis; e. initiatives that CPD has implemented for officer assistance and support; f. recruitment efforts, challenges, and successes; and g. in-service and supplemental recruit training.*

Compliance Progress

(Reporting Period: January 1, 2022, through June 30, 2022)

Recurring Schedule: Annually ☑ **Not Yet Applicable**

Preliminary:	***Not in Compliance***
Secondary:	***Not Yet Assessed***
Full:	***Not Yet Assessed***

The City and the CPD did not reach Preliminary compliance with ¶546 during the sixth reporting period.

To evaluate Preliminary compliance with ¶546 we reviewed various data sources to determine whether the City developed the annual report within 180 days following the expiration of each calendar year, and whether the CPD has developed a policy regarding the compilation and publication of an Annual Report.

Progress before the Sixth Reporting Period

The City and the CPD did not meet Preliminary compliance with ¶546 in previous reporting periods.

In the third reporting period, we reviewed the 2019 CPD Annual Report. This report included information about CPD's organizational command but did not include information about some of the units that may be most interesting to the community, including the Force Review Unit, BIA, training, and the Crisis Intervention Team (CIT). The Annual Report extensively reported various crime statistics across 35 pages, but only dedicated one page to the work that the CPD does in and with the community as required by this paragraph.

At the end of the fourth reporting period, we noted that the City had until August 30, 2021, to produce its annual report. In the fifth reporting period, the CPD provided its Annual report in September 2021. Therefore, it missed the timeline set out by the paragraph and did not reach Preliminary compliance with ¶546 in the fifth reporting period. Additionally, we noted that the 2020 report was less robust than the 2019 Annual report which we found to lack detail required by ¶546. We noted our concern and hope in the fifth reporting period that the CPD would build on previous efforts to not only finalize and publish a timely report, but develop a report that improves upon previous reports. For these reasons, the City and the CPD did not reach Preliminary compliance with ¶546 in the fifth reporting period.

Progress in the Sixth Reporting Period

The CPD did not produce its Annual Report for 2021 by the end of the sixth reporting period. Therefore, it did not reach Preliminary compliance with ¶546 in the sixth reporting period. Additionally, the CPD has made no reference to the Annual Report in its discussions with IMT during this reporting period. We stress the role this Annual Report can serve in building a relationship with the community by providing transparency. The IMT believes that the CPD must develop a directive that requires publishing its Annual Report in a timely manner and in accordance with ¶546 and it subparagraphs.

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The City and the CPD did not reach Preliminary compliance with ¶546 in the sixth reporting period. Moving forward, we expect the CPD to develop a policy regarding the compilation and publication of an Annual Report and to finalize and publish a detailed and timely Annual Report.

Paragraph 546 Compliance Progress History

FIRST REPORTING PERIOD
SEPTEMBER 1, 2019 – AUGUST 31, 2019
COMPLIANCE PROGRESS:
Not Applicable

SECOND REPORTING PERIOD
SEPTEMBER 1, 2019 – FEBRUARY 29, 2020
COMPLIANCE PROGRESS:
Not Applicable

THIRD REPORTING PERIOD
MARCH 1, 2020 – DECEMBER 31, 2020
COMPLIANCE PROGRESS:
None

FOURTH REPORTING PERIOD
JANUARY 1, 2021 – JUNE 30, 2021
COMPLIANCE PROGRESS:
None

FIFTH REPORTING PERIOD
JULY 1, 2021 – DECEMBER 31, 2021
COMPLIANCE PROGRESS:
None

SIXTH REPORTING PERIOD
JANUARY 1, 2022 – JUNE 30, 2022
COMPLIANCE PROGRESS:
None

Accountability and Transparency: ¶547

547. *CPD will regularly analyze the information it collects regarding reportable uses of force to identify significant trends. CPD will include information about any such trends in the CPD Annual Report.*

Compliance Progress

(Reporting Period: January 1, 2022, through June 30, 2022)

Recurring Schedule: Annually ☑ **Not Yet Applicable**

Preliminary: ***Not in Compliance***
Secondary: ***Not Yet Assessed***
Full: ***Not Yet Assessed***

The City and the CPD did not reach Preliminary compliance with ¶547 during the sixth reporting period.

To assess Preliminary compliance with ¶547, we reviewed the CPD's relevant policies and records following the process described in the Consent Decree (¶¶626–41), which outlines applicable consultation, resolution, workout, and public comment periods.

Progress before the Sixth Reporting Period

The CPD has not reached Preliminary compliance with ¶547 in previous reporting periods. In the fifth reporting period, the CPD provided its Annual report in September 2021. The 2020 Report lacked the data required by ¶547. Therefore, the City and the CPD did not reach Preliminary compliance with ¶547 in the fifth reporting period.

Progress in the Sixth Reporting Period

As noted in ¶546, the CPD did not produce its Annual Report for 2021 by the end of the sixth reporting period. Therefore, the City and the CPD did not reach Preliminary compliance with ¶547, as no information was provided regarding trends in reportable uses of force. Additionally, the CPD has made no reference to the Annual Report in its discussions with IMT during this reporting period. We stress the role this Annual Report can serve in building a relationship with the community by providing transparency. The IMT believes that the CPD must develop a directive that requires publishing its Annual Report in a timely manner and in accordance with ¶¶546–47.

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For these reasons, the City and the CPD did not reach Preliminary compliance with ¶547.

Paragraph 547 Compliance Progress History

FIRST REPORTING PERIOD	SECOND REPORTING PERIOD	THIRD REPORTING PERIOD
SEPTEMBER 1, 2019 – AUGUST 31, 2019	SEPTEMBER 1, 2019 – FEBRUARY 29, 2020	MARCH 1, 2020 – DECEMBER 31, 2020
COMPLIANCE PROGRESS:	COMPLIANCE PROGRESS:	COMPLIANCE PROGRESS:
Not Applicable	Not Applicable	None

FOURTH REPORTING PERIOD	FIFTH REPORTING PERIOD	SIXTH REPORTING PERIOD
JANUARY 1, 2021 – JUNE 30, 2021	JULY 1, 2021 – DECEMBER 31, 2021	JANUARY 1, 2022 – JUNE 30, 2022
COMPLIANCE PROGRESS:	COMPLIANCE PROGRESS:	COMPLIANCE PROGRESS:
None	None	None

Accountability and Transparency: ¶548

548. *Within 180 days following the expiration of each calendar year of the term of this Agreement, the City will produce and publish an annual report describing certain legal activity involving CPD during the previous calendar year ("CPD Annual Litigation Report"). The CPD Annual Litigation Report will not include any specific information or data that may not be disclosed pursuant to applicable law. Subject to applicable law, the CPD Annual Litigation Report will address: a. a list of civil lawsuits in which the plaintiff(s) seek(s) to hold the City responsible for the conduct of one or more current or former CPD members and information that either (i) the lawsuit was concluded by final order and all opportunities for appellate review were exhausted, or (ii) any judgment was satisfied during the prior calendar year. This list will include civil lawsuits handled by the City's Department of Law's ("DOL's") Federal Civil Rights Division, as well as lawsuits handled by DOL's Torts Division if the complaint seeks relief associated with a vehicle pursuit, only. b. for each case identified in (a) above, the following information will be provided in spreadsheet or open-data format: i. case name; ii. case number; iii. the date the trial court entered the final order; iv. a list of the parties at the time the final order was entered; v. the nature of the order (e.g., dismissal with prejudice, summary judgment for plaintiff(s)/defendant(s), judgment of not liable, judgment of liable); vi. the amount of the compensatory and punitive damages awarded (if applicable); and vii. the amount of attorney's fees and costs awarded (if applicable). c. a list of civil lawsuits in which the plaintiff(s) seek(s) to hold the City responsible for the conduct of one or more current or former CPD members and a settlement was reached (including approval by City Council, if applicable) during the prior calendar year. This list will include civil lawsuits handled by DOL's Federal Civil Rights Division, as well as such lawsuits handled by DOL's Torts Division if the complaint seeks relief associated with a vehicle pursuit, only. d. for each case identified in (c) above, the following information will be provided in spreadsheet or open-data format: i. case name; ii. case number; iii. a list of the parties at the time the case was settled; iv. the amount of the settlement; and v. the amount of settlement allocated to attorney's fees and costs (if known). e. the amount of attorney's fees paid by the City during the prior calendar year to outside counsel engaged to defend the City and/or one or more current or former CPD members in civil lawsuits handled by DOL's Federal Civil Rights Division, as well as*

such lawsuits handled by DOL's Tort's Division if the complaint seeks relief associated with a vehicle pursuit, only. This amount will be presented in the aggregate. f. for all individually named defendants in the cases identified in (a) and (c) above, the status (e.g., pending with BIA/COPA/OIG or charges sustained, not sustained, unfounded, or exonerated by BIA/COPA/OIG) of any administrative investigation(s) by BIA, COPA, or OIG at the time the trial court entered its final order or the settlement was reached. g. the disposition of any felony criminal prosecutions of current or former CPD members from the previous year. h. the number of pending civil lawsuits that seek to hold the City responsible for one or more current or former CPD members that the City is defending. This number will include civil lawsuits handled by the Department of Law's Federal Civil Rights Division, as well as lawsuits handled by DOL's Torts Division if the complaint seeks relief associated with a vehicle only.

Compliance Progress

(Reporting Period: January 1, 2022, through June 30, 2022)

Recurring Schedule: Annually ☑ **Not Yet Applicable**

Preliminary: ***In Compliance*** **(THIRD REPORTING PERIOD)**
Secondary: ***Not in Compliance***
Full: ***Not Yet Assessed***

The City maintained Preliminary compliance with ¶548, but did not reach additional levels of compliance in the sixth reporting period.

To evaluate Preliminary compliance, we considered whether the City and the CPD produced and published the annual report as required by ¶548. To assess Secondary compliance, we reviewed various data sources to determine whether the City and the CPD developed the annual report within 180 days following the expiration of the calendar year. We reviewed that report for sufficiency, accuracy, and completeness as required by ¶548. We also considered whether the City has allocated sufficient resources to submit an annual report that meets the requirements of this paragraph.

Progress before the Sixth Reporting Period

The City and the CPD met Preliminary compliance with ¶548 in the third reporting period by producing the City's 2019 Annual Litigation Report, which was thorough and comprehensive. In the fifth reporting period, on December 31, 2021, the City and the CPD provided the 2020 Litigation Report, but failed to produce the report within the time frame required by ¶548. Despite the timing issues, the 2020 Litigation Report was comprehensive and provided significant detail for the reader,

including information such as the types of allegations against the CPD. This information is not only important for the City leaders and community members, but also an important source of data for CPD members. The 2020 Litigation Report covered all requirements of ¶548, but the report was produced late. We emphasized that, to achieve additional levels of compliance, the City must meet the deadlines required by ¶548.

Progress in the Sixth Reporting Period

The City did not produce this report by the end of the sixth reporting period. We expect to receive it in the seventh reporting period. We emphasize that the City should make efforts to produce the 2021 Litigation Report early in the seventh reporting period to move closer to the 180-day timeframe required by ¶548.

Paragraph 548 Compliance Progress History

FIRST REPORTING PERIOD	SECOND REPORTING PERIOD	THIRD REPORTING PERIOD
SEPTEMBER 1, 2019 – AUGUST 31, 2019	SEPTEMBER 1, 2019 – FEBRUARY 29, 2020	MARCH 1, 2020 – DECEMBER 31, 2020
COMPLIANCE PROGRESS:	COMPLIANCE PROGRESS:	COMPLIANCE PROGRESS:
Not Applicable	Not Applicable	Preliminary
FOURTH REPORTING PERIOD	**FIFTH REPORTING PERIOD**	**SIXTH REPORTING PERIOD**
JANUARY 1, 2021 – JUNE 30, 2021	JULY 1, 2021 – DECEMBER 31, 2021	JANUARY 1, 2022 – JUNE 30, 2022
COMPLIANCE PROGRESS:	COMPLIANCE PROGRESS:	COMPLIANCE PROGRESS:
Preliminary	Preliminary	Preliminary

Accountability and Transparency: ¶549

549. *As part of the CPD Annual Litigation Report, the City will analyze the data and trends collected, and include a risk analysis and resulting recommendations.*

Compliance Progress

(Reporting Period: January 1, 2022, through June 30, 2022)

Recurring Schedule: Annually ☑ **Not Yet Applicable**

Preliminary: ***In Compliance*** **(THIRD REPORTING PERIOD)**
Secondary: ***Not in Compliance***
Full: ***Not Yet Assessed***

The City and the CPD maintained Preliminary compliance with ¶549 but did not reach additional levels of compliance in the sixth reporting period.

To evaluate Preliminary compliance, we considered whether the City and the CPD produced and published the annual report as required by ¶548. To assess Secondary compliance, we reviewed various data sources to determine whether the City has developed an annual report within 180 days following the expiration of each calendar year that includes data and trends collected and a risk analysis and resulting recommendations. We reviewed the litigation report for sufficiency, accuracy, and completeness as required by ¶548 and ¶549. We also considered whether the City has allocated sufficient resources to submit an annual report that meets the requirements of this paragraph.

Progress before the Sixth Reporting Period

The City and the CPD met Preliminary compliance with ¶548 in the third reporting period. The City and the CPD provided the City's 2019 Annual Litigation Report which was thorough and comprehensive. Because this report is to be published on an annual basis, the IMT did not receive or further assess compliance with ¶548 and ¶549 in the fourth reporting period.

In the fifth reporting period, on December 31, 2021, the City and the CPD provided the 2020 Litigation Report, but failed to produce the report within the time frame required by ¶548 and ¶549. Despite the timing issues, we noted that the 2020 Litigation Report was comprehensive and provided significant detail for the reader and included a thorough Risk Analysis. Moving forward we encouraged the City to attempt to isolate and analyze data from cases arising in or after 2019, to the extent possible, in order to identify trends and make recommendations for training for the CPD.

We explained in the fifth reporting period that while the 2020 Litigation Report was an extensive and detailed report providing helpful information to the public, the report was produced late. We emphasized that, to achieve additional levels of compliance, the City must meet the deadlines required by ¶548 and ¶549.

Progress in the Sixth Reporting Period

The City did not produce an annual litigation report by the end of the sixth reporting period. We expect to receive it in the seventh reporting period. We emphasize that the City should make efforts to produce the 2021 Litigation Report early in the seventh reporting period to move closer to the 180-day timeframe required by ¶548.

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To achieve additional levels of compliance the City must meet the deadlines required by ¶548.

Paragraph 549 Compliance Progress History

FIRST REPORTING PERIOD	SECOND REPORTING PERIOD	THIRD REPORTING PERIOD
SEPTEMBER 1, 2019 – AUGUST 31, 2019	SEPTEMBER 1, 2019 – FEBRUARY 29, 2020	MARCH 1, 2020 – DECEMBER 31, 2020
COMPLIANCE PROGRESS:	COMPLIANCE PROGRESS:	COMPLIANCE PROGRESS:
Not Applicable	Not Applicable	Preliminary
FOURTH REPORTING PERIOD	**FIFTH REPORTING PERIOD**	**SIXTH REPORTING PERIOD**
JANUARY 1, 2021 – JUNE 30, 2021	JULY 1, 2021 – DECEMBER 31, 2021	JANUARY 1, 2022 – JUNE 30, 2022
COMPLIANCE PROGRESS:	COMPLIANCE PROGRESS:	COMPLIANCE PROGRESS:
Preliminary	Preliminary	Preliminary

Accountability and Transparency: ¶550

550. *By April 2020, CPD and COPA will electronically publish quarterly and annual reports that will include, at a minimum, the following: a. aggregate data on the classification of allegations, self-reported complainant demographic information, and complaints received from anonymous or third party complainants; b. aggregate data on complaints received from the public, specified by district or unit of assignment and subcategorized by classification of allegations; c. aggregate data on the processing of investigations, including: i. The average time from the receipt of the complaint by COPA, BIA, or the district to the next or initial contact with the complainant or his or her representative; ii. the average time from the investigative findings and recommendations to the final disciplinary decision; iii. the average time from the investigative findings and recommendations to a final disposition; and iv. the number of investigations closed based on the absence of a complainant affidavit, including the number of attempts (if any) to obtain an override affidavit in the absence of a signed complainant affidavit; d. aggregate data on the outcomes of administrative investigations, including the number of sustained, not sustained, exonerated, and unfounded allegations; the number of sustained allegations resulting in a non-disciplinary outcome; and the number resulting in disciplinary charges; e. aggregate data on discipline, including the number of investigations resulting in written reprimand, suspension, demotion, and termination; f. aggregate data on grievance proceedings arising from misconduct investigations, including: the number of cases grieved; the number of cases that proceeded before the Police Board; the number of cases that proceeded to arbitration; and the number of cases that were settled prior to a full evidentiary hearing, whether before the Police Board or in arbitration; g. aggregate data on outcomes of misconduct investigations by classification of allegations, broken down by self-reported race, gender, and age of the complainant and the CPD member; h. aggregate data on (i) the number of CPD members who have been the subject of more than two completed misconduct investigations in the previous 12 months, and (ii) the number of CPD members who have had more than one sustained allegation of misconduct in the previous 12 months, including the number of sustained allegations; i. aggregate data on CPD members who have been the subject, in the previous 12 months, of more than two complaints in the following classifications of alle-*

gations, regardless of the outcome of those complaint investigations: i. allegations of discriminatory policing based on an individual's membership or perceived membership in an identifiable group, based upon, but not limited to: race, physical or mental disability, gender, gender identity, sexual orientation, religion, and age; ii. allegations of excessive force; and iii. allegations of unlawful stops, searches and arrests; j. the disposition of misdemeanor criminal prosecutions of current CPD members.

Compliance Progress

(Reporting Period: January 1, 2022, through June 30, 2022)

Recurring Schedule:	Quarterly	☐ **Met**	☑ **Missed**
Recurring Schedule:	Annually	☐ **Met**	☑ **Missed**

Preliminary:		***In Compliance*** **(FIFTH REPORTING PERIOD)**[262]
	CPD	***In Compliance*** **(FOURTH REPORTING PERIOD)**
	COPA	***In Compliance*** **(FIFTH REPORTING PERIOD)**
Secondary:		***In Compliance*** **(FIFTH REPORTING PERIOD)**
	CPD	***In Compliance*** **(FIFTH REPORTING PERIOD)**
	COPA	***In Compliance*** **(FIFTH REPORTING PERIOD)**
Full:		***Not in Compliance***
	CPD	***Not in Compliance***
	COPA	***In Compliance*** **(NEW)**

The City maintained Preliminary and Secondary compliance with ¶550 in the sixth reporting period.

To evaluate Preliminary compliance, we reviewed various data sources to determine whether the CPD and COPA developed quarterly and annual reports that are sufficient, accurate and complete as required by ¶550. To evaluate Secondary compliance, we considered whether the CPD and COPA have allocated sufficient resources to submit quarterly and annual reports that meet the requirements of ¶550. To evaluate Full compliance, we considered whether CPD's and COPA's quarterly and annual reports sufficiently capture the requirements of this paragraph, including but not limited to the timeliness of such reports, and reviewed quarterly and annual reports for sufficiency, accuracy, and completeness for the requirements of this paragraph prior to publication.

[262] As referenced above, the Consent Decree requires actions by various City entities, including the CPD, COPA, the Police Board, and the Office of the Inspector General. Ultimately, the City is responsible for ensuring compliance. As a result, if a Consent Decree paragraph requires actions by multiple City entities, we will not find that the City has met Preliminary, Secondary, or Full compliance until all those entities have met the corresponding level of compliance. Nonetheless, for some paragraphs, we will clarify compliance assessments for each entity to demonstrate which benchmarks have been met.

Progress before the Sixth Reporting Period

In previous reporting periods, the CPD provided several quarterly reports which were easy to read and understandable. These reports demonstrate a commitment to transparency and building trust, internally and externally in BIA's operations. Notably the Third Quarter Report covered all requirements of ¶550 except subsection (c)(i). We reported that BIA, by the end of the fourth reporting period, was continuing to develop data related to this requirement and intended to include it in future reports. We found that BIA was in Preliminary compliance based on its second and third quarterly reports, with the understanding that BIA would develop and include information delineated in ¶550(c)(i) in its next reporting period.

In the fifth reporting period, BIA produced its Fourth Quarter Report for 2020. This report demonstrated continued improvement and standardization of quarterly reports. It provided the reader with a consistent and easy-to-follow format. This report addressed every subparagraph and requirement of ¶550. BIA also provided its Annual Report in December 2021. This report completely addressed the requirements of all of ¶550's subparagraphs. The annual report was a strong first attempt at an annual report and we applauded BIA for these efforts. We noted, however, that detracting from the impressive report was the time that it took for BIA to produce the report. Moving forward, we noted our anticipation that BIA would produce the annual report more quickly after the close of year. More timely production of these reports will be necessary for Full compliance.

In addition to the reports, the CPD finalized General Order G08-01, *Complaint and Disciplinary System*, in the fifth reporting period. We noted that Section VIII addressed ¶550 completely. We noted our belief that this section of G08-01 was of particular importance, and therefore warranted a stand-alone directive to instruct completion of quarterly and annual reports. During the review and revision process, we voiced these concerns and the CPD appeared receptive to developing such a directive. We noted our anticipation that the CPD would develop this directive in the sixth reporting period.

With respect to COPA, at the end of the fourth reporting period, we noted that COPA continued to develop, refine, and publish its quarterly and annual reports. However, COPA's reports did not address all requirements set forth in ¶550(a), (c–g), and (i)–(j). COPA's 2021 Second Quarter Report aimed to address these gaps, but was not completed until after the close of the fourth reporting period. We recommended that COPA develop a policy directing continued publishing of quarterly and annual reports.

COPA, in the fifth reporting period, produced a timely and accurate report within 15 days of the close of the Third Quarter. The report included all data outlined by ¶550 that COPA is able to maintain. As COPA has explained, it does not house the data contemplated by subparagraphs (f) and (j). Instead BIA has this information,

and as noted above, BIA has reported this information. With this, COPA demonstrated in the fifth reporting period that it could provide the information available to it that is contemplated by the paragraph, and COPA established its ability to quickly and consistently publish reports required by ¶550. With this, BIA and COPA reached Secondary compliance with ¶550 in the fifth reporting period.

Progress in the Sixth Reporting Period

This reporting period, the City and the CPD provided S08-01-01, *Log Number Case Management System*.[263] The IMT submitted a no-objection notice with comments on June 3, 2022.[264] Section IV of this policy addresses ¶550 and its subparagraphs by listing the information that must be included in the CPD's quarterly and annual reports; however, the policy does not specifically direct the CPD to *publish* quarterly and annual reports as required by ¶550. We encourage the CPD to make this revision. This policy remained in the collaborative review and revision process at the end of the sixth reporting period. While not required by the Consent Decree, the IMT continues to be concerned that the CPD and BIA do not include the demographic information of officers who are accused of misconduct in the report. The IMT continues to strongly recommend, as it has for the past three years, that the CPD develop a department directive that addresses the regular and timely publication of quarterly and annual reports with this information.

In the sixth reporting period, the CPD has only produced quarterly reports for the first two quarterly reports of 2021 and has not produced its 2021 Annual Report. The first and second quarterly reports provide consistent data and address every subparagraph of ¶550, but do not address the requirements of ¶551. As we explained last reporting period, the CPD and BIA must begin finalizing and publishing their reports in a timelier manner. We believe BIA should be able to produce these

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263 In the sixth reporting period, the CPD informed the IMT and the OAG that BIA would begin to move away from Unit Directives. Instead of Unit Directives, instruction will be provided in General Orders and Special Orders. This applies to the BIA Unit Directives that we reviewed, and in some instances provided no-objection notices to in previous reporting periods. The CPD began this process in sixth reporting period, and incorporated instruction previously included in the BIA Directive *Case Management System* into S08-01-01. This process of incorporating Unit Directives into General Orders and Special Orders is ongoing.

264 Under the Consent Decree policy review process, the City and the CPD consult with the IMT and the OAG to develop or revise policies in accordance with Consent Decree requirements. *See* ¶¶626–37. The City and the CPD provide the policy for review at least 30 days before the policy is scheduled to go into effect, and the IMT and the OAG have 30 days to comment on the policy. *See* ¶¶627–28. The City, the CPD, the IMT, and the OAG then work together to resolve comments. The IMT and the OAG will, separately and in writing, notify the City and the CPD that they no longer have any comments, which is referred to as a "no-objection notice." Once the City and the CPD receive a no-objection notice from both the IMT and the OAG, the City and the CPD will begin the process of finalizing the policy. Typically, this includes the CPD posting the policy on its website for public comment for at least 15 days. The City and the CPD must then consider those comments and make additional changes, as appropriate. *See* ¶633.

reports more quickly since they have developed a consistent report format. The CPD and BIA will not reach Full compliance until they begin finalizing and publishing their reports in a timelier manner.

In the sixth reporting period, COPA continued to publish timely and accurate quarterly and annual reports on the COPA website within 15 days of the end of the reporting period. The First Quarter 2021 Report is consistent with previous COPA quarterly reports and includes improved information on pending investigations and Consent Decree compliance and training, among other topics. The data is accurate and current and addresses every subparagraph of ¶550 except ¶550(f) and (j) which COPA, the data for which COPA does not house, but the BIA has this information and includes it in reports. COPA produced its 2021 Annual Report on February 15, 2022, continuing COPA's commitment to providing its Annual Reports in a timely manner. The 2021 Annual Report builds upon the quarterly reports and includes relevant information regarding COPA leadership changes, agency goals, and COPA policy, training, and data.

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The CPD maintained Preliminary and Secondary compliance with ¶550 in the sixth reporting period, and COPA reached Full compliance. Moving forward, we will look for BIA to continue to publish reports but to do so in a timelier manner. We also strongly suggest that the CPD develop a department policy that directs the regular and timely publication of quarterly and annual reports. For COPA we will look for evidence that it continues to publish an Annual Report containing the information contemplated by ¶550.

Paragraph 550 Compliance Progress History

FIRST REPORTING PERIOD	SECOND REPORTING PERIOD	THIRD REPORTING PERIOD
SEPTEMBER 1, 2019 – AUGUST 31, 2019	SEPTEMBER 1, 2019 – FEBRUARY 29, 2020	MARCH 1, 2020 – DECEMBER 31, 2020
COMPLIANCE PROGRESS:	COMPLIANCE PROGRESS:	COMPLIANCE PROGRESS:
Not Applicable	Not Applicable	None
FOURTH REPORTING PERIOD	**FIFTH REPORTING PERIOD**	**SIXTH REPORTING PERIOD**
JANUARY 1, 2021 – JUNE 30, 2021	JULY 1, 2021 – DECEMBER 31, 2021	JANUARY 1, 2022 – JUNE 30, 2022
COMPLIANCE PROGRESS:	COMPLIANCE PROGRESS:	COMPLIANCE PROGRESS:
None	Secondary	Secondary

Accountability and Transparency: ¶551

551. *BIA's quarterly and annual reports will include data reflecting investigations conducted by the districts.*

Compliance Progress

(Reporting Period: January 1, 2022, through June 30, 2022)

Recurring Schedule:	Quarterly	☐	**Met**	☑	**Missed**
Recurring Schedule:	Annually	☐	**Met**	☑	**Missed**

Preliminary:	***In Compliance*** **(FIFTH REPORTING PERIOD)**
Secondary:	***Not in Compliance***
Full:	***Not Yet Assessed***

The City and the CPD maintained Preliminary compliance with ¶551 in the sixth reporting period.

To evaluate Preliminary compliance with ¶551, the IMT reviewed the CPD's policies following the policy process described in the Consent Decree (¶¶626–41). To assess Secondary compliance, we reviewed various data sources to determine whether the CPD has allocated resources to include data reflecting investigations conducted by the districts on a quarterly and annual basis.

Progress before the Sixth Reporting Period

In earlier reporting periods, BIA did not have means to track this information, making compliance with this paragraph not feasible. But in the fourth reporting period, BIA indicated that it had developed means to provide information required by ¶551.

In the fourth reporting period, we also reviewed the draft BIA Unit Directive, *Case Management System*. This draft policy addressed the requirements of ¶551. At the close of the fourth reporting period, this Unit Directive remained in the collaborative review process. We expressed our expectation that upon receiving a no-objection notice, BIA would post the directive for public comment and thereafter finalize the policy.[265]

[265] In the sixth reporting period, the CPD informed the IMT and the OAG that BIA would begin to move away from Unit Directives. Instead of Unit Directives, instruction will be provided in General Orders and Special Orders. This applies to the BIA Unit Directives that we reviewed, and in some instances provided no-objection notices to in previous reporting periods. The CPD began this process in sixth reporting period, and the process is ongoing.

In the fifth reporting period, the CPD made significant revisions to General Order G08-01, *Complaint and Disciplinary System*. After the CPD completed extensive revisions, we submitted a no-objection notice to G08-01.[266] After posting the policy for public comment, the CPD finalized the policy on December 31, 2021. Section VIII.C codifies the requirements of ¶551. We explained that while this is beneficial, BIA quarterly and annual reports did not yet comply with ¶551 or G08-01.

During the fifth reporting period we received and reviewed BIA's Fourth Quarter 2020 Report. While this quarterly report included data regarding investigations conducted by the districts, the data was not broken out to reflect the number or type of investigations that occurred in the districts. We also received BIA's Annual Report for 2020. The 2020 Annual report partially addressed ¶551 in table four, by making it clear that the information presented represents investigations by BIA and the District Accountability Sergeants. Additionally, table 11 in the report provided aggregate data for the districts but did not indicate which cases were conducted by Accountability Sergeants and BIA investigators. We noted that we understood that BIA was unable to extract the data as required by ¶551 and as required by G08-01 at that time. We explained that we hoped to see this remedied in the sixth reporting period.

Progress in the Sixth Reporting Period

This reporting period, we reviewed BIA's First and Second Quarter 2021 Reports. These reports do not address ¶551's requirement that BIA's quarterly and annual reports will include data reflecting investigations conducted by the districts.

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The City and the CPD maintained Preliminary compliance with ¶551 in the sixth reporting period, but did not achieve Secondary compliance. In the coming reporting periods, we will look for BIA to provide quarterly and annual reports that comply with the requirements of ¶551.

[266] Under the Consent Decree policy review process, the City and the CPD consult with the IMT and the OAG to develop or revise policies in accordance with Consent Decree requirements. *See* ¶¶626–37. The City and the CPD provide the policy for review at least 30 days before the policy is scheduled to go into effect, and the IMT and the OAG have 30 days to comment on the policy. *See* ¶¶627–28. The City, the CPD, the IMT, and the OAG then work together to resolve comments. The IMT and the OAG will, separately and in writing, notify the City and the CPD that they no longer have any comments, which is referred to as a "no-objection notice." Once the City and the CPD receive a no-objection notice from both the IMT and the OAG, the City and the CPD will begin the process of finalizing the policy. Typically, this includes the CPD posting the policy on its website for public comment for at least 15 days. The City and the CPD must then consider those comments and make additional changes, as appropriate. *See* ¶633.

Paragraph 551 Compliance Progress History

FIRST REPORTING PERIOD	SECOND REPORTING PERIOD	THIRD REPORTING PERIOD
SEPTEMBER 1, 2019 – AUGUST 31, 2019	SEPTEMBER 1, 2019 – FEBRUARY 29, 2020	MARCH 1, 2020 – DECEMBER 31, 2020
COMPLIANCE PROGRESS:	COMPLIANCE PROGRESS:	COMPLIANCE PROGRESS:
Not Applicable	Not Applicable	None

FOURTH REPORTING PERIOD	FIFTH REPORTING PERIOD	SIXTH REPORTING PERIOD
JANUARY 1, 2021 – JUNE 30, 2021	JULY 1, 2021 – DECEMBER 31, 2021	JANUARY 1, 2022 – JUNE 30, 2022
COMPLIANCE PROGRESS:	COMPLIANCE PROGRESS:	COMPLIANCE PROGRESS:
None	Preliminary	Preliminary

Accountability and Transparency: ¶552

552. *For non-disciplinary purposes, including historical trend analysis, CPD will track, for each CPD member, for every misconduct investigation: the nature of allegations, the outcome of the investigation, and the disposition of discipline.*

Compliance Progress (Reporting Period: January 1, 2022, through June 30, 2022)

Preliminary:	***Not in Compliance***
Secondary:	***Not Yet Assessed***
Full:	***Not Yet Assessed***

The City and the CPD did not reach Preliminary compliance with ¶552 in the sixth reporting period.

To evaluate Preliminary compliance with ¶552, the IMT reviewed the CPD's policies following the policy process described in the Consent Decree (¶¶626–41).

Progress before the Sixth Reporting Period

In the fourth reporting period, we reviewed BIA's draft *Case Management System* Unit Directive. We noted that this draft Unit Directive partially addressed the requirements set out in ¶552. We also stated our belief that the Case Management System provides the CPD with a path toward compliance with this paragraph, but the CPD would need a finalized directive directing compliance.

In the fourth and fifth reporting periods, we noted that BIA had a draft *Case Management System* Unit Directive that related to the requirements of ¶552; additional edits were needed to better address the paragraph. We noted in the fifth reporting period that this Unit Directive remained in the collaborative review and revision process.[267]

We also reviewed Department Notice, D20-04 *Operational Support System (OSS) Pilot Program* in the fifth reporting period. We stated that Section III.C.6 of D20-04 contributed to compliance with ¶552. However, since the program remained in the pilot status and did not fully address the requirements of ¶552, the CPD did not reach Preliminary compliance in the fifth reporting period.

[267] In the sixth reporting period, the CPD informed the IMT and the OAG that BIA would begin to move away from Unit Directives. Instead of Unit Directives, instruction will be provided in General Orders and Special Orders. This applies to the BIA Unit Directives that we reviewed, and in some instances provided no-objection notices to in previous reporting periods. The CPD began this process in sixth reporting period, and the process is ongoing.

Progress in the Sixth Reporting Period

This reporting period, the City and the CPD provided S08-01-01, *Log Number Case Management System*.[268] The IMT submitted a no-objection notice with comments on June 3, 2022. Section IV.D of this policy completely addresses the requirements of ¶552 by stating specifically that the CPD will track, for each CPD member, for every misconduct investigations: the nature of allegations, the outcome of the investigation, and the disposition of discipline. This policy remained in the collaborative review and revision process at the end of the sixth reporting period.

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The City and the CPD did not reach Preliminary compliance with ¶552 in the sixth reporting period. We will look for the CPD to finalize S08-01-01, which addresses ¶552, in the next reporting period.

Paragraph 552 Compliance Progress History

FIRST REPORTING PERIOD SEPTEMBER 1, 2019 – AUGUST 31, 2019 COMPLIANCE PROGRESS: Not Applicable	SECOND REPORTING PERIOD SEPTEMBER 1, 2019 – FEBRUARY 29, 2020 COMPLIANCE PROGRESS: Status Update	THIRD REPORTING PERIOD MARCH 1, 2020 – DECEMBER 31, 2020 COMPLIANCE PROGRESS: Status Update
FOURTH REPORTING PERIOD JANUARY 1, 2021 – JUNE 30, 2021 COMPLIANCE PROGRESS: None	FIFTH REPORTING PERIOD JULY 1, 2021 – DECEMBER 31, 2021 COMPLIANCE PROGRESS: None	SIXTH REPORTING PERIOD JANUARY 1, 2022 – JUNE 30, 2022 COMPLIANCE PROGRESS: None

[268] In the sixth reporting period, the CPD informed the IMT and the OAG that BIA would begin to move away from Unit Directives. Instead of Unit Directives, instruction will be provided in General Orders and Special Orders. This applies to the BIA Unit Directives that we reviewed, and in some instances provided no-objection notices to in previous reporting periods. The CPD began this process in sixth reporting period, and incorporated instruction previously included in the BIA Directive *Case Management System* into S08-01-01. This process of incorporating Unit Directives into General Orders and Special Orders is ongoing.

Accountability and Transparency: ¶553

553. *Beginning in 2020, CPD will audit, on at least an annual basis, the investigation and disciplinary process involving complaints investigated by BIA and the districts to ensure that the investigations are conducted in accordance with BIA policies and this Agreement. The audits will include completed investigations and the recommendations of discipline. CPD will make public any of the audit findings, ensuring that any personally identifiable information is redacted.*

Compliance Progress

(Reporting Period: January 1, 2022, through June 30, 2022)

Recurring Schedule: Annually ☑ **Not Yet Applicable**

Preliminary: ***In Compliance*** **(THIRD REPORTING PERIOD)**
Secondary: ***Not in Compliance***
Full: ***Not Yet Assessed***

The City and the CPD maintained Preliminary compliance with ¶553 in the sixth reporting period, but did not reach additional levels of compliance.

To evaluate Preliminary compliance with ¶553, the IMT reviewed the CPD's relevant policies and documents following the process described in the Consent Decree (¶¶626–41). To evaluate Secondary compliance, we reviewed annual audits to determine whether the annual audits are sufficient and made public as required by this paragraph.

Progress before the Sixth Reporting Period

The CPD met Preliminary compliance with ¶553 in the third reporting period because the CPD Audit Division completed its annual report, CD-553-2020, *Review of Data on Investigations Into Allegations Made Against Department Members* (2019).

In the fourth reporting period, we received a draft of BIA's *Case Management System* Unit Directive. The draft Unit Directive addressed the requirements of ¶553, but remained in the collaborative review and revision process at the end of the reporting period. Notwithstanding the status of the Unit Directive, we noted that the requirements of ¶553 should be addressed in a department-wide directive.

We also reviewed G08-01, *Complaint and Disciplinary System* in the fourth reporting period, which directed compliance with ¶553. Like the Unit Directive, this General Order remained in the review and revision process at the close of the fourth reporting period.

In the fifth reporting period, the CPD completed extensive revisions to General Order G08-01, *Complaint and Disciplinary System*. After those revisions, we submitted a no-objection notice to the directive.[269] Thereafter the CPD published the directive for public comment and, on December 31, 2021, finalized the directive. With the finalization of G08-01, the City and the CPD maintained Preliminary compliance with ¶553 in the fifth reporting period. While this is sufficient to maintain Preliminary compliance, we encouraged the CPD to develop a standalone directive guiding audits and reporting.

We also received and reviewed the Audit Division's *Audit of 2020 Investigation Timeframe Requirements* in the fifth reporting period. We stated that this audit was well done. It noted many of the areas requiring significant additional work on the part of BIA to reach compliance with several Consent Decree Paragraphs—namely those related to reporting through the Case Management System. We expressed concern that this audit was not released for over eleven months after the close of the year, and stated our expectation that annual audits will be provided in a timelier manner in the future. Still, we noted our appreciation of the thorough audit, which provided the CPD with focus points for improvement. We stated our anticipation that CPD will begin providing regular reports on the status of correcting the deficiencies noted in the audit early in and throughout the sixth reporting period.

Progress in the Sixth Reporting Period

This reporting period, the City and the CPD provided S08-01-01, *Log Number Case Management System*.[270] The IMT submitted a no-objection notice with comments on June 3, 2022. Section IV.F.2 of this policy addresses ¶553, although the CPD did

[269] Under the Consent Decree policy review process, the City and the CPD consult with the IMT and the OAG to develop or revise policies in accordance with Consent Decree requirements. *See* ¶¶626–37. The City and the CPD provide the policy for review at least 30 days before the policy is scheduled to go into effect, and the IMT and the OAG have 30 days to comment on the policy. *See* ¶¶627–28. The City, the CPD, the IMT, and the OAG then work together to resolve comments. The IMT and the OAG will, separately and in writing, notify the City and the CPD that they no longer have any comments, which is referred to as a "no-objection notice." Once the City and the CPD receive a no-objection notice from both the IMT and the OAG, the City and the CPD will begin the process of finalizing the policy. Typically, this includes the CPD posting the policy on its website for public comment for at least 15 days. The City and the CPD must then consider those comments and make additional changes, as appropriate. *See* ¶633.

[270] In the sixth reporting period, the CPD informed the IMT and the OAG that BIA would begin to move away from Unit Directives. Instead of Unit Directives, instruction will be provided in General Orders and Special Orders. This applies to the BIA Unit Directives that we reviewed, and in some instances provided no-objection notices to in previous reporting periods. The CPD began this process in sixth reporting period, and incorporated instruction previously included in the BIA Directive *Case Management System* into S08-01-01. This process of incorporating Unit Directives into General Orders and Special Orders is ongoing.

not document it as such. This policy remained in the collaborative review and revision process at the end of the sixth reporting period.

While this policy addresses the text of ¶553, the CPD has much work to do to ensure that it can fulfill the requirements of this paragraph operationally. As we noted in Independent Monitoring Report 5, the BIA Audit Division's *Audit of 2020 Investigation Timeframe Requirements* indicates that BIA is not in operational compliance with many of the paragraphs which involve reporting requirements through the Case Management System. To achieve greater levels of compliance, the CPD must have these reporting systems in place. The 2020 Audit indicated that command officers are either not aware of policies and procedures they must adhere to, or do not follow policy and procedure.

In Independent Monitoring Report 5, we expressed our concern that this Audit was not released for over eleven months after the close of the year and that the CPD waited until two days before the end of the reporting period to produce the Audit to the IMT for review. The IMT expects that this Audit and production of this Audit will occur much earlier following each reporting period, and expects that future audits will include updates on the deficiencies identified in this Audit and will continue to identify other issues not identified or included in this Audit report. We suggest that future audits should include interviews and/or surveys with those responsible for following these policies to ensure that they are aware of and understand their responsibilities and obligations. The IMT looks forward to receiving the *Audit of 2021 Investigation Timeframe Requirements*, which we expect to be produced in the seventh reporting period.

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The City and the CPD maintained Preliminary compliance with ¶553 in the sixth reporting period. Moving forward, we will look for evidence that the audits are sufficient per the requirements of ¶553. We also encourage the CPD to publish the next audit in a timelier manner to not only inform its own effort toward reform but also to provide information for the public. Additionally, as we noted in Independent Monitoring Report 5, we encourage the CPD to develop a standalone directive guiding audits and reporting.

Paragraph 553 Compliance Progress History

FIRST REPORTING PERIOD	SECOND REPORTING PERIOD	THIRD REPORTING PERIOD
SEPTEMBER 1, 2019 – AUGUST 31, 2019	SEPTEMBER 1, 2019 – FEBRUARY 29, 2020	MARCH 1, 2020 – DECEMBER 31, 2020
COMPLIANCE PROGRESS:	COMPLIANCE PROGRESS:	COMPLIANCE PROGRESS:
Not Applicable	Not Applicable	Preliminary
FOURTH REPORTING PERIOD	**FIFTH REPORTING PERIOD**	**SIXTH REPORTING PERIOD**
JANUARY 1, 2021 – JUNE 30, 2021	JULY 1, 2021 – DECEMBER 31, 2021	JANUARY 1, 2022 – JUNE 30, 2022
COMPLIANCE PROGRESS:	COMPLIANCE PROGRESS:	COMPLIANCE PROGRESS:
Preliminary	Preliminary	Preliminary

Accountability and Transparency: ¶554

554. *OAG acknowledges that the City adopted a policy relating to the public release of video footage capturing weapons discharges and incidents involving death or serious bodily injury. Consistent with applicable law, the City will continue to ensure COPA publicly releases such video footage pursuant to the June 2016 Video Release Policy for the City of Chicago. The Video Release Policy will not supersede or otherwise limit the City's legal obligations pursuant to state and federal transparency laws, including the Illinois Freedom of Information Act, 5 ILCS 140/1 et seq.*

Compliance Progress

(Reporting Period: January 1, 2022, through June 30, 2022)

Preliminary:	***In Compliance*** **(FOURTH REPORTING PERIOD)**
Secondary:	***In Compliance*** **(FOURTH REPORTING PERIOD)**
Full:	***In Compliance*** **(FOURTH REPORTING PERIOD)**
Sustainment Period Ends	***June 30, 2023***

The City and COPA maintained Full compliance with ¶554 in the sixth reporting period.

To evaluate Preliminary compliance with ¶554, we reviewed the City's and COPA's relevant policies and documents following the process described in the Consent Decree (¶¶626–41).[271] To evaluate Secondary compliance, we reviewed the entities' training development, implementation, and evaluation. To evaluate Full compliance, we reviewed data sources to determine whether the City and COPA have implemented their policy and training to mobilize compliance with ¶554.

Progress before the Sixth Reporting Period

We assessed the City's compliance with ¶554 for the first time in fourth reporting period and found that the City reached compliance with the paragraph. In the fifth reporting period we reviewed a Video Release Policy submitted by the City in June 2021. The City also provided documentation on several CPD cases that have followed the policy. COPA also presented its Policy 2.1.2, *Transparency Initiatives-Release of Video and Related Materials*. We stated that this Policy completely and thoroughly addresses ¶554 and provides detail beyond that which is required by

[271] The OAG, the City, and the IMT agreed to a stipulation that provides a different review process for review of COPA policies and training materials. *See Stipulation Regarding the Policy and Training Review Process for COPA*, *Illinois v. Chicago*, Case No. 1:17-cv-06260 (Jan. 30, 2020). The review process in the Stipulation mirrors the review process under ¶¶626–41, but among other things, gives the OAG and the IMT a shorter timeframe for review of COPA policies and training materials.

the Consent Decree, including how and when information will be released. With this the City and COPA maintained Full compliance with ¶554 in the fifth reporting period.

Progress in the Sixth Reporting Period

The City and COPA maintained Full compliance in the sixth reporting period by continuing to implement policy and training addressing the requirements of ¶554, including COPA's Policy 2.1.2., *Transparency Initiatives – Release of Video and Related Materials* and COPA's online Case Data Portal.

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With this the City and COPA maintained Full compliance with ¶554 in the sixth reporting period.

Paragraph 554 Compliance Progress History

FIRST REPORTING PERIOD	SECOND REPORTING PERIOD	THIRD REPORTING PERIOD
SEPTEMBER 1, 2019 – AUGUST 31, 2019	SEPTEMBER 1, 2019 – FEBRUARY 29, 2020	MARCH 1, 2020 – DECEMBER 31, 2020
COMPLIANCE PROGRESS:	COMPLIANCE PROGRESS:	COMPLIANCE PROGRESS:
Not Applicable	Not Applicable	Not Applicable
FOURTH REPORTING PERIOD	**FIFTH REPORTING PERIOD**	**SIXTH REPORTING PERIOD**
JANUARY 1, 2021 – JUNE 30, 2021	JULY 1, 2021 – DECEMBER 31, 2021	JANUARY 1, 2022 – JUNE 30, 2022
COMPLIANCE PROGRESS:	COMPLIANCE PROGRESS:	COMPLIANCE PROGRESS:
Full	Full	Full

Accountability and Transparency: ¶555

555. *On an annual basis, the Police Board will track and publish case-specific and aggregate data about Police Board decisions. Such publications will contain and include, at minimum, the following: a. the date on which the investigating agency (COPA, BIA, district, or OIG) received the complaint or notification for investigation; b. the date of the Police Board hearing over which the hearing officer presided; c. the disciplinary recommendations and/or decisions (where applicable) made by COPA, BIA, the Superintendent, and the Police Board; d. the average time between the filing of disciplinary charges with the Police Board and the first day of hearing; e. the average time between the filing of disciplinary charges with the Police Board and the Police Board's decision; f. the average time between the date on which the investigating agency (COPA, BIA, district, or OIG) received the complaint for investigation and the Police Board's decision; g. the date of the alleged misconduct; h. the average time between the date of the alleged misconduct giving rise to the complaint or notification and the Police Board's decision; and i. whether any Police Board decision has been appealed to any state court and, if so, the court's final judgment.*

Compliance Progress (Reporting Period: January 1, 2022, through June 30, 2022)

Recurring Schedule:	Annually	✓ **Met**	☐ **Missed**

Preliminary:	***In Compliance*** **(THIRD REPORTING PERIOD)**
Secondary:	***In Compliance*** **(FIFTH REPORTING PERIOD)**
Full:	***In Compliance*** **(FIFTH REPORTING PERIOD)**
Sustainment Period Ends	***December 31, 2023***

The City and Police Board maintained Full compliance with ¶555 in the sixth reporting period.

To evaluate Preliminary compliance with ¶555, the IMT reviewed the Police Board's policies following the policy process described in the Consent Decree (¶¶626–41) and determined whether the Police Board tracked and annually published case-specific and aggregate data publications to meet the requirements of ¶555. To evaluate Secondary compliance with ¶555, we considered whether the Police Board has allocated sufficient resources to develop and publish the case specific and aggregate data on an annual basis as required by ¶555. To evaluate Full compliance, we determined whether the Police Board's annual publications sufficiently captured case specific and aggregate data about Police Board decisions.

Progress before the Sixth Reporting Period

In past reporting periods, we found the Police Board reached Preliminary compliance based on our review of information provided on the Police Board's website and the Police Board's Annual Reports for years 2017 through 2019, which is responsive to all subparagraphs of ¶555.

In the fifth reporting period, the Police Board continued to provide complete, up-to-date information in an excel spreadsheet housed on the Police Board website. The discipline spreadsheet indicates the number of cases filed with the Police Board in 2021. The excel sheet contains information responsive to all subparagraphs of ¶555. With this, the Police Board demonstrated that it is able to continuously provide, in a timely manner, the information contemplated by ¶555. This moved the Police Board into Full compliance in the fifth reporting period.

Progress in the Sixth Reporting Period

In the sixth reporting period, the Police Board continued to provide complete, up-to-date information in an excel spreadsheet housed on the Police Board website. The discipline spreadsheet indicates the number of cases filed with the Police Board in 2022. The excel sheet contains information responsive to all subparagraphs of ¶555. Additionally, the Police Board's website now provides more comprehensive information on the Police Discipline page, including Police Board decisions, reports, and data on Police Board cases; cases currently before the Police Board; and reviews of COPA and the CPD disagreements on discipline. In addition to this information, the Police Board submitted its *2021 Annual Report* in the sixth reporting period. The report reflects the information provided in the discipline spreadsheet and further provided comprehensive information regarding Police Board activities and disciplinary cases. With this, the Police Board maintained Full compliance with ¶555 in this reporting period.

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Moving forward, we will look for the Police Board to continue these efforts and provide information to the IMT to maintain compliance with ¶555.

Paragraph 555 Compliance Progress History

FIRST REPORTING PERIOD SEPTEMBER 1, 2019 – AUGUST 31, 2019 COMPLIANCE PROGRESS: Not Applicable	SECOND REPORTING PERIOD SEPTEMBER 1, 2019 – FEBRUARY 29, 2020 COMPLIANCE PROGRESS: Not Applicable	THIRD REPORTING PERIOD MARCH 1, 2020 – DECEMBER 31, 2020 COMPLIANCE PROGRESS: Preliminary
FOURTH REPORTING PERIOD JANUARY 1, 2021 – JUNE 30, 2021 COMPLIANCE PROGRESS: Preliminary	FIFTH REPORTING PERIOD JULY 1, 2021 – DECEMBER 31, 2021 COMPLIANCE PROGRESS: Full	SIXTH REPORTING PERIOD JANUARY 1, 2022 – JUNE 30, 2022 COMPLIANCE PROGRESS: Full

Accountability and Transparency: ¶556

556. *The Deputy PSIG will conduct periodic analysis and evaluations, and perform audits and reviews as authorized by Municipal Code of Chicago § 2-56-230.*

Compliance Progress

(Reporting Period: January 1, 2022, through June 30, 2022)

Preliminary:	***In Compliance*** **(THIRD REPORTING PERIOD)**
Secondary:	***In Compliance*** **(FOURTH REPORTING PERIOD)**
Full:	***In Compliance*** **(FOURTH REPORTING PERIOD)**
Sustainment Period Ends	***June 30, 2023***

The City and Deputy PSIG maintained Full compliance with ¶556 in the sixth reporting period**.**

To evaluate Preliminary compliance with ¶556 the IMT reviewed the PSIG's relevant policies and documents following the process described in the Consent Decree (¶¶626–41). To evaluate Secondary compliance, we reviewed, among other things, the Deputy PSIG's training development, implementation, and evaluation of training. For Full compliance, we evaluated various data sources to determine whether the PSIG sufficiently implemented its policy and training. To confirm that the Deputy PSIG maintained compliance with ¶556, we reviewed a memorandum submitted by the Deputy PSIG that detailed the audits and reviews completed by the Deputy PSIG.

Progress before the Sixth Reporting Period

In previous reporting periods, the Deputy PSIG reached Full Compliance with ¶556 by completing reviews and audits and detailing them in quarterly reports and the *Public Safety Section 2020 Annual Report.* We also reviewed the Deputy PSIG's *Public Safety Section Policies Manual*.

In November 2021, the Deputy PSIG provided a memorandum which provided evidence that the Deputy PSIG had continued to conduct periodic analysis and evaluations and perform audits and evaluations as authorized by the Municipal Code. With these efforts, the Deputy PSIG maintained Full compliance with ¶556 in the fifth reporting period.

Progress in the Sixth Reporting Period

In the sixth reporting period, the Deputy PSIG published its *2021 Annual Report*. This report showed the continued progress the Deputy PSIG has made in regard to the requirements of ¶556. The report was comprehensive, factual, and provides great detail to the community regarding the work PSIG conducted during 2021. Additionally, the report addresses specific analyses and evaluations that comply

with the requirements of ¶556 and are authorized by *Municipal Code of Chicago § 2-56-230*. The report also provides an overview of the evaluations and reviews PSIG conducted during 2021 and provides encouragement for the community to seek the actual reports for each evaluation for more detailed information. In addition, the Deputy PSIG also provided the following reports: *Report on Race-and Ethnicity-Based Disparities in the Chicago Police Department's Use of Force*, *Fairness and Consistency in the Disciplinary Process for CPD Members*, and *Advisory on Background Checks on Members of the Public*. With this, the City and Deputy PSIG maintained Full compliance with ¶556 in this reporting period.

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We look forward to the Deputy PSIG continuing its efforts in the seventh reporting period to maintain Full compliance with ¶556.

Paragraph 556 Compliance Progress History

FIRST REPORTING PERIOD	SECOND REPORTING PERIOD	THIRD REPORTING PERIOD
SEPTEMBER 1, 2019 – AUGUST 31, 2019	SEPTEMBER 1, 2019 – FEBRUARY 29, 2020	MARCH 1, 2020 – DECEMBER 31, 2020
COMPLIANCE PROGRESS:	COMPLIANCE PROGRESS:	COMPLIANCE PROGRESS:
Not Applicable	Not Applicable	Preliminary
FOURTH REPORTING PERIOD	**FIFTH REPORTING PERIOD**	**SIXTH REPORTING PERIOD**
JANUARY 1, 2021 – JUNE 30, 2021	JULY 1, 2021 – DECEMBER 31, 2021	JANUARY 1, 2022 – JUNE 30, 2022
COMPLIANCE PROGRESS:	COMPLIANCE PROGRESS:	COMPLIANCE PROGRESS:
Full	Full	Full

Accountability and Transparency: ¶557

557. *The Deputy PSIG's audits and reviews will be conducted pursuant to the Association of Inspectors General Principles and Standards for Offices of Inspector General.*

Compliance Progress

(Reporting Period: January 1, 2022, through June 30, 2022)

Preliminary:	***In Compliance*** **(THIRD REPORTING PERIOD)**
Secondary:	***In Compliance*** **(FOURTH REPORTING PERIOD)**
Full:	***In Compliance*** **(FOURTH REPORTING PERIOD)**
Sustainment Period Ends	***June 30, 2023***

The City and Deputy PSIG maintained Full compliance with ¶557 in the sixth reporting period**.**

To evaluate Preliminary compliance with ¶557 the IMT reviewed the PSIG's relevant policies and documents following the process described in the Consent Decree (¶¶626–41). To evaluate Secondary compliance, we reviewed, among other things, the CPD's training development, implementation, and evaluation. For Full compliance, we evaluated various data sources to determine whether the Deputy PSIG sufficiently implemented its policy and training. To confirm that the Deputy PSIG maintained compliance with ¶557, we reviewed a memorandum detailing how audits and reviews completed by the Deputy PSIG conformed to the Association of Inspector General Principles and Standards for Offices of Inspector Generals.

Progress before the Sixth Reporting Period

In the fourth reporting period, the Deputy PSIG reached Full compliance. The City and Deputy PSIG provided the Deputy PSIG's staff training materials and class rosters which demonstrated that the staff was well-trained, and therefore, well-prepared to fulfill the requirements of ¶557. We also reviewed a letter from the Association of the Inspectors General that concluded that the Investigations and APR sections comply with the major standards set by the Association of Inspectors General Principles and Standards for Offices of Inspector General Green Book and Yellow Book.

During the fifth reporting period, there was no change in the manner in which the Deputy PSIG followed the major standards set out by the Association of Inspector General Principles and Standards for Office of Inspector General Green Book and Yellow Book. In November 2021, the Deputy PSIG provided a memorandum that explained that the next Associate of Inspectors General peer review process was expected to occur in summer 2022. The Deputy PSIG also provided titles and web locations for six reports published since April 2021 that demonstrated the PSIG's

continued adherence to the Green Book standards. With these efforts, the Deputy PSIG maintained Full compliance with ¶557 in the fifth reporting period.

Progress in the Sixth Reporting Period

In the sixth reporting period, PSIG provided documentation that showed continued compliance with the requirements of ¶557. Additionally, PSIG submitted documentation regarding the standard, three-year peer review according to the AIG Principles and Standards for Offices of Inspector General. The peer review revealed that the Office of Inspector General and specifically PSIG adhere to the principles and standards of the Association of Inspector General Principles and that the peer review revealed no issues or problems.

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We look forward to the Deputy PSIG continuing its efforts to maintain Full compliance with ¶557 in the seventh reporting period.

Paragraph 557 Compliance Progress History

FIRST REPORTING PERIOD	SECOND REPORTING PERIOD	THIRD REPORTING PERIOD
SEPTEMBER 1, 2019 – AUGUST 31, 2019	SEPTEMBER 1, 2019 – FEBRUARY 29, 2020	MARCH 1, 2020 – DECEMBER 31, 2020
COMPLIANCE PROGRESS:	COMPLIANCE PROGRESS:	COMPLIANCE PROGRESS:
Not Applicable	Not Applicable	Preliminary
FOURTH REPORTING PERIOD	**FIFTH REPORTING PERIOD**	**SIXTH REPORTING PERIOD**
JANUARY 1, 2021 – JUNE 30, 2021	JULY 1, 2021 – DECEMBER 31, 2021	JANUARY 1, 2022 – JUNE 30, 2022
COMPLIANCE PROGRESS:	COMPLIANCE PROGRESS:	COMPLIANCE PROGRESS:
Full	Full	Full

Accountability and Transparency: ¶558

558. *Within 60 days of the Effective Date, the Deputy PSIG will develop policies for regularly, and at least annually, conducting data-driven reviews and audits to measure the effectiveness of the City and CPD's accountability practices. These reviews and audits will be designed to measure whether members of the community can readily make a complaint alleging misconduct and whether such complaints are investigated and adjudicated consistently with CPD policy, this Agreement, and the law. Reviews and audits will include: a. analysis of the number of complaints received, the disposition of complaints by complaint type, the timeliness and average length of administrative investigations, and disciplinary actions taken; b. analysis of complaint trends; c. analysis of CPD's enforcement of its Rule 14, Rule 21, and Rule 22; d. analysis of the thoroughness of administrative investigations, and of the justifications for terminating investigations before the investigative findings and recommendations; e. analysis of disciplinary grievance procedures and outcomes; and f. analysis of complainant-involved mediation.*

Compliance Progress (Reporting Period: January 1, 2022, through June 30, 2022)

Recurring Schedule:	At Least Annually	✓ **Met**	**Missed**

Preliminary:	***In Compliance*** **(FIRST REPORTING PERIOD)**
Secondary:	***In Compliance*** **(FOURTH REPORTING PERIOD)**
Full:	***In Compliance*** **(FOURTH REPORTING PERIOD)**
Sustainment Period Ends	***June 30, 2023***

The Deputy PSIG maintained Full compliance with ¶558 in the sixth reporting period.

To evaluate Preliminary compliance with ¶558, the IMT reviewed the Deputy PSIG's relevant policies and documents following the process described in the Consent Decree (¶¶626–41). To evaluate Secondary compliance, we reviewed, among other things, the CPD's training development, implementation, and evaluation. To evaluate Full compliance, we considered whether the Deputy PSIG completed the audits and reviews required by each subparagraph and performed these audits and reviews according to the Green Book, as well as whether the PSIG's policy manual reflects a requirement that the Deputy PSIG continues to do these audits and reviews at a frequency that complies with the paragraph and is consistent with its capabilities. Additionally, we evaluated whether the Deputy PSIG continued to track and provide data related to the requirements listed in ¶558 in its yearly project plan. The Deputy PSIG met Full compliance in the fourth reporting period. In

the fifth reporting period, we focused on confirming whether the Deputy PSIG maintained Full compliance. To do this, we reviewed a memorandum detailing PSIG's progress on reviews and audits contained in PSIG's policy related to the requirements of ¶558. We also reviewed the annual plan which includes discussion of plans for and status updates for work related to mobilizing ¶558 compliance.

Progress before the Sixth Reporting Period

The Deputy PSIG reached Full compliance in the fourth reporting period. As we explained in the fifth reporting period, the City of Chicago Office of Inspector General Public Safety Section *Policies Manual* directs that the Deputy PSIG will, among many other responsibilities, conduct data-driven review and audits of the City's and the CPD's accountability practices. Proposed reviews and audits include but are not limited to Service Call Response Times, Beat Integrity, Duty Restrictions for CPD Members, Compliance with Chicago's Welcoming Ordinance, Asset Forfeiture, Promotions, Inventory, Use and Impact of Military Grade Equipment and Homicide Clearance Rates.

We received evidence demonstrating that the Deputy PSIG engages the public in a variety of ways and on a variety of issues. The PSIG seeks community input through a variety of means regarding each report or audit it conducts. Because the PSIG demonstrated that it continued to track and provide data related to the requirements listed in ¶558 in its yearly project plan, the City and the Deputy PSIG met Full compliance with ¶558.

In the fifth reporting period, the Deputy PSIG continued to meet and exceed the requirements set out in ¶558. The Deputy PSIG provides up-to-date reports and audits on its websites. Its work ensures that BIA and COPA cases are properly investigated. The 2020 annual report provided detailed responses to the subparagraph. We anticipated that the Deputy PSIG would release its 2021 report during the sixth reporting period. With continued efforts that met all subparagraphs of ¶558, the Deputy PSIG maintained Full compliance in the fifth reporting period.

Progress in the Sixth Reporting Period

In the sixth reporting period, PSIG published its *Annual Report*, which was comprehensive, factual, and provides great detail to the community regarding the work PSIG conducted during 2021. The report specifically addressed analyses and evaluations that are directed by the requirements of ¶558. The report also provides an overview of the evaluations and reviews PSIG conducted during 2021 and provides encouragement for the community to seek the actual reports for each evaluation for more detailed information. Additionally, PSIG provided its *Public Safety Section Policies Manual* that fully addressed the requirements set forth in ¶558. The Deputy PSIG continues to meet and exceed the requirements set out in ¶558, and continues to provide up-to-date reports and audits on its website. With

this, the City and Deputy PSIG maintained Full compliance with ¶558 in this reporting period.

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We look forward to the Deputy PSIG continuing its efforts to maintain Full compliance with ¶558 in the seventh reporting period.

Paragraph 558 Compliance Progress History

FIRST REPORTING PERIOD SEPTEMBER 1, 2019 – AUGUST 31, 2019 COMPLIANCE PROGRESS: Preliminary	SECOND REPORTING PERIOD SEPTEMBER 1, 2019 – FEBRUARY 29, 2020 COMPLIANCE PROGRESS: Preliminary	THIRD REPORTING PERIOD MARCH 1, 2020 – DECEMBER 31, 2020 COMPLIANCE PROGRESS: Preliminary
FOURTH REPORTING PERIOD JANUARY 1, 2021 – JUNE 30, 2021 COMPLIANCE PROGRESS: Full	FIFTH REPORTING PERIOD JULY 1, 2021 – DECEMBER 31, 2021 COMPLIANCE PROGRESS: Full	SIXTH REPORTING PERIOD JANUARY 1, 2022 – JUNE 30, 2022 COMPLIANCE PROGRESS: Full

Accountability and Transparency: ¶559

559. *The Deputy PSIG will conduct reviews of individual closed COPA and CPD administrative investigative files for thoroughness, fairness, and objectivity, and will make recommendations based on those reviews, including the recommendation that an investigation be reopened upon a finding of a deficiency that materially affects the outcome of the investigation.*

Compliance Progress

(Reporting Period: January 1, 2022, through June 30, 2022)

Preliminary:	***In Compliance*** **(FOURTH REPORTING PERIOD)**
Secondary:	***In Compliance*** **(FOURTH REPORTING PERIOD)**
Full:	***In Compliance*** **(FOURTH REPORTING PERIOD)**
Sustainment Period Ends	***June 30, 2023***

The City and Deputy PSIG maintained Full compliance with ¶559 in the sixth reporting period**.**

To evaluate Preliminary compliance with ¶559, the IMT reviewed the Deputy PSIG's relevant policies and documents following the process described in the Consent Decree (¶¶626–41). To evaluate Secondary compliance we reviewed, among other things, the CPD's training development, implementation, and evaluation. To evaluate Full compliance, we reviewed various data sources including but not limited to PSIG's Policy Manual and observed PSIG's Virtual Case Intake Meeting to determine whether the Deputy PSIG sufficiently implemented its policy and training, including feedback the Deputy PSIG receives from its own personnel, CPD, and COPA regarding the processes for sampling, reviews, and recommendations.

The Deputy PSIG met Full compliance in the fourth reporting period. In the fifth reporting period, we focused on confirming whether the Deputy PSIG maintained Full compliance. To do this, the Deputy PSIG submits for review any recommendations to reopen investigation. We also reviewed a memorandum provided to us by the Deputy PSIG that provides summary statistics regarding PSIG's case review work.

Progress before the Sixth Reporting Period

In the fourth reporting period, the Deputy PSIG reached Full compliance with ¶559. The Deputy PSIG provided the revised City of Chicago Office of Inspector General Public Safety Section *Policies Manual* (*PSIG Policy Manual*), dated April 2021, that provides a complete review process for closed COPA and the CPD administrative investigative files. The review process includes reviews for completeness, objectivity, and fairness, including a detailed process for recommendations that investigations be reopened by COPA or the CPD, per ¶559. The *PSIG Policy*

Manual also requires Case Intake Meetings to include the specific PSIG members responsible for reviewing the closed case and supervisory PSIG personnel who discuss the cases and collectively determine whether a recommendation to reopen a case should be recommended to the CPD or COPA.

In the fourth reporting period, we also observed a PSIG Virtual Case Intake Meeting. All members required to attend per the *PSIG Policy Manual* were in attendance. This meeting was not unique but one of several such standing meetings. Beyond this, we also reviewed examples of administrative investigative files that reflected that the Deputy PSIG reviewed the administrative investigative files for thoroughness, fairness, and objectivity and made proper recommendations when necessary.

Because (1) the PSIG Policy Manual provided direction, (2) the Case Intake Meeting demonstrated that the policy is being followed, and (3) the provided administrative investigative file examples demonstrated that the policy and work sufficiently address the paragraph, we found the Deputy PSIG in Full compliance with ¶559.

Since reaching Full compliance, the Deputy PSIG has provided evidence that it continues to act in accordance with ¶559. Thus, the Deputy PSIG maintained Full compliance with ¶559 in the fifth reporting period.

Progress in the Sixth Reporting Period

In the sixth reporting period, the Deputy PSIG provided a memorandum containing statistics regarding its case review work. The Deputy PSIG demonstrated consistency in its case screening and reviews. Additionally, it demonstrated consistency in its recommendations to improve future disciplinary investigations and decisions. As a snapshot of its work, in the fourth quarter of 2021 and first quarter of 2022, the Deputy PSIG conducted 500 case screenings of closed BIA and COPA cases. It reopened 24 cases for further review. This information provides evidence that the Deputy PSIG has continued ¶559 compliant actions and efforts throughout the sixth reporting period. The Deputy PSIG maintained Full compliance with ¶559.

***

We look forward to the Deputy PSIG continuing its efforts to maintain Full compliance with ¶559 in the seventh reporting period.

Paragraph 559 Compliance Progress History

FIRST REPORTING PERIOD
SEPTEMBER 1, 2019 – AUGUST 31, 2019
COMPLIANCE PROGRESS:
Not Applicable

SECOND REPORTING PERIOD
SEPTEMBER 1, 2019 – FEBRUARY 29, 2020
COMPLIANCE PROGRESS:
Not Applicable

THIRD REPORTING PERIOD
MARCH 1, 2020 – DECEMBER 31, 2020
COMPLIANCE PROGRESS:
Not Applicable

FOURTH REPORTING PERIOD
JANUARY 1, 2021 – JUNE 30, 2021
COMPLIANCE PROGRESS:
Full

FIFTH REPORTING PERIOD
JULY 1, 2021 – DECEMBER 31, 2021
COMPLIANCE PROGRESS:
Full

SIXTH REPORTING PERIOD
JANUARY 1, 2022 – JUNE 30, 2022
COMPLIANCE PROGRESS:
Full

Accountability and Transparency: ¶560

560. *The Deputy PSIG will have timely and full access to all information in the possession or control of COPA, CPD, the Police Board, and any other City departments or agencies in order to conduct any review or audit within the Deputy PSIG's jurisdiction.*

Compliance Progress

(Reporting Period: January 1, 2022, through June 30, 2022)

Preliminary:	***In Compliance*** **(NEW)**
CPD	***In Compliance*** **(NEW)**
COPA	***In Compliance*** **(NEW)**
Police Board	***In Compliance*** **(NEW)**
Secondary:	***In Compliance*** **(NEW)**
CPD	***In Compliance*** **(NEW)**
COPA	***In Compliance*** **(NEW)**
Police Board	***In Compliance*** **(NEW)**
Full:	***Not Yet Assessed***
CPD	***Not Yet Assessed***
COPA	***Not Yet Assessed***
Police Board	***Not Yet Assessed***

This reporting period, the CPD, COPA, and the Police Board reached Secondary compliance with ¶560. With this, the City reached Secondary compliance.

To evaluate Preliminary compliance with ¶560, the IMT reviewed data sources relevant to compliance with the requirements of the paragraph and considered available data that is necessary or helpful to identify, verify, and sustain compliance and reform efforts. Specifically, the IMT looked for evidence that COPA, CPD, the Police Board, and any other City departments or agencies are aware of obligations to provide information to the Deputy PSIG and that they develop systems to share information and communicate with PSIG regarding their information needs. To evaluate Secondary compliance with ¶560, the IMT reviewed data sources to demonstrate that COPA, CPD, the Police Board, and any other City departments or agencies will timely provide access to information to PSIG. To assess Full compliance we looked at the entities' relevant policies and records following the process described in the Consent Decree (¶¶626-41), which outlines applicable consultation, resolution, workout, and public comment periods that instruct provisions of information to PSIG, and looked for evidence of each entity following that policy.

The sixth reporting period marked the first time the IMT assessed compliance with ¶560. The Deputy PSIG provided a memorandum that indicated it developed a method for data requests from the entities. Additionally, PSIG organized a twice monthly meeting with the CPD to discuss specific production requests made to the

CPD. The memorandum stated that in the sixth reporting period, PSIG made three production/document requests to COPA which were fully responded to in a timely fashion. PSIG made twelve document requests to CPD with ten that were responded and two that were being addressed in a timely fashion. Lastly, PSIG made one document request to the Police Board, which received a full and prompt response. All three entities are aware of their obligations to provide information to the Deputy PSIG and have developed systems to share the information and communicate with PSIG regarding their information needs. Additionally, all three entities have demonstrated their ability to timely provide access to information to PSIG. With this, COPA, the CPD, and the Police Board reached Secondary compliance with ¶560.

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In the seventh reporting period, we look forward to working with the CPD, COPA, and the Police Board to develop a policy that instructs compliance with ¶560 to determine whether information is adequately shared with the Deputy PSIG in accordance with the agency's respective policies.

Paragraph 560 Compliance Progress History

FIRST REPORTING PERIOD	SECOND REPORTING PERIOD	THIRD REPORTING PERIOD
SEPTEMBER 1, 2019 – AUGUST 31, 2019	SEPTEMBER 1, 2019 – FEBRUARY 29, 2020	MARCH 1, 2020 – DECEMBER 31, 2020
COMPLIANCE PROGRESS:	COMPLIANCE PROGRESS:	COMPLIANCE PROGRESS:
Not Applicable	Not Applicable	Not Applicable
FOURTH REPORTING PERIOD	**FIFTH REPORTING PERIOD**	**SIXTH REPORTING PERIOD**
JANUARY 1, 2021 – JUNE 30, 2021	JULY 1, 2021 – DECEMBER 31, 2021	JANUARY 1, 2022 – JUNE 30, 2022
COMPLIANCE PROGRESS:	COMPLIANCE PROGRESS:	COMPLIANCE PROGRESS:
Not Applicable	Not Applicable	Secondary

Accountability and Transparency: ¶561

561. *The Deputy PSIG will hire a full-time staff member responsible for diversity and inclusion issues, who will have specific authority to review CPD actions for potential bias, including racial bias, on any matter within the Deputy PSIG's statutory authority. The Deputy PSIG will regularly publish reports on diversity and inclusion issues, no less frequently than on an annual basis, which will contain findings and analysis.*

Compliance Progress

(Reporting Period: January 1, 2022, through June 30, 2022)

Recurring Schedule: At Least Annually ☑ **Met** ☐ **Missed**

Preliminary: ***In Compliance*** **(SECOND REPORTING PERIOD)**
Secondary: ***In Compliance*** **(FOURTH REPORTING PERIOD)**
Full: ***In Compliance*** **(FOURTH REPORTING PERIOD)**
Sustainment Period Ends ***June 30, 2023***

The City and the Deputy PSIG maintained Full compliance with ¶561 in the sixth reporting period**.**

To evaluate Preliminary compliance with ¶561, the IMT reviewed the Deputy PSIG's relevant policies and documents following the process described in the Consent Decree (¶¶626–41). To evaluate Secondary compliance, we reviewed data sources to determine if the Deputy PSIG had hired a member responsible for diversity and inclusion issues as described in ¶561, and we reviewed training materials to ensure the hired individual is properly trained to fulfill their obligations as outlined in ¶561. To evaluate Full compliance, we reviewed various data sources to determine whether the Deputy PSIG sufficiently implemented its policy and training, and we also confirmed that the required reports on diversity and inclusion issues are published as required by ¶561.

Progress before the Sixth Reporting Period

The Deputy PSIG reached Preliminary compliance with ¶561 in the second reporting period when it introduced a diversity, equity, and inclusion (DEI) framework across its various responsibilities. With this, the DEI officer provides DEI-anchored feedback in various areas of the Office of the Inspector General's work. In the third and fourth reporting periods the Deputy PSIG hired a new DEI Director. The DEI Director quickly got to work conducting audits and reviews of reports focusing on issues of diversity, equity, and inclusion. We reviewed the *Evaluation of the Demographic Impacts of the Chicago Police Department's Hiring Process* draft report, which was an example of the DEI Director's work, in the fourth reporting period. The report contained findings and recommendations regarding the demographic

impacts during the stages of the CPD hiring process. After reviewing this and other data sources provided by the Deputy PSIG, we found it had reached Full compliance with ¶561.

In the fifth reporting period, we reviewed a memorandum provided by the Deputy PSIG that provided details regarding the DEI Director's ongoing work. During the fifth reporting period, the Deputy PSIG published the *Evaluation of the Demographic Impacts of the Chicago Police Department's Hiring Process*, the draft of which we had reviewed in the fourth reporting period. We found that this report satisfied ¶561's annual reporting requirement. The memorandum also detailed projects that are being led by the DEI Director that review the CPD's operations for potential bias. With this evidence, the Deputy PSIG maintained Full compliance with ¶561 in the fifth reporting period.

Progress in the Sixth Reporting Period

In the sixth reporting period, we reviewed a memorandum provided by the Deputy PSIG that details the ongoing involvement of the DEI Director in PSIG's general operations including training and other projects that are currently in process. The Director is involved in every aspect of PSIG's audits and reports to ensure that diversity, equity, and inclusion are considered. The memorandum also advises that the DEI Director is also involved in ongoing evaluations that do not specifically focus on DEI in order to discuss how DEI might be considered during the studies. Additionally, the DEI Director is involved in investigations involving CPD members who are being investigated for DEI related issues. Also this reporting period, the Deputy PSIG provided its *Report on Race- and Ethnicity-Based Disparities in the Chicago Police Department's Use of Force*, which satisfied PSIG's annual reporting requirement related to ¶561. With this, the Deputy PSIG maintained Full compliance with ¶561 in the sixth reporting period.

***

We look forward to the Deputy PSIG continuing its efforts to maintain Full compliance with ¶561 in the seventh reporting period.

Paragraph 561 Compliance Progress History

FIRST REPORTING PERIOD	SECOND REPORTING PERIOD	THIRD REPORTING PERIOD
SEPTEMBER 1, 2019 – AUGUST 31, 2019	SEPTEMBER 1, 2019 – FEBRUARY 29, 2020	MARCH 1, 2020 – DECEMBER 31, 2020
COMPLIANCE PROGRESS:	COMPLIANCE PROGRESS:	COMPLIANCE PROGRESS:
Not Applicable	Status Update	Preliminary
FOURTH REPORTING PERIOD	**FIFTH REPORTING PERIOD**	**SIXTH REPORTING PERIOD**
JANUARY 1, 2021 – JUNE 30, 2021	JULY 1, 2021 – DECEMBER 31, 2021	JANUARY 1, 2022 – JUNE 30, 2022
COMPLIANCE PROGRESS:	COMPLIANCE PROGRESS:	COMPLIANCE PROGRESS:
Full	Full	Full

Accountability and Transparency: ¶562

562. *The Deputy PSIG will provide all staff members with comprehensive initial onboarding training and annual in-service training. The Deputy PSIG will create initial and in-service training plans and submit these plans to the Monitor and OAG for review and comment.*

Compliance Progress

(Reporting Period: January 1, 2022, through June 30, 2022)

Recurring Schedule: Annually ☑ **Met** ☐ **Missed**

Preliminary:	***In Compliance*** **(FOURTH REPORTING PERIOD)**
Secondary:	***In Compliance*** **(FOURTH REPORTING PERIOD)**
Full:	***In Compliance*** **(FOURTH REPORTING PERIOD)**
Sustainment Period Ends	***June 30, 2023***

The City and the Deputy PSIG maintained Full compliance with ¶562 in the sixth reporting period**.**

To evaluate Preliminary compliance with ¶562, the IMT reviewed the Deputy PSIG's relevant policies and documents following the process described in the Consent Decree (¶¶626–41). To evaluate Secondary compliance, we reviewed, among other things, the Deputy PSIG's training development, implementation, and evaluation. To evaluate Full compliance, we reviewed various data sources to determine whether the Deputy PSIG sufficiently implemented its policy and training, and provided the training called for by ¶562. In considering whether the Deputy PSIG maintained full compliance, we reviewed a memorandum that details the Deputy PSIG's ongoing training efforts, along with training presentations that have been developed and attendance records of the trainings that have been provided.

Progress before the Sixth Reporting Period

The Deputy PSIG reached Full compliance with ¶562 in the fourth reporting period because it provided initial onboarding and annual in-service training to all staff members. The Deputy PSIG provided us training materials that were thorough and comprehensive. It also provided rosters showing the attendance of those trainings. This evidence demonstrated that the Deputy PSIG was undertaking actions consistent with ¶562's mandates.

In the fifth reporting period, the Deputy PSIG provided a several-hundred page memorandum that included details of ongoing training efforts: training materials, training presentations, and attendance rosters. The Deputy PSIG provided this ma-

terial for both onboarding and in-service trainings. The Deputy PSIG's training remained consistently appropriate and thorough. With this, the Deputy PSIG maintained Full compliance with ¶562 in the fifth reporting period.

Progress in the Sixth Reporting Period

In the sixth reporting period, the Deputy PSIG provided training materials and information regarding all attendees for trainings provided. PSIG continues to demonstrate that it will provide relevant and timely training for its new employees, as well as veteran staff through onboarding training and in-service training. PSIG's commitment to providing such trainings is commendable and we acknowledge the comprehensive reporting regarding the specifics of each training throughout the reporting periods. With this, the Deputy PSIG maintained Full compliance with ¶562 in the sixth reporting period.

***

We look forward to the Deputy PSIG continuing its efforts to maintain Full compliance with ¶562 in the seventh reporting period.

Paragraph 562 Compliance Progress History

FIRST REPORTING PERIOD	SECOND REPORTING PERIOD	THIRD REPORTING PERIOD
SEPTEMBER 1, 2019 – AUGUST 31, 2019	SEPTEMBER 1, 2019 – FEBRUARY 29, 2020	MARCH 1, 2020 – DECEMBER 31, 2020
COMPLIANCE PROGRESS:	COMPLIANCE PROGRESS:	COMPLIANCE PROGRESS:
Not Applicable	Status Update	Under Assessment
FOURTH REPORTING PERIOD	**FIFTH REPORTING PERIOD**	**SIXTH REPORTING PERIOD**
JANUARY 1, 2021 – JUNE 30, 2021	JULY 1, 2021 – DECEMBER 31, 2021	JANUARY 1, 2022 – JUNE 30, 2022
COMPLIANCE PROGRESS:	COMPLIANCE PROGRESS:	COMPLIANCE PROGRESS:
Full	Full	Full

Accountability and Transparency: ¶563

563. *At least 60 days prior to publishing its annual audit plan, the Deputy PSIG will provide the Monitor with a draft of its audit plan for review and comment.*

Compliance Progress

(Reporting Period: January 1, 2022, through June 30, 2022)

Deadline:	Annually (Moving)	✓ **Met**	**Missed**

Preliminary:	***In Compliance*** **(SECOND REPORTING PERIOD)**
Secondary:	***In Compliance*** **(THIRD REPORTING PERIOD)**
Full:	***In Compliance*** **(THIRD REPORTING PERIOD)**
Sustainment Period Ends	***June 30, 2023***

The City and Deputy PSIG maintained Full compliance with ¶563 in the sixth reporting period**.**

To evaluate Preliminary compliance with ¶563, the IMT determined whether the Deputy PSIG provided the IMT with a draft of its audit plan. To evaluate Secondary compliance, we determined whether the Deputy PSIG provided an opportunity to receive IMT comments and appropriately responded. To evaluate Full compliance, we reviewed the Deputy PSIG's audit plan to ensure that it was complete and sufficient under ¶563. To determine whether the Deputy PSIG maintained Full compliance we have reviewed the draft annual audit plan and provided comments, where appropriate.

Progress before the Sixth Reporting Period

The Deputy PSIG reached Full compliance with ¶563 in the third reporting period. The Deputy PSIG provided the IMT with its draft *2021 Outlook on Police Oversight and Accountability* ("2021 Audit Plan") for review and comment 60 days before publishing the plan. This marked the second year in a row that the Deputy PSIG provided the IMT with its Audit Plan consistent with ¶563. With this, the Deputy PSIG reached Full compliance.

In the fifth reporting period, the Deputy PSIG provided its *2022 Outlook on Police Oversight and Accountability* for review and comment. This draft was a comprehensive work and audit plan for 2022, and it was provided to us with plenty of time to allow the IMT to review and comment. This plan includes 22 potential projects, including some that were part of the 2021 Audit Plan that the Deputy PSIG was not able to address in 2021. We noted our appreciation that the Deputy PSIG did not simply drop the 2021-listed projects but moved them into the 2022 Audit Plan. With this, the Deputy PSIG maintained Full compliance with ¶563 in the fifth reporting period.

Progress in the Sixth Reporting Period

As required by ¶563, the Deputy PSIG publishes an annual audit plan. Since the plan will be released in the seventh reporting period, the Deputy PSIG did not have materials to provide this reporting period relevant to the requirements of ¶563. We anticipate receiving the Audit Plan in the seventh reporting period at least 60 days prior to its publishing for review and comment. With this, the Deputy PSIG maintained Full compliance with ¶563 in the sixth reporting period.

***

We look forward to reviewing the Deputy PSIG's annual audit plan in the seventh reporting period for compliance with ¶563.

Paragraph 563 Compliance Progress History

FIRST REPORTING PERIOD	SECOND REPORTING PERIOD	THIRD REPORTING PERIOD
SEPTEMBER 1, 2019 – AUGUST 31, 2019	SEPTEMBER 1, 2019 – FEBRUARY 29, 2020	MARCH 1, 2020 – DECEMBER 31, 2020
COMPLIANCE PROGRESS:	COMPLIANCE PROGRESS:	COMPLIANCE PROGRESS:
Not Applicable	Preliminary	Full

FOURTH REPORTING PERIOD	FIFTH REPORTING PERIOD	SIXTH REPORTING PERIOD
JANUARY 1, 2021 – JUNE 30, 2021	JULY 1, 2021 – DECEMBER 31, 2021	JANUARY 1, 2022 – JUNE 30, 2022
COMPLIANCE PROGRESS:	COMPLIANCE PROGRESS:	COMPLIANCE PROGRESS:
Full	Full	Full

Accountability and Transparency: ¶564

564. *The Deputy PSIG will exercise his or her discretionary and oversight responsibilities without interference from any person, group, or organization, including CPD, COPA, the Police Board, and City officials. Any person that knowingly interferes with the Deputy PSIG's performance of his or her duties will be subject to the penalties set forth in Municipal Code of Chicago Sections 2-56-140, 145, 270.*

Compliance Progress

(Reporting Period: January 1, 2022, through June 30, 2022)

Preliminary:	***Not in Compliance***
CPD	***Not in Compliance***
COPA	***Not in Compliance***
Police Board	***Not in Compliance***
Secondary:	***Not Yet Assessed***
Full:	***Not Yet Assessed***

In the sixth reporting period, the CPD, COPA, and the Police Board did not reach Preliminary compliance with ¶564.

To evaluate Preliminary compliance with ¶564, the IMT reviewed the CPD's, the Police Board's, and COPA's relevant policies and documents following the process described in the Consent Decree (¶¶626–41), which outlines applicable consultation, resolution, workout, and public comment periods.[272] These paragraphs delineate various requirements, such as requiring that policies be "plainly written, logically organized, and use clearly defined terms."

The sixth reporting period marked the first time the IMT assessed compliance with ¶564. This paragraph sets a negative requirement for the CPD, COPA, Police Board, and City members: that they not interfere with the Deputy PSIG's exercise of discretion and oversight responsibility. The Deputy PSIG provided a memorandum stating that PSIG made requests to COPA, the Police Board, and the CPD, and the

[272] The OAG, the City, and the IMT agreed to a stipulation that provides a different review process for review of COPA policies and training materials. *See Stipulation Regarding the Policy and Training Review Process for the Civilian Office of Police Accountability (COPA)*, *Illinois v. Chicago*, Case No. 17-cv-6260 (January 30, 2020), https://cpdmonitoringteam.com/wp-content/uploads/2020/06/2020_01-Stipulation-Regarding-the-Policy-and-Training-Review-Process-for.._.pdf. The review process in the Stipulation mirrors the review process under ¶¶626–41, but among other things, gives the OAG and the IMT a shorter timeframe for review of COPA policies and training materials.

PSIG confirmed that the entities were responding appropriately. The memorandum did not suggest that the Deputy PSIG had faced any interference from these entities or other City officials.

While we appreciate that the entities appear to have followed the mandates of ¶564 in the sixth reporting period, we note that to reach Preliminary compliance, each entity must produce written guidance such as a policy that captures the requirement of this paragraph. We did not receive any policies from the entities on this point in the sixth reporting period.

***

With this, the entities did not reach Preliminary compliance. We look forward to receiving policies relevant to this paragraph in the future reporting periods.

Paragraph 564 Compliance Progress History

FIRST REPORTING PERIOD	SECOND REPORTING PERIOD	THIRD REPORTING PERIOD
SEPTEMBER 1, 2019 – AUGUST 31, 2019	SEPTEMBER 1, 2019 – FEBRUARY 29, 2020	MARCH 1, 2020 – DECEMBER 31, 2020
COMPLIANCE PROGRESS:	COMPLIANCE PROGRESS:	COMPLIANCE PROGRESS:
Not Applicable	Not Applicable	Not Applicable
FOURTH REPORTING PERIOD	**FIFTH REPORTING PERIOD**	**SIXTH REPORTING PERIOD**
JANUARY 1, 2021 – JUNE 30, 2021	JULY 1, 2021 – DECEMBER 31, 2021	JANUARY 1, 2022 – JUNE 30, 2022
COMPLIANCE PROGRESS:	COMPLIANCE PROGRESS:	COMPLIANCE PROGRESS:
Not Applicable	Not Applicable	None

Accountability and Transparency: ¶565

565. *At least quarterly, COPA, the Deputy PSIG, and the President of the Police Board, or his or her designee, will meet to confer and share information regarding trends and analyses of data relating to CPD. They will jointly or separately provide any resulting recommendations for changes in CPD policy or rules, in writing, to the Superintendent. Thereafter: a. the Superintendent will respond to any such recommendation within 60 days of receipt; b. the Superintendent's response will include a description of the actions that the Superintendent has taken or plans to take with respect to the issues raised in the recommendations; and c. all policy recommendations and responses to the same will be published on a City website.*

Compliance Progress

(Reporting Period: January 1, 2022, through June 30, 2022)

Recurring Schedule:	Quarterly	☑ **Met**	☐ **Missed**

Preliminary:	***In Compliance*** **(FIRST REPORTING PERIOD)**
Secondary:	***In Compliance*** **(SECOND REPORTING PERIOD)**
Full:	***In Compliance*** **(FOURTH REPORTING PERIOD)**
Sustainment Period Ends	***June 30, 2023***

The City maintained Full compliance with ¶565 in the sixth reporting period.

To evaluate Preliminary compliance with ¶565, the IMT determined whether the relevant representatives are meeting quarterly. To evaluate Secondary compliance, we determined whether the relevant entities have allocated sufficient resources to ensure that the meetings contemplated by ¶565 continue on a quarterly basis. To evaluate Full compliance, we determined whether the meetings sufficiently include the requisite coordination and whether any recommendations result from the process.

Progress before the Sixth Reporting Period

The City and its entities achieved Full compliance with the requirements of ¶565 during the fourth reporting period. In the third and fourth reporting periods, the COPA Chief, the Deputy Inspector General for Public Safety, and the Police Board President and Vice President met to discuss trends and share information regarding data analysis related to the CPD. We were pleased to learn that these meetings have proven a meaningful opportunity to discuss such issues, as intended by ¶565.

In the fifth reporting period, the Police Board President provided the IMT with documentation regarding the Quarterly meetings held during the first three quarters of 2021. The meeting minutes indicated that the entities met regularly and had substantive discussions regarding each agency's work within and outside of the Consent Decree. We noted that, to date, no joint recommendations had been made to the CPD. This evidence demonstrated continued Full compliance with ¶565.

Progress in the Sixth Reporting Period

In the sixth reporting period, the Police Board President provided the IMT with documentation regarding the Quarterly meetings held during the fourth quarter of 2021. The Police Board provided minutes of the March 2022 meeting of the Police Board, COPA, and Deputy PSIG Quarterly meeting. Representatives from each were documented as attending the meeting, and relevant topics appear to have been discussed in a meaningful way. The minutes indicate that COPA, the Deputy PSIG and the Police Board continue meeting on a regular basis and have substantive discussions regarding each agency's work within and beyond the scope of the Consent Decree. To this point, no joint recommendations have been made to the CPD Superintendent.

***

With this, the City maintained Full compliance with ¶565. Next reporting period we expect to receive evidence of continued compliance with this paragraph.

Paragraph 565 Compliance Progress History

FIRST REPORTING PERIOD	SECOND REPORTING PERIOD	THIRD REPORTING PERIOD
SEPTEMBER 1, 2019 – AUGUST 31, 2019	SEPTEMBER 1, 2019 – FEBRUARY 29, 2020	MARCH 1, 2020 – DECEMBER 31, 2020
COMPLIANCE PROGRESS:	COMPLIANCE PROGRESS:	COMPLIANCE PROGRESS:
Preliminary	Secondary	Secondary
FOURTH REPORTING PERIOD	**FIFTH REPORTING PERIOD**	**SIXTH REPORTING PERIOD**
JANUARY 1, 2021 – JUNE 30, 2021	JULY 1, 2021 – DECEMBER 31, 2021	JANUARY 1, 2022 – JUNE 30, 2022
COMPLIANCE PROGRESS:	COMPLIANCE PROGRESS:	COMPLIANCE PROGRESS:
Full	Full	Full

Appendix 10
Data Collection, Analysis & Management Assessments, by Paragraph

Appendix 10
Data Collection, Analysis & Management Assessments, by Paragraph

¶568 ¶579 ¶590 ¶601
¶569 ¶580 ¶591 ¶602
¶570 ¶581 ¶592 ¶603
¶571 ¶582 ¶593 ¶604
¶572 ¶583 ¶594 ¶605
¶573 ¶584 ¶595 ¶606
¶574 ¶585 ¶596 ¶607
¶575 ¶586 ¶597 ¶608
¶576 ¶587 ¶598 ¶609
¶577 ¶588 ¶599
¶578 ¶589 ¶600

Data Collection, Analysis & Management: ¶568

568. *CPD will collect and maintain the data and records necessary to accurately evaluate its use of force practices and to facilitate transparency and accountability regarding those practices.*

Compliance Progress (Reporting Period: January 1, 2022, through June 30, 2022)

Preliminary:	***In Compliance*** **(NEW)**
Secondary:	***Not in Compliance***
Full:	***Not in Compliance***

In the sixth reporting period, the City and CPD achieved Preliminary compliance with ¶568.

The CPD presently possesses the necessary directives and forms to ensure that data and records related to use of force are collected and maintained. These include:

- *Tactical Response Report (TRR)*, G03-02-02;
- *Tactical Response Investigation Report (TRR-I)*, G03-02-08;
- *Tactical Response Report Review (TRR-R)*, G03-02-08;
- *Arrest Report*: G06-01-01 and G03-02-02;
- *Case Incident Report: Field Reporting Manual*, S04-13-06, D20-03, and G03-02-02;
- *Investigatory Stop Report*, S04-13-09;
- *Administrative Case Files*, G08-01;
- *Body-Worn Camera*, S03-14;
- *In-Car Camera*, S03-05;
- *Third-Party Recordings*, G03-02-02;
- *Witness Interviews*, G03-02-02; and
- *Officer Interviews*, G03-02-02.

Although we note that some of these directives and forms are undergoing ongoing transformation as part of the entire Consent Decree implementation process, they remain sufficient to act as data collection efforts related to this paragraph. We therefore find that the CPD has achieved Preliminary compliance with this paragraph.

In order to achieve subsequent levels of compliance, the CPD will need to take several steps. As an initial step, the CPD will need to demonstrate comprehensive training for all officers on each of the policies and forms above. However, during

this monitoring period, we were not provided training records for modules related to each of the above directives and forms. Aside from training, the CPD will also need to ensure that it can "accurately evaluate its use of force practices and [] facilitate transparency and accountability regarding those practices." This includes ensuring consistent operation of the TRED, which is currently operating under-capacity and experiencing a significant backlog as part of the Division's force evaluation responsibilities (*see* ¶¶574 and 575). Additionally, the CPD will need to ensure the Audit Division is completing rigorous examinations of use of force data integrity, a topic not found in their 2022 plan. Furthermore, the CPD must verify that it is accurately collecting all data related to the Consent Decree (including force data) through the comprehensive ¶606 assessment. Related to this, we note that the CPD is currently in the process of securing a new Records Management System (also known as RMS). We credit the CPD for taking the initial steps to implement a new RMS to-date and observed the Information Systems Development Group provide updates on the Records Management System during this monitoring period (*see* ¶608). However, as of this reporting period, they have not implemented a new Records Management System despite prior audits indicating the limitations of their current system.

Paragraph 568 Compliance Progress History

FIRST REPORTING PERIOD SEPTEMBER 1, 2019 – AUGUST 31, 2019 COMPLIANCE PROGRESS: Not Applicable	SECOND REPORTING PERIOD SEPTEMBER 1, 2019 – FEBRUARY 29, 2020 COMPLIANCE PROGRESS: Not Applicable	THIRD REPORTING PERIOD MARCH 1, 2020 – DECEMBER 31, 2020 COMPLIANCE PROGRESS: Not Applicable
FOURTH REPORTING PERIOD JANUARY 1, 2021 – JUNE 30, 2021 COMPLIANCE PROGRESS: Not Applicable	FIFTH REPORTING PERIOD JULY 1, 2021 – DECEMBER 31, 2021 COMPLIANCE PROGRESS: Not Applicable	SIXTH REPORTING PERIOD JANUARY 1, 2022 – JUNE 30, 2022 COMPLIANCE PROGRESS: Preliminary

Data Collection, Analysis & Management: ¶569

569. *CPD must collect, track, and maintain all available documents related to use of force incidents, including: a. TRRs, or any other similar form of documentation CPD may implement for initial reporting of reportable use of force incidents; b. TRR-Is, or any other similar form of documentation CPD may implement to document supervisory investigation of reportable use of force incidents; c. Tactical Response Reports – Review ("TRR-Rs"), or any other similar form of documentation CPD may implement to document review or auditing of reportable use of force incidents; d. arrest reports, original case incident reports, and investigatory stop reports associated with a reportable use of force incident; e. administrative investigative files, including investigative materials generated, collected, or received by BIA, or COPA, or any similar form of documentation CPD may implement for misconduct allegations or civilian complaints; and f. all reasonably available documentation and materials relating to any reportable use of force, in-custody injury or death, or misconduct allegation, including body-worn, in-car, or known third-party camera recordings, and statements, notes, or recordings from witness and officer interviews.*

Compliance Progress

(Reporting Period: January 1, 2022, through June 30, 2022)

Preliminary:	***In Compliance*** **(FOURTH REPORTING PERIOD)**
Secondary:	***Not in Compliance***
Full:	***Not Yet Assessed***

In the sixth reporting period, the City and the CPD maintained Preliminary compliance with ¶569.

The CPD presently possesses the necessary directives and forms to ensure that data and records related to use of force are collected and maintained. These include:

- *Tactical Response Report (TRR)*, G03-02-02;
- *Tactical Response Investigation Report (TRR-I)*, G03-02-08;
- *Tactical Response Report Review (TRR-R)*, G03-02-08;
- *Arrest Report*: G06-01-01 and G03-02-02;
- *Case Incident Report: Field Reporting Manual*, S04-13-06, D20-03, and G03-02-02;
- *Investigatory Stop Report*, S04-13-09;

- *Administrative Case Files*, G08-01;
- *Body-Worn Camera*, S03-14;
- *In-Car Camera*, S03-05;
- *Third-Party Recordings*, G03-02-02;
- *Witness Interviews*, G03-02-02; and
- *Officer Interviews*, G03-02-02.

Although we note that some of these directives and forms are undergoing ongoing transformation as part of the entire Consent Decree implementation process, they remain sufficient to act as data collection efforts related to this paragraph. We therefore find the CPD has maintained Preliminary compliance with this paragraph.

In order to achieve subsequent levels of compliance, the CPD will need to take several steps. As an initial step, the CPD will need to demonstrate comprehensive training for all officers on each of the policies and forms above. However, during this monitoring period, we were not provided training records for modules related to each of the above directives and forms. Aside from training, the CPD will also need to ensure that it can "accurately evaluate its use of force practices and [] facilitate transparency and accountability regarding those practices." This includes ensuring consistent operation of the TRED, which is currently operating under-capacity and experiencing a significant backlog as part of the Division's force evaluation responsibilities (see ¶¶574 and 575). Additionally, the CPD will need to ensure the Audit Division is completing rigorous examinations of use of force data integrity, a topic not found in their 2022 plan. Furthermore, the CPD must verify that it is accurately collecting all data related to the Consent Decree (including force data) through the comprehensive ¶606 assessment. Related to this, we note that the CPD is currently in the process of securing a new Records Management System (also known as RMS). We credit the CPD for taking the initial steps to implement a new Records Management System to-date and observed the Information Systems Development Group provide updates on the Records Management System during this monitoring period (see ¶608). However, as of this reporting period, they have not implemented a new Records Management System despite prior audits indicating the limitations of their current system.

Paragraph 569 Compliance Progress History

FIRST REPORTING PERIOD	SECOND REPORTING PERIOD	THIRD REPORTING PERIOD
SEPTEMBER 1, 2019 – AUGUST 31, 2019	SEPTEMBER 1, 2019 – FEBRUARY 29, 2020	MARCH 1, 2020 – DECEMBER 31, 2020
COMPLIANCE PROGRESS:	COMPLIANCE PROGRESS:	COMPLIANCE PROGRESS:
None	None	None

FOURTH REPORTING PERIOD	FIFTH REPORTING PERIOD	SIXTH REPORTING PERIOD
JANUARY 1, 2021 – JUNE 30, 2021	JULY 1, 2021 – DECEMBER 31, 2021	JANUARY 1, 2022 – JUNE 30, 2022
COMPLIANCE PROGRESS:	COMPLIANCE PROGRESS:	COMPLIANCE PROGRESS:
Preliminary	Preliminary	Preliminary

Data Collection, Analysis & Management: ¶570

570. *The City will ensure that reasonably available documents related to reportable uses of force that are or become subject to misconduct complaints or investigations are promptly provided to the appropriate investigative entity (e.g., COPA, BIA). The City will ensure that any reasonably available documents related to reportable uses of force subject to misconduct complaints or investigations, except for open confidential investigations, are accessible in the CMS the City is working to create, or in any similar electronic system, by June 30, 2020. Within seven days of the receipt of a misconduct complaint or the initiation of an administrative investigation, whichever occurs first, the City will identify any available reportable use of force documentation associated with the incident and ensure such documentation is accessible via the CMS or similar system. By June 30, 2020, whenever a reportable use of force incident becomes the subject of a misconduct investigation, COPA will notify CPD via the CMS within three days of the initiation of the investigation.*

Compliance Progress

(Reporting Period: January 1, 2022, through June 30, 2022)

Preliminary:	***In Compliance*** **(THIRD REPORTING PERIOD)**
Secondary:	***In Compliance*** **(NEW)**
Full:	***Not Yet Assessed***

In the sixth monitoring period, the City maintained Preliminary compliance and achieved Secondary compliance with ¶570.

To assess Preliminary compliance with ¶570, the IMT reviews the policies of the City's entities. To assess Secondary compliance with ¶570, the IMT reviews records demonstrating that the City's entities have qualified personnel to meet the requirements of this paragraph. To assess Full compliance, the IMT will review the City's entities' data to determine whether the requirements of ¶570 have been operationalized.

During the sixth monitoring period, COPA maintained Directive 3.1.6 (*CLEAR and COLUMN CMS Systems*) which sufficiently memorializes the operation of the Case Management System (also known as CMS). Additionally, the Case Management System code continues to allow for COPA to access the Case Management System for documents and evidence related to administrative investigations of use-of-

force events. We therefore find the City has maintained Preliminary compliance with the requirements of ¶570.

Furthermore, in this monitoring period, the IMT was provided with the prior three years of COPA in-service training related to the Case Management System. In our review of these trainings, we found them to provide sufficient guidance for COPA investigators to navigate the Case Management System and store investigative material as necessary. We therefore find the City has reached Secondary compliance with the requirements of ¶570.

However, we continue to note that the CPD does not have a companion directive that memorializes their responsibilities for facilitating a full and complete investigation by COPA, including when COPA's access to the CPD's data systems is restricted, a further condition of subsequent levels of compliance. Moving forward, we recommend the CPD develop a companion directive. Once developed, the system will then need to be audited to ensure that the Case Management System is being used consistent with the intent of ¶570.

Paragraph 570 Compliance Progress History

FIRST REPORTING PERIOD	SECOND REPORTING PERIOD	THIRD REPORTING PERIOD
SEPTEMBER 1, 2019 – AUGUST 31, 2019	SEPTEMBER 1, 2019 – FEBRUARY 29, 2020	MARCH 1, 2020 – DECEMBER 31, 2020
COMPLIANCE PROGRESS:	COMPLIANCE PROGRESS:	COMPLIANCE PROGRESS:
None	None	Preliminary

FOURTH REPORTING PERIOD	FIFTH REPORTING PERIOD	SIXTH REPORTING PERIOD
JANUARY 1, 2021 – JUNE 30, 2021	JULY 1, 2021 – DECEMBER 31, 2021	JANUARY 1, 2022 – JUNE 30, 2022
COMPLIANCE PROGRESS:	COMPLIANCE PROGRESS:	COMPLIANCE PROGRESS:
Preliminary	Preliminary	Secondary

Data Collection, Analysis & Management: ¶571

571. *CPD must have an electronic system that accurately and reliably tracks all data derived from reportable use of force incidents, including: a. the response by CPD members during the incident, including the type(s) of force used; b. the date, time, location, and district of the incident; c. whether a foot or vehicle pursuit occurred that is associated with the incident; d. the actual or, if unavailable, perceived race, ethnicity, age, and gender of the subject; e. the name, watch, employee number, and unit and beat of assignment of any CPD member(s) who used force; f. CPD units identified in the incident report as being on the scene of the use of force incident; g. whether the incident occurred during an officer-initiated contact or a call for service; h. the subject's mental health or medical condition, use of drugs or alcohol, ability to understand verbal commands, or disability, as perceived by the CPD member(s) at the time force was used; i. the subject's actions that led to the CPD member's use of force; j. whether the CPD member perceived that the subject possessed a weapon and, if so, what type(s); k. whether the subject possessed a weapon and, if so, what type(s); l. whether reportable force was used against a subject that was handcuffed or otherwise in physical restraints; m. any injuries sustained by CPD members; n. any injuries sustained or alleged by the subject(s) and any medical treatment that was offered or performed on the scene of the incident; o. for each weapon discharged by an officer, including firearms, Tasers, and OC devices, the number of discharges per weapon; and p. whether the subject was charged with an offense and, if so, which offense(s).*

Compliance Progress

(Reporting Period: January 1, 2022, through June 30, 2022)

Preliminary:	***In Compliance*** **(FOURTH REPORTING PERIOD)**
Secondary:	***In Compliance*** **(NEW)**
Full:	***Not Yet Assessed***

In the sixth monitoring period, the City and the CPD achieved Secondary compliance with ¶571.

During the sixth monitoring period, the CPD completed their training of officers and supervisors on reporting requirements after a use-of-force event. The training

had previously been approved by the IMT and included instruction on completing the *Tactical Response Report* (*TRR*) and *TRR-Review* (TRR-R) forms. As the CPD has a responsive policy, a corresponding form, and has now delivered sufficient training on officer and supervisor requirements for completing the form, we find the CPD to now be in Secondary compliance with the requirements of this paragraph.

Full compliance will require audit findings that ensure officers and supervisors are completing the forms accurately. Presently, this function is accomplished by the TRED (*see* ¶4, 692) which reviews the *TRR*s and *TRR-R*s to identify deficiencies in report writing and issues corresponding recommendations or advisements. For instance, in the fourth quarter of 2021 (the most recent quarter we have data for), the TRED review noted that 60.2% of the 536 *TRR*s that were reviewed resulted in some type of recommendation and/or advisement for either the officer or the supervisor. This represents an increase from the deficiency rate in the prior quarter (50.7%). Given that TRED's own analyses show that three of the top four debriefing points are reporting deficiencies (as opposed to debriefs related to the officer's actions or decisions), we cannot yet say that the *TRR* data is reliable.

The CPD has taken a number of steps to ensure the reliability of Use of Force data. For instance, the CPD has begun using the data from the TRED review to allow supervisors to take proactive steps to improve reporting accuracy for officers under their command. For example, in March of 2022, the CPD met with the IMT to share updates to the supervisor Use of Force dashboard. This dashboard allows supervisors to follow trends in debriefing points and identify areas for enhanced review or focused remedial training. Supervisors can also sign up to receive alerts when there are significant changes to debriefing points. In addition to this dashboard, the CPD is currently planning an audit of TRED reviews to determine the effectiveness of the division's recommendations and advisements, though this audit was not completed during the sixth monitoring period.

As it relates to collecting Use of Force data, we credit the CPD with the work they have done so far. This includes updating their policies, updating data collection forms, providing updated training to officers and supervisors, creating a division to evaluate the accuracy of force data, creating a dashboard to inform supervisory reviews, and taking initial steps to evaluate the remediation process. Although we will still need to see evidence that each of these steps has ultimately led to consistently reliable data on use of force, the current approach is reasonable and consistent with learning-organization concepts.

Paragraph 571 Compliance Progress History

FIRST REPORTING PERIOD	SECOND REPORTING PERIOD	THIRD REPORTING PERIOD
SEPTEMBER 1, 2019 – AUGUST 31, 2019	SEPTEMBER 1, 2019 – FEBRUARY 29, 2020	MARCH 1, 2020 – DECEMBER 31, 2020
COMPLIANCE PROGRESS:	COMPLIANCE PROGRESS:	COMPLIANCE PROGRESS:
None	None	Status Update

FOURTH REPORTING PERIOD	FIFTH REPORTING PERIOD	SIXTH REPORTING PERIOD
JANUARY 1, 2021 – JUNE 30, 2021	JULY 1, 2021 – DECEMBER 31, 2021	JANUARY 1, 2022 – JUNE 30, 2022
COMPLIANCE PROGRESS:	COMPLIANCE PROGRESS:	COMPLIANCE PROGRESS:
Preliminary	Preliminary	Secondary

Data Collection, Analysis & Management: ¶572

572. *CPD will regularly review citywide and district-level data regarding reportable uses of force to: a. assess the relative frequency and type of force used by CPD members against persons in specific demographic categories, including race or ethnicity, gender, age, or perceived or known disability status; and b. identify and address any trends that warrant changes to policy, training, tactics, equipment, or Department practice.*

Compliance Progress (Reporting Period: January 1, 2022, through June 30, 2022)

Recurring Schedule:	Ongoing	☐ **Met**	☑ **Missed**

Preliminary:	***Not in Compliance***
Secondary:	***Not Yet Assessed***
Full:	***Not Yet Assessed***

In the sixth monitoring, the City and the CPD did not take any meaningful steps to comply with the requirements of ¶572.

The Tactical Review and Evaluation Division continues to be responsible for suggesting changes to policy, training, tactics, equipment, or Department practice based on their review of force events. This requirement of ¶572 continues to be memorialized in G03-02-02 (*Incidents Requiring the Completion of a Tactical Response Report*). However, the Tactical Review and Evaluation Division is currently understaffed and is planning to deploy its personnel to patrol duties over the course of the summer, further impacting the Division's ability to address trends. We refer the reader to our assessments of other paragraphs for additional discussion related to the Tactical Review and Evaluation Division's operations and staffing levels.

The CPD continues to make no meaningful effort to "assess the relative frequency and type of force used by CPD members against persons in specific demographic categories, including race or ethnicity, gender, age, or perceived or known disability status." During the sixth monitoring period, the CPD informed us that it planned to contract with an external academic partner to conduct the assessment required by ¶¶572 and 573. However, to-date, we have received no follow-up on efforts to identify or contract with the external partner. Naturally, this also means that have not received any metrics for performing the assessment (*see also* ¶573).

In our past report, we noted that force against persons in specific demographic categories was a concern presented in the Department of Justice's (DOJ's) findings,

which led to the creation of the Consent Decree. Furthermore, we noted the substantial public interest in knowing relative force rates across demographic categories. However, despite these facts, the CPD has shied away from taking any affirmative steps to conducting the review required by ¶572 and the present inaction is both puzzling and disappointing. As previously stated to the City and the CPD, the importance of providing transparent data on use of force cannot be ignored.

The City and the CPD have still not reached any level of compliance with ¶572 and will need to prioritize this assessment in the next monitoring period.

Paragraph 572 Compliance Progress History

FIRST REPORTING PERIOD	SECOND REPORTING PERIOD	THIRD REPORTING PERIOD
SEPTEMBER 1, 2019 – AUGUST 31, 2019	SEPTEMBER 1, 2019 – FEBRUARY 29, 2020	MARCH 1, 2020 – DECEMBER 31, 2020
COMPLIANCE PROGRESS:	COMPLIANCE PROGRESS:	COMPLIANCE PROGRESS:
None	None	Status Update

FOURTH REPORTING PERIOD	FIFTH REPORTING PERIOD	SIXTH REPORTING PERIOD
JANUARY 1, 2021 – JUNE 30, 2021	JULY 1, 2021 – DECEMBER 31, 2021	JANUARY 1, 2022 – JUNE 30, 2022
COMPLIANCE PROGRESS:	COMPLIANCE PROGRESS:	COMPLIANCE PROGRESS:
None	None	None

Data Collection, Analysis & Management: ¶573

573. *Prior to conducting the initial assessment required by Paragraph 572, CPD will share its proposed methodology, including any proposed factors to be considered as part of the assessment, with the Monitor for review and approval. The Monitor will approve CPD's proposed methodology provided that the Monitor determines that CPD's methodology comports with published, peer-reviewed methodologies and this Agreement.*

Compliance Progress

(Reporting Period: January 1, 2022, through June 30, 2022)

Recurring Schedule: Ongoing ☐ **Met** ☑ **Missed**

Preliminary: ***Not in Compliance***
Secondary: ***Not Yet Assessed***
Full: ***Not Yet Assessed***

In the sixth monitoring period, the CPD did not take any meaningful steps to comply with the requirements of ¶573.

As noted in our assessment of ¶572, the CPD has not made any progress on conducting the necessary force assessment. We re-emphasize the importance of this assessment and the fact that the CPD will need to prioritize this effort in the upcoming monitoring period.

As stated in the conclusion for ¶572, the CPD must prioritize the development of the metrics for reviewing disparities in use of force in the next monitoring period and provide the IMT with a comprehensive plan going forward.

Paragraph 573 Compliance Progress History

FIRST REPORTING PERIOD	SECOND REPORTING PERIOD	THIRD REPORTING PERIOD
SEPTEMBER 1, 2019 – AUGUST 31, 2019	SEPTEMBER 1, 2019 – FEBRUARY 29, 2020	MARCH 1, 2020 – DECEMBER 31, 2020
COMPLIANCE PROGRESS:	COMPLIANCE PROGRESS:	COMPLIANCE PROGRESS:
None	None	Status Update

FOURTH REPORTING PERIOD	FIFTH REPORTING PERIOD	SIXTH REPORTING PERIOD
JANUARY 1, 2021 – JUNE 30, 2021	JULY 1, 2021 – DECEMBER 31, 2021	JANUARY 1, 2022 – JUNE 30, 2022
COMPLIANCE PROGRESS:	COMPLIANCE PROGRESS:	COMPLIANCE PROGRESS:
None	None	None

Data Collection, Analysis & Management: ¶574

574. *A designated unit at the CPD headquarters level will routinely review and audit documentation and information collected regarding each level 2 reportable use of force incident, a representative sample of level 1 reportable use of force, and incidents involving accidental firearms discharges and animal destructions with no human injuries to ensure: a. CPD members completely and thoroughly reported the reason for the initial stop, arrest, or other enforcement action, the type and amount of force used, the subject's actions or other circumstances necessitating the level of force used, and all efforts to de-escalate the situation; b. the district-level supervisory review, investigation, and policy compliance determinations regarding the incident were thorough, complete, objective, and consistent with CPD policy; c. any tactical, equipment, or policy concerns are identified and, to the extent necessary, addressed; and d. any patterns related to use of force incidents are identified and, to the extent necessary, addressed.*

Compliance Progress (Reporting Period: January 1, 2022, through June 30, 2022)

Preliminary:	***In Compliance*** **(THIRD REPORTING PERIOD)**
Secondary:	***Not in Compliance*** **(NEW: LOST COMPLIANCE)**
Full:	***Not in Compliance***

In the sixth reporting period, the City and the CPD maintained Preliminary compliance but did not maintain Secondary compliance with ¶574 because of inadequate staffing.

During the sixth monitoring period, the CPD maintained General Order G03-02-08, *Department Review of Use of Force*, which memorializes the role of the Tactical Review and Evaluation Division (TRED) and the requirements of ¶574. Additionally, the TRED has a comprehensive Standard Operating Procedure (SOP), which provides clear instruction on how to conduct the TRED's audits, including the points of review described in ¶574(a–d). Furthermore, TRED members have received sufficient training to carry out the tasks in accordance with the SOP, and have been provided with an 8-hour CIT training which included modules related to de-escalation (so as to adequately be able to assess the appropriateness of de-escalation attempts by officers). The SOP and overall training regimen satisfy the first of our criteria for achieving and maintaining Secondary compliance.

However, the ability of the CPD to adequately staff the TRED is another criterion used to assess Secondary compliance and one which we no longer find is being satisfied. During the monitoring period, the TRED experienced a significant decline in the number of personnel, including higher-rank personnel. For instance, in May of 2022, the CPD informed us that TRED had only 36 officers despite being budgeted for 48 officers. Additionally, TRED had 6 sergeants, despite being budgeted for 8. Finally, TRED is currently operating without a commander and has a single lieutenant. Particularly given that TRED is operating at 75% capacity for officers and sergeants, we can no longer say that the CPD has provided "sufficient resources to perform" the tasks TRED is required to perform (¶575). TRED has released a Notice of Job Opportunity (NOJO) for five additional officers but, despite having been released for several months, none of positions have been filled.

We do note that the current work of the TRED is in-line with expectations for this paragraph. Overall, the TRED uses a tiered approach to conducting its audits. The first tier evaluates individual deficiencies based on officers' *TRR*s and supervisors' investigations and reviews of the force events. The TRED then forwards these identified deficiencies to the involved officer as a learning opportunity. In its second tier of review, the TRED identifies concerns at the unit level as compared with other units. The TRED then forwards these concerns to the District Commander for remediation. Lastly, the TRED's third tier aims to identify department-wide trends and may provide recommendations to the Education and Training Division or to the Research and Development Division to address the identified issues.

The TRED's quarterly reports detail how the TRED identifies meaningful trends and provides responsive recommendations. Based on TRED's fourth quarter report (published April 2022), 60.2% of *TRR* reviews (323 out of 536) resulted in recommendations or advisements, which is an increase of 9.5% compared to the third quarter. The most common debriefing point for involved members was for deficiencies in body-worn camera activation, in addition to continued inadequacies in describing the de-escalation and force mitigation efforts made before using force. The most common debriefing point for Reviewing Supervisors was "Evidence Technician Not Requested," as supervisors are required to request an evidence technician any time an injury or alleged injury occurs. During the fourth quarter there were also 121 *TRR*s related to a foot pursuit accounting for about 22% of all *TRR*s reviewed, a decrease compared to the previous quarter.

Through comprehensive SOPs and well-trained personnel, the TRED has the opportunity to provide meaningful feedback for the department and in fact already does so. However, as a result of the staffing issues violating one of our

compliance criterion, we find that the CPD has not maintained Secondary compliance for this paragraph. To return to Secondary compliance, the CPD will need ensure that TRED has sufficient personnel and that they have been adequately trained.

Paragraph 574 Compliance Progress History

FIRST REPORTING PERIOD	SECOND REPORTING PERIOD	THIRD REPORTING PERIOD
SEPTEMBER 1, 2019 – AUGUST 31, 2019	SEPTEMBER 1, 2019 – FEBRUARY 29, 2020	MARCH 1, 2020 – DECEMBER 31, 2020
COMPLIANCE PROGRESS:	COMPLIANCE PROGRESS:	COMPLIANCE PROGRESS:
None	None	Preliminary

FOURTH REPORTING PERIOD	FIFTH REPORTING PERIOD	SIXTH REPORTING PERIOD
JANUARY 1, 2021 – JUNE 30, 2021	JULY 1, 2021 – DECEMBER 31, 2021	JANUARY 1, 2022 – JUNE 30, 2022
COMPLIANCE PROGRESS:	COMPLIANCE PROGRESS:	COMPLIANCE PROGRESS:
Secondary	Secondary	Preliminary

Data Collection, Analysis & Management: ¶575

575. *CPD recently established a Force Review Unit ("FRU") and tasked the FRU with certain responsibilities described in the preceding paragraph. CPD will ensure that the FRU or any other unit tasked with these responsibilities has sufficient resources to perform them. CPD will ensure that the FRU or any other unit tasked with these responsibilities is staffed with CPD members, whether sworn or civilian, with sufficient experience, rank, knowledge, and expertise to: effectively analyze and assess CPD's use of force practices and related reporting and review procedures; conduct trend analysis based on use of force data; identify tactical, equipment, training, or policy concerns based on analysis of use of force incidents and data; and develop recommendations regarding modifications to tactics, equipment, training, or policy as necessary to address identified practices or trends relating to the use of force.*

Compliance Progress (Reporting Period: January 1, 2022, through June 30, 2022)

Preliminary:	***Not in Compliance*** **(NEW: LOST COMPLIANCE)**
Secondary:	***Not in Compliance*** **(NEW: LOST COMPLIANCE)**
Full:	***Not in Compliance***

In the sixth reporting period, the City and the CPD did not maintain Preliminary or Secondary compliance with ¶575 because of inadequate staffing.

During the monitoring period, the Tactical Review and Evaluation Division (TRED) experienced a significant decline in the number of personnel, including higher-rank personnel. For instance, in May of 2022, the CPD informed us that TRED had only 36 officers despite being budgeted for 48 officers. Additionally, TRED had 6 sergeants, despite being budgeted for 8. Finally, TRED is currently operating without a commander and has a single lieutenant. Particularly given that TRED is operating at 75% capacity for officers and sergeants, we can no longer say that the CPD has provided "sufficient resources to perform" the tasks TRED is required to perform. TRED has released a Notice of Job Opportunity (NOJO) for five additional officers but, despite having been released for several months, none of positions have been filled.

The impact of decreased personnel has also been demonstrated by the return of a substantial backlog in TRED reviews. Although TRED had resolved a prior backlog, the CPD informed the IMT during the May 2022 meeting that 84 use of force

reviews were currently assigned to a reviewer while 178 were pending assignment. This means that over twice as many use of force instances were pending review than actually being reviewed. Additionally, TRED reviews of events containing an officer pointing their firearm were similarly backlogged with 334 pointing incidents awaiting review compared with 106 assigned to a reviewer.

In discussing these statistics with the CPD, we were informed that they expected the backlog to increase in the near future. One reason for this is the pending deployment of TRED personnel to patrol assignments during the summer months. This decision is likely to affect the operation of TRED in several ways. First, TRED is already operating at 75% capacity; the deployment of current TRED reviewers will reduce this even more, thereby causing an even greater backlog. Second, there is the potential for the quality of TRED reviews to decline if TRED reviewers are required to wear two hats (patrol and TRED). The potential for fatigue from this set-up is very real and TRED reviewers may not conduct their reviews with the same diligence as before if they are also being asked to work the street. Finally, though the CPD reports this has not happened yet, there is the potential for a TRED reviewer to use force on patrol, leading to a situation wherein TRED must evaluate its own member.

As a result, we find that the CPD has no longer ensured that TRED has "sufficient resources" to perform their duties nor ensured that TRED is "staffed with CPD members, whether sworn or civilian." We therefore find that they have no longer achieved any level of compliance with this paragraph. To return to Preliminary compliance, the CPD will need ensure that TRED has sufficient personnel and that they have been adequately trained. We also call attention to the fact that the Consent Decree allows for civilian staff, a possible solution to the issue of TRED officers being deployed.

While we have listed our concerns as it relates to TRED resources, we note that the personnel currently within TRED have received the necessary training to conduct the analyses of ¶575 (as well as ¶574, discussed above). Additionally, TRED continues to provide relevant information to street-level supervisors, thereby reinforcing the utility of their reviews. For instance, during the monitoring period, the IMT received a demonstration of the CPD's use of force dashboard for supervisors. The dashboard allows supervisors to review trends in TRED debriefings which can also be used by the supervisor to identify potential needs for focused training. Supervisors can also sign up to receive alerts when there are significant changes to debriefing points. We therefore continue to be satisfied with the product that TRED produces but must base initial levels of compliance on whether TRED is sufficiently staffed to continue the work currently being done.

Paragraph 575 Compliance Progress History

FIRST REPORTING PERIOD SEPTEMBER 1, 2019 – AUGUST 31, 2019 COMPLIANCE PROGRESS:	SECOND REPORTING PERIOD SEPTEMBER 1, 2019 – FEBRUARY 29, 2020 COMPLIANCE PROGRESS:	THIRD REPORTING PERIOD MARCH 1, 2020 – DECEMBER 31, 2020 COMPLIANCE PROGRESS:
None	None	None
FOURTH REPORTING PERIOD JANUARY 1, 2021 – JUNE 30, 2021 COMPLIANCE PROGRESS:	**FIFTH REPORTING PERIOD** JULY 1, 2021 – DECEMBER 31, 2021 COMPLIANCE PROGRESS:	**SIXTH REPORTING PERIOD** JANUARY 1, 2022 – JUNE 30, 2022 COMPLIANCE PROGRESS:
Secondary	Secondary	None

Data Collection, Analysis & Management: ¶576

576. *CPD will conduct random audits of body-worn and in-car camera recordings of incidents that involved civilian interactions to assess whether CPD officers are complying with CPD policy. CPD will take corrective action to address identified instances where CPD officers have not complied with CPD policy as permitted by law, and will identify any trends that warrant changes to policy, training, tactics, equipment, or Department practice.*

Compliance Progress (Reporting Period: January 1, 2022, through June 30, 2022)

Preliminary:	***Not in Compliance***
Secondary:	***Not Yet Assessed***
Full:	***Not Yet Assessed***

In the sixth reporting period, the City and the CPD did not achieve any level of compliance with ¶576.

During the sixth monitoring period, the CPD provided an updated version of Special Order S03-14, *Body Worn Cameras*. The Special Order clearly states the responsibility of Watch Operations Lieutenants (WOLs) to "review one randomly selected body-worn-camera recording on their respective watch per tour of duty" and document their review in a Body Worn Camera Video Review Report (which was also provided by CPD). The Special Order also identifies the Audit Division as a mechanism for auditing video recordings and evaluating WOL reviews to identify "any trends that warrant changes to policy, training, tactics, equipment, or Department practices."

However, we note some current limitations to the CPD's current processes as found in the policy. For example, the Body Worn Camera Video Review Report primarily focuses on the technical requirements for *operating* a Body Worn Camera and does not collect data on whether the officers' actions throughout the interaction were consistent with the CPD's broader policies. Furthermore, the body-worn-camera policy is not clear as to whether all "civilian interactions" are subject to WOL reviews. This may be addressed through updated sampling protocols and parameters by which the CPD's Random Video Review (also known as RVR) application selects videos for WOL review. However, we were not provided updated protocols and parameters during the monitoring period and so we cannot verify whether all civilian interactions are within sampling framework.

We have also not been provided an updated version of Special Order S03-05, *In-Car Video Systems*. As ¶576 also requires random audits of in-car camera recordings, the CPD will need to provide us an updated version of this Special Order as well so that we can ensure it contains similar processes as the body-worn-camera Special Order.

Presently, we believe that the CPD has memorialized the Body Worn Camera audit requirements of ¶576 into policy (assuming all civilian interactions are subjected to WOL review per audit protocols and parameters). However, to achieve Preliminary compliance with the requirements of ¶576, the CPD will need to provide us with an updated version of Special Order S03-05. We will also need to review the Random Video Review protocols and parameters to ensure that the CPD has built in reasonable guidelines for selecting videos.

To achieve subsequent levels of compliance, the CPD will need to ensure that body-worn-camera and in-car-camera hardware is working adequately and that the CPD members are consistently and reliably tagging videos in a way that would facilitate the Watch Operations Lieutenant reviews. The CPD will also need to train Watch Operations Lieutenants on an updated review protocol, ensuring that each review is of consistent quality. Full compliance will then depend on Watch Operations Lieutenants conducting their reviews with the IMT conducting audits of reviews to ensure their accuracy and adequacy.

Also related to Full compliance will be the ability of the CPD's Audit Division to conduct reviews of body-worn cameras as well as audits of WOL reviews and associated trends in findings. We have not seen Audit Division protocols for identifying such trends and, although the CPD plans on conducting a Body Worn Camera Activation Audit in 2022, we have not been provided with the objectives, scope, or methodology for this audit. We will assess the adequacy of the Audit Division's efforts once we receive additional information.

Paragraph 576 Compliance Progress History

FIRST REPORTING PERIOD	SECOND REPORTING PERIOD	THIRD REPORTING PERIOD
SEPTEMBER 1, 2019 – AUGUST 31, 2019	SEPTEMBER 1, 2019 – FEBRUARY 29, 2020	MARCH 1, 2020 – DECEMBER 31, 2020
COMPLIANCE PROGRESS:	COMPLIANCE PROGRESS:	COMPLIANCE PROGRESS:
Not Applicable	Status Update	None

FOURTH REPORTING PERIOD	FIFTH REPORTING PERIOD	SIXTH REPORTING PERIOD
JANUARY 1, 2021 – JUNE 30, 2021	JULY 1, 2021 – DECEMBER 31, 2021	JANUARY 1, 2022 – JUNE 30, 2022
COMPLIANCE PROGRESS:	COMPLIANCE PROGRESS:	COMPLIANCE PROGRESS:
None	None	None

Data Collection, Analysis & Management: ¶577

577. *CPD will create a Force Review Board ("FRB") to review, from a Department improvement perspective: (a) any level 3 reportable use of force incident, except for accidental firearms discharges and animal destructions with no human injuries, and (b) any reportable uses of force by a CPD command staff member.*

Compliance Progress (Reporting Period: January 1, 2022, through June 30, 2022)

Preliminary: ***In Compliance*** **(THIRD REPORTING PERIOD)**
Secondary: ***Not Yet Assessed***
Full: ***Not Yet Assessed***

In the sixth reporting period, the City and the CPD maintained Preliminary compliance with ¶577.

During the sixth monitoring period, the CPD maintained Directive G03-02-08, *Department Review of Use of Force*, which memorializes the role of the Force Review Board (also known as the FRB) in reviewing Level 3 uses of force and reportable uses of force by a CPD command staff member. As the Force Review Board continues to be detailed in policy, we find that the CPD has remained in Preliminary compliance with ¶577.

Additionally, the CPD has provided the IMT with an updated version of SOP 2020-003 (*Force Review Board*). Although the requirements of ¶577 had been memorialized in prior drafts of the SOP, additional revisions to the SOP were necessary before it could be finalized. While we find that such revisions were largely made in the most recent version of the SOP, other issues prevent us from providing a no-objection to the current SOP. Of primary concern (and necessary to achieve Full compliance with this paragraph), is that the IMT has been unable to observe the Force Review Board process from start to finish. Although the CPD indicates they have been holding Force Review Board meetings, we have not been provided any documentation to evidence the reviews. The IMT has not been invited to observe any Force Review Board meeting and no minutes are kept of the meetings. Additionally, the CPD has not provided any summary documents to the IMT. Therefore, we cannot comment on the personnel who attended the Force Review Board, nor can we comment on the quality of Force Review Board reviews, including the scope of the review or the prudency of recommendations for improved policy, training, tactics, or equipment. To achieve subsequent levels of

compliance with this paragraph, the IMT will need to observe these meetings in-person.

Paragraph 577 Compliance Progress History

FIRST REPORTING PERIOD	SECOND REPORTING PERIOD	THIRD REPORTING PERIOD
SEPTEMBER 1, 2019 – AUGUST 31, 2019	SEPTEMBER 1, 2019 – FEBRUARY 29, 2020	MARCH 1, 2020 – DECEMBER 31, 2020
COMPLIANCE PROGRESS:	COMPLIANCE PROGRESS:	COMPLIANCE PROGRESS:
Not Applicable	None	Preliminary

FOURTH REPORTING PERIOD	FIFTH REPORTING PERIOD	SIXTH REPORTING PERIOD
JANUARY 1, 2021 – JUNE 30, 2021	JULY 1, 2021 – DECEMBER 31, 2021	JANUARY 1, 2022 – JUNE 30, 2022
COMPLIANCE PROGRESS:	COMPLIANCE PROGRESS:	COMPLIANCE PROGRESS:
Preliminary	Preliminary	Preliminary

Data Collection, Analysis & Management: ¶578

578. *For any reportable use of force incident subject to an ongoing investigation by COPA, COPA will be exclusively responsible for recommending disciplinary action relating to the incident. The purpose of FRB's review will be to: a. evaluate if actions by CPD members during the incident were tactically sound and consistent with CPD training; and b. if applicable, identify specific modifications to existing policy, training, tactics, or equipment that could minimize the risk of deadly force incidents occurring and the risk of harm to officers and the public.*

Compliance Progress (Reporting Period: January 1, 2022, through June 30, 2022)

Preliminary: ***In Compliance*** **(THIRD REPORTING PERIOD)**
Secondary: ***Not Yet Assessed***
Full: ***Not Yet Assessed***

In the sixth reporting period, the City and the CPD maintained Preliminary compliance with ¶578.

During the sixth monitoring period, the CPD maintained Directive G03-02-08, *Department Review of Use of Force*, which memorializes the fact that the Force Review Board will not conduct a disciplinary review if the event is being investigated by COPA. Furthermore, the Directive includes the language of subsections (a) and (b) as the focus of the review. As the Force Review Board continues to have detailed policy, we find that the CPD has remained in Preliminary compliance with ¶578.

Additionally, the CPD has provided the IMT with an updated version of SOP 2020-003 (*Force Review Board*). The revisions to the SOP are consistent with recommendations the IMT had made regarding how Force Review Board reviews should occur (i.e., a review of each consequential action and/or decision from each participant in the use of force event). The SOP now includes guidance for conducting the reviews, including that reviews should consider actions taken prior to the use of force (e.g., OEMC-officer communication, officer-officer communication, officer-supervisor communication, body-worn camera activation, tactical approaches, etc.), the use of force itself (e.g., consistency with training, etc.), and post-force actions (e.g., rendering aid, communication, crime-scene security, etc.).

Overall, we find that the current draft has incorporated many of the changes suggested by the IMT, but other issues prevent us from providing a no-objection to the current SOP. Of primary concern (and necessary to achieve Full compliance with this paragraph), is that the IMT has been unable to observe the Force Review Board process from start to finish. Although the CPD indicates they have been holding Force Review Board meetings, we have not been provided any documentation to evidence the reviews. The IMT has not been invited to observe any Force Review Board meeting and no minutes are kept of the meetings. Additionally, the CPD has not provided any summary documents to the IMT. Therefore, we cannot comment on the personnel who attended the Force Review Board, nor can we comment on the quality of Force Review Board reviews, including the scope of the review or the prudency of recommendations for improved policy, training, tactics, or equipment. To achieve subsequent levels of compliance with this paragraph, the IMT will need to observe these meetings in-person.

Paragraph 578 Compliance Progress History

FIRST REPORTING PERIOD	SECOND REPORTING PERIOD	THIRD REPORTING PERIOD
SEPTEMBER 1, 2019 – AUGUST 31, 2019	SEPTEMBER 1, 2019 – FEBRUARY 29, 2020	MARCH 1, 2020 – DECEMBER 31, 2020
COMPLIANCE PROGRESS:	COMPLIANCE PROGRESS:	COMPLIANCE PROGRESS:
Not Applicable	None	Preliminary
FOURTH REPORTING PERIOD	**FIFTH REPORTING PERIOD**	**SIXTH REPORTING PERIOD**
JANUARY 1, 2021 – JUNE 30, 2021	JULY 1, 2021 – DECEMBER 31, 2021	JANUARY 1, 2022 – JUNE 30, 2022
COMPLIANCE PROGRESS:	COMPLIANCE PROGRESS:	COMPLIANCE PROGRESS:
Preliminary	Preliminary	Preliminary

Data Collection, Analysis & Management: ¶579

579. *The FRB will be chaired by the Superintendent, or his or her designee, and will include, at a minimum, the Chief of the Bureau of Patrol, or his or her designee, and CPD members at the rank of Deputy Chief, or above, who are responsible for overseeing policy development, policy implementation, training, and misconduct investigations. CPD's General Counsel, or his or her designee, will also serve on the FRB.*

Compliance Progress (Reporting Period: January 1, 2022, through June 30, 2022)

Preliminary:	***In Compliance*** **(THIRD REPORTING PERIOD)**
Secondary:	***Not Yet Assessed***
Full:	***Not Yet Assessed***

In the sixth reporting period, the City and the CPD maintained Preliminary compliance with ¶579.

During the sixth monitoring period, the CPD maintained Directive G03-02-08, *Department Review of Use of Force*, which memorializes the personnel required to attend Force Review Board (also known as the FRB) meetings. As the Force Review Board continues to be detailed in policy, we find that the CPD has remained in Preliminary compliance with ¶579.

Additionally, the CPD has provided the IMT with an updated version of SOP 2020-003 (*Force Review Board*). Although the requirements of ¶579 had been memorialized in prior drafts of the SOP, additional revisions to the SOP were necessary before it could be finalized. While we find that such revisions were largely made in the most recent version of the SOP, other issues prevent us from providing a no-objection to the current SOP. Of primary concern (and necessary to achieve Full compliance with this paragraph), is that the IMT has been unable to observe the Force Review Board process from start to finish. Although the CPD indicates they have been holding Force Review Board meetings, we have not been provided any documentation to evidence the reviews. The IMT has not been invited to observe any Force Review Board meeting and no minutes are kept of the meetings. Additionally, the CPD has not provided any summary documents to the IMT. Therefore, we cannot comment on the personnel who attended the Force Review Board, nor can we comment on the quality of Force Review Board reviews, including the scope of the review or the prudency of recommendations for improved policy, training, tactics, or equipment. To achieve subsequent levels of

compliance with this paragraph, the IMT will need to observe these meetings in-person.

Paragraph 579 Compliance Progress History

FIRST REPORTING PERIOD	SECOND REPORTING PERIOD	THIRD REPORTING PERIOD
SEPTEMBER 1, 2019 – AUGUST 31, 2019	SEPTEMBER 1, 2019 – FEBRUARY 29, 2020	MARCH 1, 2020 – DECEMBER 31, 2020
COMPLIANCE PROGRESS:	COMPLIANCE PROGRESS:	COMPLIANCE PROGRESS:
Not Applicable	None	Preliminary

FOURTH REPORTING PERIOD	FIFTH REPORTING PERIOD	SIXTH REPORTING PERIOD
JANUARY 1, 2021 – JUNE 30, 2021	JULY 1, 2021 – DECEMBER 31, 2021	JANUARY 1, 2022 – JUNE 30, 2022
COMPLIANCE PROGRESS:	COMPLIANCE PROGRESS:	COMPLIANCE PROGRESS:
Preliminary	Preliminary	Preliminary

Data Collection, Analysis & Management: ¶580

580. *The FRB will review each incident within its purview promptly, which will in no event be more than 96 hours after the incident occurs. Within 30 days after its review of an incident, the FRB will issue recommendations, if appropriate, to the Superintendent regarding any need for additional training or modifications to policies, tactics, equipment, or Department practices. Upon review and approval by the Superintendent, or his or her designee, the FRB will assign each approved recommendation to a specific CPD command staff member for implementation. CPD will promptly implement each approved recommendation.*

Compliance Progress

(Reporting Period: January 1, 2022, through June 30, 2022)

Preliminary:	***In Compliance*** **(THIRD REPORTING PERIOD)**
Secondary:	***Not in Compliance***
Full:	***Not Yet Assessed***

In the sixth reporting period, the City and the CPD maintained Preliminary compliance with ¶580.

During the sixth monitoring period, the CPD maintained Directive G03-02-08 (*Department Review of Use of Force*) which memorializes timelines and processes for implementing recommendations generated from Force Review Board meetings. As the Force Review Board continues to be detailed in policy, we find CPD has remained in Preliminary compliance with ¶580.

Additionally, the CPD has provided the IMT with an updated version of SOP 2020-003 (*Force Review Board*). Although the requirements of ¶580 had been memorialized in prior drafts of the SOP, additional revisions to the SOP were necessary before it could be finalized. While we find that such revisions were largely made in the most recent version of the SOP, other issues prevent us from providing a no-objection to the current SOP. Of primary concern (and necessary to achieve Full compliance with this paragraph), is that the IMT has been unable to observe the Force Review Board process from start to finish. Although the CPD indicates they have been holding Force Review Board meetings, we have not been provided any documentation to evidence the reviews. The IMT has not been invited to observe any Force Review Board meeting and no minutes are kept of the meetings. Additionally, the CPD has not provided any summary documents to the IMT. Therefore, we cannot comment on the personnel who attended the Force

Review Board, nor can we comment on the quality of Force Review Board reviews, including the scope of the review or the prudency of recommendations for improved policy, training, tactics, or equipment. To achieve subsequent levels of compliance with this paragraph, the IMT will need to observe these meetings in-person.

Paragraph 580 Compliance Progress History

FIRST REPORTING PERIOD	SECOND REPORTING PERIOD	THIRD REPORTING PERIOD
SEPTEMBER 1, 2019 – AUGUST 31, 2019	SEPTEMBER 1, 2019 – FEBRUARY 29, 2020	MARCH 1, 2020 – DECEMBER 31, 2020
COMPLIANCE PROGRESS:	COMPLIANCE PROGRESS:	COMPLIANCE PROGRESS:
Not Applicable	None	Preliminary

FOURTH REPORTING PERIOD	FIFTH REPORTING PERIOD	SIXTH REPORTING PERIOD
JANUARY 1, 2021 – JUNE 30, 2021	JULY 1, 2021 – DECEMBER 31, 2021	JANUARY 1, 2022 – JUNE 30, 2022
COMPLIANCE PROGRESS:	COMPLIANCE PROGRESS:	COMPLIANCE PROGRESS:
Preliminary	Preliminary	Preliminary

Data Collection, Analysis & Management: ¶581

581. *Beginning within 180 days of the Effective Date, CPD will publish on at least a monthly basis aggregated and incident-level data, excluding personal identifying information (e.g., name, address, contact information), regarding reportable use of force incidents via a publicly accessible, web-based data platform.*

Compliance Progress (Reporting Period: January 1, 2022, through June 30, 2022)

Recurring Schedule:	Monthly	✓ **Met**	**Missed**

Preliminary:	***In Compliance*** **(THIRD REPORTING PERIOD)**
Secondary:	***In Compliance*** **(NEW)**
Full:	***Not Yet Assessed***

In the sixth reporting period, the City and the CPD achieved Secondary compliance with ¶581.

During the sixth reporting period, the CPD maintained their use-of-force dashboard, which updates on a monthly basis. The dashboard continues to provide aggregate data on the department's use of force as well incident-level data via the ability to download the dashboard's underlying data. Furthermore, the CPD now has put in place mechanisms for collecting community feedback and has updated the dashboard to provide a user guide for community members. The CPD has also identified TRED as the unit responsible for reviewing public comments received through the feedback form and TRED will include a quarterly review of public feedback beginning with its 2022 Q2 report (as well as include a review in TRED's annual report). Given these efforts, we find the CPD has achieved Secondary compliance with the requirements of ¶581.

To achieve Full compliance, we will need to review TRED's reports to ensure that community comments have been addressed and that responsive actions have been taken, where appropriate. Full compliance will also depend on the CPD's ability to demonstrate the reliability of the use of force dashboard data. We discuss this in greater detail in our assessment of ¶569.

Finally, as a point of technical assistance, we note that the feedback form that is now available for community members to provide comments asks for both the name and email address of the community member. While completion of these fields does not appear to be required to submit a comment, there is nowhere that explicitly clarifies this. Some community members may avoid submitting comments if they believe they may be required to also submit their name and

email. Unless there is a compelling reason, we suggest removing these fields or, alternatively, making it clear that they are not required to submit a comment.

Paragraph 581 Compliance Progress History

FIRST REPORTING PERIOD	SECOND REPORTING PERIOD	THIRD REPORTING PERIOD
SEPTEMBER 1, 2019 – AUGUST 31, 2019	SEPTEMBER 1, 2019 – FEBRUARY 29, 2020	MARCH 1, 2020 – DECEMBER 31, 2020
COMPLIANCE PROGRESS:	COMPLIANCE PROGRESS:	COMPLIANCE PROGRESS:
Not Applicable	None	Preliminary
FOURTH REPORTING PERIOD	**FIFTH REPORTING PERIOD**	**SIXTH REPORTING PERIOD**
JANUARY 1, 2021 – JUNE 30, 2021	JULY 1, 2021 – DECEMBER 31, 2021	JANUARY 1, 2022 – JUNE 30, 2022
COMPLIANCE PROGRESS:	COMPLIANCE PROGRESS:	COMPLIANCE PROGRESS:
Preliminary	Preliminary	Secondary

Data Collection, Analysis & Management: ¶582

582. *The publicly accessible, web-based data platform will enable visitors to: a. identify where reportable uses of force occur through interactive maps depicting incident frequencies at a citywide, district, neighborhood, and ward level; b. identify the frequency, in the aggregate and by type, of reportable uses of force at the citywide, district, neighborhood, and ward level through graphs, charts, and other data visualizations; and c. review aggregate demographic information about the race, ethnicity, age, and gender of persons subjected to reportable uses of force at the citywide, district, neighborhood, and ward level through graphs, charts, and other data visualizations.*

Compliance Progress

(Reporting Period: January 1, 2022, through June 30, 2022)

Preliminary:	***In Compliance*** **(THIRD REPORTING PERIOD)**
Secondary:	***In Compliance*** **(NEW)**
Full:	***Not Yet Assessed***

In the sixth reporting period, the City and the CPD achieved Secondary compliance with ¶582.

During the sixth reporting period, the CPD maintained their use of force dashboard. The dashboard continues to allow visitors to filter data by year, location, force type, and subject demographics. We therefore find they have maintained Preliminary compliance.

Furthermore, the CPD has now put in place mechanisms for collecting community feedback and has updated the dashboard to provide a user guide for community members. The CPD has also identified TRED as the unit responsible for reviewing public comments received through the feedback form and TRED will include a quarterly review of public feedback beginning with its 2022 Q2 report (as well as include a review in TRED's annual report). Given these efforts, we find the CPD has achieved Secondary compliance with the requirements of ¶581.

To achieve Full compliance, we will need to review TRED's reports to ensure that community comments have been addressed and that responsive actions have been taken, where appropriate. Full compliance will also depend on the CPD's ability to demonstrate the reliability of the use of force dashboard data. We discuss this in greater detail in our assessment of ¶569.

Finally, as a point of technical assistance, we note that the feedback form that is now available for community members to provide comments asks for both the name and email address of the community member. While completion of these fields does not appear to be required to submit a comment, there is nowhere that explicitly clarifies this. Some community members may avoid submitting comments if they believe they may be required to also submit their name and email. Unless there is a compelling reason, we suggest removing these fields or, alternatively, making it clear that they are not required in order to submit a comment.

Paragraph 582 Compliance Progress History

FIRST REPORTING PERIOD	SECOND REPORTING PERIOD	THIRD REPORTING PERIOD
SEPTEMBER 1, 2019 – AUGUST 31, 2019	SEPTEMBER 1, 2019 – FEBRUARY 29, 2020	MARCH 1, 2020 – DECEMBER 31, 2020
COMPLIANCE PROGRESS:	COMPLIANCE PROGRESS:	COMPLIANCE PROGRESS:
Not Applicable	None	Preliminary
FOURTH REPORTING PERIOD	**FIFTH REPORTING PERIOD**	**SIXTH REPORTING PERIOD**
JANUARY 1, 2021 – JUNE 30, 2021	JULY 1, 2021 – DECEMBER 31, 2021	JANUARY 1, 2022 – JUNE 30, 2022
COMPLIANCE PROGRESS:	COMPLIANCE PROGRESS:	COMPLIANCE PROGRESS:
Preliminary	Preliminary	Secondary

Data Collection, Analysis & Management: ¶583

583. *CPD must collect and provide information to supervisors that enables them to proactively identify at-risk behavior by officers under their command, and to provide individualized interventions and support to address the at-risk behavior. CPD must provide supervisors with an automated electronic system that provides this information and equips supervisors to perform these duties.*

Compliance Progress (Reporting Period: January 1, 2022, through June 30, 2022)

Preliminary:	***In Compliance*** **(FIFTH REPORTING PERIOD)**
Secondary:	***Not Yet Assessed***
Full:	***Not Yet Assessed***

In the sixth reporting period, the CPD maintained Preliminary compliance with ¶583.

For most supervisors, the Performance Recognition System continues to be the mechanism by which they are to proactively identify at-risk behavior by officers and address such behavior. During the fifth monitoring period, the CPD provided us with updated versions of Employee Resource E05-02, *Performance Recognition System* and Department Notice D20-04, *Officer Support System (OSS) – Pilot Program*, which we found were sufficient to warrant Preliminary compliance.[1]

During the sixth monitoring period, the CPD provided a supervisor in-service training that provided guidance to supervisors on holding conversations that can

[1] Several paragraphs within the Consent Decree relate to the Officer Support System (OSS), which is designed to assist supervisors in supporting CPD sworn members in a non-disciplinary manner. The OSS helps supervisors identify members who may benefit from additional support by collecting and maintaining data on each member's reported uses of force, arrests, injuries, vehicle pursuits, misconduct allegations, civil or administrative claims, disciplinary history, body-worn and in-car camera policy violations, awards and commendations, sick leave usage, missed court appearances, training history, and current rank and assignment. It uses advanced models to identify Department members who may be at risk of experiencing an excessive force complaint, suspension, an off-duty complaint, or a domestic abuse/substance abuse complaint. The OSS application provides early intervention and relies on five key elements that include regular reviews, continued communication between supervisors and sworn members, and connecting members with available resources.
Additionally, other paragraphs in this section relate to the Performance Recognition System, a data warehouse where supervisors are able to cull through similar data as those that feed the OSS. Supervisors are required to regularly check officer metrics so as to proactively identify officers who demonstrate potential problematic behavior. The interventions available through PRS reviews mirror the interventions available in the OSS.

naturally be difficult when discussing officers' at-risk behavior. While we found the training sufficiently discussed how to have such difficult conversations (*i.e.*, using positive communications skills), there was no discussion about how to identify the officers with whom such discussions should be held. Supervisors have a wealth of officer information at their fingertips but we have not seen any training on how to parse through the data to determine who would and who would not benefit from an intervention. We are aware that some of this training will be included in the upcoming Officer Support System pilot training though this training will only be given to supervisors in three of the CPD's 22 districts, leaving supervisors in other districts still without the tools needed to "proactively identify at-risk behavior by officers under their command." We have also noted in the past that subsequent levels of compliance are likely not possible without a complete switch to the Officer Support System given the technological challenges with the Performance Recognition System. We will therefore provide an updated assessment once the Officer Support System has been fully implemented.

Paragraph 583 Compliance Progress History

FIRST REPORTING PERIOD	SECOND REPORTING PERIOD	THIRD REPORTING PERIOD
SEPTEMBER 1, 2019 – AUGUST 31, 2019	SEPTEMBER 1, 2019 – FEBRUARY 29, 2020	MARCH 1, 2020 – DECEMBER 31, 2020
COMPLIANCE PROGRESS:	COMPLIANCE PROGRESS:	COMPLIANCE PROGRESS:
Not Applicable	Not Applicable	Not Applicable
FOURTH REPORTING PERIOD	**FIFTH REPORTING PERIOD**	**SIXTH REPORTING PERIOD**
JANUARY 1, 2021 – JUNE 30, 2021	JULY 1, 2021 – DECEMBER 31, 2021	JANUARY 1, 2022 – JUNE 30, 2022
COMPLIANCE PROGRESS:	COMPLIANCE PROGRESS:	COMPLIANCE PROGRESS:
None	Preliminary	Preliminary

Data Collection, Analysis & Management: ¶584

584. *The automated electronic system must be: a. data-driven and developed with statistical methods and analytic techniques; b. customizable to CPD; c. adaptive as new information becomes available; d. capable of being audited and evaluated to improve accuracy; and e. able to generate sufficient data that enables assessment of the effects, if any, of support provided and interventions undertaken.*

Compliance Progress (Reporting Period: January 1, 2022, through June 30, 2022)

Preliminary:	***In Compliance*** **(FIFTH REPORTING PERIOD)**
Secondary:	***Not Yet Assessed***
Full:	***Not Yet Assessed***

In the sixth reporting period, the CPD maintained Preliminary compliance with ¶584.

Housed with what will ultimately become the Talent Management System is the Officer Support System (also known as OSS), an automated system which uses underlying statistical models to identify officers and alerts supervisors that a review is required.[2] During the sixth monitoring period, the CPD maintained Department Notice D20-04, which contains the requirements of ¶584.

Additionally, the department began taking the necessary steps to expand the Officer Support System pilot into three districts, including developing revised training and creating an evaluation plan for assessing the efficacy of the system. In reviewing the training, we found that it sufficiently introduced the Officer Support System and provided sufficient guidance in evaluating potentially problematic officers and providing responsive interventions when necessary.

However, in reviewing the evaluation plan, we believe more revisions will be necessary to move forward. For instance, the evaluation plan does not adequately address some Consent Decree paragraphs related to the Officer Support System, including ¶¶590, 592, and 594. Additionally, the evaluation plan noted that tactical officers may generate more work items than patrol officers despite the fact that Officer Support System controls for assignment and activity; the plan must therefore reconcile this inconsistency. While we overall believe that the evaluation

[2] We note that the OSS process is different from that required by ¶583 in that ¶583 requires supervisors to *proactively* identify officers whereas the Officer Support System process automatically flags officers for supervisory review. However, both processes require supervisors to review underlying data and implement appropriate interventions.

plan will positively contribute to the Officer Support System pilot (and subsequent expansion of the program to the entire department), additional revisions will first be necessary.

The CPD has maintained Preliminary compliance with the requirements of this paragraph. Subsequent levels of compliance will require the CPD to revise the evaluation plan and, once revised, begin collecting data in the Officer Support System pilot districts. We anticipate this may occur in the next reporting period and we will provide updates in our next report.

Paragraph 584 Compliance Progress History

FIRST REPORTING PERIOD	SECOND REPORTING PERIOD	THIRD REPORTING PERIOD
SEPTEMBER 1, 2019 – AUGUST 31, 2019	SEPTEMBER 1, 2019 – FEBRUARY 29, 2020	MARCH 1, 2020 – DECEMBER 31, 2020
COMPLIANCE PROGRESS:	COMPLIANCE PROGRESS:	COMPLIANCE PROGRESS:
Not Applicable	Not Applicable	Not Applicable
FOURTH REPORTING PERIOD	**FIFTH REPORTING PERIOD**	**SIXTH REPORTING PERIOD**
JANUARY 1, 2021 – JUNE 30, 2021	JULY 1, 2021 – DECEMBER 31, 2021	JANUARY 1, 2022 – JUNE 30, 2022
COMPLIANCE PROGRESS:	COMPLIANCE PROGRESS:	COMPLIANCE PROGRESS:
None	Preliminary	Preliminary

Data Collection, Analysis & Management: ¶585

585. *The automated electronic system must perform these primary functions: a. using statistical methods to identify officers who are at elevated risk of engaging in conduct leading to at-risk behavior; b. identifying and facilitating support and interventions that prevent or reduce the occurrence of the identified at-risk behavior; c. providing supervisors with a dashboard of relevant information about members under their direct command to facilitate appropriate supervisory intervention and support; and d. performing peer group analysis with comparative data to account for differences in job assignments, and to identify group- and unit-level patterns of activity.*

Compliance Progress (Reporting Period: January 1, 2022, through June 30, 2022)

Preliminary:	***In Compliance*** **(FIFTH REPORTING PERIOD)**
Secondary:	***Not Yet Assessed***
Full:	***Not Yet Assessed***

In the sixth reporting period, the CPD maintained Preliminary compliance with ¶585.

In reviewing the Officer Support System (OSS), we continue to find that it is capable of accomplishing the goals of ¶585. For instance, the Officer Support System uses four specific algorithmic scoring models, as well as an overarching model to identify officers. Additionally, the CPD has provided a list of supports and interventions that are available to officers who have been identified as potentially problematic. Furthermore, the Officer Support System provides supervisors with a dashboard of relevant information in a centralized location, allowing them to implement tailored interventions. Finally, the four scoring models used by the Officer Support System controls for several factors, including assignment, which negates the need for peer-group analysis since peer group factors are already statistically zeroed out. Each of these elements is listed in the updated version of D20-04, *Officer Support System (OSS) – Pilot Program*. As a result, the CPD has maintained Preliminary compliance.

However, as discussed in our assessment of prior paragraphs, the CPD has yet to deliver training on the Officer Support System to all supervisors in the Officer Support System pilot districts. Additionally, as discussed in our assessment of ¶584, training cannot yet be delivered as the CPD does not have a comprehensive

evaluation plan for the pilot. Such an evaluation plan will be necessary to ensure that the Officer Support System is "providing supervisors with a dashboard of relevant information about members under their direct command to facilitate appropriate supervisory intervention and support." To achieve subsequent levels of compliance, the CPD will need to deliver training for all supervisors on the Officer Support System. Additionally, the CPD will need to ensure that a comprehensive evaluation plan is in place prior to training.

Furthermore, we note that none of the training we have observed or reviewed has been specifically related to command staff. Given ¶585's requirement to use the Officer Support System to "identify group- and unit-level patterns of activity," tailored training for command staff will be necessary. Supporting this position, recent research has demonstrated that groups of officers demonstrating at-risk behavior can be found using data that feeds into the Officer Support System. For instance, Jain, Sinclair, & Papachristos (2022) found that "approximately 25% of all use of force complaints, city payouts for civil and criminal litigations, and police-involved shootings" in Chicago could be attributed to 1,156 officers (less than 4% of all CPD members).[3] Additionally, the authors found that these officers acted as part of "crews," finding approximately 160 crews within the data. We look forward to discussing with the CPD how they have incorporated this recent analysis of the CPD data into their overall Officer Support System strategy and training.

Paragraph 585 Compliance Progress History

FIRST REPORTING PERIOD	SECOND REPORTING PERIOD	THIRD REPORTING PERIOD
SEPTEMBER 1, 2019 – AUGUST 31, 2019	SEPTEMBER 1, 2019 – FEBRUARY 29, 2020	MARCH 1, 2020 – DECEMBER 31, 2020
COMPLIANCE PROGRESS:	COMPLIANCE PROGRESS:	COMPLIANCE PROGRESS:
Not Applicable	Not Applicable	Not Applicable
FOURTH REPORTING PERIOD	**FIFTH REPORTING PERIOD**	**SIXTH REPORTING PERIOD**
JANUARY 1, 2021 – JUNE 30, 2021	JULY 1, 2021 – DECEMBER 31, 2021	JANUARY 1, 2022 – JUNE 30, 2022
COMPLIANCE PROGRESS:	COMPLIANCE PROGRESS:	COMPLIANCE PROGRESS:
None	Preliminary	Preliminary

[3] Jain A, Sinclair R, Papachristos AV, *Identifying misconduct-committing officer crews in the Chicago police department*, PLOS ONE 17(5): e0267217 (2022), https://doi.org/10.1371/journal.pone.0267217.

Data Collection, Analysis & Management: ¶586

586. *A primary goal of the automated electronic system will be to facilitate early identification of officers at elevated risk of being involved in certain types of events so that the officers can receive tailored interventions intended to reduce such risk. The types of events sought to be avoided could include, depending upon the feasibility of identifying these events using statistical methods and analytic techniques, examples such as any instance in which a CPD member is: directly involved in an excessive force incident; subject to a sustained finding in a misconduct investigation; a defendant in a civil lawsuit resulting in an adverse judgment or settlement; suspended more than five days; the subject of a recommendation of employment termination by COPA, BIA, or the Superintendent; a direct participant in an officer-involved shooting or death determined to be unjustified or out of policy by COPA, BIA, the Superintendent, the Police Board, or a court of law; convicted of a crime; or subject to an increased risk of suicide or alcohol and/or substance abuse.*

Compliance Progress (Reporting Period: January 1, 2022, through June 30, 2022)

Preliminary:	***In Compliance*** **(FIFTH REPORTING PERIOD)**
Secondary:	***Not Yet Assessed***
Full:	***Not Yet Assessed***

In the sixth reporting period, the CPD maintained Preliminary compliance with ¶586.

During the sixth monitoring period, the CPD maintained Department Notice D20-04, *Officer Support System (OSS) – Pilot Program* which identifies the four specific algorithmic scoring models to identify officers potentially in need of an intervention. These four models seek to identify officers who will experience:

(1) a complaint involving a domestic or substance use event,

(2) a complaint involving an off-duty event with the exception of domestic or substance use event,

(3) a sustained excessive force complaint, and

(4) a suspension.

To achieve additional levels of compliance, the CPD will have to deliver comprehensive training on the Officer Support System to ensure "early identification of officers at elevated risk of being involved in certain types of events." During this monitoring period, the CPD provided us with updated training that it will use for the pilot sites. In reviewing the training, we found it contained all relevant topics and was overall comprehensive in introducing the Officer Support System and providing guidance on using the Officer Support System. We therefore issued a no-objection notice for the training, though we also noted that a comprehensive evaluation plan would be necessary before the CPD actually delivers the training. As that evaluation plan has not yet been finalized, the CPD cannot yet actually deliver the Officer Support System training. We will continue to provide updates in future reports.

Paragraph 586 Compliance Progress History

FIRST REPORTING PERIOD SEPTEMBER 1, 2019 – AUGUST 31, 2019 COMPLIANCE PROGRESS: Not Applicable	SECOND REPORTING PERIOD SEPTEMBER 1, 2019 – FEBRUARY 29, 2020 COMPLIANCE PROGRESS: Not Applicable	THIRD REPORTING PERIOD MARCH 1, 2020 – DECEMBER 31, 2020 COMPLIANCE PROGRESS: Not Applicable
FOURTH REPORTING PERIOD JANUARY 1, 2021 – JUNE 30, 2021 COMPLIANCE PROGRESS: None	FIFTH REPORTING PERIOD JULY 1, 2021 – DECEMBER 31, 2021 COMPLIANCE PROGRESS: Preliminary	SIXTH REPORTING PERIOD JANUARY 1, 2022 – JUNE 30, 2022 COMPLIANCE PROGRESS: Preliminary

Data Collection, Analysis & Management: ¶587

587. *The automated electronic system must include a computerized relational database that will be used to collect, maintain, integrate, analyze, visualize, and retrieve data for each CPD officer. The information collected and maintained must include but is not limited to: a. all reportable uses of force; b. all arrests by CPD personnel; c. all injuries to and deaths of persons in CPD custody; d. all injuries and deaths resulting from conduct by CPD personnel; e. all vehicle pursuits and traffic collisions involving CPD equipment or personnel; f. all misconduct complaints and investigations involving CPD officers, including the disposition of each allegation; g. all civil or administrative claims initiated against the City or CPD, or CPD officers for Jobs-related conduct; h. all criminal proceedings initiated against a CPD officer, which CPD will require officers to report; i. all instances in which CPD is notified that a court has made a negative credibility determination regarding a CPD officer; j. instances in which CPD learns through the Cook County State's Attorney's Office that an affirmative finding was made during the course of a criminal proceeding that a CPD member was untruthful, including any findings made at suppression hearings; k. all instances in which CPD learns through the Cook County State's Attorney Office, the United States Attorney's Office for the Northern District of Illinois, or other prosecutorial authority that prosecution was declined based in whole or in part on concerns about a CPD officer's credibility; l. judicial proceedings where an officer is the subject of a restraining or protective order, which CPD will require officers to report; m. disciplinary history for all CPD members; n. all non-disciplinary corrective action retained electronically; o. all violations of CPD's body-worn and in-car camera policies; p. all awards and commendations received by CPD officers; q. officer sick leave usage; r. missed court appearances; s. training history; and t. rank, assignment, and transfer history.*

Compliance Progress (Reporting Period: January 1, 2022, through June 30, 2022)

Preliminary: ***In Compliance*** **(FIFTH REPORTING PERIOD)**
Secondary: ***Not Yet Assessed***
Full: ***Not Yet Assessed***

In the sixth reporting period, the CPD maintained Preliminary compliance with ¶587.

During the fifth monitoring period, the CPD provided the IMT with updated versions of Department Notice D20-04, *Officer Support System (OSS) – Pilot Program*, and Employee Resource E05-02, *Performance Recognition System*. We found these policies were sufficient to achieve Preliminary compliance though noted that subsequent levels of compliance would require the CPD to provide comprehensive training on accessing the information referenced in ¶587 as well as ensure that all data was reliably collected. However, we cannot say CPD has achieved either of these yet.

As it relates to training, we reviewed two training efforts developed by CPD. The first is the supervisor in-service training that should give supervisors the skills to access the information referenced in ¶587 in order to inform conversations with officers. As discussed in our assessment of ¶583, the in-service training failed to deliver sufficient guidance on such skills, focusing instead on conversations that should occur after reviewing ¶587 data. The second training is on the Officer Support System and will be delivered to all supervisors in pilot districts in the near future. However, as discussed in our assessment of ¶584, this training cannot yet be delivered as the CPD does not have a comprehensive evaluation plan for the pilot.

As it relates to the reliability of the data, we reported in the last monitoring period the fact that an independent assessment of the CPD's data systems found that the CPD does not collect some of the information required by this paragraph (*see* our IMR-5 assessment of ¶606 for additional information about the review). During the sixth monitoring period, the CPD provided us with a spreadsheet that evaluated the data necessary to develop, implement, and evaluate the Officer Support System (*see* our assessment of ¶606). However, the spreadsheet does not cover the data elements of ¶587 and therefore the only evidence we have at-hand indicates that the CPD does not collect all data to comply with this paragraph. To achieve subsequent levels of compliance, the CPD will need to deliver training for all supervisors on how to navigate the data as well as ensure that all data is being reliably captured.

Paragraph 587 Compliance Progress History

FIRST REPORTING PERIOD	SECOND REPORTING PERIOD	THIRD REPORTING PERIOD
SEPTEMBER 1, 2019 – AUGUST 31, 2019	SEPTEMBER 1, 2019 – FEBRUARY 29, 2020	MARCH 1, 2020 – DECEMBER 31, 2020
COMPLIANCE PROGRESS:	COMPLIANCE PROGRESS:	COMPLIANCE PROGRESS:
Not Applicable	Not Applicable	Not Applicable
FOURTH REPORTING PERIOD	**FIFTH REPORTING PERIOD**	**SIXTH REPORTING PERIOD**
JANUARY 1, 2021 – JUNE 30, 2021	JULY 1, 2021 – DECEMBER 31, 2021	JANUARY 1, 2022 – JUNE 30, 2022
COMPLIANCE PROGRESS:	COMPLIANCE PROGRESS:	COMPLIANCE PROGRESS:
None	Preliminary	Preliminary

Data Collection, Analysis & Management: ¶588

588. *CPD will collect and maintain all information reasonably necessary to identify patterns of behavior that are indicative of a future instance of at-risk behavior. The automated electronic system must employ specific criteria to identify officers who will be subject to an intervention or targeted support. The criteria may be based on a single indicator, such as the number of misconduct complaints against an officer, a combination of multiple indicators, or an algorithmic scoring model. CPD will adjust the criteria as necessary based on data and experience to ensure interventions and support are optimally targeted.*

Compliance Progress (Reporting Period: January 1, 2022, through June 30, 2022)

Preliminary:	***In Compliance*** **(FIFTH REPORTING PERIOD)**
Secondary:	***Not Yet Assessed***
Full:	***Not Yet Assessed***

In the sixth reporting period, the CPD maintained Preliminary compliance with ¶588.

During the fifth monitoring period, the CPD provided us with an updated version of Department Notice D20-04, *Officer Support System (OSS) – Pilot Program*, which memorializes the early intervention program contemplated by ¶588. The policy specifies that the Officer Support System uses the CPD data as part of a predictive algorithm involving four separate scoring models to identify officers who are at a heightened risk for adverse events.

However, as discussed in our assessment of prior paragraphs, the CPD has yet to deliver training on the Officer Support System to all supervisors in the Officer Support System pilot districts. Additionally, as discussed in our assessment of ¶584, this training cannot yet be delivered as the CPD does not have a comprehensive evaluation plan for the pilot. Such an evaluation plan will be necessary to "adjust the criteria as necessary based on data and experience to ensure interventions and support are optimally targeted." Furthermore, as noted in ¶587, the CPD does not currently collect all "all information reasonably necessary to identify patterns of behavior that are indicative of a future instance of at-risk behavior." To achieve subsequent levels of compliance, the CPD will need to deliver training for all supervisors on the Officer Support System models as well as ensure that a comprehensive evaluation plan (including all required data) is in place prior to training.

Paragraph 588 Compliance Progress History

FIRST REPORTING PERIOD	SECOND REPORTING PERIOD	THIRD REPORTING PERIOD
SEPTEMBER 1, 2019 – AUGUST 31, 2019	SEPTEMBER 1, 2019 – FEBRUARY 29, 2020	MARCH 1, 2020 – DECEMBER 31, 2020
COMPLIANCE PROGRESS:	COMPLIANCE PROGRESS:	COMPLIANCE PROGRESS:
Not Applicable	Not Applicable	Not Applicable
FOURTH REPORTING PERIOD	**FIFTH REPORTING PERIOD**	**SIXTH REPORTING PERIOD**
JANUARY 1, 2021 – JUNE 30, 2021	JULY 1, 2021 – DECEMBER 31, 2021	JANUARY 1, 2022 – JUNE 30, 2022
COMPLIANCE PROGRESS:	COMPLIANCE PROGRESS:	COMPLIANCE PROGRESS:
None	Preliminary	Preliminary

Data Collection, Analysis & Management: ¶589

589. *CPD will ensure that all required information is entered into the automated electronic system in a timely, accurate, and complete manner. All information captured within the automated electronic system will be accessible in an organized manner that facilitates identification of at-risk officer conduct.*

Compliance Progress

(Reporting Period: January 1, 2022, through June 30, 2022)

Preliminary:	***In Compliance*** **(FIFTH REPORTING PERIOD)**
Secondary:	***Not Yet Assessed***
Full:	***Not Yet Assessed***

In the sixth reporting period, the CPD maintained Preliminary compliance with ¶589.

During the fifth monitoring period, the CPD provided us with updated versions of Department Notice D20-04, *Officer Support System (OSS) – Pilot Program*, and Employee Resource E05-02, *Performance Recognition System*. Both policies include provisions related to supervisors accessing the respective data system to review members and identify at-risk conduct. As such, we found them sufficient to warrant Preliminary compliance.

However, as discussed in our assessment of prior paragraphs, the CPD has yet to deliver training on the Officer Support System to all supervisors in the Officer Support System pilot districts nor have all supervisors in the CPD been given adequate training on how to identify "at-risk officer conduct." Additionally, as discussed in our assessment of ¶584, training cannot yet be delivered as the CPD does not have a comprehensive evaluation plan for the pilot. Such an evaluation plan will be necessary to ensure that all information is "accessible in an organized manner that facilitates identification of at-risk officer conduct." To achieve subsequent levels of compliance, the CPD will need to deliver training for all supervisors on the Officer Support System, including supervisors' ability to proactively identify at-risk officers. Additionally, the CPD will need to ensure that a comprehensive evaluation plan is in place prior to training.

Paragraph 589 Compliance Progress History

FIRST REPORTING PERIOD	SECOND REPORTING PERIOD	THIRD REPORTING PERIOD
SEPTEMBER 1, 2019 – AUGUST 31, 2019	SEPTEMBER 1, 2019 – FEBRUARY 29, 2020	MARCH 1, 2020 – DECEMBER 31, 2020
COMPLIANCE PROGRESS:	COMPLIANCE PROGRESS:	COMPLIANCE PROGRESS:
Not Applicable	Not Applicable	Not Applicable
FOURTH REPORTING PERIOD	**FIFTH REPORTING PERIOD**	**SIXTH REPORTING PERIOD**
JANUARY 1, 2021 – JUNE 30, 2021	JULY 1, 2021 – DECEMBER 31, 2021	JANUARY 1, 2022 – JUNE 30, 2022
COMPLIANCE PROGRESS:	COMPLIANCE PROGRESS:	COMPLIANCE PROGRESS:
None	Preliminary	Preliminary

Data Collection, Analysis & Management: ¶590

590. *CPD will require unit commanding officers to review the automated electronic system data regarding all officers who are transferred to their command within 14 days of the transfer. CPD will require supervisors to conduct monthly reviews of the automated electronic system data regarding officers under their direct command. The purpose of these reviews will be for supervisors to identify and address patterns of behavior by officers under their direct command that are indicative of a future instance of at-risk behavior. CPD will also require supervisors to review the automated electronic system data together with officers under their direct command during the annual performance evaluation process.*

Compliance Progress (Reporting Period: January 1, 2022, through June 30, 2022)

Recurring Schedule: Monthly ☑ **Met** ☐ **Missed**

Preliminary: ***In Compliance*** **(FIFTH REPORTING PERIOD)**
Secondary: ***Not Yet Assessed***
Full: ***Not Yet Assessed***

In the sixth reporting period, the CPD maintained Preliminary compliance with ¶590.

Although the CPD is still migrating from the Performance Recognition System to the Talent Management System (TMS) (which houses the Officer Support System), supervisors in non-pilot districts continue to be required to use the Performance Recognition System through Employee Resource E05-02, *Performance Recognition System*. During this monitoring period, the CPD maintained E05-20 which contains the requirements of ¶590. As ¶604 allows the CPD to continue to use Performance Recognition System on an interim basis while transitioning to the new system, we find that E05-20 continues to evidence Preliminary compliance with the requirements of ¶590.

During the sixth monitoring period, the CPD provided a supervisor in-service training that provided guidance to supervisors on holding conversations that can naturally be difficult when discussing officers' at-risk behavior. While we found the training sufficiently discussed how to have such difficult conversations (i.e., using positive communications skills), there was no discussion about how to identify the officers with whom such discussions should be held, including as part of new-to-

command reviews, monthly reviews, or officers' annual performance evaluation reviews. Supervisors have a wealth of officer information at their fingertips, but we have not seen any training on how to parse through the data to determine who would and who would not benefit from an intervention. We are aware that some of this training will be included in the upcoming Officer Support System pilot training though this training will only be given to supervisors in three of the CPD's 22 districts, leaving supervisors in other districts still without the tools needed to "identify and address patterns of behavior by officers under their direct command that are indicative of a future instance of at-risk behavior." We have also noted in the past that subsequent levels of compliance are likely not possible without a complete switch to the Officer Support System given the technological challenges with the Performance Recognition System. We will therefore provide an updated assessment once the Officer Support System has been fully implemented.

Paragraph 590 Compliance Progress History

FIRST REPORTING PERIOD	SECOND REPORTING PERIOD	THIRD REPORTING PERIOD
SEPTEMBER 1, 2019 – AUGUST 31, 2019	SEPTEMBER 1, 2019 – FEBRUARY 29, 2020	MARCH 1, 2020 – DECEMBER 31, 2020
COMPLIANCE PROGRESS:	COMPLIANCE PROGRESS:	COMPLIANCE PROGRESS:
Not Applicable	Not Applicable	None

FOURTH REPORTING PERIOD	FIFTH REPORTING PERIOD	SIXTH REPORTING PERIOD
JANUARY 1, 2021 – JUNE 30, 2021	JULY 1, 2021 – DECEMBER 31, 2021	JANUARY 1, 2022 – JUNE 30, 2022
COMPLIANCE PROGRESS:	COMPLIANCE PROGRESS:	COMPLIANCE PROGRESS:
None	Preliminary	Preliminary

Data Collection, Analysis & Management: ¶591

591. *The automated electronic system will employ push notifications and similar mechanisms to alert supervisors when patterns of conduct indicative of a future instance of at risk behavior are identified. CPD will provide appropriate interventions and support in a timely manner.*

Compliance Progress (Reporting Period: January 1, 2022, through June 30, 2022)

Preliminary:	***In Compliance* (FIFTH REPORTING PERIOD)**
Secondary:	***Not Yet Assessed***
Full:	***Not Yet Assessed***

In the sixth reporting period, the CPD maintained Preliminary compliance with ¶591.

During the sixth monitoring period, the CPD maintained Directive D20-04 (*Officer Support System Pilot Program*), which includes the elements of ¶591. For instance, the CPD uses Officer Support System push notifications and CPD email to notify supervisors that an alert has been generated. Additionally, the D20-04 includes specific timelines for completing tasks as part of the process, facilitating the timely provision of interventions and support. As a result, the CPD maintained Preliminary compliance.

However, as discussed in our assessment of prior paragraphs, the CPD has yet to deliver training on the Officer Support System to all supervisors in the Officer Support System pilot districts. Additionally, as discussed in our assessment of ¶584, training cannot yet be delivered as the CPD does not have a comprehensive evaluation plan for the pilot. Such an evaluation plan will be necessary to ensure that "appropriate interventions and support [have been provided] in a timely manner." To achieve subsequent levels of compliance, the CPD will need to deliver training for all supervisors on the Officer Support System. Additionally, the CPD will need to ensure that a comprehensive evaluation plan is in place prior to training.

Paragraph 591 Compliance Progress History

FIRST REPORTING PERIOD	SECOND REPORTING PERIOD	THIRD REPORTING PERIOD
SEPTEMBER 1, 2019 – AUGUST 31, 2019	SEPTEMBER 1, 2019 – FEBRUARY 29, 2020	MARCH 1, 2020 – DECEMBER 31, 2020
COMPLIANCE PROGRESS:	COMPLIANCE PROGRESS:	COMPLIANCE PROGRESS:
Not Applicable	Not Applicable	Not Applicable
FOURTH REPORTING PERIOD	**FIFTH REPORTING PERIOD**	**SIXTH REPORTING PERIOD**
JANUARY 1, 2021 – JUNE 30, 2021	JULY 1, 2021 – DECEMBER 31, 2021	JANUARY 1, 2022 – JUNE 30, 2022
COMPLIANCE PROGRESS:	COMPLIANCE PROGRESS:	COMPLIANCE PROGRESS:
None	Preliminary	Preliminary

Data Collection, Analysis & Management: ¶592

592. *CPD will ensure that any CPD member required to receive counseling after being identified through the automated electronic system has the opportunity to participate in an initial counseling session within 14 days of the member being notified of the requirement.*

Compliance Progress (Reporting Period: January 1, 2022, through June 30, 2022)

Preliminary:	***In Compliance* (FIFTH REPORTING PERIOD)**
Secondary:	***Not Yet Assessed***
Full:	***Not Yet Assessed***

In the sixth reporting period, the CPD maintained Preliminary compliance with ¶592.

During the sixth monitoring period, the CPD maintained Directive D20-04, *Officer Support System Pilot Program*, which contains ¶592's requirements that officers receive an initial counseling session within 14 days of the agreed upon intervention. As a result, the CPD continues to be in Preliminary compliance with this paragraph.

However, as discussed in our assessment of prior paragraphs, the CPD has yet to deliver training on the Officer Support System to all supervisors in the Officer Support System pilot districts. Additionally, as discussed in our assessment of ¶584, training cannot yet be delivered as the CPD does not have a comprehensive evaluation plan for the pilot. Such an evaluation plan will be necessary to ensure that supervisors are appropriately identifying officers who would benefit most from counseling services. To achieve subsequent levels of compliance, the CPD will need to deliver training for all supervisors on the Officer Support System. Additionally, the CPD will need to ensure that a comprehensive evaluation plan is in place prior to training.

Additionally, as noted in our prior report, the CPD does not currently possess the data processes to reliably track and document whether officers received an initial counseling session within 14 days, as required by ¶592. We discuss this issue in more depth in our assessments of ¶¶389 and 391. In order to achieve Full compliance, the CPD will need to resolve the wellness unit's data shortcomings so as to demonstrate adherence with the 14-day timeline found in this paragraph.

Paragraph 592 Compliance Progress History

FIRST REPORTING PERIOD	SECOND REPORTING PERIOD	THIRD REPORTING PERIOD
SEPTEMBER 1, 2019 – AUGUST 31, 2019	SEPTEMBER 1, 2019 – FEBRUARY 29, 2020	MARCH 1, 2020 – DECEMBER 31, 2020
COMPLIANCE PROGRESS:	COMPLIANCE PROGRESS:	COMPLIANCE PROGRESS:
Not Applicable	Not Applicable	Not Applicable
FOURTH REPORTING PERIOD	**FIFTH REPORTING PERIOD**	**SIXTH REPORTING PERIOD**
JANUARY 1, 2021 – JUNE 30, 2021	JULY 1, 2021 – DECEMBER 31, 2021	JANUARY 1, 2022 – JUNE 30, 2022
COMPLIANCE PROGRESS:	COMPLIANCE PROGRESS:	COMPLIANCE PROGRESS:
None	Preliminary	Preliminary

Data Collection, Analysis & Management: ¶593

593. *CPD will ensure that command staff regularly use the automated electronic system data to effectively manage CPD officers and supervisors across all ranks, watches, beats, and districts.*

Compliance Progress (Reporting Period: January 1, 2022, through June 30, 2022)

Preliminary:	***In Compliance*** **(FIFTH REPORTING PERIOD)**
Secondary:	***Not Yet Assessed***
Full:	***Not Yet Assessed***

In the sixth reporting period, the CPD maintained Preliminary compliance with ¶593.

Similar to the assessment of ¶590, the CPD supervisors in non-OSS pilot districts continue to be required to use the Performance Recognition System through Directive E05-02, *Performance Recognition System*. During this monitoring period, the CPD maintained Employee Resource E05-20 that contains requirements for supervisors (including command-level supervisors) to regularly review members under their command. Furthermore, the CPD maintained Directive D20-04, *Officer Support System (OSS) – Pilot Program*, which lists as the first of the Officer Support System's key elements to effectiveness the need for command staff to regularly review of the Officer Support System to effectively manage the CPD officers. As a result, the CPD has maintained Preliminary compliance.

During the sixth monitoring period, the CPD provided an in-service training for supervisors that provided guidance to supervisors on holding conversations that can naturally be difficult when discussing officers' at-risk behavior. While we found the training sufficiently discussed how to have such difficult conversations (i.e., using positive communications skills), there was no discussion about how to identify the officers with whom such discussions should be held as part of supervisors' overall employee management approach. Supervisors have a wealth of officer information at their fingertips but we have not seen any training on how to parse through the data to determine who would and who would not benefit from an intervention. We are aware that some of this training will be included in the upcoming Officer Support System pilot training though this training will only be given to supervisors in three of the CPD's 22 districts, leaving supervisors in other districts still without the tools needed to "effectively manage CPD officers and supervisors across all ranks, watches, beats, and districts." We have also noted in the past that subsequent levels of compliance are likely not possible without a

complete switch to the Officer Support System given the technological challenges with the PRS. We will therefore provide an updated assessment once the Officer Support System has been fully implemented.

Additionally, we note that none of the training we have observed or reviewed has been specifically related to command staff. Given ¶593's requirement to use the Officer Support System to "effectively manage CPD officers and supervisors across *all ranks, watches, beats, and districts*" (emphasis added), tailored training for command staff will be necessary. Supporting this position, recent research has demonstrated that groups of officers demonstrating at-risk behavior can be found using data that feeds into the Officer Support System. For instance, Jain, Sinclair, & Papachristos (2022) found that "approximately 25% of all use of force complaints, city payouts for civil and criminal litigations, and police-involved shootings" in Chicago could be attributed to 1,156 officers (less than 4% of all CPD members).[4] Additionally, the authors found that these officers acted as part of "crews," finding approximately 160 crews within the data. We look forward to discussing with the CPD how they have incorporated this recent analysis of the CPD data into their overall Officer Support System strategy and training.

Paragraph 593 Compliance Progress History

FIRST REPORTING PERIOD	SECOND REPORTING PERIOD	THIRD REPORTING PERIOD
SEPTEMBER 1, 2019 – AUGUST 31, 2019	SEPTEMBER 1, 2019 – FEBRUARY 29, 2020	MARCH 1, 2020 – DECEMBER 31, 2020
COMPLIANCE PROGRESS:	COMPLIANCE PROGRESS:	COMPLIANCE PROGRESS:
Not Applicable	Not Applicable	Not Applicable
FOURTH REPORTING PERIOD	**FIFTH REPORTING PERIOD**	**SIXTH REPORTING PERIOD**
JANUARY 1, 2021 – JUNE 30, 2021	JULY 1, 2021 – DECEMBER 31, 2021	JANUARY 1, 2022 – JUNE 30, 2022
COMPLIANCE PROGRESS:	COMPLIANCE PROGRESS:	COMPLIANCE PROGRESS:
None	Preliminary	Preliminary

[4] Jain A, Sinclair R, Papachristos AV, *Identifying misconduct-committing officer crews in the Chicago police department*, PLOS ONE 17(5): e0267217 (2022), https://doi.org/10.1371/journal.pone.0267217.

Data Collection, Analysis & Management: ¶594

594. *CPD will provide training to all officers, supervisors, and command staff regarding the automated electronic system to ensure proper understanding and use of the system.*

Compliance Progress (Reporting Period: January 1, 2022, through June 30, 2022)

Preliminary:	***In Compliance* (FIFTH REPORTING PERIOD)**
Secondary:	***Not Yet Assessed***
Full:	***Not Yet Assessed***

In the sixth reporting period, the CPD maintained Preliminary compliance with ¶594.

During the sixth monitoring period, the CPD maintained Directive D20-04 (*Officer Support System (OSS) – Pilot Program*) which contains the training requirements found in ¶594. The Directive identifies training requirements for the pilot districts and accounts for situations where members transfer into a pilot district. The Directive also discusses training requirements for officers, supervisors, and command staff. As a result, the CPD has maintained Preliminary compliance.

However, as discussed in our assessment of prior paragraphs, the CPD has yet to deliver training on the Officer Support System to all supervisors in the Officer Support System pilot districts. Additionally, as discussed in our assessment of ¶584, training cannot yet be delivered as the CPD does not have a comprehensive evaluation plan for the pilot. Such an evaluation plan will be necessary to ensure "proper understanding and use of the system." To achieve subsequent levels of compliance, the CPD will need to deliver training for all supervisors on the Officer Support System. Additionally, the CPD will need to ensure that a comprehensive evaluation plan is in place prior to training.

Finally, we have not received any information regarding training for officers to ensure that they have a proper understanding of the system. In reviewing the supervisors training, a significant portion of it could also be used as the training for officers, with the remaining portion being delivered to only supervisors. To achieve additional levels of compliance, the CPD will need ensure that all members have been adequately trained.

Paragraph 594 Compliance Progress History

FIRST REPORTING PERIOD	SECOND REPORTING PERIOD	THIRD REPORTING PERIOD
SEPTEMBER 1, 2019 – AUGUST 31, 2019	SEPTEMBER 1, 2019 – FEBRUARY 29, 2020	MARCH 1, 2020 – DECEMBER 31, 2020
COMPLIANCE PROGRESS:	COMPLIANCE PROGRESS:	COMPLIANCE PROGRESS:
Not Applicable	Not Applicable	Not Applicable
FOURTH REPORTING PERIOD	**FIFTH REPORTING PERIOD**	**SIXTH REPORTING PERIOD**
JANUARY 1, 2021 – JUNE 30, 2021	JULY 1, 2021 – DECEMBER 31, 2021	JANUARY 1, 2022 – JUNE 30, 2022
COMPLIANCE PROGRESS:	COMPLIANCE PROGRESS:	COMPLIANCE PROGRESS:
None	Preliminary	Preliminary

Data Collection, Analysis & Management: ¶595

595. *CPD will train all supervisors to use the automated electronic system as designed, to interpret the outputs, to perform appropriate interventions and support, to address underlying stressors to promote officer well-being, and to improve the performance of officers under their direct command.*

Compliance Progress (Reporting Period: January 1, 2022, through June 30, 2022)

Preliminary: ***In Compliance*** **(FIFTH REPORTING PERIOD)**
Secondary: ***Not Yet Assessed***
Full: ***Not Yet Assessed***

In the sixth reporting period, the CPD maintained Preliminary compliance with ¶595.

During the sixth monitoring period, the CPD maintained Department Notice D20-04 which contains the requirement for all supervisors to be trained on the Officer Support System in accordance with ¶595. As a result, the CPD has maintained Preliminary compliance.

However, as discussed in our assessment of prior paragraphs, the CPD has yet to deliver training on the Officer Support System to all supervisors in the Officer Support System pilot districts. Additionally, as discussed in our assessment of ¶584, training cannot yet be delivered as the CPD does not have a comprehensive evaluation plan for the pilot. Such an evaluation plan will be necessary to ensure that supervisors are able to "interpret [system] outputs, perform appropriate interventions and support . . . officer well-being." To achieve subsequent levels of compliance, the CPD will need to deliver training for all supervisors on the Officer Support System. Additionally, the CPD will need to ensure that a comprehensive evaluation plan is in place before training.

Paragraph 595 Compliance Progress History

FIRST REPORTING PERIOD	SECOND REPORTING PERIOD	THIRD REPORTING PERIOD
SEPTEMBER 1, 2019 – AUGUST 31, 2019	SEPTEMBER 1, 2019 – FEBRUARY 29, 2020	MARCH 1, 2020 – DECEMBER 31, 2020
COMPLIANCE PROGRESS:	COMPLIANCE PROGRESS:	COMPLIANCE PROGRESS:
Not Applicable	Not Applicable	Not Applicable
FOURTH REPORTING PERIOD	**FIFTH REPORTING PERIOD**	**SIXTH REPORTING PERIOD**
JANUARY 1, 2021 – JUNE 30, 2021	JULY 1, 2021 – DECEMBER 31, 2021	JANUARY 1, 2022 – JUNE 30, 2022
COMPLIANCE PROGRESS:	COMPLIANCE PROGRESS:	COMPLIANCE PROGRESS:
None	Preliminary	Preliminary

Data Collection, Analysis & Management: ¶596

596. *CPD will conduct annual audits of the automated electronic system. The audits will: a. assess the overall effectiveness of the automated electronic system and the support and interventions prompted by the system; b. assess whether and to what extent supervisors are completing monthly reviews of the automated electronic system information regarding officers under their direct command; c. assess whether and to what extent CPD is providing interventions and support in a timely manner; d. assess whether the interventions and support provided are appropriate and effective; and e. identify any recommended changes to improve the effectiveness of the automated electronic system.*

Compliance Progress

(Reporting Period: January 1, 2022, through June 30, 2022)

Recurring Schedule: Annually ☐ **Met** ☑ **Missed**

Preliminary: ***In Compliance*** **(FIFTH REPORTING PERIOD)**
Secondary: ***Not Yet Assessed***
Full: ***Not Yet Assessed***

In the sixth reporting period, the CPD maintained Preliminary compliance with ¶596.

During the sixth monitoring period, the CPD maintained D20-04 (*Officer Support System (OSS) – Pilot Program*) and E05-02 (*Performance Recognition System*), both of which contain the audit requirements of ¶596. As a result, the CPD maintains Preliminary compliance.

As an initial step, the CPD will use the pilot evaluation plan to carry out the audit requirements of ¶596. In reviewing the audit plan, we note that it contains many of the paragraphs requirements though still requires revision to ensure it can adequately measure the requirements of all other Officer Support System paragraphs within this section. Upon completion, and assuming sufficient resources and personnel to carry out the evaluation, we believe the CPD will have evidenced Secondary compliance. Full compliance will then require the CPD to demonstrate the ability to conduct ongoing evaluations and that the results are used to improve utilization of the different systems.

Paragraph 596 Compliance Progress History

FIRST REPORTING PERIOD	SECOND REPORTING PERIOD	THIRD REPORTING PERIOD
SEPTEMBER 1, 2019 – AUGUST 31, 2019	SEPTEMBER 1, 2019 – FEBRUARY 29, 2020	MARCH 1, 2020 – DECEMBER 31, 2020
COMPLIANCE PROGRESS:	COMPLIANCE PROGRESS:	COMPLIANCE PROGRESS:
Not Applicable	Not Applicable	None

FOURTH REPORTING PERIOD	FIFTH REPORTING PERIOD	SIXTH REPORTING PERIOD
JANUARY 1, 2021 – JUNE 30, 2021	JULY 1, 2021 – DECEMBER 31, 2021	JANUARY 1, 2022 – JUNE 30, 2022
COMPLIANCE PROGRESS:	COMPLIANCE PROGRESS:	COMPLIANCE PROGRESS:
None	Preliminary	Preliminary

Data Collection, Analysis & Management: ¶597

597. *CPD will provide timely and appropriate interventions and support to officers identified through the automated electronic system. Interventions and support will be designed to assist officers in avoiding and correcting at-risk behavior. All interventions and support will be documented in the automated electronic system. CPD will review, evaluate, and document in the automated electronic system the progress and effectiveness of the intervention or support strategy for each officer.*

Compliance Progress

(Reporting Period: January 1, 2022, through June 30, 2022)

Preliminary:	***In Compliance*** **(NEW)**
Secondary:	***Not Yet Assessed***
Full:	***Not Yet Assessed***

In the sixth reporting period, the CPD achieved Preliminary compliance with ¶597.

During this monitoring period, the CPD maintained General Order G20-04 (*Officer Support System (OSS) – Pilot Program*) which includes the process for determining, documenting, and tracking interventions stemming from the Officer Support System. As a result, we find the CPD to be in Preliminary compliance with the requirements of this paragraph.

However, as discussed in our assessment of prior paragraphs, the CPD has yet to deliver training on the Officer Support System to all supervisors in the Officer Support System pilot districts. Additionally, as discussed in our assessment of ¶584, training cannot yet be delivered as the CPD does not have a comprehensive evaluation plan for the pilot. Such an evaluation plan will be necessary to ensure that supervisors are providing "timely and appropriate interventions." To achieve subsequent levels of compliance, the CPD will need to deliver training for all supervisors on the Officer Support System. Additionally, the CPD will need to ensure that a comprehensive evaluation plan is in place prior to training.

Paragraph 597 Compliance Progress History

FIRST REPORTING PERIOD	SECOND REPORTING PERIOD	THIRD REPORTING PERIOD
SEPTEMBER 1, 2019 – AUGUST 31, 2019	SEPTEMBER 1, 2019 – FEBRUARY 29, 2020	MARCH 1, 2020 – DECEMBER 31, 2020
COMPLIANCE PROGRESS:	COMPLIANCE PROGRESS:	COMPLIANCE PROGRESS:
Not Applicable	Not Applicable	Not Applicable
FOURTH REPORTING PERIOD	**FIFTH REPORTING PERIOD**	**SIXTH REPORTING PERIOD**
JANUARY 1, 2021 – JUNE 30, 2021	JULY 1, 2021 – DECEMBER 31, 2021	JANUARY 1, 2022 – JUNE 30, 2022
COMPLIANCE PROGRESS:	COMPLIANCE PROGRESS:	COMPLIANCE PROGRESS:
Not Applicable	Not Applicable	Preliminary

Data Collection, Analysis & Management: ¶598

598. *In seeking to provide improved support and wellness to its officers, CPD will seek to identify which supports and interventions are most helpful to officers and develop support and training based on CPD feedback and best practices. The types of support services offered to CPD officers may include, but not be limited to: counseling; training; coaching and mentoring; and additional supervision or monitoring.*

Compliance Progress

(Reporting Period: January 1, 2022, through June 30, 2022)

Preliminary:	***In Compliance*** **(FIFTH REPORTING PERIOD)**
Secondary:	***Not Yet Assessed***
Full:	***Not Yet Assessed***

In the sixth reporting period, the CPD maintained Preliminary compliance with ¶598.

In the sixth monitoring period, the CPD provided us with updated versions of D20-04, *Officer Support System (OSS) – Pilot Program*, which contains the requirements of ¶598. As a result, the CPD continues to be in Preliminary compliance with this paragraph.

As with our last report, Secondary compliance with this paragraph will depend on the CPD being able to demonstrate an ability to "identify which supports and interventions are most helpful to officers." During this monitoring period, we received the CPD's initial evaluation plan for the Officer Support System and, although we felt it captured important elements to evaluate the helpfulness of interventions, additional revisions will be necessary before the CPD can expand the pilot. We discuss these in our assessment of ¶584 though also note that Full compliance with this paragraph will require a longer timeline given the number of cases that will be needed to draw reliable conclusions. We recommend the CPD resolve the interim data issues for the moment in order to expand the pilot and, ultimately, implement the Officer Support System department-wide so that the CPD can carry out the analysis required by this paragraph.

Paragraph 598 Compliance Progress History

FIRST REPORTING PERIOD	SECOND REPORTING PERIOD	THIRD REPORTING PERIOD
SEPTEMBER 1, 2019 – AUGUST 31, 2019	SEPTEMBER 1, 2019 – FEBRUARY 29, 2020	MARCH 1, 2020 – DECEMBER 31, 2020
COMPLIANCE PROGRESS:	COMPLIANCE PROGRESS:	COMPLIANCE PROGRESS:
Not Applicable	Not Applicable	Not Applicable
FOURTH REPORTING PERIOD	**FIFTH REPORTING PERIOD**	**SIXTH REPORTING PERIOD**
JANUARY 1, 2021 – JUNE 30, 2021	JULY 1, 2021 – DECEMBER 31, 2021	JANUARY 1, 2022 – JUNE 30, 2022
COMPLIANCE PROGRESS:	COMPLIANCE PROGRESS:	COMPLIANCE PROGRESS:
None	Preliminary	Preliminary

Data Collection, Analysis & Management: ¶¶599–600

599. *CPD currently maintains a PRS, which is modeled on first-generation attempts by other large departments to develop early intervention systems to identify and address at-risk conduct by officers. CPD has partnered with the University of Chicago's Crime Lab ("Crime. Lab") to develop a next-generation EIS that will improve on early intervention systems implemented in other jurisdictions.*

600. *CPD will maintain its partnership with the Crime Lab or another similarly qualified service provider until such time as an EIS consistent with the requirements of this Agreement has been implemented department-wide, and CPD has developed sufficient technical competency to maintain and improve the EIS as necessary.*

Compliance Progress (Reporting Period: January 1, 2022, through June 30, 2022)

Preliminary:	***In Compliance*** **(NEW)**
Secondary:	***Not Yet Assessed***
Full:	***Not Yet Assessed***

In the sixth monitoring period, the CPD achieved Preliminary compliance with ¶600.

The CPD continues to partner with the University of Chicago Urban Labs which has played an integral part in reviewing the underlying the CPD data, developing risk models, presenting the Officer Support System program, and providing clarifications to the IMT and CPD representatives, including members of the CPD Collective Bargaining Units. During the fifth monitoring period, the CPD provided us with a Non-Disclosure Agreement (NDA) which identified the range and scope of data that is available to Urban Labs as part of the partnership. As we have been provided evidence that an ongoing relationship exists, we find the CPD to have achieved Preliminary compliance.

Subsequent levels of compliance depend on, in large part, the point at which the CPD has "developed sufficient technical competency to maintain and improve the EIS as necessary." At that point, we would expect the CPD to post Notice of Job Opportunities (NOJOs) and develop staff who will be able to maintain and independently oversee the Officer Support System. This will require the CPD provide the monitoring team with adequate training plans and outcome statistics

to demonstrate the technical competency to maintain and improve the Officer Support System as needed.

Paragraph 599 Compliance Progress History

FIRST REPORTING PERIOD	SECOND REPORTING PERIOD	THIRD REPORTING PERIOD
SEPTEMBER 1, 2019 – AUGUST 31, 2019	SEPTEMBER 1, 2019 – FEBRUARY 29, 2020	MARCH 1, 2020 – DECEMBER 31, 2020
COMPLIANCE PROGRESS:	COMPLIANCE PROGRESS:	COMPLIANCE PROGRESS:
Not Applicable	Not Applicable	Not Applicable
FOURTH REPORTING PERIOD	**FIFTH REPORTING PERIOD**	**SIXTH REPORTING PERIOD**
JANUARY 1, 2021 – JUNE 30, 2021	JULY 1, 2021 – DECEMBER 31, 2021	JANUARY 1, 2022 – JUNE 30, 2022
COMPLIANCE PROGRESS:	COMPLIANCE PROGRESS:	COMPLIANCE PROGRESS:
Not Applicable	Not Applicable	Preliminary

Paragraph 600 Compliance Progress History

FIRST REPORTING PERIOD	SECOND REPORTING PERIOD	THIRD REPORTING PERIOD
SEPTEMBER 1, 2019 – AUGUST 31, 2019	SEPTEMBER 1, 2019 – FEBRUARY 29, 2020	MARCH 1, 2020 – DECEMBER 31, 2020
COMPLIANCE PROGRESS:	COMPLIANCE PROGRESS:	COMPLIANCE PROGRESS:
Not Applicable	Not Applicable	Not Applicable
FOURTH REPORTING PERIOD	**FIFTH REPORTING PERIOD**	**SIXTH REPORTING PERIOD**
JANUARY 1, 2021 – JUNE 30, 2021	JULY 1, 2021 – DECEMBER 31, 2021	JANUARY 1, 2022 – JUNE 30, 2022
COMPLIANCE PROGRESS:	COMPLIANCE PROGRESS:	COMPLIANCE PROGRESS:
Not Applicable	Not Applicable	Preliminary

Data Collection, Analysis & Management: ¶601

601. *CPD will continue to solicit input and feedback from representatives of its collective bargaining units during the development and implementation of the EIS.*

Compliance Progress (Reporting Period: January 1, 2022, through June 30, 2022)

Preliminary: ***In Compliance*** **(THIRD REPORTING PERIOD)**
Secondary: ***Not Yet Assessed***
Full: ***Not Yet Assessed***

In the sixth reporting period, the CPD maintained Preliminary compliance with ¶601.

During this monitoring period, members of the Fraternal Order of Police (FOP) and Illinois Police Benevolent and Protective Association (PBPA) Captains, Lieutenants, and Sergeants received a presentation from the University of Chicago Crime Lab regarding the Officer Support System data models, including the processes for identifying officers and providing appropriate interventions. In observing the meeting, we felt the Crime Lab representatives clearly and accurately described the models and processes. However, the collective bargaining unit representatives expressed several concerns with the Officer Support System, particularly as it relates to the implications of being flagged by the system and the accuracy of the data models. We believe the Crime Lab representatives did a good job of answering the collective bargaining unit representatives' questions, at one point plainly stating that the goal of the data is to "tell us, historically, when things have gone wrong for an officer, what has the pattern looked like." At the end of the meeting, the collective bargaining unit representatives' concerns appeared to remain.

A separate meeting was scheduled for May of 2022 to present the Officer Support System training materials we assess in throughout this section. However, despite the training presentation's potential to resolve some of the collective bargaining unit representatives' confusion, only one collective bargaining unit representative was present and the decision was made to postpone the presentation. In summarizing the CPD's efforts, a June 2022 memo stated "My understanding is that the Unions do not see a need to meet at present."

We believe that the CPD attempted to meaningfully engage with the collective bargaining units during this monitoring period. While unfortunate that the collective bargaining units did not appear interested in attending a training where they could have given substantive feedback on the Officer Support System process,

we also note that this is not the only opportunity that should be afforded to the collective bargaining units. The CPD has not yet expanded the Officer Support System pilot and a comprehensive evaluation of the pilot (see also ¶584) may answer some of the collective bargaining unit representatives' questions or provide them with enough confidence in the system that they see a need to re-engage in the collaborative process.

As we noted in our last report, input from the collective bargaining unit on the Officer Support System is of unique importance given that it is a non-disciplinary process that necessarily requires officer and supervisor buy-in to have long-term success. Through their efforts during this monitoring period, we believe the CPD has maintained Preliminary compliance with the requirements of ¶601. However, subsequent levels of compliance with ¶601 will require the CPD to re-engage with collective bargaining units after sufficient pilot data has been collected to inform the department-wide rollout. At such a point, we would expect the CPD to discuss with the collective bargaining units the findings, issues, and proposed resolutions resulting from their evaluation. The informed input from collective bargaining units should then be incorporated into the final Officer Support System model, policy, and training before expanding the system department-wide.

Paragraph 601 Compliance Progress History

FIRST REPORTING PERIOD	SECOND REPORTING PERIOD	THIRD REPORTING PERIOD
SEPTEMBER 1, 2019 – AUGUST 31, 2019	SEPTEMBER 1, 2019 – FEBRUARY 29, 2020	MARCH 1, 2020 – DECEMBER 31, 2020
COMPLIANCE PROGRESS:	COMPLIANCE PROGRESS:	COMPLIANCE PROGRESS:
Not Applicable	Not Applicable	Preliminary
FOURTH REPORTING PERIOD	**FIFTH REPORTING PERIOD**	**SIXTH REPORTING PERIOD**
JANUARY 1, 2021 – JUNE 30, 2021	JULY 1, 2021 – DECEMBER 31, 2021	JANUARY 1, 2022 – JUNE 30, 2022
COMPLIANCE PROGRESS:	COMPLIANCE PROGRESS:	COMPLIANCE PROGRESS:
Preliminary	Preliminary	Preliminary

Data Collection, Analysis & Management: ¶602

602. *Prior to beginning the phased implementation of the EIS, CPD will develop and implement new or revised policies and procedures for using the EIS and, if applicable, the updated PRS and information obtained from them. The policies and procedures will address data storage, data retrieval, data analysis, reporting, pattern identification, supervisory use, intervention and support options and procedures, documentation and audits, access to the system, and confidentiality of personally identifiable information.*

Compliance Progress (Reporting Period: January 1, 2022, through June 30, 2022)

Preliminary: ***In Compliance*** **(FIFTH REPORTING PERIOD)**
Secondary: ***Not Yet Assessed***
Full: ***Not Yet Assessed***

In the sixth reporting period, the CPD maintained Preliminary compliance with ¶602.

In the sixth monitoring period, the CPD maintained Directive D20-04, *Officer Support System (OSS) – Pilot Program*, which contains each of the requirements listed in ¶602. Furthermore, in accordance with ¶602, the CPD maintained Employee Resource E05-02, *Performance Recognition System*, which contains the requirements of ¶602 as well as requirements found in other paragraphs within this Section. As a result of having both these policies, the CPD continues to be in Preliminary compliance with this paragraph.

However, as discussed in our assessment of prior paragraphs, the CPD has yet to deliver training on the Officer Support System to all supervisors in the Officer Support System pilot districts. Additionally, as discussed in our assessment of ¶584, training cannot yet be delivered as the CPD does not have a comprehensive evaluation plan for the pilot. Such an evaluation plan will be necessary to ensure that supervisors understand the "procedures for using the EIS and information obtained from them." To achieve subsequent levels of compliance, the CPD will need to deliver training for all supervisors on the Officer Support System. Additionally, the CPD will need to ensure that a comprehensive evaluation plan is in place prior to training.

Paragraph 602 Compliance Progress History

FIRST REPORTING PERIOD	SECOND REPORTING PERIOD	THIRD REPORTING PERIOD
SEPTEMBER 1, 2019 – AUGUST 31, 2019	SEPTEMBER 1, 2019 – FEBRUARY 29, 2020	MARCH 1, 2020 – DECEMBER 31, 2020
COMPLIANCE PROGRESS:	COMPLIANCE PROGRESS:	COMPLIANCE PROGRESS:
Not Applicable	Status Update	None

FOURTH REPORTING PERIOD	FIFTH REPORTING PERIOD	SIXTH REPORTING PERIOD
JANUARY 1, 2021 – JUNE 30, 2021	JULY 1, 2021 – DECEMBER 31, 2021	JANUARY 1, 2022 – JUNE 30, 2022
COMPLIANCE PROGRESS:	COMPLIANCE PROGRESS:	COMPLIANCE PROGRESS:
None	Preliminary	Preliminary

Data Collection, Analysis & Management: ¶603

603. *After the completion of the development of the EIS, CPD will implement the EIS through a phased rollout that incorporates pilot testing to identify and address any technical or design issues. CPD will begin phased implementation of the EIS within 18 months of the Effective Date, and will complete full implementation of the EIS by no later than 24 months after the Effective Date.*

Compliance Progress

(Reporting Period: January 1, 2022, through June 30, 2022)

Preliminary:	***In Compliance*** **(FIFTH REPORTING PERIOD)**
Secondary:	***Not Yet Assessed***
Full:	***Not Yet Assessed***

In the sixth reporting period, the CPD maintained Preliminary compliance with ¶603.

During the sixth monitoring period, the CPD continued to develop the Officer Support System training, evaluation plan, and a plan for assessing data reliability (see ¶606). As part of this, the CPD has maintained Directive D20-04 (Officer Support System (OSS) – Pilot Program), which continues to evidence Preliminary compliance with this paragraph.

However, as discussed in our assessment of prior paragraphs, the CPD has yet to deliver training on the Officer Support System to all supervisors in the Officer Support System pilot districts. Additionally, as discussed in our assessment of ¶584, training cannot yet be delivered as the CPD does not have a comprehensive evaluation plan for the pilot. Such an evaluation plan will be necessary to ensure that any technical or design issues are identified and addresses before full implementation. To achieve subsequent levels of compliance, the CPD will need to deliver training for all supervisors on the Officer Support System. Additionally, the CPD will need to ensure that a comprehensive evaluation plan is in place prior to training.

Paragraph 603 Compliance Progress History

FIRST REPORTING PERIOD	SECOND REPORTING PERIOD	THIRD REPORTING PERIOD
SEPTEMBER 1, 2019 – AUGUST 31, 2019	SEPTEMBER 1, 2019 – FEBRUARY 29, 2020	MARCH 1, 2020 – DECEMBER 31, 2020
COMPLIANCE PROGRESS:	COMPLIANCE PROGRESS:	COMPLIANCE PROGRESS:
Not Applicable	Not Applicable	Not Applicable
FOURTH REPORTING PERIOD	**FIFTH REPORTING PERIOD**	**SIXTH REPORTING PERIOD**
JANUARY 1, 2021 – JUNE 30, 2021	JULY 1, 2021 – DECEMBER 31, 2021	JANUARY 1, 2022 – JUNE 30, 2022
COMPLIANCE PROGRESS:	COMPLIANCE PROGRESS:	COMPLIANCE PROGRESS:
None	Preliminary	Preliminary

Data Collection, Analysis & Management: ¶604

604. *Prior to full implementation of the EIS, CPD will continue to use the PRS as well as other existing tools and resources to identify patterns of conduct by officers that warrant support and intervention. Following the development and implementation of the EIS, the functions required of the automated electronic system described above may be performed by a combination of the EIS and the PRS as long as all required functions are performed and supervisors are using the system(s) as required by CPD policy. To the extent CPD continues utilizing PRS to perform any of the functions required by this Agreement, CPD will update the PRS to enhance the system's effectiveness, usability, and accuracy by no later than January 1, 2020.*

Compliance Progress (Reporting Period: January 1, 2022, through June 30, 2022)

Preliminary:	***In Compliance*** **(FIFTH REPORTING PERIOD)**
Secondary:	***Not Yet Assessed***
Full:	***Not Yet Assessed***

In the sixth reporting period, the CPD maintained Preliminary compliance with ¶604.

In the sixth monitoring period, the CPD had not yet fully implemented the Officer Support System and therefore the allowances of ¶604 were in effect. Consequently, the CPD maintained Employee Resource E05-02 (*Performance Recognition System*), which includes sections related to identifying patterns of conduct by officers that warrant support and intervention.

During the sixth monitoring period, the CPD provided a supervisor in-service training that provided guidance to supervisors on holding conversations that can naturally be difficult when discussing officers' at-risk behavior. While we found the training sufficiently discussed how to have such difficult conversations (i.e., using positive communications skills), there was no discussion about how to identify the officers with whom such discussions should be held. Supervisors have a wealth of officer information at their fingertips but we have not seen any training on how to parse through the data to determine who would and who would not benefit from an intervention. We are aware that some of this training will be included in the upcoming Officer Support System pilot training though this training will only be given to supervisors in three of the CPD's 22 districts, leaving supervisors in other districts still without the "tools and resources to identify patterns of conduct by

officers that warrant support and intervention." We have also noted in the past that subsequent levels of compliance are likely not possible without a complete switch to the Officer Support System given the technological challenges with the Performance Recognition System. We will therefore provide an updated assessment once the Officer Support System has been fully implemented.

Paragraph 604 Compliance Progress History

FIRST REPORTING PERIOD	SECOND REPORTING PERIOD	THIRD REPORTING PERIOD
SEPTEMBER 1, 2019 – AUGUST 31, 2019	SEPTEMBER 1, 2019 – FEBRUARY 29, 2020	MARCH 1, 2020 – DECEMBER 31, 2020
COMPLIANCE PROGRESS:	COMPLIANCE PROGRESS:	COMPLIANCE PROGRESS:
Not Applicable	None	None
FOURTH REPORTING PERIOD	**FIFTH REPORTING PERIOD**	**SIXTH REPORTING PERIOD**
JANUARY 1, 2021 – JUNE 30, 2021	JULY 1, 2021 – DECEMBER 31, 2021	JANUARY 1, 2022 – JUNE 30, 2022
COMPLIANCE PROGRESS:	COMPLIANCE PROGRESS:	COMPLIANCE PROGRESS:
None	Preliminary	Preliminary

Data Collection, Analysis & Management: ¶605

605. *The City will ensure CPD has adequate funding to develop, implement, and maintain the EIS and, if necessary, the updated PRS, including ongoing hardware and support requirements and officer support services.*

Compliance Progress

(Reporting Period: January 1, 2022, through June 30, 2022)

Preliminary: ***Not in Compliance***
Secondary: ***Not Yet Assessed***
Full: ***Not Yet Assessed***

During the sixth monitoring period, the CPD did not reach any level of compliance with the requirements of ¶605.

The Officer Support System program is currently being developed and, consistent with our assessments of previous paragraphs, there are additional revisions necessary for training and for the program evaluation plan before the Officer Support System can be expanded. While there appears to have been significant progress with more recent efforts, we at this time do not have sufficient evidence to determine whether there exists "adequate funding to develop implement and maintain the EIS." As part of the revisions to the evaluation plan, we recommend including mechanisms to assess current Officer Support System funding across the entire program (particularly funding for officer support services). The CPD and City will also need to ensure a process is developed for ongoing assessment of funding adequacy and, where the assessment identifies additional funding is necessary, work together to provide the appropriate resources.

Paragraph 605 Compliance Progress History

FIRST REPORTING PERIOD	SECOND REPORTING PERIOD	THIRD REPORTING PERIOD
SEPTEMBER 1, 2019 – AUGUST 31, 2019	SEPTEMBER 1, 2019 – FEBRUARY 29, 2020	MARCH 1, 2020 – DECEMBER 31, 2020
COMPLIANCE PROGRESS:	COMPLIANCE PROGRESS:	COMPLIANCE PROGRESS:
Not Applicable	Not Applicable	Not Applicable
FOURTH REPORTING PERIOD	**FIFTH REPORTING PERIOD**	**SIXTH REPORTING PERIOD**
JANUARY 1, 2021 – JUNE 30, 2021	JULY 1, 2021 – DECEMBER 31, 2021	JANUARY 1, 2022 – JUNE 30, 2022
COMPLIANCE PROGRESS:	COMPLIANCE PROGRESS:	COMPLIANCE PROGRESS:
Not Applicable	Not Applicable	None

Data Collection, Analysis & Management: ¶606

606. *Within 365 days of the Effective Date, CPD will conduct an assessment of CPD's current information collection mechanisms and data management technology to identify: a. what data CPD currently collects and what additional data is required to be collected to comply with this Agreement; b. the manner of collection (e.g., electronic or paper); c. the frequency with which each type of data is updated; d. the quality control mechanisms in place, or the need for such mechanisms, to ensure the accuracy of data collected; e. what software applications or data systems CPD currently has and the extent to which they are used or accessed by CPD members; f. redundancies or inefficiencies among the applications and systems currently in use; and g. the extent to which the applications and systems currently in use interact with one another effectively.*

Compliance Progress (Reporting Period: January 1, 2022, through June 30, 2022)

Preliminary:	***In Compliance*** **(NEW)**
Secondary:	***Not in Compliance***
Full:	***Not in Compliance***

In the sixth reporting period, the City and the CPD achieved Preliminary compliance with ¶606.

In the sixth reporting period, the CPD provided us with an example of their approach to conducting the assessment required by ¶606. The CPD is using their *Roadmap to Operational Compliance* as the framing mechanism for the assessment and provided us with a spreadsheet for data necessary to develop, implement, and evaluate the Officer Support System. Although only one of the many reforms CPD is required to undertake, the spreadsheet shows an appreciable effort to measure the data necessary for successful compliance. The spreadsheet identifies data points necessary for successful implementation of the Officer Support System as well as how they are collected, when they are collected, where they are stored, whether they are systematically analyzed, and how they are managed (among other things). Furthermore, each of the data points are directly linked to one or more Consent Decree paragraphs as well as the CPD's own Roadmap cultural objectives, programs, and member expectations.

The evolution of conducting an assessment consistent with this paragraph has far exceeded the 365 days contemplated by the Consent Decree. And, to be clear, the

example provided by the CPD is only one piece of a much larger picture and significant effort will be required to replicate the process across the entire Consent Decree (which will also likely require significant resources). However, the example provided by the CPD is reflective of the steps we outlined in our IMR-5 report and we recommend the CPD refer to that report as the department does similar assessments for other sections of the Consent Decree. Given that the CPD now appears to have a methodology for the review in the form of the example analysis, we find they have achieved Preliminary compliance with the requirements of ¶606. Subsequent levels of compliance will require the department replicating the assessment across all sections, ensuring that each substantive paragraph within the Consent Decree has been assessed (while incorporating input from each respective Associate Monitor), and memorializing the assessment in a format that will best facilitate the development of the Data Systems Plan required by ¶607.

Paragraph 606 Compliance Progress History

FIRST REPORTING PERIOD	SECOND REPORTING PERIOD	THIRD REPORTING PERIOD
SEPTEMBER 1, 2019 – AUGUST 31, 2019	SEPTEMBER 1, 2019 – FEBRUARY 29, 2020	MARCH 1, 2020 – DECEMBER 31, 2020
COMPLIANCE PROGRESS:	COMPLIANCE PROGRESS:	COMPLIANCE PROGRESS:
Not Applicable	None	None

FOURTH REPORTING PERIOD	FIFTH REPORTING PERIOD	SIXTH REPORTING PERIOD
JANUARY 1, 2021 – JUNE 30, 2021	JULY 1, 2021 – DECEMBER 31, 2021	JANUARY 1, 2022 – JUNE 30, 2022
COMPLIANCE PROGRESS:	COMPLIANCE PROGRESS:	COMPLIANCE PROGRESS:
None	Under Assessment	Preliminary

Data Collection, Analysis & Management: ¶607

607. *Within 90 days of completion of the assessment described in the preceding paragraph, CPD will develop a plan, including a timeline for implementation, to prioritize and address the needs identified to enhance CPD's information collection mechanisms and data management technology ("Data Systems Plan"). CPD will implement the Data Systems Plan in accordance with the specified timeline for implementation.*

Compliance Progress

(Reporting Period: January 1, 2022, through June 30, 2022)

Preliminary:	***Not in Compliance***
Secondary:	***Not Yet Assessed***
Full:	***Not Yet Assessed***

In the sixth monitoring period, the City and the CPD did not meet any level of compliance with ¶607.

As discussed above, the CPD has taken significant steps towards the assessment related to ¶606 and, ultimately, ¶607. However, as the ¶606 assessment has not yet been fully completed, the CPD cannot yet reach any level of compliance with ¶607.

To achieve Preliminary compliance with ¶607, the City and the CPD will first need to create a data systems plan which reflects the assessment done in accordance with ¶606.

Paragraph 607 Compliance Progress History

FIRST REPORTING PERIOD	SECOND REPORTING PERIOD	THIRD REPORTING PERIOD
SEPTEMBER 1, 2019 – AUGUST 31, 2019	SEPTEMBER 1, 2019 – FEBRUARY 29, 2020	MARCH 1, 2020 – DECEMBER 31, 2020
COMPLIANCE PROGRESS:	COMPLIANCE PROGRESS:	COMPLIANCE PROGRESS:
Not Applicable	Not Applicable	Status Update
FOURTH REPORTING PERIOD	**FIFTH REPORTING PERIOD**	**SIXTH REPORTING PERIOD**
JANUARY 1, 2021 – JUNE 30, 2021	JULY 1, 2021 – DECEMBER 31, 2021	JANUARY 1, 2022 – JUNE 30, 2022
COMPLIANCE PROGRESS:	COMPLIANCE PROGRESS:	COMPLIANCE PROGRESS:
None	None	None

Data Collection, Analysis & Management: ¶608

608. *CPD will continue to maintain an Information Systems Development Group ("ISDG"). The ISDG will continue to be chaired by the Chief of the Bureau of Technical Services or other high-ranking member of CPD's command staff. The ISDG will also include, in some capacity, personnel from various units of the Department that are responsible for overseeing patrol field operations; conducting criminal investigation and processing juvenile offenders; initiating and conducting investigations of organized crime; overseeing the administrative aspects of CPD; managing data, technology, and information systems; coordinating and exercising supervision over disciplinary matters; administering training; providing legal advice; developing and publishing department policies and procedures; and overseeing and coordinating CPD's budget and fiscal responsibilities. The ISDG will be responsible for: a. ensuring implementation of the Data Systems Plan; b. ensuring CPD's information collection mechanisms and data management technologies are in the best long-term interests of the Department for improving operations and management consistent with the terms of this Agreement; and c. recommending strategies to promote the development, sharing, and reporting of relevant information to the Superintendent, the public, the FRB, COPA, BIA, and OIG.*

Compliance Progress (Reporting Period: January 1, 2022, through June 30, 2022)

Preliminary:	***In Compliance*** **(FOURTH REPORTING PERIOD)**
Secondary:	***In Compliance*** **(FIFTH REPORTING PERIOD)**
Full:	***Not in Compliance***

During the sixth monitoring period, the CPD maintained Secondary compliance with the requirements of ¶608.

In the sixth monitoring period, the CPD continued to maintain the Information Systems Development Group (also known as the ISDG), which is chaired by the Deputy Director of Information Technology. The CPD has sent us Information Systems Development Group meeting notes and agendas, as well as a resource guide which outlines the meeting process. The minutes continue to include relevant personnel, as required in ¶608. Additionally, the resource guide outlines the meeting process, including determining priorities for meeting topics,

procedures for opening and closing meetings, appropriate document templates for reviews, distribution of relevant materials, and documenting meeting notes.

We have also seen each of the above elements in practice. For instance, in March and June of 2022, the IMT observed Information Systems Development Group meetings that discussed the following: members use of SecureRadio and secure channels; progress of the new CAD system still on target for November 2022; rollout of the DEX (Desktop Experience) System which was tested in the 19th district and received positive feedback; progress update on the Records Management Subcommittee; and piloting the automation of timecards by the end of the year. The Information Systems Development Group also met in April of 2022, with the minutes indicating a discussion of a data sharing and crime analytics platform.

Accordingly, the City and the CPD maintained Secondary compliance in the sixth reporting period. Full compliance will require the CPD to demonstrate their ability appropriately select and prioritize agenda topics, provide sound guidance on data system integrity, and assist in the implementation of recommendations born out of the complete ¶606 review.

Paragraph 608 Compliance Progress History

FIRST REPORTING PERIOD	SECOND REPORTING PERIOD	THIRD REPORTING PERIOD
SEPTEMBER 1, 2019 – AUGUST 31, 2019	SEPTEMBER 1, 2019 – FEBRUARY 29, 2020	MARCH 1, 2020 – DECEMBER 31, 2020
COMPLIANCE PROGRESS:	COMPLIANCE PROGRESS:	COMPLIANCE PROGRESS:
Not Applicable	Not Applicable	Status Update

FOURTH REPORTING PERIOD	FIFTH REPORTING PERIOD	SIXTH REPORTING PERIOD
JANUARY 1, 2021 – JUNE 30, 2021	JULY 1, 2021 – DECEMBER 31, 2021	JANUARY 1, 2022 – JUNE 30, 2022
COMPLIANCE PROGRESS:	COMPLIANCE PROGRESS:	COMPLIANCE PROGRESS:
Preliminary	Secondary	Secondary

Data Collection, Analysis & Management: ¶609

609. *On an annual basis, to improve the accuracy, reliability, and efficiency of its data collection, CPD will review and, as necessary, revise departmental forms relating to: use of force, arrests, interactions with individuals in crisis, and the disciplinary process.*

Compliance Progress

(Reporting Period: January 1, 2022, through June 30, 2022)

Recurring Schedule: Annually ☐ **Met** ☑ **Missed**

Preliminary: ***In Compliance*** **(FOURTH REPORTING PERIOD)**
Secondary: ***In Compliance*** **(FOURTH REPORTING PERIOD)**
Full: ***Not Yet Assessed***

In the sixth reporting period, the City and the CPD maintained Secondary compliance with ¶609.

During the sixth monitoring period, the CPD maintained Special Order S09-03-02, *Forms Management System*, which clearly states that the CPD will review departmental forms on an annual basis consistent with the requirements of ¶609. Embedded within S09-03-02 is the "Transmittal/Response Sheet-Forms Management" form which serves to standardize the process for ensuring reviews of all the CPD directives and data collection forms. The "Transmittal/Response Sheet-Forms Management" form, coupled with S09-03-02, continues to evidence Secondary compliance with the requirements of this paragraph.

However, the IMT was not provided any completed "Transmittal/Response Sheet-Forms Management" forms during this monitoring period in order for us to verify that the process outlined in S09-03-02 was followed. Subsequent levels of compliance will depend on the IMT being able to review these forms and we therefore recommend the CPD provide these to us as a regular part of the monitoring period productions in future monitoring periods.

Paragraph 609 Compliance Progress History

FIRST REPORTING PERIOD	SECOND REPORTING PERIOD	THIRD REPORTING PERIOD
SEPTEMBER 1, 2019 – AUGUST 31, 2019	SEPTEMBER 1, 2019 – FEBRUARY 29, 2020	MARCH 1, 2020 – DECEMBER 31, 2020
COMPLIANCE PROGRESS:	COMPLIANCE PROGRESS:	COMPLIANCE PROGRESS:
Not Applicable	Not Applicable	None

FOURTH REPORTING PERIOD	FIFTH REPORTING PERIOD	SIXTH REPORTING PERIOD
JANUARY 1, 2021 – JUNE 30, 2021	JULY 1, 2021 – DECEMBER 31, 2021	JANUARY 1, 2022 – JUNE 30, 2022
COMPLIANCE PROGRESS:	COMPLIANCE PROGRESS:	COMPLIANCE PROGRESS:
Secondary	Secondary	Secondary

Appendix 11
Implementation, Enforcement & Monitoring Compliance Assessments, by Paragraph

Appendix 11
Implementation, Enforcement & Monitoring Compliance Statuses, by Paragraph

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626. *CPD will develop, revise, implement, and maintain policies and procedures as required by this Agreement consistent with the timelines identified herein. CPD will ensure that its policies and procedures are plainly written, logically organized, and use clearly defined terms.*

***

627. *The City and CPD will submit all policies and procedures required to be implemented or maintained by this Agreement to the Monitor and OAG for review, comment, and, subsequently, if necessary, objection. When the City and CPD have developed the draft of a new or revised policy or procedure required by this Agreement, they will consult in a collaborative manner at the earliest feasible time with the Monitor and OAG, with the goal of developing consensus on the substance of the policy or procedure, and make any necessary and appropriate adjustments based on those consultations. The City and CPD will submit the final draft of any new or revised policy or procedure subject to review and comment by the Monitor and OAG to the Monitor and OAG at least 30 days before the policy or procedure is scheduled to take effect, unless the Parties and the Monitor agree that a shorter period of time is appropriate under the circumstances. The Parties and the Monitor will work collaboratively on developing and revising policies and procedures related to this Agreement.*

***

629. *To the extent the Parties and the Monitor have unresolved disagreements regarding a particular policy or procedure after attempting to resolve them for at least 30 days, the Monitor or OAG may provide a written notice of outstanding objections to the City and CPD ("objection notice"). The Monitor or OAG may object only if a policy or procedure does not incorporate the requirements of this Agreement or is inconsistent with the goals and objectives of this Agreement or applicable law.*

***

630. *In the event the Monitor or OAG provides an objection notice, the Monitor will convene the Parties and attempt to resolve the identified objections within 30 days of the objection notice being received by the City ("workout period"). The Monitor will*

issue a proposed resolution of remaining objections in writing at the conclusion of the workout period. If either Party disagrees with the Monitor's resolution of an objection, either Party may ask the Court to resolve such dispute. Subject to the limited extraordinary circumstances exception set out below, CPD will not publish or implement new or revised policies or procedures required by this Agreement until the Monitor and OAG have reviewed and commented on such policies or procedures, or until the workout period and related resolution processes have occurred.

***

631. *If extraordinary circumstances demand an immediate revision or clarification (e.g., due to a change in law or other urgent circumstance), CPD may issue a temporary policy or procedure. CPD must provide prompt notice of the temporary policy or procedure to the Monitor and OAG, and the temporary policy or procedure will only remain in effect until the adoption of a revised policy or procedure pursuant to the review, comment, and objections process set forth above. This paragraph does not permanently exempt any new or revised policy or procedure from the review and comment process.*

***

632. *The Parties and the Monitor will work collaboratively and cooperatively to establish and adhere to a schedule that ensures policies and procedures required by this Agreement are reviewed adequately, efficiently, and expeditiously.*

***

633. *CPD will ensure that its officers and the public have a meaningful opportunity to review and comment on material changes to CPD policies and procedures required by this Agreement. CPD will publish upcoming opportunities for CPD member and/or community input, involvement, or engagement that relate to the material requirements of this Agreement. After the Monitor and OAG comment on a proposed policy or procedure, or all workout period processes described above have been completed, CPD will post proposed policies and procedures on its public website and provide its officers and the public with an opportunity to comment for a period of not less than 15 days. There will be reasonable exceptions to the posting requirement for policies and procedures that are law enforcement sensitive, such as procedures*

regarding undercover officers or operations. In response to any comments received, CPD will consider whether any further revisions to the proposed policy or procedure are appropriate. Changes implemented in response to public or officer comment will be subject to consultation among the Parties, and review and comment by the Monitor and OAG prior to publication and implementation.

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634. *CPD will post final and published department-wide directives, policies, and procedures on CPD's public website, subject to reasonable exceptions for policies and procedures that are law enforcement sensitive.*

***

635. *CPD will provide a mechanism to electronically access approved and published department-wide directives in a usable, organized, and searchable format.*

***

636. *CPD will periodically review each policy required to be revised or developed by this Agreement. CPD will conduct an initial review of each such policy no later than two years after the policy's implementation as provided for in this Agreement. CPD will conduct subsequent reviews every two years thereafter, although the Parties may modify the timeframe for the review of a specific policy. The purpose of the initial and subsequent reviews is to evaluate whether the policy provides effective guidance and direction to CPD members and is consistent with the requirements of this Agreement and current law.*

***

637. *CPD will make any necessary updates to its policies and training based on changes in the law that are relevant to CPD's law enforcement activities and will promptly communicate to its members such changes in the law and related policies.*

***

638. *CPD will submit the following plans required by this Agreement to the Monitor and OAG for their review and approval: a. the Crisis Intervention Plan referenced in Part G of the Crisis In-*

tervention section of this Agreement; b. the CIT Officer Implementation Plan referenced in Part D of the Crisis Intervention section of this Agreement;

***

639. *When the City and CPD have developed the draft of a plan, they will consult at the earliest feasible time with the Monitor and OAG, with the goal of developing consensus on the substance and timetable for the plan, and make any necessary and appropriate adjustments based on those consultations.*

***

640. *CPD will submit the final draft of each plan required by this Agreement and subject to review and approval by the Monitor and OAG to the Monitor and OAG at least 30 days prior to the proposed date for initial implementation. In the event that the Monitor and OAG fail to comment on a submitted plan within the 30-day period, the Monitor and OAG will be deemed to have no objection to the plan, unless the Monitor, OAG, or both state in writing that additional time is necessary to complete an adequate review. Requests for additional time to review plans will be subject to the same standard and process set forth above for requesting additional time to review policies and procedures. The Parties and the Monitor will adhere to the dispute resolution process described in Part C of this Section to resolve objections as necessary. The Monitor or OAG may object if a proposed plan does not incorporate the requirements of this Agreement or is inconsistent with the goals and objectives of this Agreement. Final versions of the plans will be made public.*

***

641. *CPD will submit all new or revised curricula, lesson plans, and course materials related to trainings required by this Agreement to the Monitor and OAG for their review, comment, and, subsequently, if necessary, objection. When the City and CPD have developed the draft of any such materials required by this Agreement, they will consult at the earliest feasible time with the Monitor and OAG, with the goal of developing consensus on the substance of the materials, and make any necessary and appropriate adjustments based on those consultations. CPD will provide final drafts of curricula, lesson plans, and course materials subject to review and comment by the Monitor and OAG to the*

Monitor and OAG at least 30 days prior to instituting the applicable training. In the event that the Monitor and OAG fail to comment on submitted training materials within the 30-day period, the Monitor and OAG will be deemed to have no objection to the training materials, unless the Monitor, OAG, or both state in writing that additional time is necessary to complete an adequate review. Requests for additional time to review training materials will be subject to the same standard and process set forth above for requesting additional time to review policies and procedures. The Parties and the Monitor will adhere to the workout period process to resolve objections as necessary.

Compliance Status

The Consent Decree outlines the policy review process in ¶¶626–37 and the plan review process in ¶¶638–41. ¶633 requires the CPD to "ensure that its officers and the public have a meaningful opportunity to review and comment on material changes to CPD policies and procedures required by this Agreement." See also, ¶¶52 and 160. Further, as the City and the CPD develop and revise policies throughout the Consent Decree process, they must consult with the IMT and the OAG to develop the necessary policy or revision. The City and the CPD must then provide the IMT with the new or revised policy at least 30 days before the policy is scheduled to go into effect (¶¶627–28). The IMT and the OAG then have 30 days to comment, with a possible 15-day extension (¶¶627–28). The City, the CPD, the OAG, and the IMT then have at least 30 days to resolve comments. If we are unable to come to a timely agreement, an entity may submit a formal objection, which triggers a "workout period" (¶630). The entities then have an additional 30 days to resolve the issue before one of the Parties brings the issue to the Court to resolve (¶630). On the other hand, when the IMT and the OAG provide a "no objection" notice, then when applicable, the City and the CPD will post the new or revised policy for public comment for a minimum of 15 days (¶633). The entities will then review and consider the public comments and agree to any changes before the City and the CPD finalize the policy (¶633).

In our first report, we noted that the review process would be more efficient if the City and the CPD consulted earlier in the process and more often with the IMT while they developed policies. There was much more consultation among the IMT and the Parties during the second reporting period. As a result, the City and the CPD began to regularly develop compliant policies, curricula, and plans with input from the IMT or the OAG.

In our fourth report, we noted that the City and the CPD continued to appropriately focus on developing optimal policies and plans. Strong policing policies provide the foundation for implementing and sustaining best practices (*see* ¶730)

with transparency and accountability. These efforts continued throughout the fifth reporting period. Overall, we have been satisfied by the City's, the CPD's, and willingness to collaborate with the IMT, the OAG, and some communities regarding their policies. The review processes have not always been without complications since the inception of the Consent Decree, but we continue to work through disagreements in a largely collaborative fashion.

In the sixth reporting period, the City and the CPD continued to make efforts towards compliance with the requirements of ¶¶626-41. They continued to work to create and revise policies in collaboration with the IMT and OAG across all sections of the Consent Decree. Below, we provide some further details, by paragraph.

- ***¶631.*** The CPD has issued policies without IMT and OAG input, review, or approval by citing to ¶631 on occasion. One instance in which the CPD issued a policy prior bypassing the required procedures detailed in ¶¶626-41 was their issuance of a "temporary" policy guiding foot pursuits in May 2021.

  On March 5, 2021, the IMT recommended that the CPD adopt a foot pursuit policy based on our assessment of CPD data and information of foot pursuit incidents (*see* ¶196). Because of our recommendation, the CPD was required to adopt a foot pursuit policy by September 3, 2021, and "[a]ny foot pursuit policy adopted by CPD will be subject to review and approval by the Monitor and OAG."

  On May 4, 2021, following agreements during a settlement conference on May 3, 2021, the City and CPD submitted a draft of G03-07, *Foot Pursuits* (May 3, 2021), to IMT and OAG for review. However, on May 26, 2021, prior to appropriate input from the IMT, the City and the CPD bypassed the Consent Decree's policy review schedule (¶¶172 and 627, et al.) and issued a "temporary policy" before the summer, citing ¶631. The policy went into effect on June 11, 2021.

  On May 10, 2021, the IMT noted multiple concerns in written comments to the City and CPD regarding the temporary, draft policy. The draft did not provide clear expectations for CPD officers and supervisors, allow the CPD to enforce such expectations, or provide the public with notice on the CPD's expected practices and procedures. Furthermore, the City and CPD did not receive community input on the policy, which it finds necessary in order to receive compliance under the Consent Decree.

  Since then, the CPD has worked with the IMT and OAG to revise its interim policy, which became effective on June 11, 2021. Despite the policy being temporary it incorporates best practices and is modeled on after other peer agencies (e.g., Baltimore, Maryland).

In short, the IMT is somewhat concerned about the CPD's invocation of ¶631, especially in the foot pursuit policy instance. To be clear, the CPD's lack of a policy guiding its use of foot pursuits was determined to be problematic in the U.S. Department of Justice's investigation findings letter back in 2017, so we didn't see that the CPD's lack of a foot pursuit policy, which has been the case throughout the CPD's history, qualified as "extraordinary circumstances" that demanded "an immediate revision or clarification." We encourage the City and the CPD to carefully consider its use of the ¶631 provision as we move toward review and implementation of other crucial policies like search warrants.

- ***¶633.*** Although the CPD has generally followed the process outlined in the Consent Decree to ensure that its officers and the public have a meaningful opportunity to review and comment on material changes to CPD policies and procedures, the CPD has not always followed the processes detailed in the Consent Decree and waited to post policies for public comment[1] until after all workout period processes had been completed. For example, in the sixth reporting period the CPD posted various Special Orders for public comment prior to receiving no-objection notices from the IMT and the OAG. We expect moving forward that CPD will wait to post policies for public comment until after receiving no-objection notices from both the IMT and the OAG, otherwise we will expect that policies be re-posted if any material changes are made.

  The CPD continues to consider how to engage the public in meaningful opportunities to review and comment on material changes to their policies and procedures. In the sixth reporting period, the CPD requested technical assistance from the IMT (*see* ¶656) to address their community engagement plans and provided us with a draft of their *Roadmap to Improved Community Trust*, which references public comment on CPD policies. The IMT appreciates the CPD's thoughtful development of a long-term plan to ensure that there will be opportunities for public comment on policies every two years and look forward to seeing the public's suggestions taken into consideration.

- ***¶¶634–35.*** We recognize that the CPD has developed a new public-facing directives system and posts their final and published department-wide directives, policies, and procedures on the CPD's public website in accordance with the requirements of ¶634.[2] However, ¶635 requires the CPD to provide a mechanism that is usable, organized, and in a searchable format. The current format is difficult for the average user to navigate and to search for specific directives or topics.

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1 The CPD posts its draft policies for public comment on the "Draft Policy – Review & Comment" page of its website, accessible here: https://home.chicagopolice.org/reform/policy-review/.

2 The CPD posts its final policies on its Department Directives System, accessible here: https://home.chicagopolice.org/inside-cpd/department-directives-system-dds/.

- ***¶636:*** This paragraph requires the CPD to "periodically review each policy required to be revised or developed by this Agreement. The CPD will conduct an initial review of each such policy no later than two years after the policy's implementation as provided for in this Agreement." The IMT is concerned that the CPD is not keeping to this required timeline for review. For example, CPD policy D19-01 *Firearm Pointing Incidents* became effective November 1, 2019, but the IMT is unaware of any periodic review of this policy, which should have taken place by November 1, 2021. Since many CPD policies became effective in 2020, many will be due for review in the next reporting period (IMR-7). We will carefully track the CPD's efforts to conduct reviews compliant with this paragraph on the appropriate rolling basis.

- ***¶637:*** The CPD has consistently made necessary changes to its policies and training based on relevant changes in the law. For example, the CPD updated relevant policies and training when the 2021 Illinois Safety, Accountability, Fairness, and Equity-Today (SAFE-T) Act was signed into law. Further, as we noted above in ¶245, the CPD's 2022 in-service curriculum includes recent updates to Illinois criminal law addressing topics including choke holds, duty to intervene, duty to render aid, and penalties for the failure to activate BWCs.

- ***¶¶638-41***. To achieve compliance with the requirements of ¶¶638-41, the CPD must submit nine separate plans to the IMT and OAG for review and approval. CPD's status of each plan is listed below. The IMT is concerned that the City and the CPD don't seem to be prioritizing the development of these plans, as some have exceeded their due dates by several years. We urge the City and the CPD to complete the outstanding plans in the next reporting period.

The City and the CPD have made improvements in their practices and processes for the specific requirements laid out in ¶¶626-41, however we look forward to the City and CPD continuing their work to revise policies, procedures, and plans in collaboration with the IMT, the OAG, CPD officers, and Chicago's communities. Additionally, we will look for the City and the CPD to further refine their public engagement process, providing for a feedback loop to community members who offer insights, as they provided during the process of developing G02-01-05 *Religious Interactions* policy draft in 2020. Chicago's communities want to understand how, when, and why the CPD incorporates their suggestions into policies and we encourage the City and the CPD to provide that transparency.

Consent Decree ¶642

> ***642.*** *The Monitor will conduct reviews or audits as necessary to determine whether the City and CPD have substantially complied with the requirements of this Agreement. Compliance with a requirement means that the City and CPD: (a) have incorporated the requirement into policy; (b) have trained all relevant personnel as necessary to fulfill their responsibilities pursuant to the requirement; and (c) are carrying out the requirement in actual practice.*

Compliance Status

Throughout the Consent Decree process – beginning when Independent Monitor Maggie Hickey was appointed in March 2019 through the writing of this report – the IMT has conducted reviews or audits to determine the City's and the CPD's compliance with the requirements of this agreement; those reviews and audits comprise our semiannual reports, which are filed with the Court and are public[3] documents (*see* ¶¶661–65).

First, each of the IMT's Independent Monitoring Reports represent a six-month assessment of the City's compliance efforts; they do not reflect *all* the efforts of the City, the CPD, or the other relevant City entities to date. While we report on the compliance efforts within defined reporting periods (*see* ¶661), we stress that work is ongoing by the City, its relevant entities, the OAG, the IMT, and Chicago's communities.

Second, we assess compliance at three levels: (1) Preliminary, (2) Secondary, and (3) Full, which roughly correspond to the requirements of (a), (b), and (c) in ¶642. The Consent Decree requires the City and its entities to reach Full compliance and maintain that compliance for one to two years. *See* ¶¶714–15. These compliance levels allow us to share our assessments of the City's progress throughout the life of the Consent Decree with the Court; the City and its relevant entities; the OAG; and the public. Typically, these levels correspond with whether the City or its relevant entities have (1) created a compliant policy, (2) adequately trained personnel on that policy, and (3) successfully implemented the reform in practice. There are, however, many paragraphs that do not include policy or training elements. In those circumstances, the three levels may follow a different trajectory, such as (1) whether the City or its relevant entities have established the framework and resources to achieve the reform, (2) whether the City or its relevant entities have effectively communicated the reform to relevant personnel, and (3)

[3] Each of our semiannual reports, referred to as *Independent Monitoring Reports* may be found on the IMT's public website: https://cpdmonitoringteam.com/overview/reports-and-resources/.

whether the City or its relevant entities have appropriately implemented the reform.

Third, because of the nuances of each Consent Decree requirement and each level of compliance, the City and its relevant entities must—in a timely manner—provide the IMT with evidence, including access to personnel, records, and data to conduct our required reviews and audits to determine whether and when they have reached each level of compliance during the applicable reporting period.

Under the Consent Decree, the City, the CPD, or other relevant entities are not in compliance with any of the requirements of the Consent Decree until the IMT determines that the City provided the IMT with sufficient proof that the City, the CPD, or other relevant entities are in compliance. *See* ¶720. Even if the City has made significant efforts toward complying with a requirement—which in many cases it has—the City still has the additional burden of providing sufficient proof of its efforts with sufficient time for the IMT and the OAG to review the information.

To reflect the City's and its relevant entities' progress through the Consent Decree process, we have added four subcategories for each of the three levels of compliance (Preliminary, Secondary, or Full):

- **In Compliance.** Based on the evidence that the City has produced, the City has met a level of compliance with a requirement of the Consent Decree.

- **Under Assessment.** Based on the evidence that the City has produced per ¶720, the IMT is still assessing whether the City has met a level of compliance with a requirement of the Consent Decree. This may occur, for example, when the City's efforts are not completed within a reporting period.

- **Not in Compliance.** Based on the evidence that the City has produced, the City has not met a level of compliance with a requirement of the Consent Decree.

- **Not Yet Assessed.** The IMT has not yet assessed whether the City has met this level of compliance with a requirement of the Consent Decree. This may occur, for example, when the IMT is still assessing a lower level of compliance or the City has not yet met a lower level of compliance.

Consent Decree ¶643

> ***643.*** *CPD members who violate policies, procedures, orders, or directives that are required by this Agreement or that implement its provisions will be held accountable by CPD and the City, including through CPD's progressive discipline process. The Monitor may review and audit whether CPD is enforcing the policies, procedures, orders, or directives required by or implementing this Agreement.*

Compliance Status

Throughout the Consent Decree process, the IMT has noted challenges with the CPD's accountability processes. In fact, the lack of accountability for CPD officers engaging in misconduct was among the major findings of the U.S. Department of Justice's investigation into the CPD for civil rights violations, which ultimately resulted in this Consent Decree.

The City's and the CPD's accountability processes are complex,[4] involving many entities with overlapping roles and responsibilities, including the CPD's Bureau of Internal Affairs (BIA), the Chicago Police Board, the Civilian Office of Police Accountability (COPA), the four police unions (*see* ¶711), the City's Department of Law, and the Office of the Inspector General's Public Safety Section (PSIG). Moreover, the City is in the process of implementing a new police oversight entity, the Community Commission for Public Safety and Accountability, which will eventually be woven into the fabric of Chicago's complex police accountability system.

The IMT acknowledges that holding officers who "violate policies, procedures, orders, or directives that are required by this Agreement" accountable for their actions is sometimes complicated. The IMT has consistently emphasized that officer accountability – and public transparency about accountability processes – must be a shared responsibility among all leaders in the CPD, from sergeants to the Superintendent.

Determining compliance with this paragraph is also complex; indeed, the entire *Accountability and Transparency* section of the Consent Decree (and of this report) addresses the complexity and nuance of the City's accountability processes. We have endeavored to clearly state where accountability processes are working and where they need improvement throughout that section.

[4] For an overview of the CPD's and the City's disciplinary processes, please see the Office of the Inspector General's video explaining the process, available here: https://igchicago.org/about-the-office/our-office/public-safety-section/cpd-disciplinary-process-overview/.

Moreover, the Public Safety section of Chicago's Office of the Inspector General recently published a review of the CPD's disciplinary system, reflecting their evaluation of the "consistency and fairness of the processes by which investigating and reviewing agencies determine disciplinary sanctions."[5] Overall, the OIG's report found that "the disciplinary process for the Chicago Police Department members risks unfair and inconsistent outcomes across misconduct investigations,"[6] which is cause for concern.

We note, for example, that while several paragraphs of the Consent Decree require progressive discipline (*see* ¶¶238-239 in addition to ¶643), we have seen no evidence of a functional progressive discipline policy or process.

We understand that negotiations between the City and the FOP regarding the implementation of such discipline regarding officers failing to use BWCs properly are ongoing since discipline is subject to bargaining under the City's current collective bargaining agreements. In short, the City and the CPD have far to go toward achieving compliance with this requirement.

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5 *Chicago Police Department Disciplinary Process Overview*, OFFICE OF THE INSPECTOR GENERAL, THE CITY OF CHICAGO, https://igchicago.org/about-the-office/our-office/public-safety-section/cpd-disciplinary-process-overview/.

6 *OIG Finds That The Disciplinary Process For Chicago Police Department Members Risks Unfair And Inconsistent Outcomes Across Misconduct Investigations*, OFFICE OF THE INSPECTOR GENERAL, THE CITY OF CHICAGO, (June 16, 2022), https://igchicago.org/2022/06/16/oig-finds-that-the-disciplinary-process-for-chicago-police-department-members-risks-unfair-and-inconsistent-outcomes-across-misconduct-investigations/.

Consent Decree ¶677–78

> ***677.*** *The City and CPD agree to hire, retain, or reassign current City or CPD employees to form a unit with the knowledge, skills, and abilities necessary to facilitate compliance with this Agreement.*
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> ***678.*** *At a minimum, CPD will designate personnel to be responsible for: a. coordinating the City's and CPD's compliance and implementation activities; b. facilitating the provision of data, documents, materials, and access to the City's and CPD's personnel to the Monitor and OAG, as needed; c. ensuring that all data, documents, and records are maintained as provided in this Agreement; and d. assisting in assigning implementation and compliance related tasks to CPD personnel, as directed by the Superintendent or the Superintendent's designee.*

Compliance Status

While the City and the Chicago Police Department (CPD) continue to implement the requirements of the Consent Decree, we are increasingly concerned about the lack of consistent staffing and retention levels.

The City and the CPD have designated the following entities to be responsible for the following provisions of ¶678:

- 678(a): the CPD's Reform Management Group and the City's Department of Law;
- 678(b) and (c): the CPD's Office of Legal Affairs and the City's Department of Law; and
- 678(d): the CPD's Reform Management Group.

Overall, personnel from the City, the CPD, and other relevant City entities continue to assist the IMT by providing information, updates, and evidence of compliance efforts. These representatives frequently arrange communications and help the IMT navigate the complexity of the City entities.

As with previous reporting periods, we have had a few specific concerns about the lack of consistent staffing and retention levels in the Reform Management Group and the high level of turnover in the three years since the Consent Decree began. The Reform Management Group is located within the CPD's Office of Constitutional Policing and Reform and works closely with the CPD's Office of Legal Affairs and the City's Department of Law. Earlier in this report, we mentioned our concern

about the turnover in Executive Directors in the CPD's Office of Constitutional Policing and Reform – three people have held that position in 3.5 years. Consistent leadership is of the utmost importance for reform to be sustainably implemented.

The personnel in these groups have many of the "knowledge, skills, and abilities necessary to facilitate compliance with this Agreement." The City's Department of Law provides many of the project management functions for the relevant city entities—the Civilian Office of Police Accountability (COPA); the Chicago Police Board; the City Office of Inspector General (OIG), including the Deputy Inspector General for Public Safety (Deputy PSIG); and the Office of Emergency Management and Communications (OEMC). The Reform Management Group provides many of these project management functions for the CPD.

We also have concerns about the staffing of the CPD's Audit Division, which is critical to the sustainability of the reform effort. The Audit Division's mission is as follows:

> *The mission of the Audit Division is to provide quality, independent and objective assessments of the operations, processes, and internal controls in support of the Chicago Police Department ('Department'), including but not limited to work related to the strategic plan and consent decree. During internal audits and other reviews in which areas for improvement are identified, recommendations will be made to enhance Department operations. The Audit Division promotes accountability by proactively working with officials across all the Department to identify risks, evaluate controls, and make recommendations intended to promote constitutional policing and the effective delivery of police services. The Department is committed to the use of audits and other reviews to assess adherence to its stated orders, policies, and procedures—as well as to demonstrate consistency with the strategic plan and compliance with the consent decree into which the Department entered with the Attorney General of the State of Illinois. All audits and reviews are intended to provide objective information to inform decision*-making and to *help improve the internal transparency and accountability of the Department's operations.*

The chronic understaffing of this unit is short-sighted for the future of sustainable reform at the CPD. We note that the civilian commanding officer of the Audit Division—along with other talented analysts and social scientists who have left the CPD in the last year—left in November 2021 and has not yet been replaced.[7]

Likewise, since the beginning of the Consent Decree, we have had concerns regarding a lack of direct participation from CPD Command staff in reform activities. Those continued throughout the sixth reporting period. With some high-profile and notable exceptions, it is unclear to the IMT, for example, whether Command staff regularly review policy revisions or training curricula before the IMT, and the Office of the Illinois Attorney General (OAG) receive them for review. CPD leadership does not seem to be a part of the "unit" described above. It is our understanding that the Office of Constitutional Policing and Reform has recently regained its Chief/Commanding Officer position, but that position was vacant since the retirement of the former Chief in May 2021. The CPD's leadership—from sergeants up to the Superintendent—must consistently and intentionally participate in reform to achieve compliance with the Consent Decree more expeditiously.

We also note our concern with the staffing in a few other units within the CPD that are crucial drivers of Consent Decree compliance. The City and the CPD must continue to make efforts to maintain staffing at appropriate levels at all times in the following key departments: the Research and Development Division, the Tactical Review and Evaluation Division[8] (or TRED, an umbrella under which the Force Review Unit, the Firearm Pointing Review Unit, the Foot Pursuit Review Unit, the Search Warrant Review Unit, and the Fourth Amendment Stop Review Unit reside), the Legal Affairs Division, the Education and Training Division, the Crisis Intervention Team, the Audit Division, the Office of Community Policing, and the Reform Management Group.

Further, during previous reporting periods, we identified several additional staffing and resource needs, noting the impacts of organizational changes. Throughout this

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7 *See, e.g.*, Gregory Pratt and Madeline Buckley, *Chicago police leader resigned over 'inability' of department brass 'to even feign interest' in reform, then accused officials of retaliation*, CHICAGO TRIBUNE (November 11, 2021), https://www.chicagotribune.com/news/breaking/ct-chicago-police-consent-decree-reforms-resign-lightfoot-20211111-pdniyih24rgobpw6bmjogwgf4a-story.html.

8 The CPD Force Review Division's *2021 Year-End Report* notes, "Beginning in 2022, the Force Review Division will be renamed the Tactical Review and Evaluation Division (TRED). This name change was enacted to reflect the additional duties performed by the FRD. TRED will encompass the Force Review Unit, Firearm Pointing Review Unit, Foot Pursuit Review Unit, Search Warrant Review Unit, and the Fourth Amendment Stop Review Unit" (p.13). Before TRED's expanded responsibilities, it was known simply as the Force Review Division (as reflected in the title of the 2021 Year-End Report). The *2021 Year-End Report* is available here: https://home.chicagopolice.org/wp-content/uploads/2021-YEAR-END-REPORT.pdf.

reporting period, Superintendent David Brown has continued to make organizational changes, as well as deploy officers out of these key units to perform patrol and field duties. As we noted earlier, changes in leadership can disrupt efforts toward reform during transition periods.

Many of the City's and CPD's efforts and achievements in the first five reporting periods continued into the sixth reporting period. The City Department of Law, the CPD's Office of Constitutional Policing and Reform, the Legal Affairs Division, and the Research and Development Division (¶¶677–78) continued to be fully engaged in the monitoring process. The City and the CPD also maintained regular channels of communication with the IMT and the OAG and continued dialogue, problem-solving, and brainstorming about requirements and challenges regarding the paragraphs of the Consent Decree.

As noted in previous reporting periods, we recognize that the City's and the CPD's resources are limited. As referenced above, the City and the CPD have already added many resources to guide compliance efforts.

In prior reporting periods, we recommended that the City and the CPD increase resources and staffing to various departments. In response, the CPD increased staffing in the following departments:

- **The Research and Development Division.** The Research and Development Division frequently works with the IMT to develop compliance documents and policies. As a result, increases in staffing in this department reduced bottlenecking with limited personnel.

- **The Tactical Review and Evaluation Division.** As discussed further in the Use of Force section above, the Force Review Unit within TRED is critical to several Consent Decree requirements. The CPD agreed that the workload of this department was greater than the department's capacity and has struggled to keep consistent, appropriate staffing levels.

We do not believe, however, that these divisions are sufficiently staffed at present. Before the COVID-19 pandemic, many of these staffing increases had begun to make the City's compliance efforts more efficient. While we understand that ongoing challenges continue based on limited resources and staff and the continuing effects of COVID-19, we reiterate the need for the City and the CPD to devote sustained or increased resources and staffing to the Office of Community Policing, the Education and Training Division, the Audit Division, the Tactical Review and Evaluation Division, the Research and Development Division, and the Crisis Intervention Team.

Consent Decree ¶679

> ***679.*** *The City and CPD agree to collect and maintain all data and records necessary to document compliance with this Agreement, including data and records necessary for the Monitor to conduct reliable compliance reviews and audits.*

Compliance Status

As we have noted in each of our previous Independent Monitoring Reports and in the Data Collection, Analysis, and Management section of this report, we are unsure whether the City and the CPD are currently collecting and maintaining "all data and records necessary to document compliance with this Agreement." This is due, in part, to pervasive data systems challenges. Not only do we need complete and verifiable data to assess compliance across all areas of the Consent Decree, but also the City and the CPD need this data to monitor, reform, and adapt its efforts to current and future challenges. The research, analysis, and data collection under the Consent Decree and best practices are demanding. To effectively identify and resolve existing and upcoming challenges, the City and the CPD must maintain, track, and analyze the data. To meet these challenges, the City, the CPD, and the OAG continue to engage in data discussions for each topic area. Based on these discussions, there is universal agreement that the CPD has a long way to go to meet the data requirements of the Consent Decree.

The CPD still does not have a consistent system for auditing and validating its data systems or correcting and upgrading those systems based on regular audits (*see* ¶606). While the CPD may maintain, assess, and correct data system problems regularly, it is not doing so based on a standard audit process. The CPD is currently analyzing how it plans to identify the data required by this agreement, whether it is currently collected and if not, how to collect it. That process, however, it is only complete for one sub-section of the Data Collection, Analysis, and Management section of the Consent Decree requirements. We remain concerned that it has taken over three years to identify only a sub-section of data plans and hope to see the CPD make larger strides in the coming reporting periods.

In short, the CPD does not currently have the data resources and systems in place to meet the demands of the Consent Decree. We are aware that the CPD is still in the process of assessing and reorganizing several facets of its data management systems, and we hope that the reorganization is effective. We will continue to work with the City and the CPD to ensure that these efforts are prioritized.

Consent Decree ¶680

> ***680.*** *Beginning with the Monitor's first report filed with the Court, and for each subsequent semiannual report by the Monitor, the City agrees to file a status report one month before each of the Monitor's reports is due for the duration of this Agreement. The City's status report will delineate the steps taken by CPD during the reporting period to comply with this Agreement, and CPD's assessment of the status of its progress implementing this Agreement.*

Compliance Status

The City filed the status reports required by ¶680 before the IMT issued its draft monitoring reports for the first three reporting periods. In the fourth reporting period, however, the City and the CPD filed the status report on September 8, 2021, and in the fifth reporting period, the City and the CPD filed the status report in March 2022 (over two months late).

In the sixth reporting period, the City provided us with their status report[9] well after the sixth reporting period had ended and it therefore could not be used to assist to the IMT in preparation of the initial draft of the Independent Monitoring Report 6.

The IMT views these status reports as a helpful tool as the City's and the CPD's self-assessment to help clarify the City's progress and make accurate compliance determinations. Their utility to the IMT would increase, however, if the City and the CPD completed them and submitted them to the IMT by the deadline required by this paragraph.

[9] *Chicago Police Department, Reform Progress Update, Independent Monitoring Period No. 06.*, CHICAGO POLICE DEPARTMENT (October 2022), https://home.chicagopolice.org/wp-content/uploads/Chicago-Police-Department-Reform-Status-Update-October-2022.pdf.

Consent Decree ¶682

> ***682.*** *The Monitor will have access to all individuals, facilities, trainings, meetings, disciplinary proceedings, reviews, and incident scenes that the Monitor reasonably deems necessary to carry out the duties assigned to the Monitor by this Agreement. The City will ensure that it facilitates the Monitor's access in a prompt, cooperative, and unobstructive manner.*

Compliance Status

Since the beginning of the Consent Decree monitoring process, the IMT and the City discussed logistics regarding access to individuals, facilities, trainings, meetings, and incident scenes. Although the IMT has generally had access to necessary people, places, and events, we have not experienced receiving access to these in a prompt manner in all instances. We appreciate the access the City has given, however there is room to improve on providing prompt access to the IMT. Additionally, the IMT has not received access to disciplinary proceedings and reviews in certain instances, especially following officer involved shootings.

We look forward to the City continuing its work to ensure access to individuals, facilities, trainings, meetings, and incident scenes in a prompt, cooperative, and unobstructive manner. Additionally, we hope to see the City make improvements to allow the IMT access also to all disciplinary proceedings and reviews. We will continue to work with the City to ensure compliance with the requirements of ¶682.

Consent Decree ¶683

> ***683.*** *CPD will notify the Monitor as soon as practicable, and in any case within 24 hours, of any officer-involved shootings, any death of a person in CPD custody, or any arrest of a CPD member. In the event a CPD member is arrested by a law enforcement agency other than CPD, CPD will notify the Monitor as soon as practicable, and in any case within 24 hours of receiving notice of the arrest. The Monitor will cooperate with the City to obtain access to people and facilities in a reasonable manner that, consistent with the Monitor's responsibilities, minimizes interference with daily operations.*

Compliance Status

Since the beginning of the monitoring process, the CPD has consistently notified the IMT of any officer-involved shootings, any death of a person in CPD custody,

and any arrest of a CPD member within 24 hours after the event through its Crime Prevention and Information Center (CPIC) email notification system.

As of the date of this report, three members of the IMT are subscribed to the CPIC notification system and receive automatic emails about these events. In this reporting period, however, the CPIC notification emails did not consistently reach all members of the IMT who are subscribed. We have discussed this lapse with the CPD and we understand they are working on fixing the issue.

The CPD and the City have provided IMT access to City personnel and facilities across entities. They have also allowed members of the IMT to observe and learn more about officer-involved shooting scenes and processes.

Consent Decree ¶684

> ***684.*** *The City and CPD will ensure that the Monitor has prompt access to all City and CPD documents and data related to the Agreement that the monitor reasonably deems necessary to carry out the duties assigned to the Monitor by this Agreement, except any communications, documents, or data to which access is limited or precluded by court order, or protected by the work product doctrine or the attorney-client privilege (collectively, "privilege").*

Compliance Status

The City and the CPD have made many efforts to provide the IMT with access to documents and data relevant to the Consent Decree.

As noted in our first four monitoring reports, we had significant concerns regarding document and data productions, as a substantial number of materials would arrive at or near the end of the reporting period. While this challenge continued in the fifth reporting period, the City and its relevant entities made significant improvements. Further, throughout the sixth monitoring period, the City and the CPD continued discussions with the IMT about how to improve the quality of their document and data productions. As we mention in ¶679 (*see also* ¶606), the CPD does not currently have the data resources and systems in place to meet the demands of the Consent Decree. We are aware that the CPD is still in the process of assessing and reorganizing several facets of its data management systems, and we hope that the reorganization is effective. In the sixth reporting period, the City and the CPD continued to work with the IMT to continue the process of assessing and reorganizing several facets of its data management system.

Further, early in the Consent Decree, the IMT and the OAG began to have concerns regarding how promptly the City and some of the City's relevant entities respond

to requests for information. In the sixth reporting period, the City, the CPD, the OAG, and IMT continued to dedicate time toward addressing these concerns and improving the request and production procedures.

We look forward to continuing to work with the City and the CPD to resolve the access issues and hope for more timely responses to our requests for information in future reporting periods.

Consent Decree ¶¶685 and 686

> ***685.*** *Privilege may not be used to prevent the Monitor from observing training sessions, disciplinary hearings, or other CPD, COPA, or Police Board activities or proceedings that do not involve the provision or receipt of legal advice. The City is not required to provide the Monitor with access to documents or data that is privileged. Should the City or CPD decline to provide the Monitor with access to communications, documents, or data based on privilege, the City or CPD will inform the Monitor and OAG that documents or data are being withheld on the basis of privilege which may, but need not be, in the form of a privilege log. If the Monitor or OAG objects to an assertion of privilege, the Monitor or OAG may challenge the propriety of the privilege assertion before the Court.*
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> ***686.*** *In coordination with the City's legal counsel, OAG and its consultants and agents will have access to all City and CPD personnel, facilities, training, documents, and data related to this Agreement, except any documents or data protected by privilege. OAG and its consultants and agents will coordinate with the City's legal counsel to access personnel, facilities, training, documents, and data in a reasonable manner that is consistent with OAG's right to seek enforcement of this Agreement and that minimizes interference with daily operations. The City is not required to provide the Monitor with access to communications, documents, or data that is privileged. Should the City or CPD decline to provide OAG with access to documents or data based on privilege, the City or CPD will inform OAG that that documents or data are being withheld on this basis, which may, but need not be, in the form of a privilege log. If OAG objects to a privilege assertion by the City or CPD, OAG may challenge the propriety of the privilege assertion before the Court.*

Compliance Status

As we have noted, we do not believe that the City has deliberately used privilege to prevent us from accessing events (such as training sessions or meetings), documents, data, or communications "that do not involve the provision or receipt of legal advice" per ¶685. We regularly attend training sessions. While we continue to have concerns that the production of some materials has been unnecessarily delayed, we continue to note significant improvements regarding the willingness to share confidential information with the IMT on a timely basis.

Further, since the beginning of the Consent Decree, there have also been access issues and disputes between the OAG and the City. We believe that the City and the OAG, collectively the Parties, continue to make progress toward resolving those issues.

Consent Decree ¶687

> ***687.*** *The Monitor and OAG will provide the City and CPD with reasonable notice of a request for documents or data. Upon such request, the City and CPD will provide the documents or data (in electronic format, where readily available) in a timely manner, unless withheld based on privilege.*

Compliance Status

As we state in ¶684, early in the Consent Decree process the IMT and the OAG began to have concerns regarding how promptly the City and some of the City's relevant entities respond to requests for information.

It is important that the IMT and OAG be provided requested documents and data in a timely manner moving forward. Delays affect our compliance assessments and the City's progress in achieving compliance with the Consent Decree. We will continue to work with the City and the CPD by providing full and detailed document and data requests regularly and look forward to receiving such materials in a prompt manner.

Consent Decree ¶699

> ***699.*** *The City agrees to require compliance with this Agreement by its officers, officials, employees, agents, agencies, assigns, or successors.*

Compliance Status

This paragraph is an overarching paragraph with requirements that the City and the CPD will likely not achieve until it has achieved much more progress overall. In previous reporting periods, the IMT has relayed concerns that the City and the CPD have not made as much progress toward achieving the requirements of the Consent Decree as the IMT had hoped in the first few years. However, the City and its relevant entities have begun to work diligently to develop, revise, and implement policies, as well as develop plans and training curricula compliant with the Consent Decree.

By the end of the sixth reporting period, the City has not yet finalized and implemented all policies required by the Consent Decree. Although we have seen significant progress in this area, without finalization and implementation of each required policy, it is unclear whether the City has required "compliance by its officers, officials, employees, agents, agencies, assigns, or successors" as this paragraph requires.

We look forward to continued progress toward compliance with the requirements ¶699 and we will continue to work collaboratively with the City following the policy and plan review procedures detailed in ¶¶626–41.

Consent Decree ¶700–701 and 704–06

700. *The City will be responsible for providing necessary and reasonable financial resources necessary through steps or processes that can include the budget process to fulfill its obligations under this Agreement, subject to the terms and conditions set forth herein.*

701. *The City's entry into this Agreement is not an admission by the City, CPD, or any agent or employee of either entity that it has engaged in any unconstitutional, illegal, or otherwise improper activities or conduct. The City's entry into this Agreement is not an admission of any of the findings or conclusions contained in the DOJ's Report.*

704. *This Agreement is binding upon all Parties hereto, by and through their officials, employees, agents, representatives, agencies, assigns, and successors. If the City establishes or reorganizes a government agency or entity whose function includes overseeing, regulating, investigating, or otherwise reviewing the operations of CPD or any aspect thereof, the City agrees to ensure that these functions and entities are consistent with the terms of this Agreement and will incorporate the terms of this Agreement into the oversight, regulatory, investigation, or review functions of the government agency or entity as necessary to ensure consistency.*

705. *Nothing in this Agreement will in any way prevent or limit the City's right to adopt future measures that exceed or surpass the obligations contained herein, as long as the terms of this Agreement are satisfied.*

706*. The City is responsible for providing necessary support and resources to CPD to enable CPD to fulfill its obligations under this Agreement.*

Compliance Status

As we noted in ¶¶677–78, we have significant concerns about the lack of consistent staffing and retention levels within the City and the CPD in areas crucial to the efficient implementation of the requirements of the Consent Decree. The City and the CPD must continue to make efforts to maintain staffing at appropriate levels at all times in the following key departments: the Research and Development Division, the Force Review Unit (now housed in TRED, the Tactical Review and Evaluation Division), the Legal Affairs Division, the Education and Training Division, the

Crisis Intervention Team, the Audit Division, the Office of Community Policing, and the Reform Management Group.

By way of an example of resource shortages, when the Consent Decree process began in March 2019, the CPD comprised 13,319 officers; as of the writing of this report in July 2022, the CPD comprises 11,628 officers.[10] We provide more detail about the CPD's challenges in hiring officers in the Recruitment, Hiring, and Promotion section of this report and also note that during this reporting period, the CPD lowered its hiring standards amid the staffing shortage.[11]

The decrease in officers has drawn attention from elected leaders[12] and appointed leaders.[13] The IMT notes that significant understaffing of officers—particularly supervisors—will add to the challenge the CPD already faces to achieve compliance with the Consent Decree's Unity of Command and Span of Control requirements (*see* ¶¶357–68).

One example of insufficient staffing levels is the number of officers working in the CPD's Tactical Review and Evaluation Division (TRED). The number of officers, Sergeants, Lieutenants, and Commanders decreased significantly over the course of the sixth reporting period. Specifically, the number of officers assigned to TRED decreased 19 percent and the number of sergeants assigned to TRED decreased 14 percent. The number of Lieutenants remained the same, at only one Lieutenant working in TRED. Also noteworthy was the decrease of Commanders from one Commander to zero by the end of the sixth reporting period.

We are quite concerned about the insufficient staffing in TRED, a division crucial to the City and the CPD's implementation of the requirements of the Consent Decree that is responsible for reviewing that force used by CPD officers against Chicagoans is Constitutional. In fact, we are aware of a sizable backlog in cases regarding firearm pointing incidents, preventing TRED from meeting the review timeline (30 says) required by ¶192. The CPD must staff TRED appropriately moving forward to continue its implementation of these important requirements.

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10 *See Sworn CPD Members data dashboard,* OFFICE OF THE INSPECTOR GENERAL, CITY OF CHICAGO (accessed July 25, 2022), https://informationportal.igchicago.org/cpd-sworn-officer-unit-assignments-over-time/.

11 Cherranda Smith, *Chicago Police Department Lowers Hiring Standards Amid Staffing Shortage,* NEWSRADIO (MARCH 18, 2022), HTTPS://WOODRADIO.IHEART.COM/CONTENT/2022-03-18-CHICAGO-POLICE-DEPARTMENT-LOWERS-HIRING-STANDARDS-AMID-STAFFING-SHORTAGE/.

12 *See, e.g.*, Fran Spielman, *City Council member says CPD moving cops from special units back to districts to deal with officer exodus*, CHICAGO SUN-TIMES (January 3, 2022), https://chicago.suntimes.com/news/2022/1/3/22865587/chicago-police-crime-strategy-districts-special-units-officers-retire-brown-beck-napolitano.

13 *See Chicago is losing cops at a "significant, almost alarming" rate, deputy mayor says*, CWB-CHICAGO (January 27, 2022), https://cwbchicago.com/2022/01/chicago-is-losing-cops-at-significant-almost-alarming-rate-deputy-mayor-says.html.

Additionally, we continue to have significant concerns about the investment in the City's and the CPD's data infrastructure, arguably one of the most important investments the City can make toward achieving full and effective compliance (*see* ¶693) because the City bears the burden of demonstrating is compliance by a "preponderance of the evidence" (*see* ¶720). We are encouraged by the work of the Public Safety Administration Data team that is working to improve data collection, analysis, and management but are disappointed that three years have passed since the Consent Decree process began, and the City and the CPD have yet to fully understand their own data limitations (*see* ¶606), an exercise that was to have been completed during the first year of the Consent Decree.

Lastly, ¶705 ensures that the Consent Decree does not "prevent or limit the City's right to adopt future measures that exceed or surpass the obligations." It is important that the City and the CPD continue to work diligently toward compliance with all paragraphs, but also recognize and understand the cultural changes that must take place to fully comply with this agreement.

Consent Decree ¶711

> ***711.*** *Nothing in this Consent Decree is intended to (a) alter any of the CBAs between the City and the Unions; or (b) impair or conflict with the collective bargaining rights of employees in those units under the IPLRA. Nothing in this Consent Decree shall be interpreted as obligating the City or the Unions to violate (i) the terms of the CBAs, including any Successor CBAs resulting from the negotiation process (including Statutory Impasse Resolution Procedures) mandated by the IPLRA with respect to the subject of wages, hours and terms and conditions of employment unless such terms violate the U.S. Constitution, Illinois law or public policy, or (ii) any bargaining obligations under the IPLRA, and/or waive any rights or obligations thereunder. In negotiating Successor CBAs and during any Statutory Resolution Impasse Procedures, the City shall use its best efforts to secure modifications to the CBAs consistent with the terms of this Consent Decree, or to the extent necessary to provide for the effective implementation of the provisions of this Consent Decree.*

Compliance Status

As explained in our previous reports, the City is a party to collective bargaining relationships with four labor unions representing sworn police officers:

- The Fraternal Order of Police, Chicago Lodge No. 7 (FOP);
- The Policemen's Benevolent & Protective Association of Illinois (PBPA), Unit 156 – Sergeants;
- PBPA of Illinois, Unit 156 – Lieutenants; and
- PBPA of Illinois, Unit 156 – Captains (collectively, the "Unions").

Paragraph 711 of the Consent Decree harmonizes the City's statutory bargaining obligations with the Unions with the City's Consent Decree obligations. Specifically, Paragraph 711 adopts the following key tenets:

- As a threshold matter, the Consent Decree is not intended to alter the City's collective bargaining agreements or otherwise to impair or conflict with the officers' statutory rights to engage in collective bargaining through their chosen representatives (the Unions);

- Likewise, the Consent Decree does not obligate the City (or the Unions) to violate the terms of their collective bargaining agreements, or to violate or waive any bargaining rights or obligations;

- Nevertheless, in recognition of the fact that the City's labor agreements can and will directly impact its compliance with various provisions in the Consent Decree, the Consent Decree obligates the City to "use its best efforts" in the collective bargaining process "to secure modifications" to its collective bargaining agreements covering sworn officers that are consistent with the terms of the Consent Decree or to the extent necessary to implement the provisions of the Consent Decree.

At the time the Consent Decree was entered, the state of affairs with respect to the City's collective bargaining relationships was as follows: (1) the City's most recent collective bargaining agreements with the Unions were expired (and had been expired for an extended period of years); (2) the parties' ongoing negotiations had been unsuccessful in reaching successor agreements for any of the bargaining units; (3) pursuant to its obligations under state labor law, the City continued to apply the provisions of the expired labor agreements while negotiations continued; and (4) the parties were engaged in litigation of various claims, in arbitration and before the Illinois State Labor Relations Board, concerning issues and disputes alleged to arise under the expired agreements and/or to relate to the unsuccessful negotiations.

To monitor compliance with ¶711, the City, the IMT, and the OAG met on a near-monthly basis throughout each of the reporting periods, including the most-recent sixth reporting period, to discuss updates on the City's progress in bargaining successor labor agreements with the Unions and the status of related pending litigation.

During these meetings, the City provided access to members of its bargaining committee. These members explained the City's various contract proposals to the Unions, seeking to modify terms in the expired labor agreements to achieve compliance with various Consent Decree provisions. They further explained the City's efforts in resisting and defending litigation initiated by the Unions relating to these same issues.

For instance, as previously reported, among the most significant of the City's bargaining proposals (and, to the Unions, among the most contentious), the City proposed to modify the process for receiving and investigating complaints of officer misconduct, including allowing for the investigation of complaints that are anonymous or not backed by a sworn affidavit. *See, e.g.,* ¶¶421, 425, 427, 431, 461, 462, 475, 477, 508, and 514. The City also proposed changes to retain disciplinary records indefinitely, rather than for five years. *See* ¶508. The Unions consistently rejected these proposals.

Despite the Unions' objections, the City has now instituted these and a number of similar changes to its processes as applied to all officers in each of the four Union-represented units.

With respect to those officers in the three bargaining units represented by the PBPA, the City prevailed in a June 26, 2020 Interest Arbitration Board decision, which accepted the City's position with respect to several disputed contract proposals that have a direct impact on Consent Decree provisions. Most notably, the decision confirmed the City's right to use anonymous complaints as a basis for investigations of alleged officer misconduct and accepts the City's position regarding the retention of disciplinary records. The PBPA filed a state court lawsuit seeking to have the Interest Arbitration Board's decision vacated. As reported below, the Circuit Court (Chancery Division) recently granted summary judgment to the City, dismissing the PBPA's challenges to the interest arbitration decision. The PBPA has appealed that adverse ruling.

With respect to the City's largest bargaining unit of sworn officers—the unit represented by the FOP—the City announced shortly following the conclusion of the fourth monitoring period, that it had reached an "interim agreement" with the FOP to implement a series of "accountability changes" to the parties' collective bargaining agreement. Then, during the fifth reporting period, the new proposed agreement with the FOP was approved, both by the FOP's membership through a ratification vote and by a majority vote of the City Council. The new eight-year labor agreement reaches back to the expiration of the prior agreement, July 1, 2017, and continues through June 30, 2025.

The new agreement with the FOP includes a number of changes to the expired agreement specifically aimed at furthering CPD's compliance with various Consent Decree provisions:

- Eliminates the prior ban on anonymous complaints about police misconduct;
- Eliminates the requirement for sworn complainant affidavits, providing instead for an expedited "override" process for anonymous complaints and in situations where the complainant refuses to be identified;
- Removes the requirement to destroy disciplinary records older than five years;
- Allows for broader of use of disciplinary records in cases involving police misconduct;
- Adds language that explicitly requires supervisors to report all misconduct;

- Removes the contract language that was viewed as a "ban" on rewarding/recognizing officers who report misconduct, stating instead that officers who report potential misconduct are acting in the highest traditions of public service.

The new CBA with the FOP, and the extended bargaining that led to it, focused primarily on economics and accountability issues. Following ratification and approval of the new CBA with the FOP, the City and the FOP were to commence so-called "phase two" negotiations over further issues and potential changes to employment terms. As of the end of the fifth reporting period, these phase two negotiations had not progressed.

During the sixth reporting period, the City reported receiving a favorable ruling from the Circuit Court, granting the City summary judgment with respect to the PBPA's challenges to the June 2020 interest arbitration award. That interest arbitration decision, in turn, approved the City's changes to procedures concerning use of anonymous complaints as a basis for investigations of alleged officer misconduct and retention of disciplinary records. The PBPA appealed the Circuit Court's decision to the Illinois Appellate Court. The City is expected to continue defending this action (and the underlying procedural changes) throughout the sixth reporting period and likely into the seventh.

Aside from the ongoing litigation concerning the interest arbitration award, the City's most recent agreements with the PBPA expired June 30, 2022. The parties have given notice of intent to negotiate further changes to the expired agreements and are in the process of scheduling dates for bargaining. The City expects the PBPA to present proposals relating to COVID vaccinations, wages, and benefits.

Also during the sixth reporting period, the City commenced phase two bargaining with the FOP. The parties met on February 18, May 6 and 12, and again on June 9 and 15. To date, the parties' negotiations have yielded little progress, as the discussions have been largely dominated by disputes pertaining to COVID vaccine mandates.

In this regard, beyond the parties' discussions at the phase two bargaining table, the FOP filed a number of unfair labor practice charges with the State Labor Relations Board challenging various aspects of the City's COVID response and vaccination mandate. The labor board largely deferred those claims to the parties' contractual grievance and arbitration process. Thereafter, following a hearing and subsequent briefing concerning a consolidated grievance implicating all four Union-represented bargaining units, Arbitrator George Roumell upheld the City's vaccine mandate, but retained jurisdiction over the dispute going forward. Since the arbitrator's award (issued February 23, 2022), the parties have returned to the arbitrator for supplemental hearings on issues related to testing, masking, and discipline. In addition, the Unions have appealed Arbitrator Roumell's decision uphold-

ing the vaccine mandate and requested expedited proceedings. The Unions' appeal remains pending, and their request for expedited proceedings has been denied.

In addition to the COVID-related grievances, the City and the Unions also are in the midst of arbitrating a dispute concerning the City's ability to cancel an officer's "regular day off" (RDO) and require the officer to work. The City maintains the CBA allows for this practice, provided the officer receives premium pay. The Unions have positioned this consolidated grievance as an officer wellness issue, arguing that officers effectively no longer have RDOs and are suffering from exhaustion, which can lead to errors.

The IMT will continue to monitor the City's efforts to utilize best efforts to secure process and procedure changes applicable to its Union-represented workforce consistent with the reforms set forth in the Consent Decree. And where to date the City has achieved varying measures of success in securing such changes, the IMT will continue to monitor the City's ongoing efforts to maintain these changes in the face of ongoing litigation and other challenges initiated by the Unions.

In addition, to the extent that issues concerning COVID response and officer days off have direct bearing on officer staffing and the City's corresponding ability to implement the Consent Decree, the IMT will continue to monitor progress regarding the parties' ongoing phase two negotiations and litigation.

Consent Decree ¶714

> ***714.*** *The City will endeavor to achieve full and effective compliance within five years of the Effective Date. On or about five years from the Effective Date, the Court will hold a hearing to assess whether the Agreement should be terminated. This Agreement will terminate when the Court finds that the City has achieved full and effective compliance with this Agreement and has maintained such compliance with the material requirements for at least one year for the sections delineated as Group A below, and for at least two years for the sections delineated as Group B below. a. Group A: Recruitment, Hiring, and Promotions; Training; and Officer Wellness and Support. b. Group B: Community Policing; Impartial Policing; Crisis Intervention; Use of Force; Supervision; Accountability and Transparency; and Data Collection, Analysis, and Management.*

Compliance Status

On March 25, 2022, the City, the CPD, and the OAG entered into a Stipulation to the Consent Decree regarding Search Warrants, Consent Decree Timelines, and the Procedure for "Full and Effective Compliance"[14] (*see* ¶717).

As stated in previous monitoring reports and throughout this process, the IMT articulated its concern that the City would not achieve full and effective compliance with the Consent Decree within five years of its effective date (March 1, 2024). As a result of those concerns and other pressing issues, the Parties negotiated the Stipulation, which states that "the City agrees to endeavor to achieve full and effective compliance by the end of the 16th reporting period (June 30, 2027), eight years after the effective date of the Consent Decree." To that end, we will also provide our comprehensive assessment—and along with corresponding responsibilities in the Consent Decree—after the eighth reporting period (June 30, 2023).

Likewise, the Parties also clarified to how the IMT will report on further progress:

> *Given the City's and the CPD's intention to reach full and effective compliance with the Consent Decree in 2027 and the ongoing efforts to mitigate the impact of COVID-19, the Parties also agreed that the Monitor will track specific deadlines and recurring obligations differently: The specific deadlines will continue to be extended*

[14] *See Stipulation Regarding Search Warrants, Consent Decree Timelines, and the Procedure for "Full and Effective Compliance,"* Illinois v. Chicago, Case No. 17-cv-6260 (March 25, 2022), https://cpdmonitoringteam.com/wp-content/uploads/2022/03/2022.03.25-Stipulation-Regarding-Search-Warrants-Consent-Decree-Timelin.._.pdf.

by 64 days, but recurring obligations will return to the appropriate cadences (e.g., monthly, quarterly, annually). For each paragraph and requirement, the Parties and the IMT will—following the text of the Consent Decree—collaborate to ensure recurring requirements are scheduled to enable the City, CPD, and other City entities to reach compliance as efficiently as possible and in accordance with the purposes of each requirement (e.g., effective and regular training or data analysis).

As reflected throughout this report, we believe that these changes will permit the City, the CPD, the OAG, and the IMT to focus on the most effective and efficient paths toward effective and sustainable compliance.[15]

We look forward to the progress the City will make over the next five years as they work toward achieving full and effective compliance with all requirements of the Consent Decree. The IMT remains committed to working collaboratively with the City and the CPD as they work towards the new timelines set forth in the stipulation.

Consent Decree ¶720

720. *At all times, the City will bear the burden of demonstrating by a preponderance of the evidence it has achieved full and effective compliance with the requirements of this Agreement.*

Compliance Status

To reach compliance with the Consent Decree, the City and the CPD must provide the IMT with sufficient evidence that they are making reforms and meeting the requirements set forth therein. The CPD must also demonstrate that it has appropriate resources (*see* ¶¶700 and 706) and procedures that will effectuate timely and sustainable compliance.

We believe that the City understands that it bears the burden of demonstrating compliance with the Consent Decree. In fact, we believe that the City and many of its relevant entities have taken increased ownership over this obligation through large unilateral productions of compliance records. Since the City and its entities have started making these productions, the number of OAG and IMT requests for

[15] The Stipulation also clarified the process for the Court to find the City in full and effective compliance regarding any of the material requirements in the Consent Decree. See ¶715. Specifically, the Court "may accept the IMT's determination that the City has met 'Full compliance' in a semiannual report and may retroactively start the relevant one- or two-year compliance period at the date the IMT filed the corresponding semiannual report." *Stipulation Regarding Search Warrants, Consent Decree Timelines, and the Procedure for "Full and Effective Compliance,"* Illinois v. Chicago, Case No. 17-cv-6260 (March 25, 2022).

information has decreased (*see* ¶687). While there continue to be some challenges with the City meeting the remaining requests for productions, the City and the CPD have maintained the level of improvement that they began earlier in the process throughout the sixth reporting period.

Consent Decree ¶721

> ***721.*** *Prior to termination of this Agreement, CPD will develop a plan, in consultation with the Monitor and OAG, to conduct compliance reviews, audits, and community surveys deemed necessary and appropriate following the termination of the Consent Decree. CPD will publish the plan for continuing assessments, if any, on CPD's website.*

Compliance Status

As mentioned throughout this report, the CPD's Audit Division remains understaffed, which affects its ability to comply with the requirements of the Consent Decree. As of the date of this report, the IMT has not yet received a comprehensive plan for compliance reviews, audits, and community surveys following the termination of the Consent Decree. Although CPD has discussed their *Road to Operational Compliance* with the IMT in detail, we remain concerned about the CPD's plans for sustainability. We have not yet received a plan that covers how each division and the department as a whole will continue the reformed practices as laid out in the Consent Decree.

We are hopeful that the CPD will begin to think forward to a long-term plan for not only reaching full and effective compliance, but how it can continue these reformed practices well after the Consent Decree is terminated. Constitutional policing practices must be ingrained into the CPD's policies, practices, and culture. We believe it is crucially important that CPD begin to develop such a plan as required by ¶721.

Attachment A:
Office of the Illinois Attorney General Comments
December 2022

OFFICE OF THE ATTORNEY GENERAL
STATE OF ILLINOIS

KWAME RAOUL
ATTORNEY GENERAL

December 5, 2022

SENT VIA EMAIL

Margaret A. Hickey
Independent Monitor
ArentFox Schiff LLP
233 S. Wacker Drive, Suite 7100
Chicago, IL 60606
(Maggie.Hickey@afslaw.com)

Re: Comments on the Sixth Independent Monitoring Report
Consent Decree, *Illinois v. Chicago*, 17-cv-6260 (N.D. Ill.)

Dear Ms. Hickey:

The consent decree gives the Office of the Illinois Attorney General (OAG) an opportunity to comment on the Sixth Monitoring Report (Report) before the Independent Monitoring Team (IMT) files it with the Court. The Report covers a six-month period that saw the City and Chicago Police Department (CPD) pull resources away from reform and, predictably, lose momentum as a result. The decisions by CPD leadership to de-prioritize reform in 2022 are particularly troubling given CPD's continuing struggle to make any progress towards improving the Department's relationships with Black and brown community members and those individuals most vulnerable to police abuse.

As the many Chicagoans who spoke at the public hearing before Chief Judge Pallmeyer on November 29, 2022 made clear, CPD's slow progress on reform over the past four years has not changed the way much of the public feels about CPD. Many residents continue to experience racist, aggressive, disrespectful, and unconstitutional police tactics in Chicago. Residents frequently do not trust CPD officers and do not believe that the City and CPD are serious about reform. As one community member shared, for Chicago's most marginalized communities, CPD's ongoing failure to change its practices is a matter of life and death.

Reform cannot be an exercise in checking boxes. CPD must change its culture to prioritize respectful, unbiased, and constitutional policing in Chicago; to build genuine relationships with people in the communities it serves; and to approach community policing, reform, and public safety holistically. We acknowledge that comprehensive reform will take time, but the City and CPD must recommit to changing Department culture and practices with the urgency that Chicagoans demand.

In these comments, the OAG identifies key challenges that have stalled consent decree compliance and notes the progress the City and CPD made in the last reporting period.

CPD's Insufficient Community Policing and Community Engagement

We share the Monitor's significant concerns regarding "CPD's commitment to have constitutional policing and reform efforts lead its crime-fighting strategies." Community policing requires the systematic use of community partnerships and problem-solving techniques to build community trust and improve public safety. Yet, CPD struggled to engage community members, including the Coalition, at the early stages of policy development and, when it did hear from the community, often did not even respond to their recommendations. CPD also continued to use tactics which can harm efforts to build community trust, including routinely deploying officers to unfamiliar areas of the city where they do not know the residents; prioritizing traffic stops, which disproportionately impact Black Chicagoans[1]; and setting an arbitrary goal[2] for "positive community interactions" without adequately defining what they are, accounting for their potential misuse, getting community input, or training officers.

CPD's insufficient community engagement and use of tactics that do not prioritize community and impartial policing principles have serious consequences. For example, CPD's failure to get and listen to community input on its search warrant practices continues to result in traumatizing raids for Chicagoans whose homes are searched. Additionally, CPD's lack of a comprehensive plan which incorporates community and impartial policing requirements into its specific crime fighting strategies results in deep distrust by Black and Latino community members.[3] In turn, that distrust makes significant portions of Chicago's most vulnerable communities unwilling to contact police at all. We echo the Monitor's recommendation that the City and CPD "must incorporate comprehensive strategic planning that incorporates community and impartial policing principles."

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[1] Tom Schuba, *63% of traffic stops in Chicago targeted African-Americans last year, state report shows,* CHICAGO SUN-TIMES, (July 28, 2022), https://chicago.suntimes.com/crime/2022/7/28/23282553/traffic-stops-chicago-black-drivers-aclu.

[2] Clare Spaulding, Fran Spielman*, Lightfoot deems 2022 'make-or-break year' for lowering violent crime,* CHICAGO SUN-TIMES, (Jan. 4, 2022), https://chicago.suntimes.com/news/2022/1/4/22867604/lightfoot-brown-2022-violent-crime-chicago-police.

[3] *See, e.g., Special Report: Focus Groups with Black and Latino Men, Ages 18–35 (Conducted December 2020 – June 2021)*, Independent Monitoring Team (September 1, 2022), https://cpd-monitoringteam.com/overview/reports--and-resources/imt-special-report-focus-groups-with-black-and-latino-men-ages-18-35/.

Critical Policies Are Long Overdue

In the six-month period covered by the Report, CPD still had not completed critical policies that are long overdue. As we noted six months ago, OAG is particularly concerned that the following policies remain incomplete:

- Prohibiting sexual misconduct by officers;
- Allowing people to record officers performing their duties in public;
- Providing meaningful access to police services for individuals with disabilities;
- Providing timely and meaningful access to police services for individuals with limited English proficiency;
- Requiring officers to respond to and interact with youth and children in a developmentally appropriate way; and
- Mandating that officers use body-worn cameras in compliance with the consent decree and state law.

The deadlines to complete these policies have long passed. And, because CPD has not finalized these policies, CPD has not moved forward with training its officers on these critical requirements, nor has it begun to put these measures into practice. It is long past time for CPD to put these remaining requirements into policy.

Furthermore, the City and CPD's failure to make any progress on a revised search warrant policy is deeply concerning. The IMT, OAG, and Coalition have provided extensive recommendations based on national best practices and input from community members with lived experience to the CPD, yet CPD has not incorporated those changes into policy or engaged in robust community engagement. As with all of its delays, CPD's lack of commitment to changing its search warrant policies and practices leaves Chicagoans vulnerable to the same type of traumatic, disrespectful, and avoidable treatment and improper raids that so many community members experience, including many who testified at the recent public hearing. CPD must prioritize revising its search warrant policy in the coming monitoring period. The community demands and deserves meaningful progress to prevent even more unnecessary harm. CPD's failure to act with urgency on this issue furthers community harm and deepens community mistrust.

Inadequate Resources and Staffing Have Delayed Compliance Progress

In the last monitoring period, inadequate staffing and diversion of resources to patrol duties hindered reform progress and, in some cases, caused CPD to move backwards. Most troubling, CPD lost compliance with paragraphs 193, 574, and 575 of the consent decree because it did not adequately staff the Tactical Review and Evaluation Division (TRED). The TRED reviews most types of incidents where an officer uses force against a person and every incident where an officer points a firearm at a person. The function of TRED's review is not disciplinary; rather, TRED reviews these incidents from a Department-improvement perspective to provide feedback to officers and supervisors about their tactics, to identify concerns with Department policies, training, or practices, and to analyze use of force data. TRED staffing has continually declined, a de-prioritization which, as of November 2022, has resulted in backlogs of nearly 400 force incident reviews and nearly 1,000 firearm pointing incident reviews.

Additionally, we remain concerned that the Training Academy does not have enough instructors to meet the consent decree's extensive training requirements. We commend the hard-working instructors and curriculum developers at the Academy for designing and implementing thoughtful trainings based on best practices, including in-person training on use of force and de-escalation, crisis intervention, investigating gender-based violence, and intervention techniques for law enforcement officers. But, CPD's decision to take resources away from the Academy threatens to undermine that good work. In recent months, the Academy has had to pull in officers from other units to serve as instructors, ask overburdened instructors to work overtime, and quickly train newly assigned instructors in the complex subject matter of the course they are teaching.

As the Report notes, other CPD units' inadequate resources or staff turnover has hampered compliance progress. CPD's Reform Management Group, a critical reform unit, saw nearly 50% turnover in the reporting period. The Strategic Initiatives and Audit Divisions, crucial pieces of CPD's much-needed data analysis and collection reforms, remain severely understaffed. The Office of Community Policing, responsible for many community engagement and community policing initiatives, also remains under-resourced. Further, the Report identifies even more understaffed units doing front-line reform work: the Crisis Intervention Unit, the CIT DOCS Unit, and Research and Development.

As we heard during the public hearing, understaffing of these units has real-life consequences for Chicagoans in their interactions with officers. Though the City and CPD have finalized policies relating to crisis intervention and interacting with individuals who are potentially experiencing a mental health crisis, CPD has not yet fully trained officers on these policies, and instructor staffing shortages will likely cause continued delay. As many community members expressed, CPD's failure to train all officers in crisis intervention techniques, and to ensure adequate staffing of the specialized CIT unit, has resulted in traumatic encounters for individuals who experience a mental health crisis. The consent decree requires, and Chicagoans expect, the City and CPD to dedicate sufficient resources and staffing across all of its reform efforts.

Accomplishments and Progress in the Sixth Reporting Period

Despite the considerable challenges identified above, the City and CPD made progress towards some notable requirements in the last reporting period:

- CPD implemented a long-needed policy governing foot pursuits, which became effective on August 29, 2022.
- The Office of the Inspector General and the Deputy Inspector General for Public Safety maintained full compliance with its obligations, setting the standard for CPD and other City agencies to follow.
- The Police Board demonstrated compliance with many consent decree requirements and continues to move towards full compliance with its obligations.
- CPD provided in-person training to officers on new and revised use of force policies and community policing.
- CPD continues to refine a suicide prevention initiative.

- CPD finalized several important policies, including: S05-14, Crisis Intervention Team Program; G02-01, Human Rights and Human Resources and G02-04, Prohibition Regarding Racial Profiling and Other Bias-Based Policing.
- The Civilian Office of Police Accountability continued its thoughtful approach to consent decree compliance and obtained jurisdiction to conduct administrative investigations into allegations of sexual misconduct by CPD officers.

OAG commends this progress and appreciates the hard work of the individuals at CPD and other City agencies who are committed to reform, meaningful collaboration, and progress. While this progress is laudable, these improved policies and procedures must still be translated into changes in how community members experience day-to-day interactions with police officers.

Conclusion

The OAG is committed to working with the City, CPD, IMT, the Coalition, and all community members impacted by CPD's policing practices. As the consent decree enters a new year, the City and CPD must renew their commitment to building community trust, completing all outstanding consent decree required policies, bridging the gap between paper and practice, and providing the necessary resources for this critical work.

Respectfully,

KWAME RAOUL
Attorney General of the State of Illinois

By: s/Mary J. Grieb
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cc: Jennifer Bagby, Max Frazier, Arthur Haynes, and Allan Slagel, Counsel for the City of Chicago; Dana O'Malley, General Counsel for the Chicago Police Department (via email)

Attachment B:
City of Chicago Comments
December 2022

City of Chicago
Lori E. Lightfoot, Mayor

Department of Law

Celia Meza
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December 5, 2022

Independent Monitoring Team
c/o Maggie Hickey, Independent Monitor
233 South Wacker Drive, Suite 7100
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Maggie.Hickey@afslaw.com

Dear Ms. Hickey:

The City of Chicago provides its comments to the Independent Monitoring Team's draft report for the reporting period January 1, 2022, through June 30, 2022. The City looks forward to continued compliance progress in the next monitoring period.

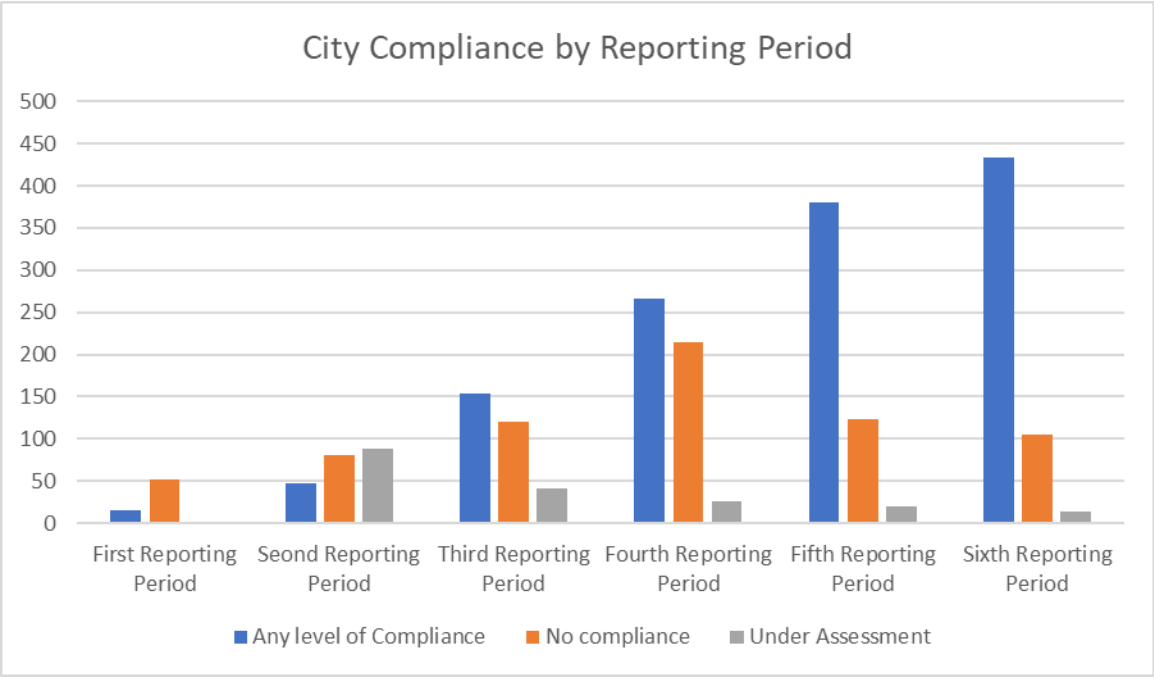
City of Chicago's Comments on the Sixth Independent Monitoring Report

Pursuant to Consent Decree Paragraph 663, the City of Chicago ("City") provides the following comments on the Independent Monitoring Team's ("IMT") draft Independent Monitoring Report 6 ("IMR6 Report"), submitted to the parties on November 15, 2022.

Summary of the City's Continued Increased Compliance

By the close of the sixth monitoring period, just over three years into the Consent Decree, the City has achieved some level of compliance with more than 77% of the 554 paragraphs assessed by the IMT in IMR6[1]. This is an increase in both the percentage of compliance as well as the paragraphs assessed in the previous monitoring report where the City was in compliance with just over 70% of the 525 paragraphs assessed by the IMT. Additionally, the City has decreased the number of paragraphs for which it is not in compliance.

[1] The City disputes that paragraphs 81 and 82 are actually under assessment and therefore should not be included in the total of 554 paragraphs under assessment. By the City's calculation, it has achieved some level of compliance with 432 out of 552 paragraphs under assessment for some level of compliance with slightly over 78% of all monitorable paragraphs.



The City's consistently increasing rates of compliance are significant but represent only a portion of the work done throughout the reporting period. The City appreciates the IMT's comments that "this report represents a sixth-month assessment of the City's compliance efforts . . . [and] does not reflect all [of] the efforts of the City . . . to date." (S*ee* IMR 6 Report – Executive Summary, pg. 2). However, the IMT's Executive Summary fails to identify any achievements in its section "*Major Developments and Principal Achievements and Challenges Impacting Compliance*." The section merely notes the increased level of compliance before identifying continued challenges facing the Chicago Police Department ("CPD") and the City. The City continues to request that the IMT balance the report of compliance with the demonstrated work being done by the Chicago Police Department (CPD), the Office of Emergency Management Communication (OEMC), the Civilian Office of Police Accountability (COPA), the Police Board, the Office of Inspector General (OIG), the Department of Human Resources (DHR), Public Safety Administration (PSA), and the other City entities involved in the work of reform.

IMR6 Achievements

The City increased the number of paragraphs with some level of compliance by over 50 paragraphs this period and decreased the number of paragraphs in which there was no compliance.

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This increased level of compliance is the result of hard work by the many City employees in CPD, OEMC, COPA, the Police Board, OIG, DHR, PSA, the Mayor's Office and many other City employees.

Some of the notable achievements in the Sixth Monitoring Period include:

- The completion of CPD policies G02-01, *Protection of Human Rights*, G02-04, *Prohibition Regarding Racial Profiling and Other Biased-Based Policing*, G02-01-05, *Religious Interactions*, S11-10, *Department Training*, S11-10-03, *In-Service Training*, after review by the IMT and OAG and community input.
- Completion of the following trainings by CPD members: *Inclusive Policing Procedural Justice III* training and *2021 Use of Force In-Service Training*, including scenario-based training.
- Finalization of CPD's *Crisis Intervention Team (CIT)* policy (S05-14), which incorporated existing SOPs and the requirements of the Consent Decree and broad community engagement.
- Finalization of CPD's *Foot Pursuit* policy. Although not effective until the beginning of IMR 7, a great deal of work on the policy and required training was done throughout IMR 6.
- Continued full compliance for all Consent Decree requirements pertaining to the Office of the Inspector General and Public Safety Inspector General.

Methodologies

Consent Decree Paragraph 655 provides that the IMT will develop and share with the City and the OAG a proposed methodology for its compliance review. Paragraph 655 allows for the parties to submit comments regarding the methodology, which both the City and the OAG have consistently submitted.

The City recognizes the complexity and difficulty of developing distinct methodologies for several hundred Consent Decree requirements spanning numerous topics and appreciates the IMT's efforts to do so in a thorough manner. The City, however, believes that many of the methodologies delineated by the IMT add substantive requirements beyond the legal requirements

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stated in the Consent Decree. Other methodologies do not provide adequate detail about the data sources and analysis methods that will be used to assess compliance.

Consent Decree Paragraph 624 provides that the IMT's review will determine whether the City has substantially complied with the Consent Decree. This paragraph further notes that "Compliance with a requirement means that the City and CPD: (a) have incorporated the requirement into policy; (b) have trained all relevant personnel as necessary to fulfill their responsibilities pursuant to the requirement; and (c) are carrying out the requirement in actual practice." Based on this paragraph, the IMT assess whether the City and its entities are in preliminary, secondary, or full compliance—each of these levels typically mirrors the three subparts of ¶ 642.[2]

As noted below, many of the City's disagreements with the IMT's current report involve methodology descriptions that vary from the methodologies described above. The City is concerned that the IMT is often times conflating the requirements for full or operational compliance in assessing secondary compliance. Additionally, often the IMT's methodologies do not provide sufficient actionable detail to allow the City to understand what will be required to achieve the next level of compliance. The IMT reports frequently provide specific guidance, which the City finds immensely helpful in planning their future compliance efforts. However, where the guidance is unclear or based upon a methodology beyond what is contained in the Consent Decree, it could cause a delay in the City's compliance efforts and may present a misleading picture to the public regarding the extent to which the City is undertaking the steps required to achieve compliance.

Some concerns related to specific section or paragraph assessments are addressed below, and further concerns have been addressed in prior correspondence and conversations between the parties and the IMT. The City will continue to engage with the IMT to clearly define and align on the methodologies that will be applied for each assessment. The City reserves the right to provide further responses or objections to the compliance methodologies identified in the IMR 6 Report, or the application of any methodology to a specific Consent Decree requirement.

Specific Comments

[2] For certain Consent Decree requirements, this three-pronged analysis is less suitable. In those situations, the Monitor develops alternate methodologies for assessing compliance.

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The City provides the following comments to the various sections of the report and specific Consent Decree paragraphs:

- **Community Policing:**

  - **Paragraph 16:** The IMT notes that it will assess Secondary compliance by assessing "whether the CPD's process includes sufficient supervisor oversight to ensure the review processes effectively determines whether each District's strategies are effective in building and strengthening community partnerships and using problem solving techniques." This description of secondary compliance is contrary to the methodologies set forth in ¶ 642 of the Consent Decree and describes full or operational compliance, not secondary compliance.

  - **Paragraph 20:** The IMT acknowledges the existence of a relevant policy as well as a training that covers the relevant policy and subject of the paragraph. The IMT further notes that "CPD did not provide any other records demonstrating developed supervisor practices including a process to track transports to ensure policy implementation." The methodology described, *i.e.*, the implementation of policy, is full or operational compliance, not secondary compliance. Based upon the erroneous methodology description and the required training, CPD and the City should be found to be in secondary compliance with this paragraph.

  - **Paragraph 24**: The IMT notes that "to achieve Secondary compliance, the IMT expects the CPD will use the Community Engagement Management System to document and track community partnerships expansion efforts, provide any required additional training, and produce progress reports." Again, the methodology described appears to conflate secondary compliance with full or operational compliance.

  - **Paragraph 43**: The requirements of paragraph 43 have been completed and there is nothing more to assess; accordingly, the City and CPD should be in full compliance with this paragraph. Any ongoing assessment requirements are found in paragraph 41.

- **Impartial Policing**:

  - **Paragraph 53**: The City and CPD continue to object to limiting assessment of this paragraph to the revision of CPD's Search Warrant policies. As noted in the comments by the IMT, CPD produced numerous policies related to this paragraph. Limiting assessment to the completion of Search Warrant policies is not an accurate reflection of the work done in this area.

- **Crisis Intervention**:

  - **Paragraphs 138 - 140**: The City and OEMC appreciate that in revising the first draft of the IMR 6 report into the current draft, the IMT returned both preliminary

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and secondary compliance on these three paragraphs in light of the previous work done by OEMC and the previous guidance provided by the IMT. However, the City and OEMC still have concerns with the comments contained in the assessment of these paragraphs. The current draft of this report was shared with the parties on November 15, 2022, a mere 45 days before the end of the current reporting period, allowing no time to address the comments raised by the IMT.

- **Paragraph 141**: The City and CPD disagree with the methodology described in the assessment of this paragraph. The IMT states that "the CPD must demonstrate that at least 95% of officers have received completion of the eLearning." However, the CIT eLearning module has nothing to do with the requirements of paragraph 141 and has no bearing on whether an officer will be prioritized for dispatch to a crisis related incident.

- **Use of Force**:

  - **Paragraph 157**: The City and CPD disagree with the methodology language set out in this paragraph assessment. Dashboards and TRED reviews are operational measures to determine implementation success or deficiencies in policy or training and are therefore required for full or operational compliance.

  - **Paragraph 167**: The City and CPD disagree with the methodology language to assess secondary compliance. The secondary compliance should be assessed based upon the relevant training. Any information from the Traffic Review Board or accident data is necessary for full or operational compliance.

- **Recruitment Hiring and Promotion**:

  - **Paragraph 261**: The IMT has failed to provide an explanation for its assertion that the process required by this paragraph must be initiated by November 1, 2022, with Expert engagement completed by April 30, 2023."

  - **Paragraph 2**64: Further explanation from the IMT for its proposed methodology for secondary compliance for this paragraph is necessary. The methodology identified is vague and indefinite to guide and measure future compliance.

- **Supervision:**

  - **Paragraphs 347, 348, 349, 350, 351, 353, 354, 355, 360, 363, 364, 372, and 376**: Secondary compliance for the above cited paragraphs should be evaluated in IMR7 through CPD's completion of the approved 2022 In-Service Supervisor training by the requisite number of CPD supervisors. Reference in these paragraphs to any other compliance items such as notice or tracking systems, reviews of logs, and

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other described items are elements of operational or full compliance and not secondary compliance.

- **Officer Wellness and Support:**

  - **Paragraph 398**: The methodology described by the IMT for assessing Secondary compliance is inconsistent with the established methodology set forth in ¶ 642 of the Consent Decree. The review of data is necessary for full or operational compliance and not secondary compliance.

- **Accountability and Transparency**:

  - **Paragraph 528**: The training requirements related to this paragraph are codified in S08-01 for preliminary compliance. Requiring the City and CPD to have a detailed written training plan for a particular policy exceeds the established methodology set forth in ¶ 642 of the Consent Decree. The training plan and the contents of a training are required for secondary compliance not preliminary compliance.

In addition to the City's comments contained in this letter, the City also submits the attached letter from the Office of the Inspector General, reflecting their comments to their work throughout IMR 6.

Sincerely,

Jennifer K. Bagby

Jennifer K. Bagby
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City of Chicago Department of Law
Public Safety Reform Division

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Via Electronic Mail

November 28, 2022

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Re: Office of Inspector General Comments on Draft IMR6 Report

Dear Ms. Hickey and Mr. Medlock:

I write to submit the Office of Inspector General (OIG) and Deputy Inspector General for Public Safety's (PSIG) comments on the draft IMR6 report, submitted to the City on November 14, 2022. *See* Consent Decree ¶ 663.

OIG and PSIG agree with the findings and conclusions in the draft IMR6 report that OIG and PSIG have maintained full compliance with the obligations contained in paragraphs 440, 444, 481, 522, 523, 537, 556, 557, 558, 559, 561, 562, 563, and 565. OIG and PSIG do not seek any substantive changes to the draft IMR6 report's summaries of their compliance with those paragraphs. Additionally, OIG and PSIG agree that they are not subject to a compliance assessment with response to paragraphs 521, 560, and 564. OIG and PSIG previously offered comments on the draft IMR6 report submitted to the City on July 31, 2022 and appreciate the incorporation of that feedback into the updated draft. *See* Ltr. from Megan Carlson, Acting Deputy Inspector General for Public Safety, City of Chi. to Margaret A. Hickey, Independent Monitor re OIG Comments on Draft IMR6 Report (August 8, 2022). OIG and PSIG have no additional comments on the draft at this time.

Sincerely,

Tobara Richardson
Deputy Inspector General for Public Safety
Office of Inspector General

cc: Office of Illinois Attorney General
Jennifer Bagby, Deputy Corporation Counsel, Department of Law
Allan Slagel, Partner, Taft

Independent Monitoring Team | Chicago Police Department Consent Decree