

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

STATE OF ILLINOIS,

Plaintiff,

v.

CITY OF CHICAGO,

Defendant.

Case No. 17-cv-6260

Judge Rebecca R. Pallmeyer

INDEPENDENT MONITORING REPORT 14

The Independent Monitor Margaret A. Hickey and the Independent Monitoring Team submit the attached *Independent Monitoring Report 14*.

Dated October 13, 2026

/s/Margaret A. Hickey

Margaret A. Hickey
ArentFox Schiff LLP
233 S. Wacker Drive, Suite 7100
Chicago, IL 60606
Telephone: (312) 258-5500
Facsimile: (312) 258-5600
maggie.hickey@afslaw.com

CERTIFICATE OF SERVICE

The undersigned attorney hereby certifies that, on October 13, 2026, she caused a true and correct copy of the foregoing ***Independent Monitoring Report 14*** to be filed electronically with the Court's CM/ECF system, which caused an electronic copy of this filing to be served on counsel of record.

/s/Margaret A. Hickey

Margaret A. Hickey
ArentFox Schiff LLP
233 S. Wacker Drive, Suite 7100
Chicago, IL 60606
Telephone: (312) 258-5500
Facsimile: (312) 258-5600
maggie.hickey@afslaw.com

Independent
Monitoring Team | Chicago Police
Department
Consent Decree



INDEPENDENT MONITORING REPORT 14

(Reporting Period: January 1, 2026, through June 30, 2026)

Report Date: October 13, 2026

Independent Monitoring Team

Chicago Police
Department
Consent Decree

This report, *Independent Monitoring Report 14*, provides our compliance assessments for efforts from the first half of 2026: January 1 through June 30, 2026. As detailed in this report, the City of Chicago (City) and the Chicago Police Department (CPD) achieved new levels of compliance in most sections of the Consent Decree, and a majority of this period's compliance gains reflect reforms moving from policy and training into practice.

Overall, the City has now achieved at least Preliminary compliance with about 99% of the original monitorable paragraphs (or 546 paragraphs), at least Secondary compliance with about 78% of paragraphs (or 428 paragraphs), and Full compliance with about 34% (or 188 paragraphs). In addition to paragraphs where the City and the CPD maintained compliance, the City gained additional levels of compliance with about 83 of these paragraphs—or about 15% of the original monitorable paragraphs—including 10 paragraphs that moved into Preliminary compliance, 31 paragraphs that moved into Secondary compliance, and 42 paragraphs that moved into Full compliance.

This report marks a key transition for the CPD. The fourteenth reporting period ended under Superintendent Larry Snelling, who retired during the fifteenth reporting period after leading the CPD toward significant levels of compliance with the Consent Decree. As a result, the progress in this report reflects the CPD's efforts under his leadership.

The Consent Decree is designed, however, to ensure that the systems required for demonstrably constitutional and effective law enforcement outlast any one individual's service. While not reflected in this report, we are encouraged by the ongoing efforts of the CPD's remaining leadership and Acting Superintendent and First Deputy's efforts to continue prioritizing compliance with the Consent Decree from the top down.

These efforts must include sustaining the large share of Full compliance achievements in the fourteenth reporting period. The City achieved, for example, Full compliance with three paragraphs in the Community Policing section, three paragraphs in the Impartial Policing section, nine paragraphs in the Crisis Intervention section, nine paragraphs in the Use of Force section, four paragraphs in the Training section, one paragraph in the Officer Wellness and Support section, and 13 paragraphs in the Accountability and Transparency section. These achievements reflect yearslong commitment, concrete operational changes, self-evaluation, listening to community voices, and refinement.

One of this period's most significant milestones came in the Accountability and Transparency section. On June 30, 2026, the CPD implemented its revised *Officer-Involved Shooting and Officer-Involved Death Incident* policy series (G03-06, G03-06-01, and G03-06-02). This is the culmination of efforts by the City, the CPD, the Office of the Illinois Attorney General (OAG), and the Court since



Monitor Maggie Hickey



Chief Rodney Monroe, Ret.

even before the start of the Consent Decree. This also reflects significant accountability and transparency improvements to procedures used by CPD personnel and the Investigative Response Team's (IRT's) investigations into officer-involved shootings and deaths.

And this critical work continues. While the existing IRT investigation process emphasizes accountability and transparency, the City, the CPD, and the OAG continue to meet with the Court to work together to address ¶492's requirements regarding the Police and Community Relations Improvement Act (PCRIA). Specifically, the Consent Decree requires the City and the CPD to comply with PCRIA by having an external "law enforcement agency" investigate officer-involved deaths. Because this inevitably requires efforts outside of the City and the CPD, the Parties have been working with other stakeholders to make tangible progress. We hope to have more to report on PCRIA compliance in *Independent Monitoring Report 15*.

While real progress has been made, staffing remains a central challenge to obtaining and sustaining progress with the Consent Decree. This year, the City and the CPD published the long-awaited workforce allocation study.¹ Its findings reinforce concerns that we have raised in several key understaffed areas. The ramifications of these staffing challenges likely touch all areas of policing in Chicago, from the safety of communities and officers to uses of force, training, data analysis, reporting, and the timeliness of CPD investigations, including investigations by the Bureau of Internal Affairs. As required by the Consent Decree, we will continue to monitor the City's responsibilities to provide "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." We look forward to reviewing the City and the CPD's plans to address the workforce allocation study recommendations and implement much-needed staffing changes.

The progress reflected in this report belongs to the many City personnel, including at the CPD, the Civilian Office of Police Accountability (COPA), the Chicago Police Board, the Community Commission for Public Safety and Accountability (CCPSA), and the Office of Emergency Management and Communications (OEMC), as well as the many members of Chicago's communities who continue to show commitment to policing reform and a safer Chicago. In *Independent Monitoring Report 15*, which will cover July 1 through December 31, 2026, we will assess whether these reforms are being sustained and whether they are reaching the people they are meant to serve. In the meantime, this winter, we look forward to publishing the results of the fourth statistically significant survey about how Chicagoans feel and interact with the CPD.²



Dr. Theron Bowman

¹ *Report on Workforce Allocation Study*, MATRIX CONSULTING GROUP (March 27, 2026), <https://www.chicagopolice.org/stories/cpd-wfa-cpa/>.

² All of our community survey reports are available on our website. See *Community Surveys*, INDEPENDENT MONITORING TEAM, <https://cpdmonitoringteam.com/community-surveys/>.

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Common Abbreviations

BIA	Bureau of Internal Affairs within the Chicago Police Department
BWC	Body Worn Camera
CCMHE	Chicago Council on Mental Health Equity
CCPSA	Community Commission for Public Safety and Accountability
CIT	Crisis Intervention Team
COPA	Civilian Office of Police Accountability
CPD	Chicago Police Department
FRB	Force Review Board within the Chicago Police Department
FTO	Field Training Officer position within the Chicago Police Department
IMT	Independent Monitoring Team
ISR	Investigatory Stop Report for the Chicago Police Department
OAG	Office of the Illinois Attorney General
OEMC	Office of Emergency Management and Communications
OID/OIS	Officer involved death/officer involved shooting
OIG	Office of Inspector General
PCD	Chicago Police Department's Professional Counseling Division
PPO	Probationary Police Officer for the Chicago Police Department
PSIG	Public Safety Inspector General for the Office of Inspector General
R&D	Research and Development for the Chicago Police Department
TOC	Training Oversight Committee
TRED	Tactical Review and Evaluation Division for the Chicago Police Department
TRR	Tactical Response Report for the Chicago Police Department
TRR-I	Tactical Response Investigation Report for the Chicago Police Department
TRR-R	Tactical Response Report Review for the Chicago Police Department
WOL	Watch Operations Lieutenant for the Chicago Police Department

Executive Summary

In August 2017, the Office of the Illinois Attorney General (OAG) sued the City of Chicago (City)—collectively, “the Parties”—in federal court regarding civil rights abuses by the Chicago Police Department (CPD). The lawsuit led to a Consent Decree, effective March 1, 2019.³ 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.

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, the Deputy Inspector General for Public Safety (Deputy PSIG); and the Office of Emergency Management and Communications (OEMC)—are complying with the Consent Decree.⁴

³ 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/). The Consent Decree is also available on the Independent Monitoring Team’s website: cpdmonitoringteam.com/wp-content/uploads/2024/02/FINAL-CONSENT-DECREE-SIGNED-BY-JUDGE-DOW.pdf.

⁴ As a party to the Consent Decree, the City is ultimately responsible for compliance. See ¶720. Unless otherwise specified, references to the City include its relevant entities. See ¶736.

This is *Independent Monitoring Report 14*. As in previous monitoring reports, this is an update to the Court and the public on compliance efforts during the fourteenth reporting period: from January 1, 2026, through June 30, 2026.⁵ Among other things required by the Consent Decree, this report also includes the following:

- an updated compliance or status assessment from the previous reporting period;
- a summary of the principal achievements and challenges facing the City's compliance with the Consent Decree; and
- an updated projection of upcoming work for the City, OAG, and the IMT. See ¶661.

Per ¶661 of the Consent Decree, the IMT will issue semiannual reports until the Consent Decree ends. See ¶¶693 and 714–15. With the agreement of the Parties, this report, *Independent Monitoring Report 14*, is a continued attempt to streamline the reporting process. We link to paragraph assessments for paragraphs where (1) the City has achieved additional levels of compliance, (2) the City has failed to maintain levels of compliance, or (3) the IMT is highlighting particular progress or lack of progress toward full and effective compliance. We look forward to feedback from the public and the Parties about how to further refine our reporting processes.⁶

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 has provided sufficient proof that the City, the CPD, or other relevant entities are in compliance. See ¶720. Even if the City has made significant

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 14th 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/2024/03/2022.03.25-Stipulation-Regarding-Search-Warrants-Consent-Decree-Timeline.pdf>.

⁶ This report represents a six-month assessment of the City's compliance efforts from January 1, 2026, through June 30, 2026. 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, 2026, and before the date we submit this report. Importantly, we have not assessed efforts made after June 30, 2026, in this report. We will do so in the monitoring report for the fifteenth reporting period (July 1, 2026, through December 31, 2026). Moreover, an overview of the IMT's assessment process and priorities, including deadlines and status updates, and a summary of the IMT's activities are available on our website: <https://cpdmonitoringteam.com/>.

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.



We assess compliance at three levels: (1) Preliminary, (2) Secondary, and (3) Full. These compliance levels allow us to share our assessments of the City’s 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.⁷ 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, facilities, and data to establish that they have achieved each level of compliance during the applicable reporting period.⁸

Once the Court finds that the City and the CPD are in full and effective compliance with Consent Decree requirements, the City and the CPD must maintain full and effective compliance for one or two years. See ¶¶714–15.⁹ Although not required,

⁷ 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.

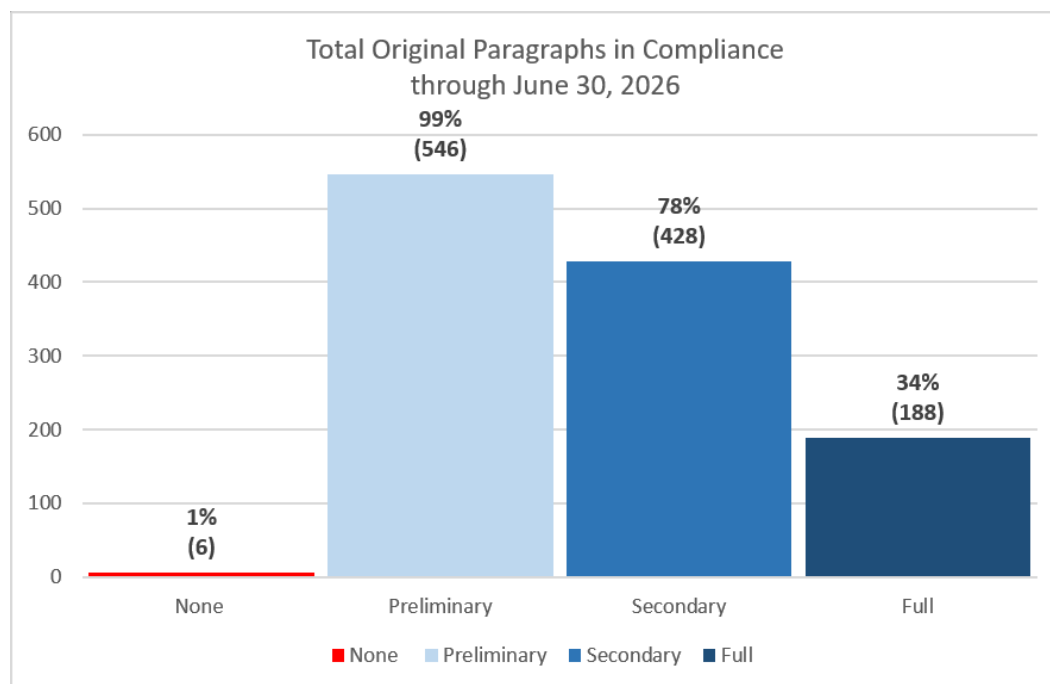
⁸ Some requirements in the Consent Decree demand more effort to comply with than others. The number of requirements—and the amount of work necessary under each requirement—can vary substantially within each paragraph and topic area.

⁹ 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/2024/03/2022.03.25-Stipulation-Regarding-Search-Warrants-Consent-Decree-Timeline.pdf>.

the Court may retroactively determine the start of the one- or two-year sustainment period when the IMT files a report finding those requirements in Full compliance.

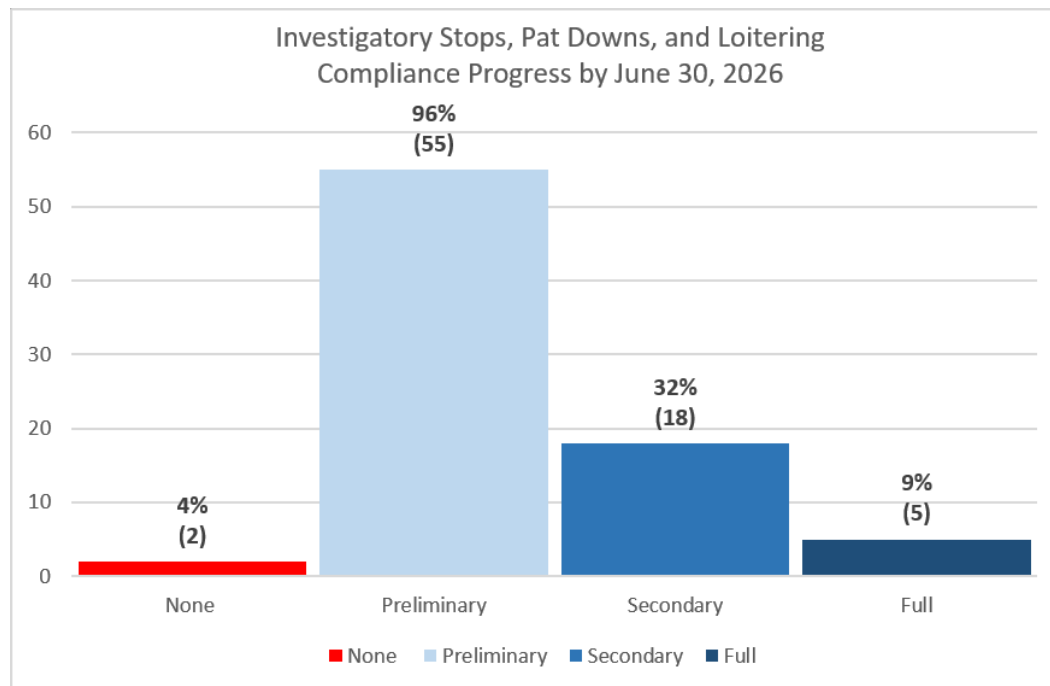
For the original monitorable paragraphs (552), the City has achieved at least Preliminary compliance with 546 paragraphs (or about 99%), at least Secondary compliance with 428 paragraphs (or about 78%), and Full compliance with about 188 paragraphs (or about 34%). More specifically, at the end of the fourteenth reporting period, and by June 30, 2026, the City remained in Preliminary compliance with 118 paragraphs, remained in Secondary compliance with 240 paragraphs, and achieved or maintained Full compliance with 188 paragraphs—leaving 6 paragraphs with no levels of compliance (or about 1%).¹⁰

As reflected in the bar graph below, compliance levels are cumulative, so all paragraphs in Secondary compliance are included in the totals for Preliminary compliance and all paragraphs in Full compliance are included in the totals for Preliminary compliance and Secondary compliance.



¹⁰ As the City and the CPD gain more levels of Full compliance, the focus will necessarily shift to sustainability efforts. To that end, the Independent Monitoring Team has been working with the City of Chicago Office of Inspector General to ensure that policing best practices and reforms are properly tracked, measured, and sustained for the long term (see Consent Decree ¶1667 regarding “Coordination with the Office of Inspector General”). For examples of the key work by the Office of Inspector General, please see their online Public Safety dashboards (<https://igchicago.org/information-portal/public-safety/>) and publications (<https://igchicago.org/publications/>).

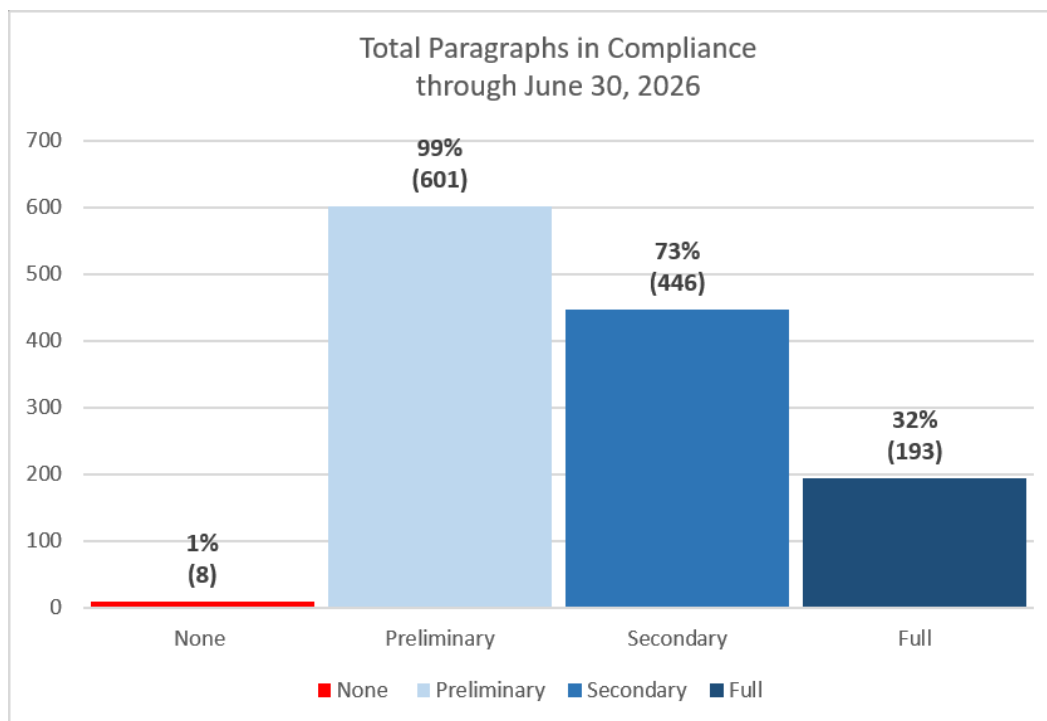
In the fourteenth reporting period, the IMT continued to assess monitorable paragraphs in the more recently added Investigatory Stops, Protective Pat Downs, and Enforcement of Loitering Ordinances section of the Consent Decree. As reflected below, the IMT assessed the City's compliance with 57 of these paragraphs in the fourteenth reporting period, and by June 30, 2026, the City received at least Preliminary compliance with 55 paragraphs (or about 96%), at least Secondary compliance with 18 paragraphs (or about 32%), and Full compliance with five paragraphs (or about 9%). More specifically, the City and the CPD remained in Preliminary compliance with 37 paragraphs, Secondary compliance with 13 paragraphs, and Full compliance with five paragraphs. As a result, the City has not achieved compliance with the remaining two paragraphs under review to date.¹¹



In sum, including all monitorable paragraphs in the fourteenth reporting period (609 paragraphs), the City has achieved Preliminary compliance with 601 paragraphs (about 99%), Secondary compliance with 446 paragraphs (about 73%), and Full compliance with 193 paragraphs (about 32%)—leaving 8 paragraphs with no levels of compliance.¹²

¹¹ See [ISR Stipulation Figure 1](#) for additional information about which paragraphs became monitorable each reporting period.

¹² [Conclusion Figure 3](#) reflects the current compliance status of all monitorable paragraphs to date.



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.” ¶16.

[Executive Summary Figure 1](#), below, provides a sample of principal achievements and challenges across the 11 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 demonstrated the operationalization and institutionalization of various reforms that helped advance compliance in prior reporting periods, from crime-victim assistance to juvenile processing. - The CPD achieved Full compliance with the requirements of three paragraphs, moving them significantly closer to fulfilling the requirements of this section of the Consent Decree.	- Implementing Community Policing Training across the CPD along with developing and refining the CPD's processes and systems to track and evaluate its community partnerships and engagement activities in the CPD districts will be paramount to the CPD's continual improvement in compliance. - Developing foundational policies and procedures related to youth interactions, specifically those focused on diversion and deflection, will be essential to the CPD's compliance with the various paragraphs that delve into youth engagement and youth interactions.
Impartial Policing	- The City and the CPD finalized and delivered a series of eLearnings and trainings that helped advance compliance with the requirements of several paragraphs. - The City and the CPD worked together to assess the effectiveness and efficiency of CPD's Language Access policies and delivered a report documenting its assessment to the Superintendent. - The City and the CPD also completed the first ANOV and Misdemeanor Assessment and continue to work on expanding its ANOV forms to more effectively capture the necessary demographic data.	- Demonstrating sustained operational compliance through data and reporting systems continues to be a challenge for the CPD. As noted in previous reports, the CPD and its Office of Equity and Engagement must strengthen their data collection, analysis, and reporting systems to effectively demonstrate sustained implementation and progress and consider how the CPD will evaluate and assess impartial policing metrics from various sources and integrate this analysis to inform policies and training. - Consistently documenting the complete feedback and decision-making process used to revise key impartial policing policies (§§54–56 and 59) will be key to furthering compliance.

Section	Sample of Principal Achievements	Sample of Principal Challenges
Crisis Intervention	- The CPD produced baseline data that measured “timely” response in connection with Certified CIT Officers’ responses to incidents identified as involving people in mental health crisis and demonstrated progress in increasing response ratios (see ¶¶107–12). - The CPD completed a review and revision of its S04-20 policy suite, incorporating feedback from the Chicago Council on Mental Health Equity (CCMHE); launched its updated <i>CIT Refresher Training</i>; and piloted its CIT District, Operations, and Community Support (CIT DOCS) Activity Log. - The CPD provided a revised draft of its <i>Certified CIT Officer Implementation Plan</i>. The IMT looks forward to the final approved <i>Plan</i> being made public per ¶1640. - The CPD launched a CIT Program Effectiveness Survey to evaluate the effectiveness of its CIT Program and previewed a new CIT website that includes a public CIT Dashboard. The IMT looks forward to the website and Dashboard being publicly launched. - The OEMC finalized its <i>8 Hour Crisis Intervention Training</i> and delivered the training to new telecommunicators.	- The CPD is still not meeting the required response ratios in all districts and watches (see ¶¶108–09). The CPD must improve the quality and completeness of its response-time data to ensure accurate data collection. - The OEMC must finalize its policy revisions, incorporating feedback from the IMT, OAG, and CCMHE, to maintain and/or achieve additional levels of compliance with several paragraphs. See, e.g., ¶¶138–40, 146, 148–49, 151. - The City held quarterly CCMHE meetings but failed to reach quorum at one of these meetings. The City’s posting of meeting agendas, meeting materials, meeting minutes, and video recordings on the City’s CCMHE webpage remains inconsistent and must be improved to better facilitate community engagement. See, e.g., ¶¶128–31. - The City has not yet completed the <i>Crisis Intervention Plan</i> required by ¶¶122–23. - The CPD’s Crisis Intervention Unit (CIU) continues to face staffing challenges and lacks essential resources. Both the CIU’s internal staffing needs assessment and a Workforce Allocation Study completed by an external consultant recommend significantly more staffing in the CIU, including in its DOCS Unit, to meet the requirements of the Consent Decree and the full demand for crisis intervention services throughout Chicago.

Section	Sample of Principal Achievements	Sample of Principal Challenges
Use of Force	- The District Level Review Program has been expanded to all CPD districts. Preliminary data from the program indicates a reduction of about 16% in firearm pointing incidents in districts that piloted the program.¹³ The District Level Review Program has strengthened credibility and working relationships between captains and officers. - As of January 1, 2026, the Tactical Review and Evaluation Division (TRED) made internal changes to better address both the Incident Debriefing Report (IDR) backlog and more current IDRs being reviewed. As a result, the backlog has been significantly reduced. - The CPD has continued to focus on de-escalation efforts through debriefing points, namely “De-escalation/Force Mitigation – Communication.” Through this debriefing point, the CPD addresses officers’ use of profanity during force incidents.	- Despite improvements, body-worn camera violations remain a top debriefing point among CPD officers.¹⁴ We will continue to monitor the CPD’s progress towards reducing this debriefing point. - Although improvements have been made, the IMT remains concerned about the limited role played by frontline supervisors. We look forward to the expansion of the District Level Review Program to train district lieutenants for more accountability at the district level and encourage frontline supervisors to be more active in identifying training opportunities for their officers. - While the CPD has made progress in its efforts to understand the use-of-force data, challenges remain. Specifically, the CPD has identified difficulties in analyzing data in conjunction with COPA’s complaint management system (CMS) through the use of category codes. Further discussions and collaboration between the CPD and COPA are needed to ensure the CMS contains the proper codes and that they are applied to ensure data is captured correctly, allowing for fruitful analysis. - Several of the paragraphs within the Use of Force section have achieved Full compliance. However, sustainment plans for such paragraphs have yet to be developed. Demonstrating sustained compliance to ensure accountability systems, among others, are effective, will ensure full and effective compliance and sustainment beyond the Consent Decree. <i>See, e.g., ¶¶720–21.</i>

¹³ TRED’s 2025 Year-End Report, CHICAGO POLICE DEPARTMENT (June 30, 2026), at 17, <https://www.chicagopolice.org/wp-content/uploads/2025-TRED-YEAR-END-REPORT.pdf>.

¹⁴ *Id.* at 15.

Section	Sample of Principal Achievements	Sample of Principal Challenges
Recruitment, Hiring & Promotion	- The Recruitment, Hiring and Promotion working groups continued to function as collaborative bodies involving the CPD, the City's Department of Human Resources (DHR), and the Office of Public Safety Administration (OPSA). This multidisciplinary approach strengthened accountability for recruitment, hiring and promotional processes and Consent Decree implementation. - The CPD continued implementing technology and process improvements designed to streamline applicant processing, improve documentation, and reduce delays in hiring while improving transparency and recordkeeping.	- The principal challenges for the Recruitment, Hiring and Promotion section are largely external and strategic: recruiting qualified candidates in a competitive environment, shortening hiring timelines, preparing future leaders, and sustaining collaborative governance across multiple City entities. - Although the collaborative governance model involving the CPD, DHR, and OPSA has strengthened the recruitment, hiring and promotion process, continued coordination, consistent communication, and shared accountability—especially with internal promotions and position changes—will be essential as reforms mature and transition from implementation to sustainment.
Training	The CPD has completed one of its most comprehensive Training Needs Assessments to date. The 2027 Training Needs Assessment incorporated extensive input from multiple sources at varying levels in the department and external units, demonstrated meaningful officer participation in identifying training priorities and elective course needs, and strengthened the Training Oversight Committee's oversight of curriculum development and training governance. The CPD also made substantial progress implementing the Benchmark Training Management System, increased use of operational risk, legal developments, and performance data to drive curriculum decisions, and continued modernizing recruit and in-service training through improved instructional design and quality assurance.	The Training Division has moved beyond establishing foundational processes and now faces implementation and sustainment challenges. The most significant challenges include successfully deploying the Benchmark Training Management System, expanding instructor capacity, balancing mandatory and elective training, responding to member demand for more scenario-based instruction, reducing the reliance on eLearnings, demonstrating measurable training effectiveness, and ensuring that data-driven needs assessments continue to inform curriculum development.
Supervision	- The CPD expanded the Unity of Command and Span of Control Pilot Program to the 15th, 16th, 17th, 20th, and 24th districts. - The Workforce Allocation Study, a culmination of months of work to better understand current staffing and future staffing needs for the CPD, was published.	- The CPD faced challenges with the implementation of the Performance Evaluation System, including issues with member identification, insufficient integration with the previous evaluation system, and a lack of notifications and reminders, among others. - Civilian supervisors continue to express the need for an amended pre-service training block to better understand operational aspects, such as discipline.

Section	Sample of Principal Achievements	Sample of Principal Challenges
Officer Wellness & Support	The CPD achieved Full compliance with ¶1397 by clearly demonstrating that its licensed mental health professionals employed by the Professional Counseling Division do not participate in fitness for duty evaluations.	The CPD continues to experience challenges with its Traumatic Incident Stress Management Program (TISMP). The most recent annual audit notes that 25% of officers who are required to be referred to the TISMP are not referred as required.
Accountability & Transparency	- The CPD revised, finalized, and implemented its <i>Officer-Involved Shooting and Officer-Involved Death Incident</i> policy series (G03-06, G03-06-01, and G03-06-02). - The City and COPA continued their efforts in developing the Community-Police Mediation Program pilot by creating a Community Mediator Selection Advisory group and mediator training materials. - The CCPSA completed its search and related community outreach for a new COPA Chief Administrator and selected a new COPA Chief Administrator.	The CPD continues to face challenges meeting Consent Decree timeframes for investigation and case completion (<i>i.e.</i>, notifications to reporting parties and members and backlogs in BIA and Accountability investigations).
Data Collection, Analysis & Management	- The CPD demonstrated progress in developing its Early Intervention and Support System (EISS) and updating E06-XX, <i>Early Intervention and Support System</i>. - The CPD demonstrated improvements to its Force Review Board (FRB) operations, with more thorough discussion and analysis among FRB members. - The Tactical Review and Evaluation Division (TRED) has taken steps to increase staffing and has demonstrated progress in reducing its backlog of Incident Debriefing Reports (IDRs) to review. On January 1, 2026, TRED implemented a backlog-reduction plan that reorganized staff into Area-based review groups and established a dedicated backlog reduction team. - The CPD continued to update its <i>Data Systems Plan</i>, treating it appropriately as a “working document” that may evolve over time. The IMT looks forward to the CPD re-producing this <i>Plan</i> each reporting period to reflect any relevant updates (<i>e.g.</i>, updated timelines).	The Information Systems Development Group (ISDG) must improve its structure and engagement to ensure that it is fulfilling the responsibilities required by ¶1608.

Section	Sample of Principal Achievements	Sample of Principal Challenges
Investigatory Stop Reports, Protective Pat Downs, & Enforcement of Loitering Ordinances	- The CPD implemented the S10-02 (<i>Gang and Narcotics-Related Loitering</i>) and G03-08 (<i>Police Encounters and the Fourth Amendment</i>) policy suites this reporting period. - The CPD fully implemented the new electronic <i>Stops Application</i>, including the <i>Incident Debriefing Report</i> (IDR) for supervisors in a format consistent with other existing IDR applications. - The CPD implemented training on the new electronic Stops Application with at least 95% of relevant personnel receiving training in both the Stops Application eLearning and the 2025 <i>Police Encounters and the 4th Amendment</i> in-service training.	- As referenced, the Fourth Amendment Stop Review Unit (4ASRU) stopped conducting their ISR reviews in February 2026 due to a transition in platforms and relaunched reviews in June 2026 within a new IDR system. This created a backlog, for which the CPD has provided a plan and timeline for completing the backlog by the end of 2026. - The implementation of the <i>Stops Application</i> and training on the system converged, leading the CPD to develop a framework of supervisory ISR-related training to then tailor for role-specific training for positions such as sergeants, lieutenants, command staff, and Field Training Officers.

Update on the Status of Implementation Plans and Training Materials

The Consent Decree outlines the plan review process in ¶¶638–40. As the City and the CPD develop and revise the plans through the Consent Decree process, they must consult with the IMT and the OAG throughout the development and revision process.¹⁵ When the IMT and the OAG approve, the City and the CPD can finalize the plan, which must be made public (¶¶638–40).

Below we summarize in a table the progress the City has made for all plans required by ¶638, with additional supporting context provided in the below subsections that include our summaries of compliance assessments within each section of the Consent Decree.

¹⁵ The City and the CPD must then provide the IMT and OAG with the final draft of the plan at least 30 days before the plan is proposed to be implemented (¶¶639–40). The IMT and the OAG then have 30 days to comment unless the IMT or OAG state in writing that additional time is necessary for an adequate review. 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).

Plans that require Monitor and OAG approval per ¶1638	Draft(s) Provided to the IMT and the OAG	City / CPD Finalized	Final Versions Made Public
Crisis Intervention Plan (¶122) <i>"Within 365 days of the Effective Date and on an annual basis thereafter"</i>	✓	✗	Not yet applicable
CIT Officer Implementation Plan (¶108) <i>"Within 180 days of the Effective Date, CPD will develop an implementation plan"</i>	✓	✓	✗
Training Plan (¶1272) <i>"Within one year of the Effective Date, and on an annual basis thereafter"</i>	✓	✓	✗
Span of Control and Unity of Command Plan (¶1360) <i>"By January 1, 2020, CPD will develop a staffing model to achieve the principles of unity of command and span of control"</i>	✓	✓	✗
Recruitment, Hiring, and Promotion Plans (¶¶258–60) <i>"By December 31, 2020 and at least every three years thereafter"</i>	✓	✓	✗
Officer Support Systems Plan (¶¶383–84) <i>"Within 60 days of the completion of the needs assessment, CPD will develop a plan"</i>	✓	✓	✗
Equipment and Technology Audit Response Plan (¶¶415–16) <i>"Within 90 days of the completion of the initial audit, CPD will develop a plan, including a timeline for implementation"</i>	✗	✗	Not yet applicable
Training plans for COPA, Deputy PSIG, and BIA (¶1530) <i>"Within 90 days of the Effective Date"</i>	COPA: ✓ Deputy PSIG: ✓ BIA: ✓	COPA: ✓ Deputy PSIG: ✓ BIA: ✓	✗
Data Systems Plan (¶1607) <i>"Within 365 days of the Effective Date"</i>	✓	✗	Not yet applicable

Update on Specific Compliance Activities

Below we highlight a few specific compliance activities that the IMT believes are important for the City and the CPD to continue addressing.

Workforce Allocation Study and Staffing

This reporting period, the City and the CPD completed a long-awaited Workforce Allocation Study, which resulted in the [Report on the Workforce Allocation Study by Matrix Consulting Group](#).¹⁶ The report was the culmination of months of work to better understand current staffing and future staffing needs for the CPD, which have important implications for Consent Decree requirements across numerous sections, which are discussed throughout this report. As we noted in the thirteenth reporting period, we believe this study can fundamentally shift the way the CPD

¹⁶ The Report on the Workforce Allocation Study by Matrix Consulting Group can be found here: <https://www.chicagopolice.org/stories/cpd-wfa-cpa/>.

approaches resource allocation and potentially expedite Consent Decree compliance.

The IMT understands that the CPD is currently working through the development of a plan which will identify which recommendations from the Workforce Allocation Study they plan to implement to bring the CPD in line with best staffing practices and further compliance with the Consent Decree. We continue to encourage the City and the CPD to work diligently to implement the recommendations of the Study and ensure that positions that are specifically for Consent Decree related roles continue to be filled. We look forward to reviewing the City's plan for implementation and continued efforts toward hiring for roles that are vacant within the CPD.

Officer-Involved Shootings and Deaths Policies (§§488–91) & PCRIA (§492)

As noted in the [Accountability and Transparency section](#), in the fourteenth reporting period, the CPD revised and finalized its *Officer-Involved Shooting and Officer-Involved Death Incident* policy series (G03-06, G03-06-01, and G03-06-02), which serves as a foundational element of the Consent Decree. The IMT and the OAG provided no-objection notices to the G03-06 policy series. Additionally, the City and the CPD posted the policy suite for public comment and implemented the new policy suite on June 30, 2026. As a result, the City and the CPD achieved Preliminary compliance with a series of critical paragraphs: §§488–91.

The City and the CPD have worked since the inception of the Consent Decree on developing a policy suite that complies with the requirements related to officer-involved shootings and death incidents. This policy suite is crucial for ensuring that the City and the CPD have strong processes in place that govern how the City and the CPD respond to and handle these incidents. This is an essential step in the oversight and accountability process and the IMT looks forward to the CPD providing training that effectively prepares officers to comply with these policies.

Another layer to the investigations of officer-involved shootings is §492. Paragraph 492 requires the City to comply with the State of Illinois' Police and Community Relations Improvement Act (PCRIA), 50 ILCS 727/1-1 et seq. PCRIA requires that an external law enforcement agency investigate all officer-involved deaths, including those resulting from officer-involved shootings. Over the last year, the Parties have reinitiated their efforts in finding a path forward to comply with PCRIA and the requirements of §492.

As we stated below in the [Accountability and Transparency section](#), the City continued its efforts to comply with PCRIA. Additionally, the OAG collaborated with the City on exploration of various paths toward compliance. As of the end of this

reporting period, the Parties are still working together on finding a viable path forward for the City and CPD's compliance with PCRIA and ¶492.

Annual City Reports on CPD Litigation (¶548)

As we previously stated in the [IMT's Comprehensive Assessment Part II](#), one key goal of the Consent Decree process is for the CPD to become self-regulated and accountable by proactively identifying and addressing potential problems in accordance with federal, State, City, CPD, and community requirements and expectations.

The toll of ineffective policing and police misconduct can be enduring and widespread, impacting the overall health of Chicago and Chicago's communities and CPD officers. While the true weight of undermining the trust and confidence in policing may be impossible to quantify, the monetary cost of settlements and court awards related to police misconduct has been massive.

Paragraph 548 of the Consent Decree requires the City to produce annual reports on CPD litigation.¹⁷ As reflected in [Executive Summary, Figure 2](#), below, these reports continue to demonstrate that the known costs are more than enough to warrant reform and require ongoing improvement.

¹⁷ The litigation reports are available on the City of Chicago's website: https://www.chicago.gov/city/en/depts/dol/supp_info/CPDAnnLitReports.html.

Executive Summary Figure 2.

Annual City Payouts for Chicago Police Department Litigation (approx.)

Year	Settlements	Court Awards	Totals
2019	\$20,751,500	\$26,034,100	\$46,785,600
2020	\$20,673,840	\$19,786,586	\$40,460,426
2021 ¹⁸	\$53,002,650	\$69,506,734	\$122,509,384
2022	\$81,332,845	\$4,956,858	\$86,289,703
2023 ¹⁹	\$55,510,599	\$25,976,310	\$81,486,409
2024 ²⁰	\$84,620,939	\$100,000	\$84,720,939
2025	\$340,156,775	\$20,100,000	\$360,256,775

As we have previously highlighted, it is important to note that these costs are also imperfect estimates of the true costs related to police-misconduct-related allegations. For example, putting aside that not all misconduct is reported, court awards and settlements are still often approximations by courts, statute, legislators, and attorneys. Settlements, for example, are often compromises that must consider risk mitigation and the baseline cost of litigation—while acknowledging that a trial would likely lead to a different result.

Moreover, the payouts often do not correspond to the years that any misconduct occurred, because the process often takes years from the time of an incident to reach settlement or court award. In the *City of Chicago's Chicago Police Department 2025 Annual Litigation Report*, its most recent, the City provided additional details that demonstrate that even the cost of old allegations remain uncertain, as about 81.8% of these costs (or about \$294.6 million) related to reversed convictions—rather than allegations of more recent misconduct. See *Executive Summary, Figure 3*.

¹⁸ These figures were updated in the 2025 report: https://www.chicago.gov/city/en/depts/dol/supp_info/CPDAnnLitReports.html.

¹⁹ These figures were updated in the 2024 report: https://www.chicago.gov/city/en/depts/dol/supp_info/CPDAnnLitReports.html.

²⁰ These figures were updated in the 2025 report: https://www.chicago.gov/city/en/depts/dol/supp_info/CPDAnnLitReports.html.

Executive Summary Figure 3.

2025 City Payouts for Chicago Police Department Litigation (approx.)²¹

Type	#	Total Amount	% of Total Payout
Reversed Conviction	199	\$294,644,242	81.8%
Use of Force	20	\$1,844,206	0.51%
Vehicle Pursuit	9	\$54,378,000	15.09%
Other	2	\$49,500	0.01%
Unlawful Pretrial Detention	6	\$380,000	0.11%
Unlawful Search and Seizure	18	\$8,425,326	2.34%
False Arrest	9	\$404,000	0.11%
Malicious Prosecution	3	\$131,500	0.04%
Total	266	\$360,256,775	100%

As a result, this means that any recent reforms and improvements may not be reflected in these costs. But it also means that ongoing delay toward reform or improvements may continue to have substantial costs for the City for years to come. In other words, the recent annual payouts for Chicago may not accurately reflect the CPD's current practices, but the litigation costs will emerge in the years to come. In comparison to the last time the IMT reported on the City's Annual Litigation Report, these costs have significantly increased. **In 2025, the total amount of City payouts increased by nearly \$279 million in comparison to the City's 2023 payouts and by about \$275 million in comparison to the City's 2024 payouts.** We hope that, through implemented reforms, the City, the CPD, and Chicago's communities find reason to have increased confidence in the CPD's policies, training, and practices, and that as a result, these costs *substantially* and *sustainably* decrease.

The Consent Decree requires the Chicago Police Department to police our communities constitutionally and within the laws of our city, state, and nation. These payouts reflect the stark reality that the City and the CPD have a long history of police misconduct and must accelerate efforts to achieve the constitutional policing our neighbors deserve and that the Consent Decree requires.

Over the years, there have been many calls on the Court and the OAG to push for additional sanctions toward the City and the CPD for failures to reach compliance with the Consent Decree. Ultimately, the City remains "responsible for providing

²¹ *City of Chicago's 2025 Report on Chicago Police Department Litigation*, CITY OF CHICAGO DEPARTMENT OF LAW (June 2026), https://www.chicago.gov/city/en/depts/dol/supp_info/CPDAnnLitReports.html#docaccess-7a785e18923a51bec3a4a12e44bc6d0a.

necessary and reasonable financial resources . . . to fulfill its obligations under this Agreement.” ¶1700. This means providing resources to support and demonstrate constitutional and effective policing, including resources toward staffing, recruitment, equipment, training, supports, community engagement, and data collection and analysis. Fortunately, the costs of these reforms are *nowhere near as costly* as settlements and court awards associated with police misconduct.

The IMT’s Community Engagement Activities

The IMT continues its efforts to hear community voices and listen to the issues that matter most to Chicago’s communities regarding policing and police reform.²² The IMT’s Community Engagement Team (CET) continues to host periodic community listening sessions and has also been visiting the Community Commission for Public Safety and Accountability’s (CCPSA) District Councils throughout the city.

The IMT’s CET performs two key tasks regarding the Consent Decree monitoring process: (1) gathering input from Chicagoans 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 the fourteenth reporting period. For example, Judge Rebecca Pallmeyer held a virtual public hearing on February 21, 2026, during which she heard from Chicagoans who voiced their concerns, observations, and ideas about CPD reform.

We also held a Listening Session in June 2026 in partnership with Greater Auburn-Gresham Development Corporation. Chicagoans shared their thoughts and concerns about policing with Independent Monitor Maggie Hickey, Associate Monitor for Data and Officer Wellness Dr. Laura Kunard, and members of the IMT’s Community Engagement Team.

²² More information regarding the IMT’s community engagement activities is available on our website at <https://cpdmonitoringteam.com/community-engagement/>.

IMT Community Listening Session Flyer (June 24, 2026)



The IMT and the CET also continued our outreach to CCPSA District Councils during the fourteenth reporting period. We visited and presented updates on the City's and the CPD's compliance with the Consent Decree to District Councils 6, 14, and 17.

We also issued periodic newsletters, emails, and press releases to update community stakeholders on our monitoring activities throughout this reporting period; we continue to encourage community members to contact us anytime through our website www.cpdmonitoringteam.com.

The following subsections include our summaries of compliance assessments within each section of the Consent Decree.

- ❖ Community Policing
- ❖ Impartial Policing
- ❖ Crisis Intervention
- ❖ Use of Force
- ❖ Recruitment, Hiring & Promotion
- ❖ Training
- ❖ Supervision
- ❖ Officer Wellness and Support
- ❖ Accountability and Transparency
- ❖ Data Collection, Analysis & Management
- ❖ Investigatory Stops, Protective Pat Downs, and Enforcement of Loitering Ordinances

I. Community Policing

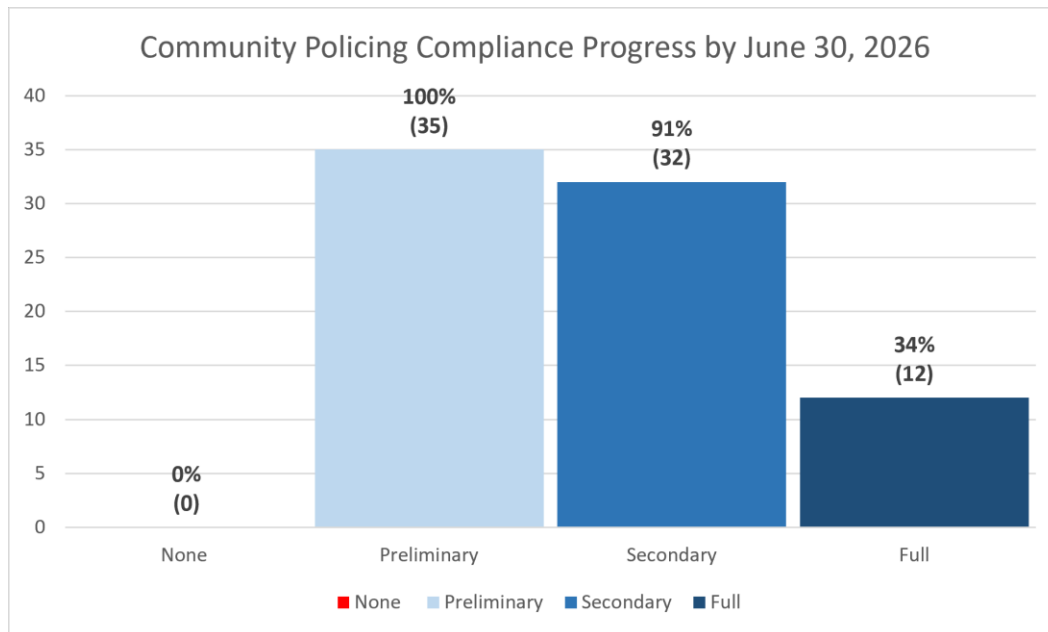
In the fourteenth reporting period, the IMT assessed compliance with community policing paragraphs by reviewing relevant policies, training curricula, records reflecting training delivery, and through attending numerous community meetings. The IMT led monthly meetings with the CPD, the City, and the OAG about community policing issues and progress in achieving compliance with community policing requirements. Additionally, the IMT participated in bi-weekly meetings with staff from the Office of Community Policing (OCP) and the CPD reform staff assigned to responsibilities related to the Community Policing section to work through compliance issues and challenges.

The CPD continued to advance compliance for its community policing requirements in the fourteenth reporting period. Most notably, the CPD achieved Full compliance for three paragraphs (§§29, 34, and 35). The CPD's progress during this reporting period is the result of the CPD implementing recommendations from various audits: the implementation of the recommendations from the Crime Victim Assistance Audit helped the CPD achieve Full compliance with §29, and the results of the CPD's audit of its juvenile investigation procedures helped achieve Full compliance with §§34 and 35.

Community Policing Progress through Fourteen Reporting Periods

Overall, the IMT assessed the City's compliance with 35 Community Policing paragraphs in the fourteenth reporting period (§§13–20, 22–48). The City and the CPD maintained Preliminary compliance with three paragraphs (§§22, 33, 37), maintained Secondary compliance for 20 paragraphs (§§14, 16, 18–20, 23–27, 32, 36, 38–43, 45, and 47), are under assessment for Secondary compliance for §37, achieved Full compliance with three paragraphs (§§29 and 34–35) and maintained Full compliance with nine paragraphs (§§13, 15, 17, 28, 30–31, 44, 46, and 48).

As reflected in the bar graph below, compliance levels are cumulative, so all paragraphs in Secondary compliance are included in the totals for Preliminary compliance and all paragraphs in Full compliance are included in the totals for Preliminary compliance and Secondary compliance.



Looking Ahead to the Fifteenth Reporting Period

As noted above, the City and the CPD have made progress during the current reporting period. We hope that this progress continues into the fifteenth reporting period, and we look forward to furthering discussions on the implementation of the in-person, standalone community policing training; the effective tracking and evaluation of community partnerships; the further development of youth-focused initiatives related to deflection and diversion; and measuring the practical application of the paragraph requirements to assess Full compliance.

Specific compliance assessments, by paragraph, for the Community Policing section are available here: <https://cpdmonitoringteam.com/wp-content/uploads/2026/10/App.-01-IMR14-Community-Policing.pdf>. This includes paragraphs where the City gained or lost compliance in the fourteenth reporting period, as well as paragraphs with significant developments toward or away from compliance.²³

²³ A fuller description of the history of compliance efforts, methodologies, compliance determinations for each original monitorable paragraphs in the Community Policing section is available in *Comprehensive Assessment Part I* (which included *Independent Monitoring Report 8*): <https://cpdmonitoringteam.com/imr-8-1/>. For reference, all IMT reports and appendices are available here: <https://cpdmonitoringteam.com/reports-information/>.

II. Impartial Policing

In the fourteenth reporting period, the City's and the CPD's progress toward compliance with the important requirements in the Impartial Policing section increased from the previous reporting period. The City and the CPD finalized, launched, and provided evidence of adequate participation in a variety of training programs, including the *Responsible Use of Social Media and Prohibitions on Criminal and Biased Organizations* eLearning; *Religious Interactions* eLearning; and the *Language Access Training for Telecommunicators* training. Evidence that 95% of the requisite personnel had completed each of these training programs helped the CPD achieve Secondary compliance with the requirements of ¶¶57 and 60.

Additionally, the City and the CPD provided evidence to demonstrate that the City's Language Access Coordinator, in collaboration with the CPD Language Coordinator, assessed the effectiveness and efficiency of CPD's policies and worked closely to ensure the CPD's compliance with its language access policy and Section 2-40 of the Municipal Code of Chicago. This helped achieve Full compliance with the requirements of ¶65. The City and OEMC also achieved Full compliance with ¶66 by providing (1) the training records for all newly hired telecommunicators and (2) the Language Access Services report for 2025.

The City and the CPD also moved towards Secondary compliance with the requirements of ¶¶79 and 80 by providing the *Administrative Notice of Violation (ANOV) and Misdemeanor Arrest Analysis Project: Final Report*. Because these paragraphs require the CPD to address the findings in the report, develop a timeline for implementation, and publish the data publicly, additional work is needed to achieve increased compliance. The production of the implementation timeline and publication of the underlying data are important steps in the process and the City and CPD are under assessment for Secondary compliance with ¶¶79 and 80.

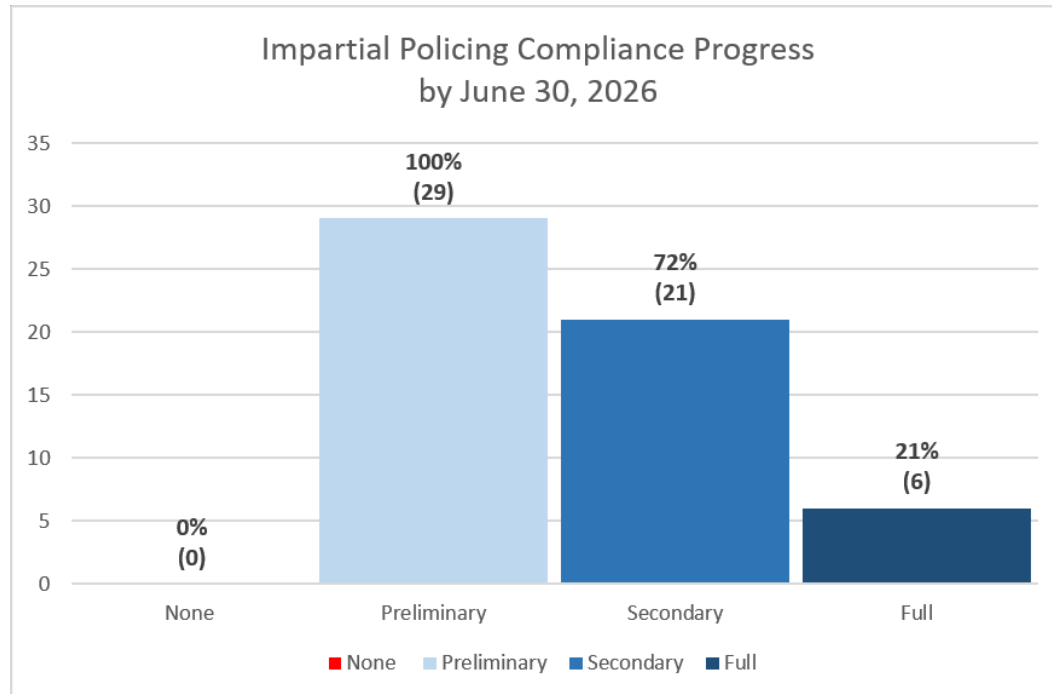
Impartial Policing Progress through Fourteen Reporting Periods

In the fourteenth reporting period, we assessed the City's compliance with 31 Impartial Policing paragraphs (¶¶52–82)—with two of those paragraphs containing conditional requirements that do not apply (¶¶81–82).²⁴ The City maintained Preliminary compliance for eight paragraphs (¶¶62, 64, 68–70, 72, and 79–80), maintained Secondary compliance for 13 paragraphs (¶¶52–56, 58–59, 61, 63, 71, and 74–76), achieved Secondary compliance for two paragraphs (¶¶57 and 60), are

²⁴ Paragraph 82 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.

under assessment for Secondary compliance for two paragraphs (§§79–80), maintained Full compliance for three paragraphs (§§67, 73, and 78), and achieved Full compliance for three paragraphs (§§65–66 and 77).

As reflected in the bar graph below, compliance levels are cumulative, so all paragraphs in Secondary compliance are included in the totals for Preliminary compliance and all paragraphs in Full compliance are included in the totals for Preliminary compliance and Secondary compliance.



Looking Ahead to the Fifteenth Reporting Period

As noted above, the City and the CPD have made progress during the current reporting period. We hope that this progress continues into the fifteenth reporting period, and we look forward to furthering discussions on measuring the practical application of the paragraph requirements to assess Full compliance.

Specific compliance assessments, by paragraph, for the Impartial Policing section are available here: <https://cpdmonitoringteam.com/wp-content/uploads/2026/10/App.-02-IMR14-Impartial-Policing.pdf>. This includes paragraphs where the City

gained or lost compliance in the fourteenth reporting period, as well as paragraphs with significant developments toward or away from compliance.²⁵

²⁵ A fuller description of the history of compliance efforts, methodologies, compliance determinations for each original monitorable paragraphs in the Impartial Policing section is available in *Comprehensive Assessment Part I* (which included *Independent Monitoring Report 8*): <https://cpdmonitoringteam.com/imr-8-1/>. For reference, all IMT reports and appendices are available here: <https://cpdmonitoringteam.com/reports-information/>.

III. Crisis Intervention

During the fourteenth reporting period, the City of Chicago (City), the Chicago Police Department (CPD), the Office of Emergency Management and Communications (OEMC), and the Chicago Council on Mental Health Equity (CCMHE) continued their work to implement the requirements in the Crisis Intervention section of the Consent Decree related to policy, training, practices, and community engagement.

First, the CPD made significant progress this reporting period. Specifically, the CPD demonstrated continued progress in increasing response ratios for calls for service identified as involving individuals in crisis (see ¶¶108–09); produced baseline data for the first time that measured “timely” response in connection with Certified CIT Officers’ responses to incidents identified as involving people in mental health crisis (see ¶¶107–12); completed a review and revision of its S04-20 policy suite, incorporating feedback from the Chicago Council on Mental Health Equity (CCMHE); launched its updated *CIT Refresher Training*; provided a revised draft of its *Certified CIT Officer Implementation Plan*; piloted its CIT District, Operations, and Community Support (CIT DOCS) Activity Log; previewed a newly developed Crisis Intervention Team website that includes a public CIT Dashboard; and launched a CIT Program Effectiveness Survey developed in collaboration with the University of Chicago Survey Lab to evaluate the effectiveness of its CIT Program.

Second, the OEMC made notable progress this reporting period by finalizing its *8 Hour Crisis Intervention Training* and delivering the training to new telecommunicators.

Third, the CCMHE continued to provide important feedback on CPD and OEMC policies, and the City met its requirement for holding quarterly CCMHE meetings (but failed to reach quorum for one of the meetings).

In the sections below, we detail the efforts, accomplishments, and challenges of the City, the CPD, the OEMC, and the CCMHE this reporting period.

Chicago Police Department

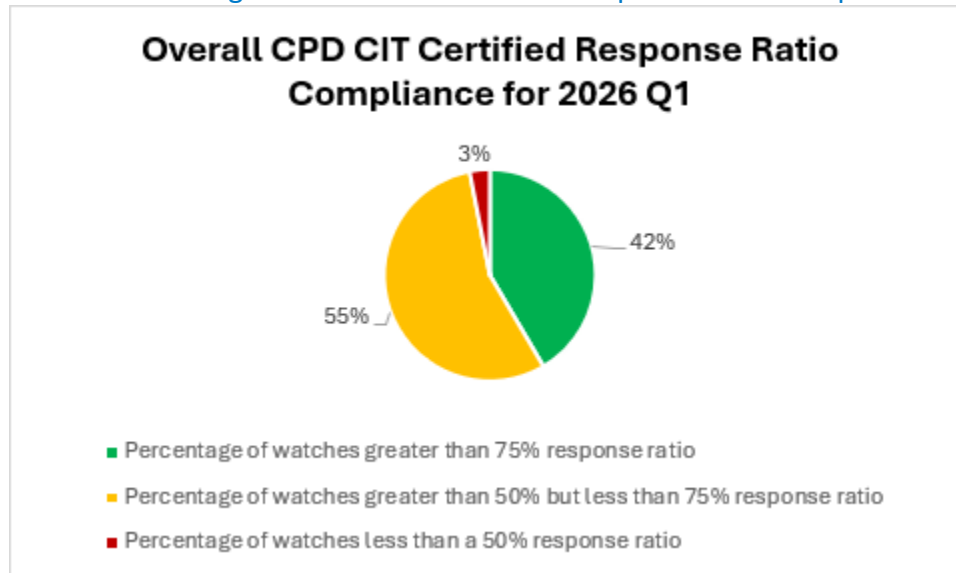
CPD - RESPONSE RATIOS

The CPD has demonstrated continued progress in increasing response ratios for calls for service identified as involving individuals in crisis. See ¶¶108–09.

Presently, out of a total of 65 watches (*i.e.*, work shifts) across 22 districts, 27 watches have a greater than 75% response ratio; 36 watches have a greater than

50% but less than 75% response ratio; and 2 watches have under a 50% response ratio. In other words, all but two watches (96.9% of watches) complied with the Consent Decree's initial response ratio target of 50% (§108(a)), and 41% of watches complied with the Consent Decree's secondary response ratio target of 75% (§108(b)).

Crisis Intervention Figure 1: CPD's CIT Certified Response Ratio Compliance



While this remains behind the Consent Decree's initial timelines for meeting the response ratio targets (*i.e.*, all watches meeting the initial response ratio target of 50% by January 1, 2020, and the secondary response ratio target of 75% by January 1, 2022, per §109), the CPD has demonstrated sustained progress and significant improvements in meeting the response ratio targets, with Q1 of 2026 representing the *eighth straight quarter* of a CPD-wide response ratio increase. Additionally, the CPD has developed a system-wide strategy to meet and maintain these response ratio targets.

CPD - TIMELY RESPONSE

The CPD produced baseline data for the first time that measured "timely" response in connection with Certified CIT Officers' responses to incidents identified as involving people in mental-health crisis based on the working definition established in the last reporting period.²⁶ This data compared response times to calls for

²⁶ During the last reporting period (the thirteenth reporting period), the CPD defined "timely" response in connection with Certified CIT Officers' responses to incidents identified as involving people in mental health crisis. This enabled the CPD to begin collecting baseline data and to establish accountability for this "timely" standard. By creating a working definition of "timely response," the CPD achieved Preliminary compliance with §§107–112. See *Independent Monitoring Report 13*.

service with a mental-health component to response times for all calls for service. The available data showed that the mean response time for calls with a mental-health component is 14.4 minutes, compared to 14.9 minutes for non-mental health calls. In 2025, based on the available data, 90% of watches met the CPD's definition of "timely;" however, inconsistent use of the "On-Scene" timestamp key by responding officers may impact the reliability of data analyses.²⁷

CPD - CHICAGO POLICE DEPARTMENT POLICIES AND TRAINING

The CPD completed a review and revision of its S04-20 policy suite²⁸, incorporating feedback from the Chicago Council on Mental Health Equity (CCMHE) (see ¶¶89 and 137). The CPD anticipates completing a review of its S05-14 policy, *Crisis Intervention Team (CIT) Program*, in the next reporting period.²⁹

The CPD launched its updated *CIT Refresher Training* in Q1 of 2026. The IMT observed this training and found its delivery to be effective. This training covers key topics including mental health and substance use conditions, adolescent issues, psychotropic medications, community resources, active listening, and challenges experienced in the field by CIT officers and strategies for addressing these challenges. The training includes robust scenario-based exercises that all officers must participate in and be evaluated on. The National Alliance on Mental Illness (NAMI) plays an active role in several of the training modules and in facilitating the scenario-based exercises, which are exceptional.

²⁷ The CPD has made efforts to improve use of the "On-Scene (ONSCN)" key, and the IMT understands that this function may become automated as part of an updated Computer-Aided Dispatch (CAD) system. The CPD should continue working to improve the reliability of this data to assess timeliness, evaluate operational performance, and identify system improvements. The IMT appreciates the CPD's continued efforts to instruct CPD members to utilize the ONSCN key to ensure accurate data collection and encourages the CPD to establish measurable targets and timelines for improving data completeness.

²⁸ This policy suite includes five policies: S04-20, *Recognizing and Responding to Individuals in Crisis*; S04-20-02, *Persons Not Under Arrest But In Need of Involuntary or Voluntary Admission*; S04-20-03, *Persons on Unauthorized Absence (UA) from a State-Operated Mental Health Center*; S04-20-04, *Mental Health Transport and Related Duties Matrix*; and S04-20-05, *Persons Under Arrest in Need of Mental Health Treatment*.

²⁹ In *Independent Monitoring Report 13*, we wrote: "The CPD should review its last policy, S05-14, with the CCMHE to complete its full Crisis Intervention policy suite review and demonstrate a shared understanding from all parties that the CPD's policy review process is in alignment with CPD policy, CCMHE bylaws, and Consent Decree requirements (see ¶89)." Further, we explained that "[o]nce the CPD reviews S05-14 with the CCMHE and demonstrates a shared understanding from all parties that the CPD's policy review process is in alignment with CPD policy, CCMHE bylaws, and Consent Decree requirements, the IMT anticipates that the City and CPD will achieve Secondary compliance with ¶89." The IMT looks forward to further discussion with the City, the CPD, and the OAG in the next reporting period regarding assessing Secondary compliance with ¶¶89 and 137.

The CPD has continued to regularly produce training evaluations for its *Basic CIT* and the *CIT Refresher* trainings. Overall, participants' course evaluations are consistently positive.

CPD AND CITY PLANS

The City continued to make progress on the *Crisis Intervention Plan* (§§122–23) and the *Certified CIT Officer Implementation Plan* (§§108–12) this reporting period.

During the last reporting period (the thirteenth reporting period), the City provided a scope of work for the *Crisis Intervention Plan*, to which the IMT provided feedback. During the fourteenth reporting period, the City of Chicago Crisis Intervention Plan Working Group continued to meet to finalize the scope of work and draft the *Crisis Intervention Plan*, but the City has not yet completed the *Crisis Intervention Plan*.³⁰

This reporting period, the CPD provided a revised draft of its *Certified CIT Officer Implementation Plan*, incorporating feedback from the IMT and the OAG. The *Certified CIT Officer Implementation Plan*, which is required by §108, provides key data and strategic priorities to enhance the CPD's responses to individuals experiencing mental or behavioral health crises, and outlines the CPD's approach to ensuring that Certified CIT Officers are available to respond to crisis calls in a timely and effective manner. The *Plan* includes information relevant to Consent Decree requirements related to staffing, response ratios, training, data collection, and reporting. The *Plan* was approved by both the IMT and the OAG (per §638(b)).³¹ In future annual progress reports (see §110), the CPD should include further data analysis that demonstrates data reliability and operational effectiveness.

CPD - CIT DISTRICT, OPERATIONS, AND COMMUNITY SUPPORT (CIT DOCS)

The CIT District, Operations, and Community Support (CIT DOCS) is a branch of the Crisis Intervention Unit (CIU) that serves to mitigate the frequency and severity of

³⁰ The IMT acknowledges the City's continued progress; however, the City cannot achieve Preliminary compliance with §§122–23 until the complete *Crisis Intervention Plan* is developed. The IMT also encourages the City to solicit feedback from the CCMHE on the scope of work for the *Crisis Intervention Plan* (see §131).

³¹ While the revised draft of the *Certified CIT Officer Implementation Plan* includes key strategic priorities and information related to staffing, response ratios, training, data collection, and reporting, the IMT notes that the revised *Plan* does not include more recent updates regarding the CPD's progress in the fourteenth reporting period, such as recommendations from a Workforce Allocation Study related to staffing, preliminary data on "timely response", or results from a CIT effectiveness study that was undertaken in partnership with the University of Chicago. In the next reporting period, the IMT expects the CPD to include these types of updates in its future annual progress reports, which must also be made public (see §110).

service calls identified as involving individuals in crisis; prevent unnecessary incarceration or hospitalization of individuals living with serious mental health conditions, substance use disorders, or co-occurring disorders; and support access to appropriate services for individuals with mental and behavioral health needs who encounter law enforcement.³²

During the last reporting period (the thirteenth reporting period), the CPD developed its CIT DOCS Activity Log. This was an important step in tracking field-based work, including community stakeholder engagement, roll-call training, follow up with high frequency utilizers of 911 services, and additional efforts informing deflection and diversion from the criminal justice system (*see, e.g.*, ¶¶87–88, 91, 114, and 119).

The CPD piloted the CIT DOCS Activity Log in the fourteenth reporting period. Initial data from the CIT DOCS Activity Log pilot shows that between January and March 2026, CIT DOCS teams reviewed over 9,500 CIT Reports (more than 80 CIT Reports per day across the City of Chicago), with 19 CIT Reports per day identified for follow-up action. During this time period, the DOCS Teams also conducted 89 well-being checks;³³ received over 2,000 requests for follow-up from district patrol officers and community members (following up on 354 requests and completing 70 WRITS, or involuntary petitions for hospitalization); completed 53 roll calls; and completed 98 community engagements.

This initial data from the CIT DOCS Activity Log demonstrates the crucial importance of the CIT DOCS Team's work, while at the same time highlighting the need for additional staffing to meet the full demand for crisis intervention services throughout the city.³⁴

CPD - CRISIS INTERVENTION TEAM WEBSITE AND DASHBOARD

This reporting period, the CPD previewed a newly developed website with the IMT, which the CPD intends to make live in the next reporting period. The website is well-designed, covers pertinent information for the public, and will include the CIT Dashboard, which is an important step toward increasing transparency. The IMT looks forward to the website and CIT Dashboard going live.

³² See S05-14, *Crisis Intervention Team (CIT) Program*, Section V.C.

³³ Well-being checks can come from a 911 call, or from a CIT Report indicating that a follow-up may be important to reduce the likelihood of another crisis.

³⁴ Both the CIU's internal staffing assessment and the independent Workforce Allocation Study concluded that the CIT DOCS teams are understaffed. The internal assessment recommends adding 10 officers (for a total of 27), while the Workforce Allocation Study recommends adding 11 sergeants (for a total of 15), and 15 officers (for a total of 30), for a combined increase of 26 field-based CIT positions.

CPD - CIT PROGRAM EFFECTIVENESS SURVEY

In 2025, the CPD contracted with the University of Chicago Survey Lab to assist the CPD's Crisis Intervention Unit in the development and distribution of a CIT Program Effectiveness Survey to evaluate the effectiveness of the CPD's CIT Program. This survey was finalized in December of 2025 and launched in March of 2026. The survey was distributed to three stakeholder groups: CIT Certified Officers, Office of Emergency Management and Communications (OEMC) telecommunicators, and members of the Chicago Council on Mental Health Equity (CCMHE). The survey had a noteworthy response rate by Certified CIT Officers, with 48% (or 1,055) responding to the voluntary survey. However, only 6.5% (or 21) of OEMC telecommunicators responded to the survey, and 33% (or 6) of CCMHE members responded to the survey.

The CIT Program Effectiveness Survey found that participants generally view the CPD CIT Program positively and believe it has improved officers' understanding of mental and behavioral health crises, strengthened de-escalation skills, and increased familiarity with community-based resources. Survey respondents also identified opportunities to strengthen the program through additional training, expanded community-based services, and enhanced partnerships with mental health professionals.³⁵

Respondents also highlighted the need for expanded access to community-based mental-health services, 24-hour support systems, additional CARE teams, and stronger partnerships with mental-health professionals.

Overall, the evaluation concluded that the CPD CIT Program is highly valued by Certified CIT Officers, OEMC personnel, and CCMHE members. The CIU intends to administer the survey again in 2029 to continue monitoring program effectiveness and identifying opportunities for improvement.

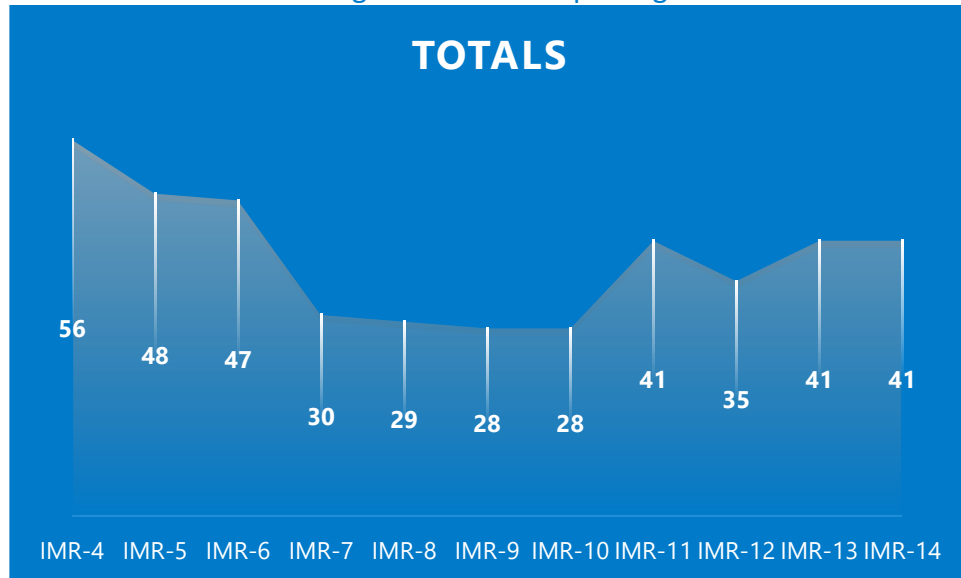
CPD - STAFFING

The CPD's Crisis Intervention Unit (CIU) continues to face staffing challenges. At the end of the fourteenth reporting period, the CPD's CIU was staffed with 41 personnel. Similar to other reporting periods, in the fourteenth reporting period, staffing fluctuated between 40–42 members, well under staffing levels before 2021 and the staffing levels required to support the goals of a CIT program and the

³⁵ Recommendations identified by survey participants included: development of advanced training opportunities; increasing DOCS officers and teams; offering trainings more frequently; incorporating less lecture-based instruction and more realistic, hands-on scenarios; expanding training on Autism, juvenile mental health, suicide intervention, officer wellness, and family interactions; and increasing role-play and scenario-based exercises.

CPD's ability to comply with the requirements of this section of the Consent Decree.

Crisis Intervention Figure 2:
Crisis Intervention Unit Staffing over Several Reporting Periods



The CIU continues to lack essential resources, including sufficient personnel, promotional opportunities within the unit, adequate office space, training resources, district level resources, vehicles, and supplies. To comply with the Consent Decree and align with national best practices, the City and the CPD must ensure that the CIU has adequate staffing and resources.

The CIU published an internally conducted staffing needs assessment in the thirteenth reporting period. Based on interviews, workload analysis, and operational requirements, the assessment recommended an increase of about 20 CIU personnel to 62 positions (60 sworn, two civilian).

This reporting period, the City and the CPD made its department-wide Workforce Allocation Study Report by the Matrix Consulting Group public.³⁶ The Workforce Allocation Study recommends elevating the Crisis Intervention Team (CIT) leadership position from the rank of Lieutenant to Commander; increasing the number of Sergeant positions assigned to the DOCS Unit by 11, for a total of 15; increasing the number of Officer positions assigned to the DOCS Unit by 15, for a total of 30; increasing the number of Officer positions assigned to the CIT Administrative Unit by 1, for a total of 5 assigned; and staffing the CIT Training Unit based on a ratio tied to the number of personnel requiring training (*i.e.*, 1 per 1,000 sworn FTE),

³⁶ The Report on the Workforce Allocation Study by Matrix Consulting Group can be found here: <https://www.chicagopolice.org/stories/cpd-wfa-cpa/>.

with a current recommendation of an additional Officer assigned to the CIT Training Unit, and increasing the number of Community Outreach Coordinator positions by 1, for a total of 2 assigned.

The Workforce Allocation Study raised particular concern with staffing of the CIT DOCS Unit. As the study explained, the CIT DOCS Unit has been

“significantly understaffed in recent years due to department-wide personnel shortages. As a result, the volume of crisis-related responses, follow-ups, and community-support activities recorded by these teams does not reflect the true level of need across Chicago. The available data represents only the portion of mental-health-related calls and support functions that the limited staff were able to complete, rather than the full demand for crisis intervention services throughout the city. Because staffing shortages have constrained DOCS capacity, workload data based on historical activity substantially understates actual service requirements.”

While the IMT acknowledges that the CIU has made notable progress this reporting period in achieving additional levels of compliance with the Consent Decree with its current CIU leadership and training staff, staffing of the unit must be sustainable for ongoing compliance and long-term success. As a next step, the IMT recommends that, as part of their plan to develop a staffing plan that considers the Workforce Allocation Study, the CPD also takes into consideration the internal CIU staffing assessment.

The Office of Emergency Management and Communications (OEMC)

This reporting period, the OEMC finalized its *8 Hour Crisis Intervention Training* and delivered it to new telecommunicators. See ¶¶142–44. The IMT observed the training on June 11, 2026. The training provided effective instruction by subject matter experts, facilitated active engagement of class participants, and included practical scenario-based exercises. The OEMC worked diligently and collaboratively this reporting period to finalize the *8 Hour Crisis Intervention Training*, and we look forward to ongoing delivery of both the *8 Hour Crisis Intervention Training* and *2 Hour Crisis Intervention and Mental Health Refresher Training* (see ¶146).

The IMT has recommended that OEMC trainers attend the CPD’s instructor training academy and observe the CPD’s scenario-based exercises as part of the CPD’s *Basic CIT* and *CIT Refresher* trainings, which may help the OEMC continue to improve its training delivery. During the last reporting period (the thirteenth reporting period), the IMT observed the OEMC’s *2 Hour Crisis Intervention and Mental Health Awareness Refresher Training* and noted areas for improvement in training delivery. The IMT looks forward to observing this training again in the next reporting period.

The OEMC continues to effectively identify, code, and dispatch calls for service with a mental-health component, while prioritizing Certified CIT Officers for dispatch to such calls (see ¶¶138–40). The OEMC also continues to follow audit protocols (see ¶149). The OEMC continues to play a central role in responding to mental health-related calls for service and in supporting the overall goals of the Crisis Intervention Program, including by supporting diversion to non-law enforcement resources such as 988 and the CARE team when appropriate.³⁷

During the last two reporting periods (the twelfth and thirteenth reporting periods), the OEMC produced nine mental health-related policies to the IMT and the OAG for review and feedback.³⁸ The OEMC has not yet finalized these policies, so they remain in the review process. The IMT encourages the OEMC to revise and finalize these policies, incorporating feedback from the IMT, OAG, and CCMHE, in the next reporting period, which will help the OEMC maintain and achieve additional levels of compliance with several Consent Decree paragraphs (*e.g.*, ¶¶138–40, 146, 148–49, and 151–52).

The Chicago Council on Mental Health Equity (CCMHE)

This reporting period, the CCMHE continued to meet quarterly and provide important feedback to the CPD and OEMC on crisis response-related policies, procedures, and training. See ¶¶128–32.

³⁷ On May 13, 2026, Chicago Mayor Brandon Johnson and the Chicago Department of Public Health (CDPH) announced the citywide expansion of the [Crisis Assistance Response and Engagement \(CARE\) program](https://www.chicago.gov/city/en/depts/mayor/press_room/press_releases/2026/citywide-CARE-expansion.html). See Press Release, City of Chicago, *Mayor Brandon Johnson and Chicago Department of Public Health Announce Citywide Expansion of CARE Program* (May 13, 2026), https://www.chicago.gov/city/en/depts/mayor/press_room/press_releases/2026/citywide-CARE-expansion.html. As part of this expansion, the City updated its CARE dispatch protocols. The IMT is encouraged by the City's expansion of the CARE program to serve individuals seeking mental health and social services support and to provide non-law enforcement responses in appropriate circumstances. See ¶86. The IMT is also aware that the CARE program has faced some challenges—including with staffing and operations—and hopes these challenges can be resolved to best serve the needs of individuals in crisis.

³⁸ In the twelfth reporting period, the OEMC produced, and the IMT reviewed, the following SOPs and TNGs: SOP 23-003, *Mental Health Event Audit*; SOP 23-004, *Crisis Intervention Team (CIT) Program*; SOP 23-005, *Mental Health Training*; TNG 22-002, *Visiting Clinicians at OEMC*; TNG 22-003, *CAD Enhancement – CIT Triage Questions*; TNG 22-005, *988 – Calls for Crisis Hotline*; TNG 23-006, *CARE 10-1*; TNG 25-001, *CIT Unit Z Attribute and Dispatch*; and TNG 25-002, *CARE (Crisis Assistance Response and Engagement)*. In the thirteenth reporting period, the OEMC produced revised versions of some but not all of these policies, and it was not clear whether the OEMC responded to IMT comments or CCMHE feedback.

The IMT acknowledges the ongoing contributions by CCMHE members and continues to encourage the City to facilitate the more robust engagement and strategic guidance required by ¶¶130–31.³⁹

The City met its requirement for quarterly meetings (on February 9, 2026, and June 8, 2026) this reporting period (see ¶129) but did not meet quorum on June 8, 2026.

The City's posting of meeting agendas, meeting materials, meeting minutes, and video recordings on the City's CCMHE website remains inconsistent and must be improved to better facilitate community engagement, as well as to achieve additional levels of compliance with the Consent Decree.⁴⁰

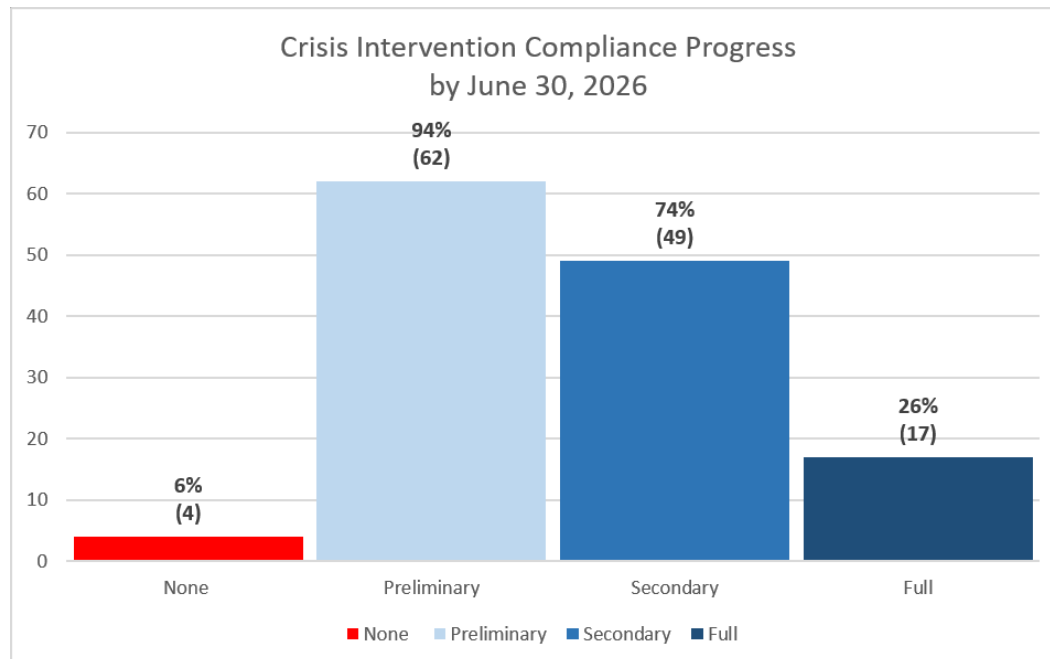
Crisis Intervention Progress through Fourteen Reporting Periods

During this reporting period, the IMT assessed the City's compliance with 66 Crisis Intervention paragraphs: ¶¶87–152. The City remained at Preliminary compliance with 13 paragraphs (¶¶87–91, 114, 119, 124–25, 130–31, 137, and 151), remained at Secondary compliance with 17 paragraphs (¶¶93, 106, 113, 115, 117–18, 128–29, 132–34, 136, 138–40, 146, and 152), achieved Secondary compliance with 15 paragraphs (¶¶94, 100, 107–12, 120, 142–45, 147, and 150), maintained Full compliance with eight paragraphs (¶¶96, 98, 104, 116, 121, 126–27, and 135), and achieved Full compliance with nine paragraphs (¶¶92, 95, 97, 99, 101–03, 105, and 141). At the end of the fourteenth reporting period, the City did not have any level of compliance with four paragraphs (¶¶122–23 and 148–49).

³⁹ The IMT understands that members of CCMHE subcommittees are contacted directly by the CPD and OEMC to solicit feedback, which is then incorporated into materials shared at quarterly CCMHE meetings. At the same time, the CCMHE quarterly meetings observed by the IMT this reporting period tended to demonstrate a presentation-style meeting rather than facilitating member participation through working groups or subcommittee report-outs. The IMT recognizes that CCMHE members are volunteers with limited capacity and appreciates CCMHE members' contributions; still, we encourage the City to consider ways to more fully utilize members' expertise "to develop and expand current strategies for responding to individuals in crisis." See ¶130.

⁴⁰ As we wrote in *Independent Monitoring Report 13*, "[t]he IMT continues to strongly encourage the CPD and the OEMC to provide materials that will be covered at the CCMHE's quarterly meeting in *advance* of the meeting to provide a meaningful opportunity for review and dialogue, and to improve efforts to solicit community feedback." Additionally, the IMT continues to encourage the City to include links to the meetings on the City's website (in addition to on its agendas), and to include links in the meeting agendas to all publicly posted policies that will be reviewed. The IMT further encourages the City to consider alternate streaming platforms for the quarterly meetings other than Facebook Live, which creates unnecessary barriers by requiring members of the public to have Facebook login credentials.

As reflected in the bar graph below, compliance levels are cumulative, so all paragraphs in Secondary compliance are included in the totals for Preliminary compliance and all paragraphs in Full compliance are included in the totals for Preliminary compliance and Secondary compliance.



Looking Ahead to the Fifteenth Reporting Period

In the fifteenth reporting period, the City and the CPD should continue to prioritize efforts to increase staffing of the Crisis Intervention Unit; complete the required *Crisis Intervention Plan* (see ¶¶122–23); continue to collect and analyze data on “timely” response to inform operational strategy and outcomes (see ¶¶107–12); use the *Certified CIT Officer Implementation Plan* together with the CIT Dashboard, to inform a strategy to meet required response ratios across districts and watches (¶108); make the CIT Dashboard and new website public; complete a review of its S05-14, *Crisis Intervention Team (CIT) Program* policy, incorporating feedback from the CCMHE; and deploy its updated Crisis Intervention (CIT) Report, CPD-15.520 (which was revised in the thirteenth reporting period) citywide. The City and the CPD should also engage in further analysis, collaboration, and strategic planning related to “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 non-emergency crisis line)” (see ¶¶88, 130–31, and 134).

The OEMC should complete the revision of its policies, incorporating feedback from the IMT, the OAG, and the CCMHE, which will help the OEMC maintain and achieve additional levels of compliance with several Consent Decree paragraphs

(e.g., ¶¶138–40, 146, 148–49, and 151–52). Additionally, the OEMC should continue to improve its training delivery, including its delivery of scenario-based exercises. The OEMC should also continue to provide evidence of the OEMC’s regular meetings with the CPD and the CCMHE (see ¶150).

The City should consider whether the CCMHE structure needs to be refined as necessary to facilitate more robust engagement and strategic guidance (see ¶¶130–31) and meet quorum consistently. Additionally, the City should improve its posting of meeting agendas, meeting materials, meeting minutes, and video recordings on the City’s CCMHE website to better facilitate community engagement, including posting quarterly meeting materials in advance of the meeting to permit sufficient review and promote public engagement.

Specific compliance assessments, by paragraph, for the Crisis Intervention section are available here: <https://cpdmonitoringteam.com/wp-content/uploads/2026/10/App.-03-IMR14-Crisis-Intervention-Appendix.pdf>. This includes paragraphs where the City gained or lost compliance in the fourteenth reporting period, as well as paragraphs with significant developments toward or away from compliance.⁴¹

⁴¹ A fuller description of the history of compliance efforts, methodologies, compliance determinations for each original monitorable paragraphs in the Crisis Intervention section is available in *Comprehensive Assessment Part I* (which included *Independent Monitoring Report 8*): <https://cpdmonitoringteam.com/imr-8-1/>. For reference, all IMT reports and appendices are available here: <https://cpdmonitoringteam.com/reports-information/>.

IV. Use of Force

In the fourteenth reporting period, the City and the CPD achieved new levels of compliance for paragraphs in the Use of Force section, including achieving Full compliance for nine paragraphs while maintaining the same levels of compliance that they achieved in previous reporting periods. The City and the CPD also made positive strides this reporting period, including revising training for captains to now include lieutenants in all districts to review firearm-pointing incidents. After piloting the program and now expanding across all districts to soon include foot pursuits, the District Level Review Program (also known as the DLRP) has become a central mechanism for reviewing firearm pointing incidents and strengthening accountability at the district level. Furthermore, the Tactical Review and Evaluation Division's (TRED's) efforts this reporting period have greatly reduced the *Incident Debriefing Report* (IDR) backlog through targeted restructuring and more efficient review practices. Lastly, the CPD's continuous efforts to refine training for planned and spontaneous large gatherings have enabled officers to more effectively plan for and address these gatherings when they occur.

As a result of these efforts, the CPD has achieved Preliminary compliance with all 96 paragraphs in this section, Secondary compliance with most paragraphs, and over half of the paragraphs are now in Full compliance. The IMT looks forward to additional progress in the next reporting period, including continued progress in the District Level Review Program across all districts, as well as progress towards consistent use of force data.

District Level Review Program

As we stated last period, the CPD has continued to refine the District Level Review Program. As of May 2026, district captains have reviewed more than 3,000 firearm pointing incident reports. While TRED continues to provide guidance to captains and maintains oversight of Tactical Response Reports (TRRs), foot pursuits, and firearm pointings, training is soon to be underway to include district lieutenants in the District Level Review Program, as well as Area Chiefs to ensure proper accountability and supervision processes are in place across all districts.

The program has increased district-level accountability and encourages more effective supervisory practices and mentorship opportunities for both supervisors and officers. In interviews this reporting period, District Captains noted that taking immediate corrective action after their reviews is more helpful than it coming from TRED as a debriefing point because it can be addressed in the officer's next tour of duty. They also indicated that they, alongside Lieutenants, have started to identify patterns and trends, and they address any issues at roll calls. Similarly, CPD officers indicated that their supervisors are providing them with constructive criticism with

regards to de-escalation efforts, and they highlight the greater level of communication and feedback they receive from their Captain as part of the District Level Review Program.

Moreover, District Captains are able to provide prompt reviews and feedback to officers within 30 days, and we look forward to continued progress in the next reporting period as lieutenants and executive staff are trained as part of the District Level Review Program, which will include the review of foot pursuits in addition to firearm pointings.

IDR Backlog

The CPD also continues to make progress addressing the Incident Debriefing Report (IDR) backlog through the district-level reviews conducted by captains and TRED's restructuring efforts. Previously, TRED's staffing levels have struggled to effectively address the backlog. Additionally, the Workforce Allocation Study examined TRED when it was led by a lieutenant and staffed with ten sergeants, fifty-two police officers, and two part-time review specialists.⁴² Because the division was expected to adjust its staffing and responsibilities to meet future demands on TRED, the study did not recommend any staffing changes but recommended increasing the number of Lieutenants in TRED from 1 to 2 positions.⁴³ However, TRED has grown from 42 Police Officer Reviewers, nine Sergeants, and two civilian Tactical Review Specialists in early 2025 to 55 Police Officer Reviewers and 11 Sergeants by January 2026.⁴⁴



⁴² *Report on the Workforce Allocation Study*, MATRIX CONSULTING GROUP (March 27, 2026), at 556, <https://www.chicagopolice.org/stories/cpd-wfa-cpa/>.

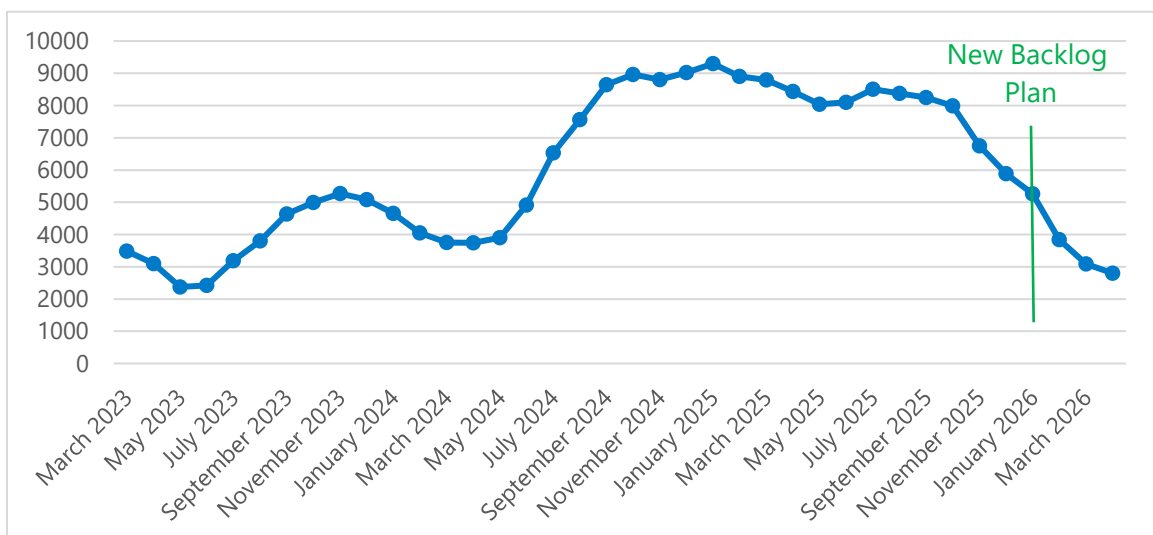
⁴³ *Id.* at 558.

⁴⁴ TRED's 2025 Year-End Report, CHICAGO POLICE DEPARTMENT (June 30, 2026), at 30, <https://www.chicagopolice.org/wp-content/uploads/2025-TRED-YEAR-END-REPORT.pdf>.

As previously mentioned, district captains have reviewed more than 3,000 firearm pointing incident reports, alleviating the number of reports that TRED reviews. In January 2026, TRED restructured the way in which reviewers addressed incoming IDRs: now, reviewers are grouped to specifically address incoming IDRs across the different areas, the backlog, and Force Review Boards (FRBs). Furthermore, as an additional level of oversight and to ensure the timely identification of patterns and trends for each area, a TRED sergeant has been assigned to each area, allowing for more effective communication between TRED, local district supervisors, and Area Chiefs on any patterns. Additionally, reviewers have been able to quickly adapt and reorganize to better address influxes in IDRs.

Through these efforts, TRED has been able to significantly decrease its backlog.

IDR Backlog, Average by Month, 2023–April 2026



Large Gatherings, including Spontaneous Events involving Youth

Lastly, this reporting period the CPD has trained to better address the influx of both planned and spontaneous First Amendment assemblies, large crowds, and large gatherings, including those involving a significant portion of youth. These gatherings have been referred to by the City, the CPD, and the community under several different names, including among other things, teen takeovers, large teen gatherings, and pop-up meetups.⁴⁵ Having learned from the Democratic National Convention in 2024, the CPD continued to refine their training for large crowds and First Amendment assemblies.

⁴⁵ For consistency, the IMT uses these terms interchangeably throughout this report to refer to the same category of event.

In particular, the CPD developed an eight-hour, scenario-based course to help members better recognize and manage different types of gatherings, including spontaneous events and vehicle-related activity. The course is organized into several modules that move from operational awareness and legal frameworks to gathering dynamics, vehicle safety, and arrest procedures, culminating in a capstone scenario that brings the material together. The training grew out of field observations, including large gatherings promoted on social media that drew rapidly growing crowds with little structure and multiple shootings, and it emphasizes that officers should have a clear, shared plan before they arrive on scene.

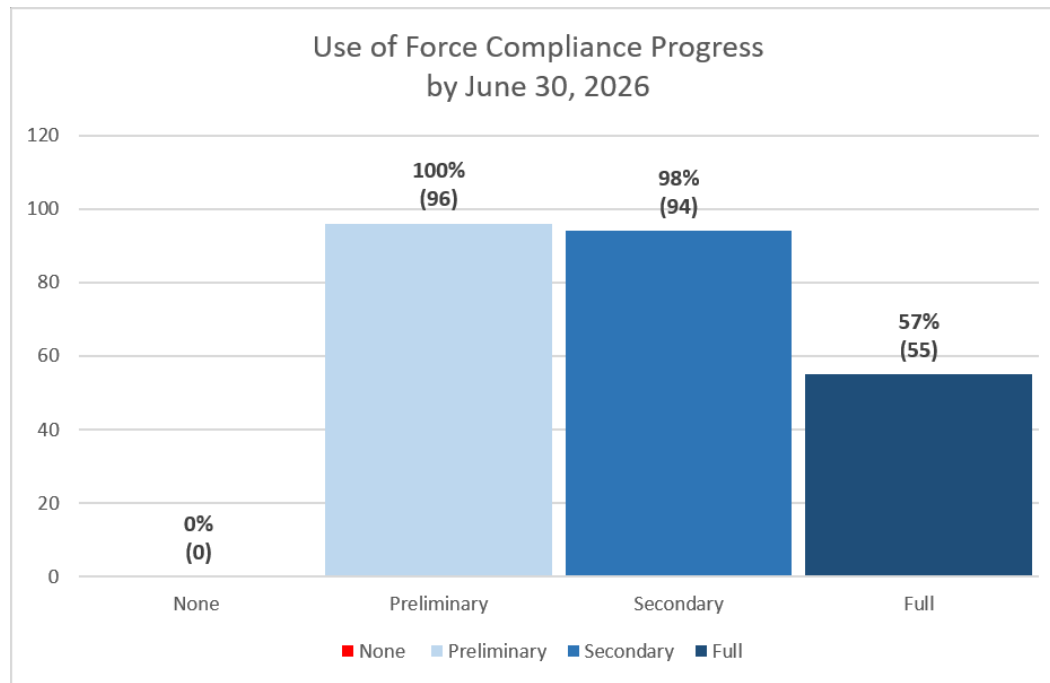
Using footage from a recent gathering that CPD officers responded to, the training addressed how supervisors and officers responded as the crowd surged, vehicles were trapped, and officers were struck by objects while multiple people were injured. The training highlighted measured crowd-movement tactics, line formations, and the importance of slowing the pace to avoid unnecessary uses of force while restoring order and allowing lifesaving efforts. The IMT commended the training as the CPD stressed communication, thoughtful planning, and organized supervision over any single tactic, noting that calm decision-making can reduce the likelihood that spontaneous large gatherings escalate further.

The IMT previously requested that the CPD provide after-action reports documenting its operational response to these large gatherings, but it has not received any such reports to date. The IMT will continue to monitor the CPD's response to these large spontaneous gatherings and expects the CPD to provide after-action reports going forward so its handling of these events remains transparent to the community.

Use of Force Progress through Fourteen Reporting Periods

During this reporting period, the IMT assessed the City's compliance with 96 Use of Force paragraphs. At the end of the fourteenth reporting period, the City maintained Preliminary compliance for two paragraphs (§§159–60). The City maintained Secondary compliance for 38 paragraphs (§§153, 155–157, 161–67, 176–78, 182–84, 186, 191–93, 198–200, 204, 217, 220, 222–24, 226–27, 233–34, 236, 239, and 242–43) and achieved Secondary compliance for one paragraph (§228). The City maintained Full compliance for 46 paragraphs (§§154, 158, 168–72, 174, 179–81, 185, 188–90, 194–97, 201–03, 205–13, 215, 218–19, 221, 225, 229–32, 235, 244–47, and 248) and achieved Full compliance with nine paragraphs (§§173, 175, 187, 214, 216, 237–38, and 240–41).

As reflected in the bar graph below, compliance levels are cumulative, so all paragraphs in Secondary compliance are included in the totals for Preliminary compliance and all paragraphs in Full compliance are included in the totals for Preliminary compliance and Secondary compliance.



Looking Ahead to the Fifteenth Reporting Period

While the City and the CPD made progress this reporting period, there continue to be areas for improvement. As noted in the previous reporting period, the CPD must continue to make progress in understanding its data to help clarify what is changing related to use-of-force incidents and why, which will help focus training, supervision, and support. The CPD continues to review and revise its department forms to ensure the reporting systems provide clear and meaningful guidance and information for officers and enhance supervisors' abilities to identify issues and respond and report appropriately. Developing transparent analytic frameworks will also demonstrate accountability to the community. We look forward to continued progress in these areas for accurate data collection, analysis, and reporting.

In addition, we await data from the CPD and COPA for compliance assessments on a number of paragraphs (see ¶¶162, 178, 199, and 232). While discussions have been held with both the CPD and COPA on requests for data, it has taken significant effort for the City to provide and analyze such data. Such undertakings are not easily replicable, which has led the CPD and COPA to revise underlying category codes in their case management system (CMS) to better track data moving forward. We look forward to progress on the implementation of these category codes in future reporting periods.

Specific compliance assessments, by paragraph, for the Use of Force section are available here: <https://cpdmonitoringteam.com/wp-content/uploads/2026/10/App.-04-IMR14-Use-of-Force.pdf>. This includes paragraphs where the City gained or lost compliance in the fourteenth reporting period, as well as paragraphs with significant developments toward or away from compliance.⁴⁶

⁴⁶ A fuller description of the history of compliance efforts, methodologies, compliance determinations for each original monitorable paragraphs in the Use of Force section is available in *Comprehensive Assessment Part I* (which included *Independent Monitoring Report 8*): <https://cpdmonitoringteam.com/imr-8-1/>. For reference, all IMT reports and appendices are available here: <https://cpdmonitoringteam.com/reports-information/>.

V. Recruitment, Hiring & Promotion

In the fourteenth reporting period, the City and the CPD maintained compliance with all paragraphs while focusing on strengthening interagency governance, modernizing workforce systems, leveraging data for informed decision-making, ensuring Consent Decree compliance, and building a sustainable framework for recruitment, hiring, and promotions.

During this reporting period, the City and the CPD functioned as an integrated governance body, bringing together the CPD, Office of Public Safety Administration (OPSA), and Department of Human Resources (DHR) to coordinate recruitment, hiring, and promotional initiatives. The reporting period reflects increasing cross-agency collaboration to align policies, timelines, responsibilities, and implementation strategies. Recent personnel changes require even greater intentionality in assuring robust interagency coordination and management occurs.

Additionally, this reporting period, the Court granted the City's and the OAG's Joint Motion to Amend ¶1261, modifying the timing of the required independent expert assessments of the CPD's Sergeant and Lieutenant promotion processes from every three years to every five years. This practical modification ensures that the upcoming assessments are informed by complete implementation of recent recommendations, and sufficient promotion cycle data, to permit a meaningful and results-based evaluation.

Compliance, Transparency, and Accountability

The City and the CPD devoted substantial effort to ensure that recruitment, hiring, and promotional practices complied with the Consent Decree and reflected principles of fairness, transparency, and documentation. This included policy development, monitoring implementation progress, maintaining appropriate records, and preparing evidence demonstrating compliance.

The City and the CPD provided revised policies for review during this reporting period, including E05-05, *Career Service Rank Promotional Process*, to outline CPD metrics for past disciplinary history that is deemed unacceptable for eligibility for promotion to the Sergeant and Lieutenant ranks.

Process Modernization and Operational Efficiency

A significant portion of the City and the CPD's efforts this reporting period focused on modernizing personnel systems and improving administrative processes. This included refining hiring workflows, implementing technology solutions, reducing

candidate processing delays, standardizing procedures, and improving the overall candidate and employee experience.

Data-Driven Decision Making and Performance Measurement

The City and the CPD Recruitment, Hiring and Promotion team emphasized the use of data to manage workforce processes. Activities included developing and refining performance metrics, monitoring recruitment and hiring outcomes, tracking promotional activity, identifying bottlenecks, and using analytics to support continuous improvement and Consent Decree reporting.

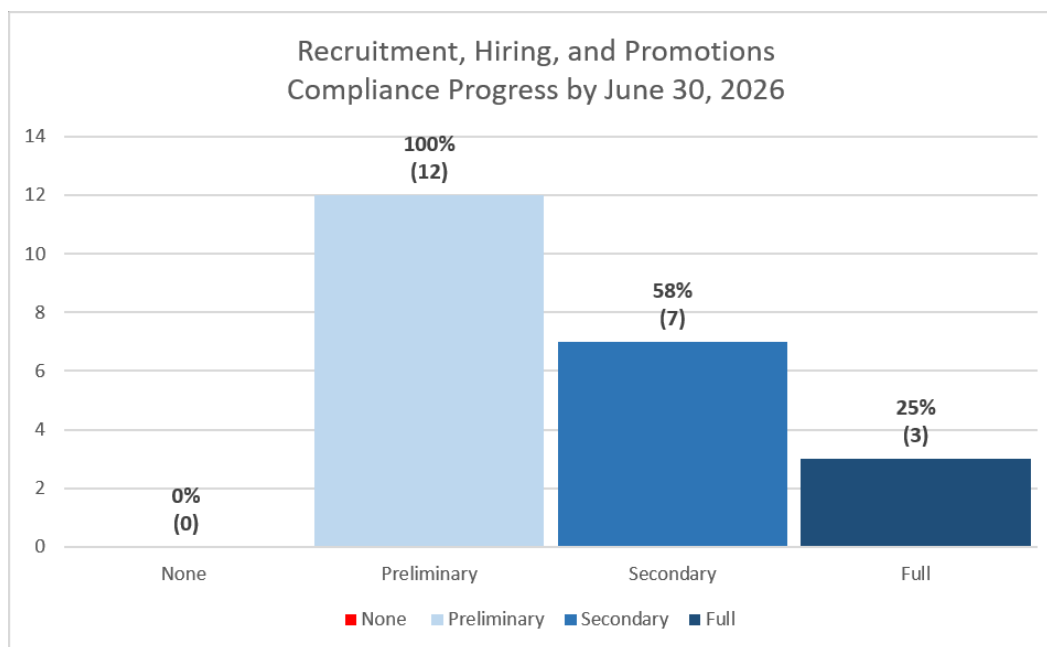
Strategic Workforce Development and Organizational Capacity

Rather than focusing solely on filling vacancies, the City and the CPD worked to strengthen the CPD's long-term workforce. Efforts included improving recruitment strategies, supporting equitable promotional processes, planning for future staffing needs, and building systems capable of sustaining organizational reform beyond the life of the Consent Decree.

Recruitment, Hiring, and Promotion Progress through Fourteen Reporting Periods

The City and the CPD maintained Preliminary compliance for five paragraphs (¶¶253–54, 256, 260, and 262), maintained Secondary compliance for four paragraphs (¶¶258–59 and 263–64), and maintained Full compliance for three paragraphs (¶¶255, 257, and 261).

As reflected in the bar graph below, compliance levels are cumulative, so all paragraphs in Secondary compliance are included in the totals for Preliminary compliance and all paragraphs in Full compliance are included in the totals for Preliminary compliance and Secondary compliance.



Looking Ahead to the Fifteenth Reporting Period

The IMT commends the City and the CPD for the significant work revising policies, such as E05-05, *Career Service Rank Promotional Process*, in the fourteenth reporting period. Because of these efforts, the IMT anticipates that the City will achieve additional levels of compliance for ¶262 in the fifteenth reporting period.

While the City and the CPD made meaningful progress this reporting period to improve systems and efficiencies, we look forward to completion of several projects in the fifteenth reporting period to achieve new levels of compliance. For example, 2026 marks the next deadline for the City and the CPD to conduct a full assessment of its recruitment, hiring, and promotional practices, and after two triennial assessments conducted by external consultants, the City has reported it can successfully conduct its own assessment this year. The City and the CPD should continue with meaningful assessment activities to solicit input from a wide range of stakeholders and experts to complete the RHP assessment in accordance with the requirements of ¶¶258–59 and evaluate and report on implementation of prior recommendations in accordance with ¶260. In particular, the IMT welcomes further discussion with the City, the CPD, and the OAG about the integration of prior disciplinary history and promotion decisions into hiring and promotional practices as recommended by prior assessments.

Regarding hiring and promotions, the City has begun to present and produce evidence that each hiring and promotional exam utilized is reviewed on a consistent cadence and validated to ensure exams are fair and properly administered. The City should continue to present evidence from each of its thirteen promotional

exams and the police officer hiring exam throughout the fifteenth reporting period.

Additionally, the City and the CPD should strive to finalize the final report for the 2025 Captain Promotional Process as early as is feasible. The City and the CPD developed a commendable report during the thirteenth reporting period for the 2024 Commander Promotional Practice, which not only provided a summary of the promotional process itself, but described feedback that applicants provided and the steps the City and the CPD took to incorporate applicant feedback and demonstrate continual commitment to transparency, procedural justice, and fairness in the promotional cycle. Timely release of the 2025 Captain Promotional Process report is important to close the promotional cycle, communicate findings to CPD members, and implement new recommendations before any future promotional cycle.

Finally, the CPD should continue to engage the IMT, the OAG, and the City on its recruitment efforts as we progress into the fifteenth reporting period with new leadership at the CPD's Education and Training Group (ETG). Successful recruitment requires a commitment to not only attract well-qualified candidates to the CPD, but also staying engaged through the Basic Law Enforcement academy training and testing and coordinating within the City through the formal hiring process.⁴⁷

⁴⁷ A fuller description of the history of compliance efforts, methodologies, compliance determinations for each original monitorable paragraphs in the Recruitment, Hiring, and Promotion section is available in *Comprehensive Assessment Part I* (which included *Independent Monitoring Report 8*): <https://cpdmonitoringteam.com/imr-8-1/>. For reference, all IMT reports and appendices—including more recent reports—are available here: <https://cpdmonitoringteam.com/reports-information/>.

VI. Training

During this reporting period, the CPD continued to make progress in many areas of training, as required by the Consent Decree, and increased compliance in seven paragraphs. The CPD continued transforming its training program into a strategically governed, technology-enabled, performance-driven training enterprise. The *2027 Annual Training Plan* reflects this evolution by emphasizing comprehensive planning, stronger governance, higher-quality curriculum, modernized training management systems, and a closer integration of training with organizational accountability and long-term Consent Decree sustainment.

The CPD continued developing its training program from a collection of individual courses into an integrated training enterprise aligned with the Consent Decree. The *2027 Annual Training Plan* demonstrates a more deliberate, department-wide approach to identifying training needs, prioritizing mandatory and elective training, integrating recruit, in-service, promotional, and field training, and aligning training investments with operational risks and constitutional policing priorities.

Rather than viewing training as a standalone function, the CPD increasingly integrated training into broader organizational accountability systems. The *2027 Annual Training Plan*, for example, places greater emphasis on using audits, member evaluations, field performance, policy changes, disciplinary outcomes, and other organizational data to identify training needs and evaluate effectiveness. This reflects an important evolution toward measuring whether training improves officer performance, supervisory practices, and constitutional policing outcomes while creating a sustainable framework potentially capable of supporting compliance beyond the duration of the Consent Decree.

Strengthening Training Governance, Planning, and Cross-Department Coordination

Throughout the fourteenth reporting period, the CPD enhanced the governance structure supporting training by strengthening coordination among the Education and Training Group (ETG), operational bureaus, subject-matter experts, executive leadership, and the Training Oversight Committee. The *2027 Annual Training Plan* reflects a more structured annual planning process, clearer assignment of responsibilities, increased stakeholder engagement, and improved mechanisms for monitoring implementation and reporting progress toward Consent Decree compliance.

Improving Curriculum Quality and Instructional Excellence

The CPD continued refining its curriculum development process by emphasizing evidence-based instructional design, adult learning principles, scenario-based exercises, standardized lesson plans, instructor development, and curriculum review. The *2027 Annual Training Plan* further demonstrates a commitment to maintaining current and legally accurate training through recurring curriculum updates, incorporation of policy revisions, expanded elective offerings, and continued enhancement of recruit, supervisory, specialized, and leadership training.

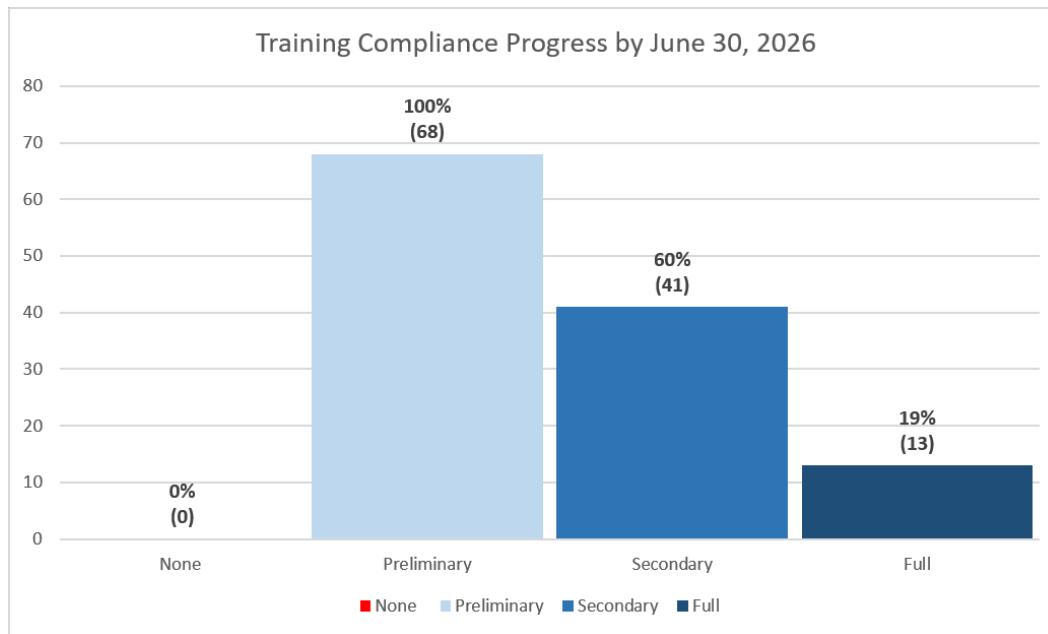
Modernizing Training Management Through Technology, Data, and Performance Analytics

A defining effort during this reporting period was the continued development of the CPD's technology infrastructure to support training administration and evaluation. The *2027 Annual Training Plan*, together with the planned Benchmark Training Management System, reflects a transition toward comprehensive electronic management of course scheduling, certifications, eLearning, field training, Daily Observation Reports, training evaluations, automated notifications, and customizable dashboards capable of tracking training compliance, performance trends, disciplinary referrals, Summary Punishment Action Request (SPAR) recommendations, and other accountability-driven training needs. These capabilities are intended to provide leadership with real-time data supporting both operational decision-making and Consent Decree reporting.

Training Progress through Fourteen Reporting Periods

In the fourteenth reporting period, we assessed the City's compliance with 68 Training paragraphs. Specifically, in the fourteenth reporting period, the City and the CPD maintained Preliminary compliance for 25 paragraphs (§§279–82, 284, 286, 288–89, 296, 303–04, 308–12, 314, 326–29, 331–33, and 338), achieved Preliminary compliance for two paragraphs (§§287 and 290), maintained Secondary compliance with 27 paragraphs (§§273–78, 283, 285, 292, 294–95, 297–98, 301–02, 313, 315–17, 319, 324, 334–37, and 339–40), achieved Secondary compliance with one paragraph (§291), maintained Full compliance with nine paragraphs (§§270–71, 299, 305–06, 318, 320–21, and 323), and achieved Full compliance for four paragraphs (§§272, 300, 307, and 322). As of this reporting period, the City and the CPD have achieved some level of compliance with all 68 paragraphs.

As reflected in the bar graph below, compliance levels are cumulative, so all paragraphs in Secondary compliance are included in the totals for Preliminary compliance and all paragraphs in Full compliance are included in the totals for Preliminary compliance and Secondary compliance.



Looking Ahead to the Fifteenth Reporting Period

Looking ahead to the next reporting period, the IMT anticipates further compliance achievement, with particular emphasis on training records management, instructor qualifications and evaluations, pre-service training, and recruit training. We look forward to collaborating with the City and the CPD as the Benchmark Training Management System is developed and implemented over the course of the fifteenth and sixteenth reporting periods.

We expect the CPD will conclude the 2026 in-service training courses in accordance with the *2026 Annual Training Plan* by the end of the fifteenth reporting period. As the CPD works to develop 2027 in-service training courses, the CPD should continue to make progress in updating portions of the Pre-Service supervisor trainings and recruit training. The CPD has previously shared a general timeline for the review and revisions of each module currently included in Pre-Service supervisory training, and we look forward to reviewing the next selection of updated Pre-Service modules. Additionally, the CPD's Recruit Curriculum Working Group has instituted a regular cadence of meetings to review and update the recruit academy curriculum and we encourage continued engagement with the IMT and the OAG as the Recruit Curriculum Working Group implements its findings and improvements.

Finally, the IMT anticipates that the CPD will make progress towards the development of policy and practices guiding quality instructor selection, training delivery, instruction, and evaluation of participant outcomes. As noted in prior reporting periods, the development of the evaluation process is crucial to assessing the effectiveness of existing training and how to improve the quality and consistency of

future instruction and curriculum. Efforts to implement enhanced evaluation processes through the Instructor Evaluation Pilot will likely aid the CPD in achieving additional levels of compliance across many sections of the Consent Decree.

Specific compliance assessments, by paragraph, for the Training section are available here: <https://cpdmonitoringteam.com/wp-content/uploads/2026/10/App.-06-IMR14-Training.pdf>. This includes paragraphs where the City gained or lost compliance in the fourteenth reporting period, as well as paragraphs with significant developments toward or away from compliance.⁴⁸

⁴⁸ A fuller description of the history of compliance efforts, methodologies, compliance determinations for each original monitorable paragraphs in the Training section is available in *Comprehensive Assessment Part I* (which included *Independent Monitoring Report 8*): <https://cpd-monitoringteam.com/imr-8-1/>. For reference, all IMT reports and appendices are available here: <https://cpdmonitoringteam.com/reports-information/>.

VII. Supervision

In the fourteenth reporting period, the City and the CPD achieved additional levels of compliance with eight paragraphs, including Secondary compliance with ¶¶369–76.

The IMT and the CPD maintained regular meetings during the fourteenth reporting period and gathered valuable information to assess compliance with Consent Decree requirements. These meetings focused on the Unity of Command and Span of Control pilot program, the implementation of the updated Performance Evaluation System, access to Supervision tracking mechanisms, and clarifications on the proposed methodologies for the fourteenth reporting period. Interactions between the IMT, the OAG, CPD command staff, and CPD project managers have continued to help clarify paths toward future levels of compliance.

Unity of Command and Span of Control

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(e). Span of control limits the number of officers any one sergeant can supervise daily. See ¶358(d). Under the Consent Decree, one goal of span of control is to create a consistent ratio of 10 officers to 1 sergeant to encourage effective supervision.

The Unity of Command and Span of Control Pilot Program is a staffing model launched to implement these concepts to enable more effective and efficient supervision, mentoring, officer support, and policing. The current model for the program, implemented in the ninth reporting period, is the third iteration and focuses on three tenets: (1) geographic familiarity, (2) high-quality supervision, and (3) resource flexibility.

The first CPD districts to operate under the Unity of Command and Span of Control staffing model were 4, 6, and 7, which are classified as "Tier 1," referring to districts with a high volume of calls for service and an elevated crime rate. The CPD has faced challenges with meeting the requirements of the pilot programs in these districts, primarily due to turnover and staffing instability. Pilot district commanders expressed concerns about the number of supervisors on long-term medical leave, detailed to other assignments for extended periods, or transferred out of the pilot districts.

To better understand the effectiveness of the staffing model and ensure its replicability, the CPD expanded the Unity of Command and Span of Control Pilot Program to new districts in the fourteenth reporting period, following an agreement

with the CPD collective bargaining units⁴⁹ which sets an annual limit of five expansion districts. Thus, CPD chose districts 15, 16, 17, 20, and 24, which are classified as “Tiers 2 and 3” and are more securely staffed.

To prepare for inclusion in the new staffing model, the CPD has historically conducted informal briefings which are not systematically tracked. During the fourteenth reporting period, the CPD produced more formalized trainings for both supervisors and all other members of the CPD, who will be required to complete them through the learning management system. The IMT looks forward to the delivery of this training to ensure a full understanding of the staffing model, the concepts of Unity of Command and Span of Control, and the benefits that result from their implementation.

As the CPD strategically staggered implementation, the Unity of Command and Span of Control Pilot Programs are in various stages of completion. [Supervision Figure 1](#), below, shows the progress of the pilots in active districts. Districts in the “Implementation Planned” phase are preparing for their participation in the program. Districts in the “Implementation Underway” phase have begun operating under the model and are tracking compliance with the pre-determined success metrics. Districts will shift to the “Implementation Complete” phase once they have achieved and maintained compliance with pre-determined success metrics.

[Supervision Figure 1.](#)

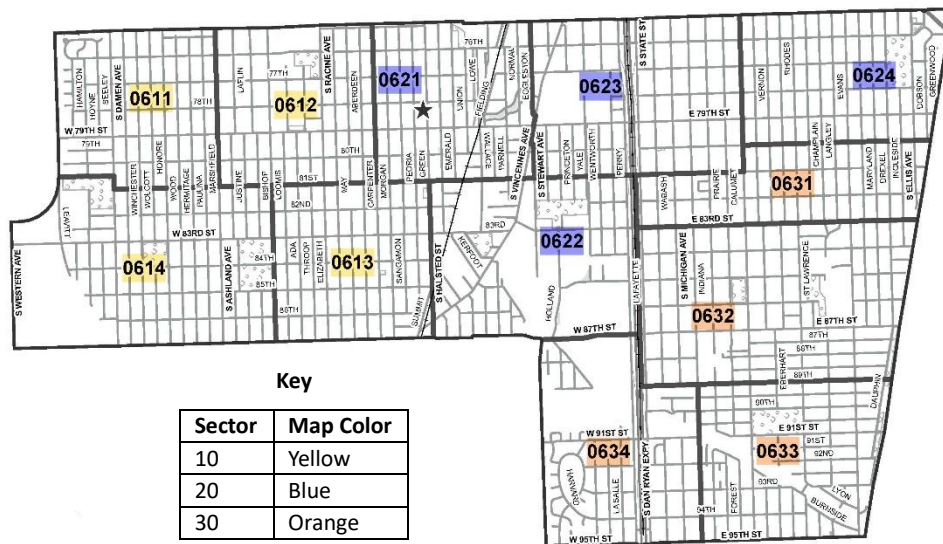
[Progress of Unity of Command/Span of Control Pilot Programs](#)

CPD District <i>(in order of implementation)</i>	Implementation Status
006 – Gresham	Implementation Underway
004 – South Chicago	Implementation Underway
007 – Englewood	Implementation Underway
015 – Austin	Implementation Underway
016 – Jefferson Park	Implementation Underway
017 – Albany Park	Implementation Underway
020 – Lincoln	Implementation Underway
024 – Rogers Park	Implementation Underway

⁴⁹ A letter from Superintendent Snelling to Fraternal Order of Police, Lodge #7 President John Catanzara states that “the Department may only reduce no more than 5 Police Districts per calendar year, with the prerequisite that the 70% manpower is maintained.” Agreement Between the City of Chicago and Fraternal Order of Police, Chicago Lodge No. 7 (2017–2027), December 2, 2020 Elective Time And Discretionary Time Off And Day Off Groups, pp. 173-174. <https://www.chicago.gov/content/dam/city/depts/dol/Collective%20Bargaining%20Agreements/BU-91-Chicago-John-Dineen-Lodge-No.-7-CBA-2017-2027-Final.pdf>

Supervision Figure 2.
6th District Beat Map (Source: Office of Public Safety Administration)

6TH District
Gresham
7808 S HALSTED ST



During monthly calls, the City and the CPD shared data about the progress of the pilot program throughout the fourteenth reporting period. The IMT has also maintained direct access to both pilot program tracking mechanisms and the Unity of Command and Span of Control Tableau Dashboard, since the thirteenth reporting period. The CPD-determined target goal for Span of Control, or the frequency with which CPD is meeting the 10:1 ratio of members compared to sergeant working within a sector/watch, is 70% (¶¶358(d) and 359–68).⁵⁰ The CPD-determined target goal for the Unity of Command by sector, or the frequency with which a member is working within their assigned sector⁵¹ is also 70% (¶¶358(e) and 359–68). The CPD-determined target goal for Unity of Command by reviewer, or the frequency with which a member is working with the supervisor assigned to complete their performance review, is 50% (¶¶358(e) and 359–68). Since the launch of the new staffing model in the ninth reporting period, compliance rates with the CPD-

⁵⁰ In the eighth reporting period, the CPD determined target goals were as follows: Span of Control: 70%, Unity of Command by Sector: 75%, Unity of Command by Reviewer for Tactical and CAPS units: 80%, and Unity of Command by Reviewer for all other Patrol Units: 50%.

⁵¹ Each CPD district is comprised of sectors which are further broken down into beats. The “10 sector” includes beats beginning with the district number and ending in 10-19, the “20 sector” includes beats beginning with the district number and ending in 20-29. And the “30 sector” includes beats beginning with the district number and ending in 30-39. This is further illustrated in Supervision Figure 2.

determined target goals have fluctuated. However, over the last year, the CPD has consistently maintained its target goal for Unity of Command by sector.

The IMT acknowledges the CPD's efforts but looks forward to all metrics stabilizing across all periods and shifts. The CPD has continued to hold regular check-ins with pilot districts to discuss the staffing model metrics and operational impacts. Through these meetings, the CPD has also identified challenges, such as supervisory dashboards not properly tracking district staff working overtime and some instances of districts misassigning personnel. The IMT is supportive of the CPD's approach to gathering feedback as it is crucial for the CPD, particularly as it looks to continue expansion each year.

Additionally, while the operational metrics are necessary for the CPD to understand certain aspects regarding the effectiveness of the staffing model, other important impacts remain unknown. The IMT encouraged the CPD to identify metrics to evaluate the staffing model's effect on supervisors' ability to: provide leadership and support; mentor to improve performance and professional growth; and guide and direct safe, lawful, and effective policing. The CPD may need to request assistance from the Audit Division or other internal stakeholders to accomplish this. However, these benefits, which are clearly outlined in CPD Policy D20-02, *Unity of Command and Span of Control Pilot Program*, are ultimately those which will be felt by the community and thus, are integral to the program's success.

The CPD has also convened a Unity of Command and Span of Control Pilot Program Evaluation Committee, which is required to meet at least twice a year to discuss implementation progress and share feedback from CPD personnel. This committee is comprised of leadership from the Bureau of Patrol, the Audit Section, the Labor Relations Division, Professional Standards and Compliance Division, the Fraternal Order of Police, and the Policemen's Benevolent & Protective Association. During the fourteenth reporting period, the committee met once and the IMT and the OAG observed. The group has the potential to play an important role in the program's effective implementation. The IMT hopes this committee will provide informed recommendations on program expansion, staffing considerations, and necessary modifications to ensure a smooth implementation process.

We recognize the progress that has been made and the Unity of Command and Span of Control Pilot in the 6th District helped the CPD to achieve Preliminary compliance in previous reporting periods. However, many of the paragraphs within the Supervision section require reforms in all 22 districts. Therefore, further levels of compliance cannot be achieved until the pilot continues to expand and can be successfully replicated and implemented in all districts. The IMT looks forward to continuing to work with the City and the CPD toward the goal of broadening the impact of implementing an effective supervision structure in all 22 districts.

Performance Evaluation System

This reporting period, the CPD progressed with the implementation of the Performance Evaluation System (PES). The CPD delivered the *PES All Department Members* and *PES Supervisors eLearning Training* to 95% of the CPD. Following the training, the CPD implemented the system. During the fourteenth reporting period, we conducted focus groups with CPD members and supervisors to gather feedback about the PES training and overall system. We heard that despite CPD offering in-person follow-up training sessions and written training materials, many members were still experiencing challenges in navigating the system. Examples included: challenges with member identification, insufficient integration with the previous evaluation system and a lack of notifications and reminders, among others. The CPD also set up an email for members to submit questions or request assistance, but we heard responses were not prompt or consistent.

Additionally, the policy governing the PES—E05-01, *Performance Evaluation of All Sworn and Civilian Department Members*—requires that supervisors meet with members for a goal setting session between January 1 and March 30 and submit quarterly portfolio notes. Due to the referenced challenges, the CPD has not seen high compliance rates with these activities. The IMT hopes to see enhancements made to the system based on personnel feedback to improve CPD members' ability to complete required tasks. The IMT acknowledges the CPD's progress on the PES and looks forward to receiving further updates and reviewing data from the system, including annual goals, portfolio notes, and performance evaluations.

General Updates:

CPD Member Training and the Workforce Allocation Study

While the pilot programs are integral to successfully fulfilling many of the requirements of the Supervision section, other actions are necessary, too. For example, the City and the CPD must regularly train all supervisors—civilian and sworn—on how to perform their duties. During the fourteenth reporting period, the IMT conducted a focus group with civilian supervisors. During past focus groups, civilian supervisors have expressed confusion about their role equivalencies with sworn members, their ability to discipline sworn members, and other facets of their duties.⁵² During this reporting period, we heard positive feedback about the *Sworn and Civilian Equivalency Chart*, which clarifies roles and was produced by the CPD during last reporting period. However, civilian supervisors reiterated the need for

⁵² In previous reporting periods, the IMT stated that it had not had the opportunity to review training curriculum for non-sworn supervisors. The CPD has since clarified that both sworn and non-sworn members will receive the same curriculum.

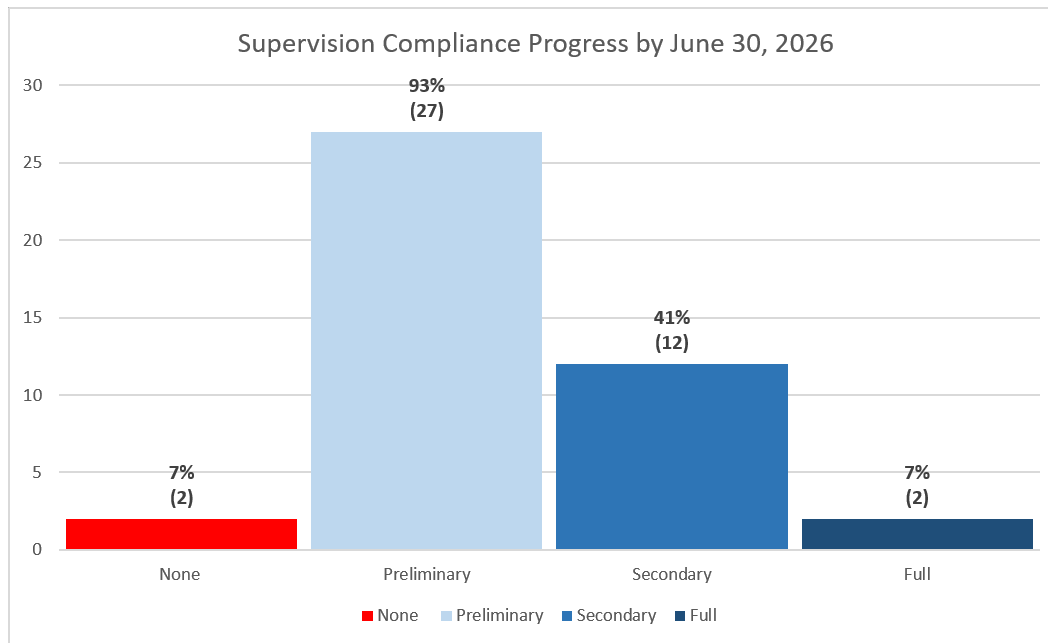
an amended pre-service training block to better understand operational aspects, such as discipline.

Additionally, the Workforce Allocation Study was published during the fourteenth reporting period. This report was the culmination of months of work to better understand current staffing and future staffing needs for the CPD. The recommendations in the report have important implications for the Supervision section, which requires specific staffing levels for various roles within the CPD (§§356), along with patrol field staff and supervisors (§§357 and 359–67). The CPD has shared intentions to develop a plan which identifies which recommendations from the Workforce Allocation Study it plans to implement to bring the CPD in line with best staffing practices and further compliance with the Consent Decree. We look forward to reviewing that plan and expect it to clearly outline how the CPD will operationalize the recommendations, indicate responsible stakeholders, and identify potential barriers or complicating factors.

Supervision Progress through Fourteen Reporting Periods

Overall, we assessed the City's compliance with 29 Supervision paragraphs during the fourteenth reporting period (§§347–57 and 359–76). In the fourteenth reporting period, the City and the CPD maintained Preliminary compliance for 15 paragraphs (§§347–48, 351–53, 355–56, 359–64, and 366–67), achieved Secondary compliance for eight paragraphs (§§369–76), maintained Secondary compliance for two paragraphs (§§349 and 354), and maintained Full compliance with two paragraphs (§§350 and 368). The City and the CPD did not achieve any level of compliance with two paragraphs (§§357 and 365).

As reflected in the bar graph below, compliance levels are cumulative, so all paragraphs in Secondary compliance are included in the totals for Preliminary compliance and all paragraphs in Full compliance are included in the totals for Preliminary compliance and Secondary compliance.



Looking Ahead to the Fifteenth Reporting Period

In the fifteenth reporting period, the IMT looks forward to further updates on the Unity of Command and Span of Control Pilot Program, including the CPD's plan to continue expansion into additional districts. We expect to review data relevant to the program, such as the current pilot districts' progress by period, training for all participating districts, and feedback from the evaluation committee. The IMT also looks forward to the CPD identifying additional success metrics to demonstrate the operational effectiveness of the staffing model.

We also hope to continue working cooperatively with the City and the CPD to identify and, if necessary, help develop data sources which accurately capture supervisory activities and show evidence of supervisors' ability to provide appropriate support and accountability.

Additionally, the IMT looks forward to receiving feedback about the newly implemented PES, along with data from the system to include annual goals, portfolio notes, and civilian evaluations. We also anticipate receiving further information about the tracking of inputs into the PES and the development of a Tableau dashboard to support that tracking. Further, the IMT should be informed as the CPD continues to expand other supervisory components of the Benchmark system, such as the Employee Intervention and Support System.

The IMT will conduct further interviews and focus groups with officers and supervisors across the CPD. The IMT also looks forward to observing any pilot program, pre-service supervisors and in-service supervisors trainings, and reviewing training evaluations. Further, we plan to observe future evaluation committee meetings.

Specific compliance assessments, by paragraph, for the Supervision section are available here: <https://cpdmonitoringteam.com/wp-content/uploads/2026/10/App.-07-IMR14-Supervision.pdf>. This includes paragraphs where the City gained or lost compliance in the fourteenth reporting period, as well as paragraphs with significant developments toward or away from compliance.⁵³

⁵³ A fuller description of the history of compliance efforts, methodologies, compliance determinations for each original monitorable paragraphs in the Supervision section is available in *Comprehensive Assessment Part I* (which included *Independent Monitoring Report 8*): <https://cpdmonitoringteam.com/imr-8-1/>. For reference, all IMT reports and appendices are available here: <https://cpdmonitoringteam.com/reports-information/>.

VIII. Officer Wellness and Support

In the fourteenth reporting period, the City and the CPD maintained compliance levels with the many requirements of the Officer Wellness and Support section of the Consent Decree. As noted in the guiding principles for this section (see ¶¶377–80), CPD members routinely encounter significant danger, chronic stress, and traumatic events in the course of serving the public. The City and the CPD must provide systems to support CPD officers and civilian members experiencing mental health, substance use, and emotional challenges.

During the fourteenth reporting period, we recognize and appreciate the CPD's continued prioritization of comprehensive mental-health, substance-use support, emotional well-being, and trauma-informed care for its members.

In this reporting period, the CPD clearly demonstrated that its licensed mental health professionals employed by the Professional Counseling Division (PCD) do not participate in fitness-for-duty evaluations; instead, those evaluations are conducted “exclusively by third-party licensed mental health professionals” as required by ¶397. The IMT appreciates the CPD's documentation and the process flow chart provided that outlines this practice.

The City and the CPD also demonstrated its new Office of Public Safety Administration (OPSA) Portal, which CPD members may use to submit equipment repair requests. The City provided a detailed walkthrough of the process workflow used to process these requests. The IMT appreciates the demonstration and looks forward to learning more about its effectiveness related to the requirements of ¶¶415–18.

While the City and the CPD made some compliance progress in the fourteenth reporting period, several process and implementation challenges continue to limit additional compliance. The IMT remains concerned with the CPD's lack of progress regarding its Traumatic Incident Stress Management Program (TISMP) (¶¶407–11). The most recent annual audit indicates that 25% of required personnel failed to complete TISMP requirements. The CPD must implement the Audit Division's recommendations in a timely fashion to achieve additional levels of compliance, particularly where recommendations have remained unresolved across multiple reporting periods.

The IMT also continues to identify deficiencies in the CPD's wellness communications strategy, a required component of the *Officer Support Systems Plan* (¶¶385–86). While the CPD's most recent *Wellness Communication Strategy* included a “Projected 2026 Communications Calendar” of wellness events, it has not yet demonstrated that the strategy effectively reaches personnel, increases aware-

ness of available wellness resources, or supports meaningful employee engagement. Further, the IMT discovered a wellness-related podcast,⁵⁴ produced by the CPD, but not produced in support of ¶385 (b) or (c). The IMT recommends that the CPD's wellness team work in coordination with its internal communications team to document wellness-related communications and demonstrate these communications to the IMT in the next reporting period, breaking down the various messaging strategies by the subparagraphs of ¶385 (a–c) and ¶386 (a–f).

The Wellness and Support Group also needs staffing rebalancing to better meet the needs of CPD members. The 2026 Workforce Allocation Study found that some positions are overstaffed relative to workload: the Peer Support Section currently has six officers, though workload data supports only two. The Study found that other positions are understaffed: the Officer Wellness Liaison (OWL) program has only three officers filling an authorized complement of ten, and the study recommends adding seven positions. The Study additionally found that the Officer Support Section has five officers but needs six to address rising caseloads. In the PCD, clinician staffing stands at 22, which the study recommends maintaining if case-loads continue to rise and more OWLs are added.

During this reporting period, the City and the CPD submitted “Compliance Sustainment Plans” for ¶404 and ¶406 to support sustained compliance with the Consent Decree. Paragraph 404 requires the CPD to “maintain a peer support program” and includes specific program requirements in subparagraphs a–g. The submitted plan includes a task-tracking spreadsheet that aligns ongoing responsibilities to designated personnel, such as providing “Cordico Updates for peer support members” each monitoring period and producing annual “Peer Support Awards records from the CLEAR system.” The IMT appreciates the details and finds it helpful to see that such tasks are assigned to specific CPD personnel for completion at a regular cadence. The Compliance Sustainment Plan was accompanied by many additional productions that address subparagraphs a–g, such as the “2026 8-hour Peer Support Refresher Training – Pre and Post Test Questions” and a memo regarding a meeting held to support ¶404(d). Overall, the IMT finds this “Compliance Sustainment Plan” to be a helpful and transparent step towards sustained compliance per ¶717.

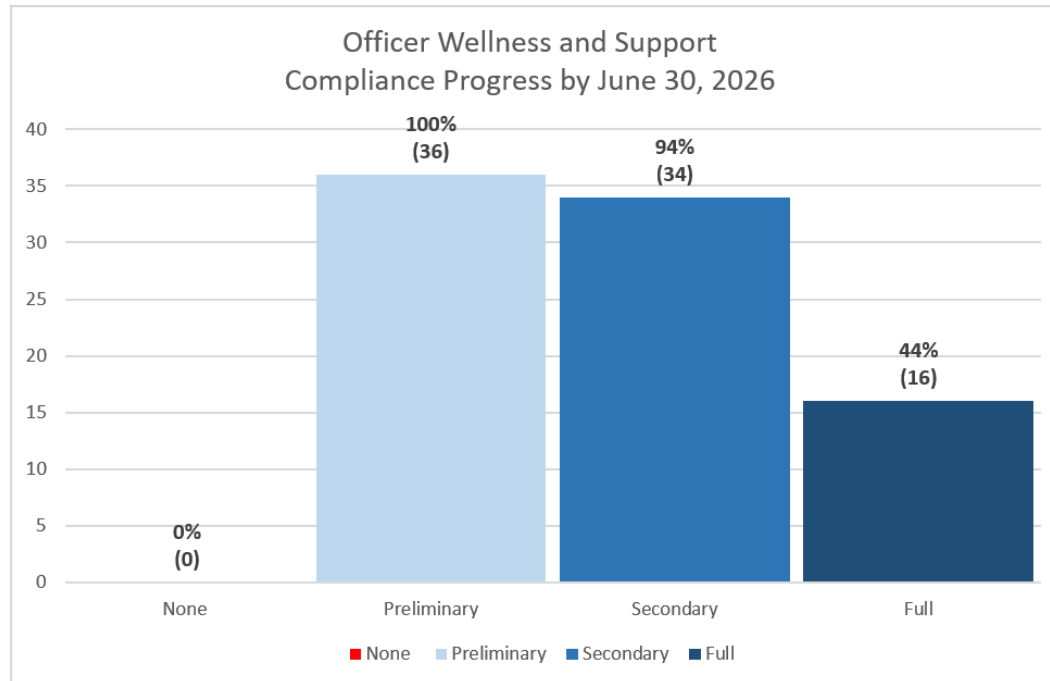
Officer Wellness and Support Progress through Fourteen Reporting Periods

Overall, we assessed the City's compliance with 36 Officer Wellness and Support paragraphs during the fourteenth reporting period (¶¶381–402, 404, and 406–18). The City and the CPD maintained Preliminary compliance for two paragraphs

⁵⁴ “Fishing for Mental Health,” *Roll Call*, CHICAGO POLICE DEPARTMENT PODCAST, *Episode 11*, May 10, 2026. Available on Spotify: <https://open.spotify.com/episode/6ulnyrL5TO0Wgj4Fqwx2t1>

(¶¶416–17), maintained Secondary compliance for 18 paragraphs (¶¶384–86, 388–89, 393, 395, 399, 407–15, and 418), achieved Full compliance with one paragraph (¶397), and maintained Full compliance with 15 paragraphs (¶¶381–83, 387, 390–92, 394, 396, 398, 400–02, 404, and 406).

As reflected in the bar graph below, compliance levels are cumulative, so all paragraphs in Secondary compliance are included in the totals for Preliminary compliance and all paragraphs in Full compliance are included in the totals for Preliminary compliance and Secondary compliance.



Looking Ahead to the Fifteenth Reporting Period

The IMT appreciates the CPD's efforts during the fourteenth reporting period. In the fifteenth reporting period, we expect the City and the CPD to demonstrate data from the Column Case management system through the CPD wellness team's Tableau dashboard to assess compliance with the timing requirements of ¶395. The IMT also expects the City and the CPD to implement a documented process for identifying officers involved in traumatic incidents, ensuring timely completion of TISMP requirements (¶¶409–11) and providing required follow-up services (¶408). Finally, the IMT looks forward to continued collaboration to strengthen department-wide wellness communications and messaging in support of the Officer Support Systems Plan requirements (¶¶385–86).

Specific compliance assessments, by paragraph, for the Officer Wellness and Support section are available here: <https://cpdmonitoringteam.com/wp-content/uploads/2026/10/App.-08-IMR14-Officer-Wellness-and-Support.pdf>. This includes paragraphs where the City gained or lost compliance in the fourteenth reporting period, as well as paragraphs with significant developments toward or away from compliance.⁵⁵

⁵⁵ A fuller description of the history of compliance efforts, methodologies, compliance determinations for each original monitorable paragraphs in the Officer Wellness and Support section is available in *Comprehensive Assessment Part I* (which included *Independent Monitoring Report 8*): <https://cpdmonitoringteam.com/imr-8-1/>. For reference, all IMT reports and appendices are available here: <https://cpdmonitoringteam.com/reports-information/>.

IX. Accountability and Transparency

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 (§§419–23).

The Accountability and Transparency section includes requirements for the following City entities: the CPD and the CPD’s Bureau of Internal Affairs (BIA), the Civilian Office of Police Accountability (COPA), and the Police Board.⁵⁶ Some requirements previously assigned to other entities have now been assumed by the Community Commission for Public Safety and Accountability (CCPSA). In addition, some of the requirements of the Accountability and Transparency section call for action by the City. All of these moving parts make up a complex accountability system in the City of Chicago.

Given the variable nature of the Accountability and Transparency Section requirements for each City entity, we provide a summary of each entity’s efforts separately.

The Chicago Police Department

In the fourteenth reporting period, the CPD continued to make progress toward compliance with Accountability and Transparency requirements.⁵⁷ The CPD revised and finalized its *Officer-Involved Shooting and Officer-Involved Death Incident* policy series (G03-06, G03-06-01, and G03-06-02), which serves as a foundational element of the Consent Decree. The IMT and the OAG provided no-objection notices to the G03-06 policy series.

The CPD also provided various data sources to demonstrate compliance with various paragraphs’ requirements, including, for example, Administrative Summary

⁵⁶ The Deputy PSIG achieved Full compliance with all requirements pertaining to its office in the fourth reporting period (January 2021 – June 2021) and maintained that Full compliance during subsequent reporting periods. In the eighth reporting period (January 2023 – June 2023), the Deputy PSIG successfully completed its two-year sustainment period, marking two years that it had maintained Full compliance with all requirements pertaining to its office. Therefore, in the ninth reporting period (July 2023 – December 2023), the Parties moved to release the OIG and the Deputy PSIG from its Consent Decree requirements, which was granted by the Court.

⁵⁷ The City takes the position that §445 does not apply to the CPD. However, the IMT has consistently monitored both the CPD and COPA throughout the past reporting periods on the requirements of this paragraph. Because the paragraph says COPA will “initiate the intake process” does not exclude CPD from its requirements for leadership to know the process when a CPD officer is untruthful, including any findings made at suppression hearings. The IMT will continue to monitor the City’s compliance through the efforts of both the CPD and COPA.

Reports, body-worn-camera footage, complaint intake records, documentation of communications between BIA supervisors and BIA investigators/Accountability Sergeants, the command channel review process, in-service training records, and other documentation from a random sample of cases.

In prior reporting periods, the CPD reached Full compliance with several paragraphs. We note, however, that the CPD has not always continued to provide Full compliance submissions in each subsequent reporting period. The IMT expects to receive documentation demonstrating ongoing efforts related to maintaining Full compliance with each paragraph each reporting period. If the CPD fails to do so, the CPD will be at risk of losing Full compliance in the future reporting periods.

In the fourteenth reporting period, the CPD revised its S08-01, *Complaint and Disciplinary Investigators and Investigations*, policy to now require each district to designate two Accountability Sergeants with their **primary responsibility** being receiving, processing, and investigating complaints against CPD members (as required by ¶¶493–94). As noted in prior reports, we have expressed concerns about classifying Accountability Sergeants as a “primary” and a “backup,” and the “backup” Accountability Sergeant performing other assignments in the district such as serving as the desk sergeant or the field sergeant for the day and only having cases assigned during the absence of the primary Accountability Sergeant. We look forward to the CPD implementing this policy change to help reduce the very high caseloads and backlogs for Accountability Sergeants.

While the IMT continues to be concerned about the high volume of BIA investigators’ and Accountability Sergeants’ caseloads and backlog, we are encouraged by the CPD’s commitment to address this problem. We are also encouraged by BIA’s use of informal sessions with Accountability Sergeants and discussions regarding assignment strategies to reduce case inventories and promote job enhancement and enrichment. In future reporting periods, we look forward to the CPD and BIA continuing to address their current backlog of cases.

Also, during the fourteenth reporting period, the IMT reviewed BIA’s 2026 *Staffing and Equipment Needs Assessment and Implementation Plan*. The plan acknowledges that BIA and the districts have investigative personnel shortages, which is a concern for the IMT, but it also includes the CPD’s plan to remedy the staffing shortages. The CPD informed the IMT and the OAG that it would be hiring additional investigative staff in August 2026 and would be posting for two additional BIA positions in the fourth quarter of 2026. The IMT notes that staffing shortages can adversely affect investigative case backlogs and cause delays in case conclusions and investigation timeliness. The IMT will look for the City and the CPD to address these staffing shortages in future reporting periods.

Civilian Office of Police Accountability

In the fourteenth reporting period, COPA continued to make efforts toward compliance with Accountability and Transparency requirements. COPA produced evidence of continued compliance with numerous paragraphs to maintain Full compliance. Such evidence includes, for example, documentation of videos released by COPA, investigation documents (*i.e.*, interview and right notices, notes, transcripts, Final Summary Reports), case management system (CMS) screenshots, memoranda, meeting agendas, intake documents for anonymous complaints, affidavit override requests, and other documentation from a random sample of cases.

In the twelfth reporting period, the IMT and the OAG agreed to allow COPA to stagger Full compliance productions to reduce COPA's burden of submitting Full compliance productions with each monitorable paragraph each reporting period, beginning in the twelfth reporting period. This staggered production schedule applies to paragraphs only where COPA had already achieved Full compliance before the twelfth reporting period. For those paragraphs, COPA will provide Full compliance productions in alternating reporting periods, such that COPA will provide one production per monitorable paragraph per year (as opposed to per each reporting period).

We acknowledge COPA's continued progress and encourage COPA to continue these efforts in future reporting periods to maintain and achieve additional levels of compliance. The IMT appreciates the opportunity for continued conversations to discuss what documentation is necessary for Full and effective compliance. We also look forward to continuing positive discussions about compliance in future reporting periods.

The Chicago Police Board

In the fourteenth reporting period, the Police Board produced evidence of continued compliance with numerous paragraphs to maintain Full compliance. Such evidence includes, for example, links to the Police Board website where the public can view the monthly Police Board meetings and recordings, minutes from quarterly meetings with partner agencies, and PSIG requests for information and documents.

Throughout the fourteenth reporting period, the IMT met with the Police Board on a regular basis. During these meetings, the Police Board provided various updates on its compliance efforts and also provided updates regarding pending litigation between a police union and the City regarding arbitration of serious police

discipline cases.⁵⁸ That litigation is currently pending appeal, and under the court's decision, the Police Board only heard cases in which the officer consented to the Police Board's procedures in the fourteenth reporting period.

Beyond taking the steps necessary to achieve compliance levels, the Police Board has continued to demonstrate a dedication to the spirit of the Consent Decree, taking reform, accountability, and transparency seriously. We commend the Police Board for its continued efforts and progress to date.

The Community Commission for Public Safety and Accountability (CCPSA)

In 2021, the City of Chicago created the Community Commission for Public Safety and Accountability (CCPSA), a new entity for police oversight, accountability, and public safety. The CCPSA is now responsible for selecting a COPA Chief Administrator and Police Board members when vacancies occur (see ¶¶525 and 532).⁵⁹ Since the eleventh reporting period (July 2024 – December 2024), there have been no vacancies on the Police Board.

In the twelfth reporting period (January 2025 – June 2025), the CCPSA began its search for a new COPA Chief Administrator. As part of this process, the CCPSA continued its engagement activities, which included holding listening sessions, administering a survey, and releasing educational materials about the role of COPA and the search process. The CCPSA continued its efforts in the thirteenth reporting period and selected a new COPA Chief Administrator in the fourteenth reporting period.

Other City Entities

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

During the eleventh reporting period (July 2024 – December 2024), the City and COPA created a new Director of Mediation position, housed within COPA, to oversee the City's Community-Police Mediation Program pilot, which offers a meaningful opportunity to build trust and facilitate honest discussions between community members and CPD officers. Since the eleventh reporting period, COPA produced

⁵⁸ See *Chicago John Dineen Lodge #7 v. City of Chicago, et al.*, Case No. 2024-CH-00093 (Circuit Court of Cook County, Illinois County Department, Chancery Division). As of the time of this report, the IMT understands this litigation is still pending appeal.

⁵⁹ As noted in our *Comprehensive Assessment Part II*, the IMT recommends incorporating the CCPSA into the Consent Decree to reflect current City entity responsibilities.

evidence of its community engagement efforts with the public and CPD members, its *Community-Police Mediation* policy, and its mediation training materials.

During the fourteenth reporting period, COPA produced further evidence of its community engagement as well as documentation regarding its Community Mediator Selection Advisory group and mediator training materials. The IMT appreciates COPA's significant efforts to develop the Community Mediation Program pilot. However, to achieve Full compliance, the IMT will need to review documentation demonstrating that the Community Mediation Program is no longer in a pilot phase and is operating as outlined in its policy.

Finally, the City continued its efforts to comply with the Police and Community Relations Improvement Act, 50 ILCS 727/1-1 *et seq.* (PCRIA), which sets forth the requirements regarding the criminal investigation of officer-involved death incidents. Specifically, PCRIA requires, among other things, that "[n]o investigator involved in the investigation may be employed by the law enforcement agency that employs the officer involved in the officer-involved death" 50 ILCS 727/1-10(b).

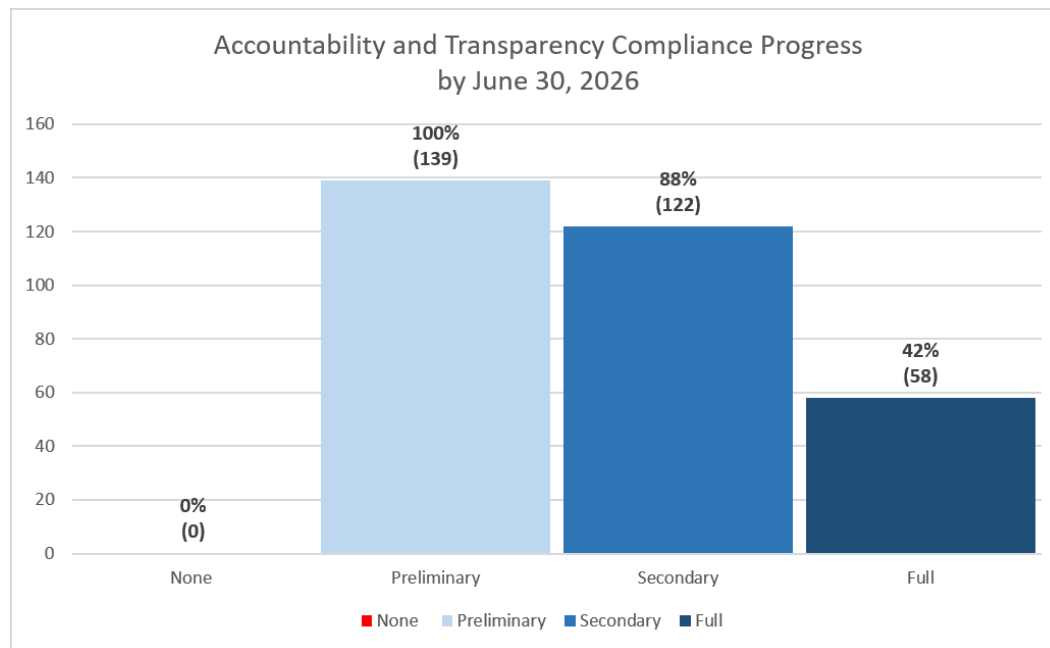
During the twelfth and thirteenth reporting periods, the City provided documentation detailing the City's and the CPD's outreach efforts to various law enforcement agencies to date. The City has explored—and is continuing to explore—three potential solutions for complying with PCRIA: (1) having the Illinois State Police (ISP) conduct all investigations of CPD officer-involved deaths; (2) creating a regional task force to conduct all investigations of CPD officer-involved deaths; or (3) seeking an exemption for COPA, the CPD, and the City from PCRIA. During the fourteenth reporting period, the City and the CPD continued their efforts to reach a solution in order to comply with PCRIA. We look forward to additional updates next reporting period.

Accountability and Transparency Progress through Fourteen Reporting Periods

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 maintained Preliminary compliance with 10 paragraphs (§§445, 463, 481–82, 492–93, 495, 501, 531, and 549) and met Preliminary compliance with 7 paragraphs (§§488–91, 494, 512, and 545). The City also maintained Secondary compliance with 60 paragraphs (§§427–28, 432, 434, 440, 443–44, 446, 448–49, 454–57, 459–61, 464–66, 468–69, 471–72, 474–75, 478–80, 483–84, 486–87, 496–97, 500, 503–09, 513–19, 532, 540–42, 544, 546–47, 552, 560, and 564), eight of which are under assessment for Full compliance (§§432, 446, 475, 483, 517–18, and 546–47), and met Secondary compliance with four paragraphs

(¶¶451, 521–22, and 529). The City also maintained Full compliance with 45 paragraphs (¶¶424–26, 429–31, 436–39, 441–42, 447, 450, 452, 462, 467, 470, 473, 485, 499, 502, 511, 526, 533–39, 543, 550–51, 553–59, 561–63, and 565) and met Full compliance with 13 paragraphs (¶¶433, 435, 453, 476–77, 498, 523–25, 527–28, 530, and 548).

As reflected in the bar graph below, compliance levels are cumulative, so all paragraphs in Secondary compliance are included in the totals for Preliminary compliance and all paragraphs in Full compliance are included in the totals for Preliminary compliance and Secondary compliance.



Looking Ahead to the Fifteenth Reporting Period

In the fifteenth reporting period, for the CPD, the IMT looks forward to reviewing updated information on the CPD's plans to reduce the investigative backlog of cases for BIA and Accountability Sergeants and Full compliance submissions demonstrating continued compliance with each paragraph in which the CPD has reached Full compliance.

For COPA, the IMT looks forward to receiving updates on COPA's plan for productions in the fifteenth reporting period and updates on the Community-Police Mediation Program pilot. For the Police Board, the IMT looks forward to receiving updates on the Police Board's implementation of annual training for Police Board members and hearing officers. For the CCPSA, the IMT looks forward to evidence on whether the CCPSA continues to follow the set method for filling Police Board member vacancies, when necessary.

Specific compliance assessments, by paragraph, for the Accountability and Transparency section are available here: <https://cpdmonitoringteam.com/wp-content/uploads/2026/10/App.-09-IMR14-Accountability-and-Transparency.pdf>. This includes paragraphs where the City gained or lost compliance in the fourteenth reporting period, as well as paragraphs with significant developments toward or away from compliance.⁶⁰

⁶⁰ A fuller description of the history of compliance efforts, methodologies, compliance determinations for each original monitorable paragraphs in the Accountability and Transparency section is available in *Comprehensive Assessment Part I* (which included *Independent Monitoring Report 8*): <https://cpdmonitoringteam.com/imr-8-1/>. For reference, all IMT reports and appendices are available here: <https://cpdmonitoringteam.com/reports-information/>.

X. Data Collection, Analysis & Management

During the fourteenth reporting period, the City and the CPD took some significant steps forward on three important requirements of the Data Collection, Analysis, and Management section: the CPD's Early Intervention System (EIS), its Force Review Board (FRB), and its Tactical Review and Evaluation Division (TRED). In other areas, such as the Information Systems Development Group (ISDG), we observed less progress.

First, the IMT acknowledges the progress and appreciates documentation of the ongoing development activities performed by Benchmark Analytics. Benchmark Analytics is the vendor selected by the City to create new or enhance existing data systems for a variety of crucial CPD functions and Consent Decree requirements, including for example, the EIS (§§583–605).

During this reporting period, the CPD provided E06-XX, *Early Intervention and Support System* (EISS) for review. This Employee Resource is a revised version of what was previously a Department Notice titled D20-04, *Early Intervention and Support System – Pilot Program*, which went through several rounds of review. The IMT appreciates the updates to this policy and offered feedback; we look forward to reviewing a revised E06-XX soon. We also look forward to the continued development of the *Early Intervention and Support System*, the pilot-testing phase, the “phased rollout” and “phased implementation” required by §603, and the CPD's messaging, “marketing,” and training to support the implementation of the EISS.

Importantly, during this reporting period we saw some improvements to Force Review Board operations (§§577–80). The FRB meetings the IMT observed (both in person and online) included some facilitated discussion designed to solicit the viewpoints of the board members required to attend (§579). With multiple voices weighing in, the meeting discussions were more robust and focused on officer decisions leading up to and during an event to understand how these decisions contributed to the outcome and whether, from an operational perspective, there are opportunities to improve. We were encouraged by the breadth and depth of the conversations and hope they continue to improve. To achieve and maintain Full compliance with FRB paragraphs, we will look for evidence that the FRB is consistently engaging in a critical review of the incidents that come before it and, importantly, drawing upon decision-point analysis that is designed to enhance the CPD's overall operations and support officer and community safety.

We also observed progress in the Tactical Review and Evaluation Division (TRED). TRED has taken steps to increase staffing and to reduce its backlog of Incident Debriefing Reports (IDRs) to review. On January 1, 2026, TRED implemented a backlog-reduction plan that reorganized staff into Area-based review groups and established a dedicated backlog team. TRED has demonstrated continued progress

in reducing the backlog. To continue this important progress, the CPD must ensure that TRED has sufficient resources and staffing (§575).

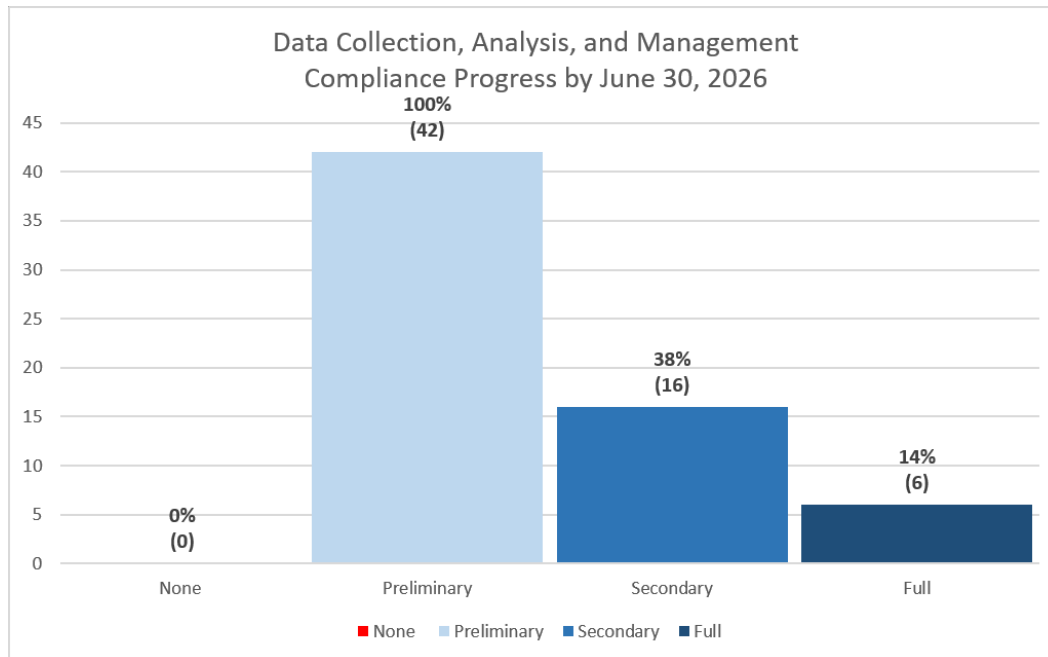
Similarly, the City and the CPD's *Data Systems Plan* (§607) continues to evolve. We appreciate the revisions and the inclusion of additional important details to direct the planning and implementation of the "needs identified to enhance CPD's information collection mechanisms and data management technology" identified in the needs assessment required by §606.

We did not see much progress in the ISDG's engagement and execution of its responsibilities during this reporting period (§608). We encourage the City and the CPD to consider restructuring these meetings to allow for the ISDG to engage in robust and meaningful conversation including "recommending strategies to promote the development, sharing, and reporting of relevant information to the Superintendent, the public, the FRB, COPA, BIA, and OIG," among their other responsibilities.

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

Overall, the IMT assessed the City's compliance with 42 Data Collection, Analysis, and Management paragraphs. At the end of the fourteenth reporting period, the City achieved Preliminary compliance with one paragraph (§575), maintained Preliminary compliance with 25 paragraphs (§§572, 574, and 583–605), maintained Secondary compliance with ten paragraphs (§§569–70, 573, 576, 578, 580–82, and 607–08), and maintained Full compliance with six paragraphs (§§568, 571, 577, 579, 606, and 609).

As reflected in the bar graph below, compliance levels are cumulative, so all paragraphs in Secondary compliance are included in the totals for Preliminary compliance and all paragraphs in Full compliance are included in the totals for Preliminary compliance and Secondary compliance.



Looking Ahead to the Fifteenth Reporting Period

Moving forward, the CPD should continue to work collaboratively to address the Data Collection, Analysis, and Management section of the Consent Decree. We look forward to the below in the next reporting period:

- ❖ the CPD continuing to make progress as it develops its EIS system, pilot-testing, and accompanying training (see ¶¶583–605);
- ❖ the Information Systems Development Group (ISDG) leading the implementation of the Data Systems Plan per ¶608;
- ❖ the CPD TRED continuing to make progress in reducing its backlog of IDRs to review (see ¶1575); and
- ❖ the CPD's FRB continuing to improve its proceedings to comply with the Consent Decree and CPD policies.

We will continue to monitor the City and the CPD's progress in meeting the requirements of the Consent Decree in the next reporting period.

Specific compliance assessments, by paragraph, for the Data Collection, Analysis & Management section are available here: <https://cpdmonitoringteam.com/wp-content/uploads/2026/10/App-10-IMR14-Data-Collection-Analysis-and-Mgmt.pdf>. This includes paragraphs where the City gained or lost compliance in

the fourteenth reporting period, as well as paragraphs with significant developments toward or away from compliance.⁶¹

⁶¹ A fuller description of the history of compliance efforts, methodologies, compliance determinations for each original monitorable paragraphs in the Data Collection, Analysis, and Management section is available in *Comprehensive Assessment Part I* (which included *Independent Monitoring Report 8*): <https://cpdmonitoringteam.com/imr-8-1/>. For reference, all IMT reports and appendices are available here: <https://cpdmonitoringteam.com/reports-information/>.

XI. Investigatory Stops, Protective Pat Downs, and Enforcement of Loitering Ordinances

The Investigatory Stops, Protective Pat Downs, and Enforcement of Loitering Ordinances paragraphs were added to the Consent Decree by stipulation during the eighth reporting period, on June 27, 2023. The IMT began to monitor the Investigatory Stops, Protective Pat Downs, and Enforcement of Loitering Ordinances paragraphs (namely, ¶¶854, 866, and 868) during the ninth reporting period. The IMT began to monitor 33 additional paragraphs (¶¶803–21, 834–35, 838, 841, 852–53, 856–59, 862–64, and 873) during the tenth reporting period and an additional 16 paragraphs (¶¶827–33, 836–37, 839–40, 860–61, 869–70, and 872) during the eleventh reporting period. The IMT began to monitor five additional paragraphs (¶¶822–26) during the thirteenth reporting period. The IMT originally planned to begin monitoring the remaining eight monitorable paragraphs (¶¶844–51) during the fourteenth reporting period. However, after discussion with the Parties and delays receiving the data (which have now been produced), the IMT adjusted the Monitoring Plan and hopes to have more to report soon.⁶²

In the fourteenth reporting period, the City and the CPD achieved new levels of compliance for multiple paragraphs in the Investigatory Stops, Protective Pat Downs, and Enforcement of Loitering Ordinances section. On February 3, 2026, the City and the CPD implemented the revised G03-08 (*Police Encounters and the Fourth Amendment*) Policy suite and the S10-02 (*Gang and Narcotics Loitering*) Policy suite governing investigatory stops, protective pat-downs, and enforcement of loitering ordinances. Additionally, the City and the CPD fully implemented the Temporary Detention Application (*i.e.*, *Stop Application*). The *Stop Application* is intended to streamline the CPD's reporting by providing one application for multiple types of police encounters. The City and the CPD not only implemented *Temporary Detention Application (Stop Application)* eLearning on the new Stops Application, but they also demonstrated that at least 95% of relevant personnel received this training.

Due to the implementation of the *Stops Application* in February 2026 and subsequent implementation of the *Incident Debriefing Report (IDR)* in June 2026 for supervisors to complete, the CPD halted Investigatory Stop Report (ISR) reviews by the Fourth Amendment Stop Review Unit (4ASRU) from February to June 2026, resulting in a new backlog of reviews for the 4ASRU to clear. Upon relaunch of ISR

⁶² The IMT now intends to begin monitoring these paragraphs during the sixteenth reporting period. The IMT assessed compliance for 57 Stipulation paragraphs during the fourteenth reporting period. Paragraphs not mentioned here are not monitorable at this time.

reviews in June 2026, the CPD planned ahead for staffing and review prioritization to work through this backlog in 2026 and ensure ISR reviews remain current through the rest of the year. To advance in compliance, the City and the CPD must demonstrate that the 4ASRU consistently and continuously conducts its reviews of completed ISRs without creating additional backlogs for the unit.

The 4ASRU unit increased staffing levels this reporting period, and we are encouraged by the additions of newly trained reviewers and supervisors to support the anticipated completion of the 4ASRU backlog in 2026. At the end of the last reporting period, the 4ASRU was comprised of two sergeants and eight sworn positions supporting Department-level ISR reviews, instructor and subject matter expert responsibilities, subpoena and administrative functions, and data management activities necessary to fulfill the Unit's review and reporting responsibilities. In the fall of 2025, the City and the CPD completed the Notice of Job Opportunity (NOJO) process to support anticipated operational responsibilities associated with the Department's updated Fourth Amendment reporting and review environment. The Unit also identified the need for additional workspace to accommodate anticipated personnel growth and future operational requirements. These planning efforts were intended to ensure that 4ASRU maintained sufficient personnel, technology, and operational resources to perform its Department-level review responsibilities effectively. In February 2026, the City and the CPD hired five 4ASRU reviewers and added a third Sergeant to support the Unit. The 4ASRU began providing on-the-job training to new members, who subsequently were important contributors to the Stops Application rollout and CPD supervisor training for ISR reviews. The 4ASRU continues to develop a formalized onboarding training protocol to use for future members in accordance with all relevant CPD ISR policies and training.

Additionally, this reporting period, the City and the CPD provided the *2025 Tactical Review and Evaluation Division (TRED) Mid-Year Report* for review. The TRED Report includes many requirements outlined in the Investigatory Stops, Protective Pat Downs, and Enforcement of Loitering Ordinances section of the Consent Decree; however, the City and the CPD did not address all requirements. For example, ¶860(b) requires that the City and the CPD identify any trends or patterns relating to protective pat downs. Paragraph 858 requires the City and the CPD to demonstrate that the subset of protective pat downs reviewed is demographically and geographically representative of community members stopped by CPD officers throughout Chicago. The City and the CPD did not include those specific requirements in their *2025 TRED Mid-Year Report*. During the IMT's site visit this reporting period, the City, the CPD, the OAG, and the IMT discussed these missing requirements. The IMT appreciates the City and the CPD's open discussion regarding these requirements. The IMT looks forward to receiving future reports with required elements included for the City and the CPD to achieve further compliance levels.

Investigatory Stops, Protective Pat Downs, and Enforcement of Loitering Ordinances Progress through Fourteen Reporting Periods

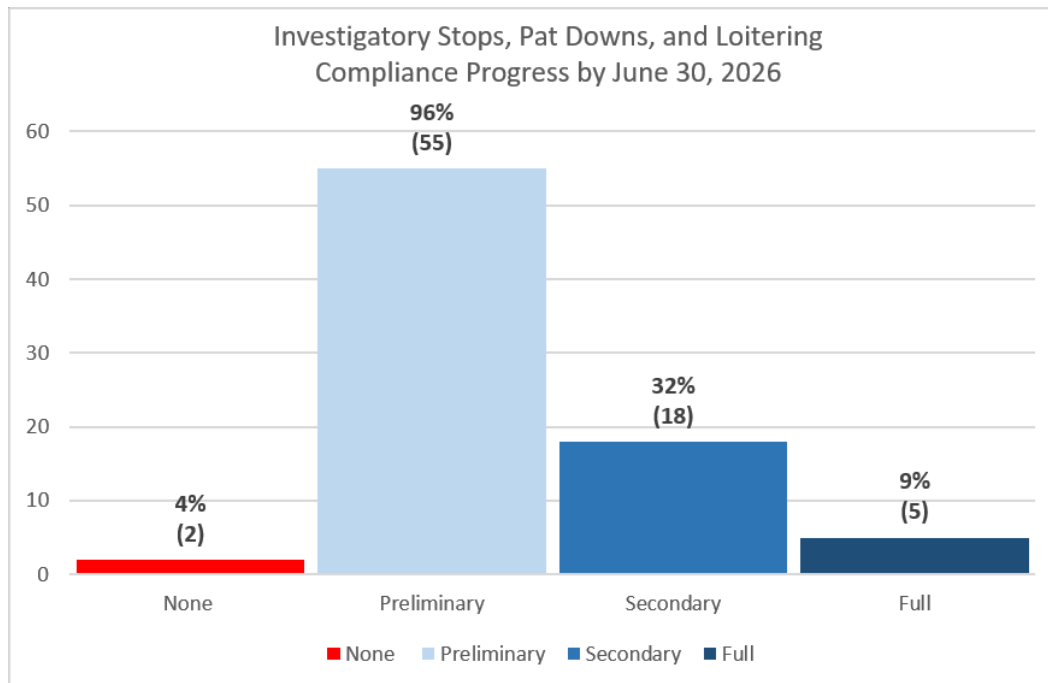
During this reporting period, the IMT assessed the City's and the CPD's compliance with 57 paragraphs relating to Investigatory Stops, Protective Pat Downs, and Enforcement of Loitering Ordinances section.⁶³ The City and the CPD achieved Preliminary compliance with 10 paragraphs this reporting period (¶¶822–26, 837, 840, 869–70, and 872) and maintained Preliminary compliance with 31 paragraphs (¶¶805–15, 817–20, 828–33, 841, 853, 857, 859–60, 862–64, 866, and 873). The City and the CPD achieved Secondary compliance with eight paragraphs (¶¶803–04, 816, 821, 837, 840, and 869–70) and maintained Secondary compliance with five paragraphs (¶¶827, 838–39, 852, and 858).⁶⁴ The City and the CPD did not achieve Full compliance with any paragraphs. The City and the CPD maintained Full compliance with five paragraphs (¶¶834–35, 854, 856, and 868). There are two paragraphs that are not in compliance (¶¶836 and 861).⁶⁵

As reflected in the bar graph below, compliance levels are cumulative, so all paragraphs in Secondary compliance are included in the totals for Preliminary compliance and all paragraphs in Full compliance are included in the totals for Preliminary compliance and Secondary compliance.

⁶³ Paragraphs 800–02, 842, 843, 855, 865, 871, 874, and 875–77 do not contain substantive requirements for the City. Additionally, the IMT continues to conduct the study contemplated by ¶¶842–43 and looks forward to continuing to work with the City and the CPD to ensure we have continued access to the necessary data.

⁶⁴ The City and the CPD achieved Preliminary and Secondary compliance for ¶837 this reporting period.

⁶⁵ The IMT's original Monitoring Plan for these new paragraphs anticipated that the IMT would begin to monitor ¶¶822–26 during the eleventh reporting period. *See Independent Monitoring Report 9* (May 23, 2024) at 83. Each of these paragraphs requires the CPD to design and implement training for officers relating to investigatory stops, protective pat-downs, and enforcement of the Loitering Ordinances. The City and the CPD made progress in the eleventh and twelfth reporting periods toward implementing revised policies in these areas. However, to give them sufficient time to develop training on the yet-to-be-implemented policies, the IMT amended the Monitoring Plan to begin monitoring ¶¶822–26 in the thirteenth reporting period (July – December 2025). Additionally, to allow for the completion of the IMT's assessment of data regarding investigatory stops and Loitering Ordinance dispersals completed by CPD officers through and including the period ending December 31, 2024 (*see* ¶843), the IMT amended the Monitoring Plan to begin monitoring ¶¶844–51 in the fourteenth reporting period (January – June 2026). As referenced above, the IMT amends the Monitoring Plan to begin monitoring ¶¶844–51 in the sixteenth reporting period, which ends on June 30, 2027.



ISR Stipulation Figure 1 below sets out the Amended Monitoring Plan for investigatory stops, protective pat-downs, and enforcement of Loitering Ordinances.

**ISR Stipulation Figure 1:
Investigatory Stops, Protective Pat Downs, and
Enforcement of Loitering Ordinances Amended Monitoring Plan**

Monitoring Period	Paragraphs
Ninth Reporting Period (July 1, 2023–December 31, 2023)	¶¶854, 866, 868 (Total = 3)
Tenth Reporting Period (January 1, 2024–June 30, 2024)	¶¶803–21, 834–35, 838, 841, 852–53, 856–59, 862–64, 873 +33 paragraphs (Total = 36)
Eleventh Reporting Period (July 1, 2024–December 31, 2024)	¶¶827–33, 836–37, 839–40, 860–61, 869–70, 872 +16 paragraphs (Total = 52)
Thirteenth Reporting Period (July 1, 2025–December 31, 2025)	¶¶822–26 +5 paragraphs (Total = 57)
Sixteenth Reporting Period (January 1, 2027–June 30, 2027)	¶¶844–51 +8 paragraphs (Total = 65)

Looking Ahead to the Fifteenth Reporting Period

In the next reporting period, we expect the CPD will continue to achieve new levels of compliance with requirements in this section. We anticipate that the CPD will achieve new compliance levels with several investigatory stop paragraphs if they submit a revised *Pre-Service (Supervisor) Navigating ISRs* module with updated information about the new ISR policy suites and tailor this content to the ISR-related

responsibilities for each supervisory rank and Field Training Officers. The CPD and the City must follow the required review process and receive no-objection notices from the IMT and the OAG for each of its Pre-Service training materials. Additionally, the CPD and the City must demonstrate that at least 95% of the relevant personnel received each of the relevant Pre-Service trainings.

With the 4ASRU halting their reviews of ISRs during the fourteenth reporting period, we expect that the CPD will develop a plan to eliminate the current backlog and return to reviewing current ISRs completed by CPD personnel. To support further compliance advancement in multiple paragraphs, the CPD and the City must demonstrate that they eliminated the current backlog of ISR reviews conducted by the 4ASRU.

Finally, with the implementation of the *Stops Application*, the CPD and the City will collect data in a more efficient manner and have the ability to use that data to identify ways to inform policy, training, and overall departmental operations for investigative stops, protective pat downs, and the enforcement of loitering ordinances.

ISR Stipulation Figure 2 below specifies the paragraphs that the IMT anticipates may achieve additional levels of compliance next reporting period (the fifteenth reporting period) and the requirements for their advancement.

ISR Stipulation Figure 2: Expectations for the Fifteenth Reporting Period

Relevant ¶s	Expectations for the Fifteenth Reporting Period
¶¶805–15, 817–20, 822–26, 828–33, 839, 852, 857, 859, and 873	The CPD must complete the steps below for each of these paragraphs: 1. The CPD must revise or develop training on ISRs which reflect newly implemented ISR policies for CPD supervisors, and the training curricula should be tailored to the rank and responsibilities of each supervisory position, including FTOs. Likewise, CPD must implement a standard onboarding training for members of the 4ASRU. 2. The CPD must demonstrate its community engagement conducted during the training development phase, including the associated revisions to the trainings based on community feedback, which may include community feedback received through the CPD's Training Community Advisory Committee (TCAC). 3. The CPD must finalize and deliver the trainings to 95% of the required personnel and provide evidence to the IMT and OAG demonstrating that 95% of the required personnel attended the courses.
¶¶833, 841, 853, and 857	The CPD and the City must demonstrate to the IMT and OAG that they eliminated the current backlog of ISR reviews conducted by the 4ASRU.
¶¶839, 858, and 860	To achieve Secondary compliance, the 4ASRU needs to perform a more fulsome data analysis according to each of the metrics set out in ¶860. This must also demonstrate that protective pat-downs are distinctly collected, maintained, and reported.
¶¶862–64	• To achieve Secondary compliance with ¶862, the City and the CPD must provide the IMT with their plans to establish mechanisms to facilitate community engagement on investigatory stop policies and forms consistent with ¶862. • To achieve Secondary compliance with ¶863, the City and the CPD must ensure that the data derived from the community engagement process is used effectively in the review of its training, not just its policy, including TCAC review. Moreover, the CPD must provide documentation of feedback received from the public that was utilized to revise or enhance the policies. • To achieve Secondary compliance with ¶864, the City and the CPD must provide the IMT with their plans to conduct the regular community engagement required by ¶864.
¶839	To achieve Full compliance with the requirements of ¶839, the CPD must demonstrate a feedback loop from supervisors to CPD officers regarding investigatory stop, protective pat down, and loitering enforcement practices.

Specific compliance assessments, by paragraph, for the Investigatory Stops, Protective Pat Downs, and Enforcement of Loitering Ordinances section are available here: <https://cpdmonitoringteam.com/wp-content/uploads/2026/10/App.-11-IMR14-ISR-Stipulation.pdf>. This includes paragraphs where the City gained or lost compliance in the fourteenth reporting period, as well as paragraphs with significant developments toward or away from compliance.⁶⁶

⁶⁶ A fuller description of the history of compliance efforts, methodologies, compliance determinations for each original monitorable paragraph in the Investigatory Stops, Protective Pat Downs, and Enforcement of Loitering Ordinances section is available in *Comprehensive Assessment Part I* (which included *Independent Monitoring Report 8*): <https://cpdmonitoringteam.com/imr-8-1/>. For reference, all IMT reports and appendices are available here: <https://cpdmonitoringteam.com/reports-information/>.

Conclusion, Looking Ahead to *Independent Monitoring Report 15*

We have concluded our monitoring efforts for the fourteenth reporting period (January 1, 2026, through June 30, 2026). We appreciate the reform efforts made by many hard-working City personnel, including the compliance progress made by the City, the CPD, COPA, the Chicago Police Board, the CCPSA, and the OEMC.

The IMT's next semiannual report, *Independent Monitoring Report 15*, will cover the reporting period from July 1, 2026, through December 31, 2026. As with previous reports, we will continue to work with the City and the OAG to implement all the Consent Decree's requirements.⁶⁷ We will also continue to engage with Chicagoans to determine whether these reforms are being felt in their communities.

⁶⁷ Our previous Monitoring Plans are available on our website. See *Reports*, INDEPENDENT MONITORING TEAM, <https://cpdmonitoringteam.com/reports-information/>.

Conclusion Figure 1. Reporting Periods for Years One through Eight

Year One	
1st Reporting Period	March 1, 2019 – August 31, 2019 (See Independent Monitoring Report 1)
2nd Reporting Period	September 1, 2019 – February 29, 2020 (See Independent Monitoring Report 2)
Year Two	
3rd Reporting Period	March 1, 2020 – December 31, 2020 ⁶⁸ (See Independent Monitoring Report 3)
4th Reporting Period	January 1, 2021 – June 30, 2021 (See Independent Monitoring Report 4)
Year Three	
5th Reporting Period	July 1, 2021 – December 31, 2021 (See Independent Monitoring Report 5)
6th Reporting Period	January 1, 2022 – June 30, 2022 (See Independent Monitoring Report 6)
Year Four	
7th Reporting Period	July 1, 2022 – December 31, 2022 (See Independent Monitoring Report 7)
8th Reporting Period	January 1, 2023 – June 30, 2023 (See Independent Monitoring Report 8)
Year Five	
9th Reporting Period	July 1, 2023 – December 31, 2023 (Independent Monitoring Report 9)
10th Reporting Period	January 1, 2024 – June 30, 2024 (Independent Monitoring Report 10)
Year Six	
11th Reporting Period	July 1, 2024 – December 31, 2024 (Independent Monitoring Report 11)
12th Reporting Period	January 1, 2025 – June 30, 2025 (Independent Monitoring Report 12)
Year Seven	
13th Reporting Period	July 1, 2025 – December 31, 2025 (Independent Monitoring Report 13)
14th Reporting Period	January 1, 2026 – June 30, 2026 (Independent Monitoring Report 14)
Year Eight	
15th Reporting Period	July 1, 2026 – December 31, 2026 (Independent Monitoring Report 15 , Spring 2027)
16th Reporting Period	January 1, 2027 – June 30, 2027 (Independent Monitoring Report 16 , Fall 2027)

⁶⁸ In response to COVID-19, the Parties extended the third reporting period to December 31, 2020. See *Order Regarding the Extension of Consent Decree Obligation Deadlines* (March 27, 2020), https://cpdmonitoringteam.com/wp-content/uploads/2024/04/2020_03_27-Order-Regarding-the-Extension-of-Consent-Decree-Obligation-De.pdf.

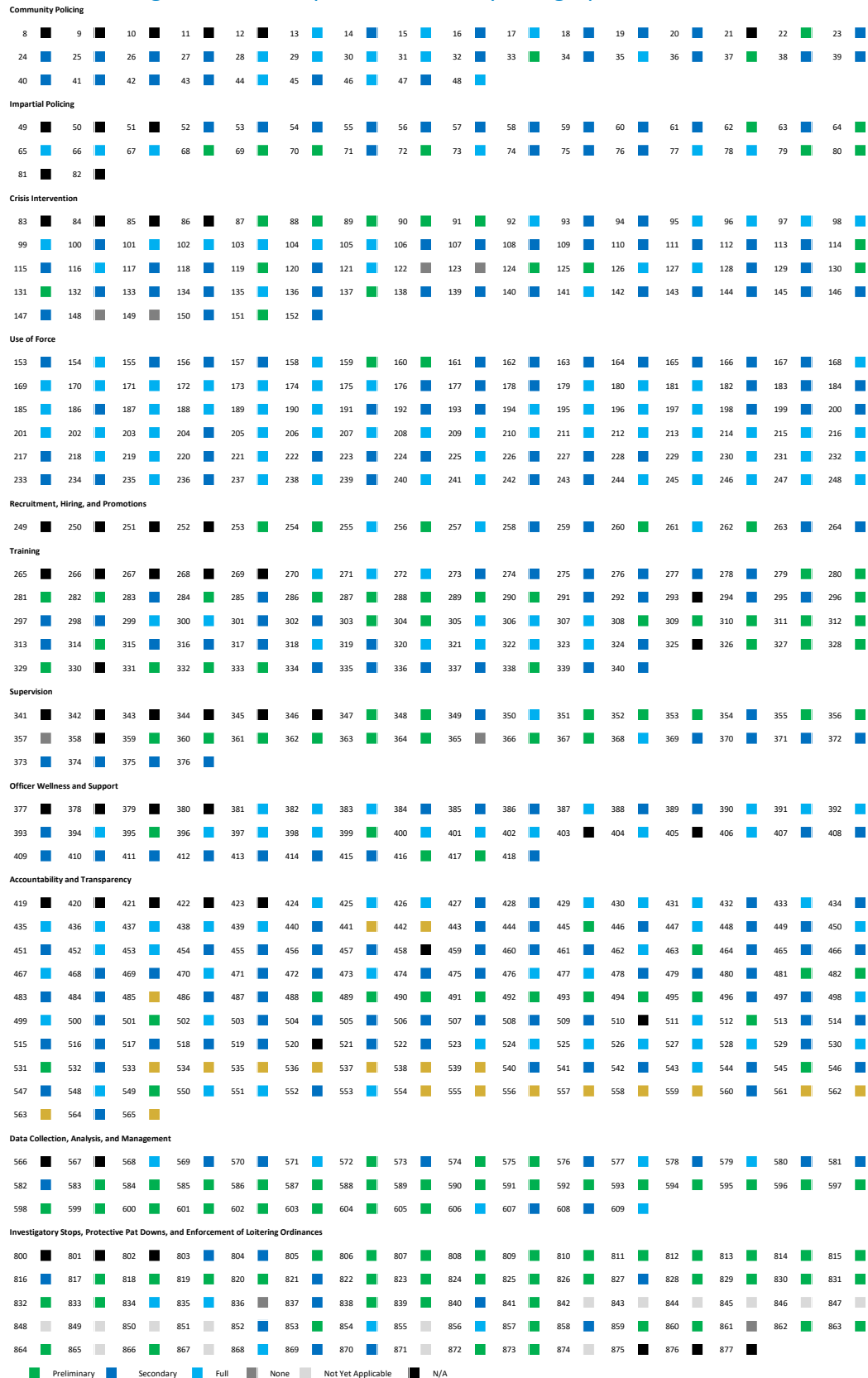
Conclusion Figure 2 on the following page reflects all monitorable paragraphs – including the new Investigatory Stops section – in the Consent Decree, which the IMT will continue to monitor in Year Seven.

Finally, Conclusion Figure 3 reflects the current compliance status of all monitorable paragraphs to date. This table is also available online at <https://cpdmonitoringteam.com/fourteenth-semi-annual-independent-monitoring-report/>.

Conclusion Figure 2. Monitoring Plan for Year Eight
(July 1, 2026 – June 30, 2027)

Topic Area	Year Eight Monitoring
Community Policing	13, 14, 15, 16, 17, 18, 19, 20, 22, 23, 24, 25, 26, 27, 28, 29, 30, 31, 32, 33, 34, 35, 36, 37, 38, 39, 40, 41, 42, 43, 44, 45, 46, 47, 48 (Total = 35)
Impartial Policing	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 (Total = 29)
Crisis Intervention	87, 88, 89, 90, 91, 92, 93, 94, 95, 96, 97, 98, 99, 100, 101, 102, 103, 104, 105, 106, 107, 108, 109, 110, 111, 112, 113, 114, 115, 116, 117, 118, 119, 120, 121, 122, 123, 124, 125, 126, 127, 128, 129, 130, 131, 132, 133, 134, 135, 136, 137, 138, 139, 140, 141, 142, 143, 144, 145, 146, 147, 148, 149, 150, 151, 152 (Total = 66)
Use of Force	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 (Total = 96)
Recruitment, Hiring, and Promotion	253, 254, 255, 256, 257, 258, 259, 260, 261, 262, 263, 264 (Total = 12)
Training	270, 271, 272, 273, 274, 275, 276, 277, 278, 279, 280, 281, 282, 283, 284, 285, 286, 287, 288, 289, 290, 291, 292, 294, 295, 296, 297, 298, 299, 300, 301, 302, 303, 304, 305, 306, 307, 308, 309, 310, 311, 312, 313, 314, 315, 316, 317, 318, 319, 320, 321, 322, 323, 324, 326, 327, 328, 329, 331, 332, 333, 334, 335, 336, 337, 338, 339, 340 (Total = 68)
Supervision	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 (Total = 29)
Officer Wellness and Support	381, 382, 383, 384, 385, 386, 387, 388, 389, 390, 391, 392, 393, 394, 395, 396, 397, 398, 399, 400, 401, 402, 404, 406, 407, 408, 409, 410, 411, 412, 413, 414, 415, 416, 417, 418 (Total = 36)
Accountability and Transparency	424, 425, 426, 427, 428, 429, 430, 431, 432, 433, 434, 435, 436, 437, 438, 439, 440, 441, 442, 443, 444, 445, 446, 447, 448, 449, 450, 451, 452, 453, 454, 455, 456, 457, 459, 460, 461, 462, 463, 464, 465, 466, 467, 468, 469, 470, 471, 472, 473, 474, 475, 476, 477, 478, 479, 480, 481, 482, 483, 484, 485, 486, 487, 488, 489, 490, 491, 492, 493, 494, 495, 496, 497, 498, 499, 500, 501, 502, 503, 504, 505, 506, 507, 508, 509, 511, 512, 513, 514, 515, 516, 517, 518, 519, 521, 522, 523, 524, 525, 526, 527, 528, 529, 530, 531, 532, 533, 534, 535, 536, 537, 538, 539, 540, 541, 542, 543, 544, 545, 546, 547, 548, 549, 550, 551, 552, 553, 554, 555, 556, 557, 558, 559, 560, 561, 562, 563, 564, 565 (Total = 139)
Data Collection, Analysis, and Management	568, 569, 570, 571, 572, 573, 574, 575, 576, 577, 578, 579, 580, 581, 582, 583, 584, 585, 586, 587, 588, 589, 590, 591, 592, 593, 594, 595, 596, 597, 598, 599, 600, 601, 602, 603, 604, 605, 606, 607, 608, 609 (Total = 42)
Investigatory Stops, Protective Pat Downs, and Enforcement of Loitering Ordinances	803, 804, 805, 806, 807, 808, 809, 810, 811, 812, 813, 814, 815, 816, 817, 818, 819, 820, 821, 822, 823, 824, 825, 826, 827, 828, 829, 830, 831, 832, 833, 834, 835, 836, 837, 838, 839, 840, 841, 844, 845, 846, 847, 848, 849, 850, 851, 852, 853, 854, 857, 858, 859, 860, 861, 862, 863, 864, 865, 866, 868, 869, 870, 872, 873 (Total = 65)
TOTAL	617

Conclusion Figure 3. All Compliance Levels, By Paragraph



Attachment A:
Office of the Illinois Attorney General
Comments
(October 7, 2026)



**OFFICE OF THE ATTORNEY GENERAL
STATE OF ILLINOIS**

KWAME RAOUL
ATTORNEY GENERAL

October 7, 2026

Margaret A. Hickey
Independent Monitor
ArentFox Schiff LLP
233 S. Wacker Drive, Suite 7100
Chicago, IL 60606
Maggie.Hickey@afslaw.com

**Re: OAG Comments on the Fourteenth 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 Fourteenth Monitoring Report (Report) before the Independent Monitoring Team (IMT) files it with the Court. The Report covers January 1, 2026 through June 30, 2026. The City of Chicago and the Chicago Police Department (CPD or Department) have reached full compliance with about 34% of the original Consent Decree requirements, which is an 8% increase from the last monitoring period.

The City and CPD's progress under former Superintendent Snelling towards full compliance with many reform requirements is commendable. It reflects the change that is possible when Department leadership prioritizes reform. As CPD transitions to new permanent leadership in the coming months, OAG encourages the Department to maintain forward momentum while also accelerating progress on critical reform efforts that are behind schedule, such as conducting fulsome and timely internal affairs investigations, continuing to expand the unity of command and span of control staffing model, and building out dynamic data systems.

City and CPD's Notable Accomplishments in IMR14

The Report describes progress in many areas during the first six months of 2026. As an example, the CPD released an independent, comprehensive study of staff and resource allocation,

required by Paragraph 356 of the Consent Decree.¹ This assessment analyzed years of data and considered input from Department and community members. Its recommendations reflect the most efficient use of, and need for, City and CPD resources.

The Department also published the long-awaited policy suite governing investigations of officer-involved deaths and shootings, required by Paragraphs 488-491. Although the City and CPD still must work to comply with the Police and Community Relations Improvement Act (50 ILCS 727), the policy suite provides clear rules and procedures regarding the Department's investigation of an officer's most serious use of force in a transparent manner.

Additionally, CPD published its policy suite governing stops of individuals under the Fourth Amendment, G03-08 *et al.*, and provided high-level training to Department members on the new Stop Report. CPD also continued to develop and implement high-quality training for its members. The trainings incorporate adult learning principles and community input and expertise and are responsive to a thorough analysis of officer and civilian Department member needs. Finally, CPD published annual reports and data regarding many aspects of CPD interactions with members of the public, including its uses of force, responses to hate crime incidents, and investigations into allegations of officer misconduct.

The City and CPD Must Accelerate Progress on Key Consent Decree Reforms

The City and CPD must continue to make progress and, in some cases, accelerate progress towards complex structural changes required by the Consent Decree. For example, the OAG encourages the City and CPD to prioritize the following work in the months to come:

- Across all Consent Decree sections, the City and CPD must identify and collect appropriate data to show operational and sustained compliance.
- The City must develop and implement its Crisis Intervention Plan, consistent with the requirements of Paragraphs 122 and 123.
- CPD must thoughtfully expand its unity of command and span of control staffing model to the remaining districts.
- CPD must successfully implement its Performance Evaluation System across the Department, as required by Paragraphs 369-376.

The above reforms require coordination of staffing and resources to effect complex structural and cultural changes to policing in Chicago. As the City and CPD achieve secondary compliance with many Consent Decree requirements, the focus will shift to whether the City and CPD can show with data that they are reforming the way police interact with Chicago residents every day. For that reason, the City and CPD must make the above reforms a priority.

The City and CPD Must Ensure Adequate Staffing for Critical Units

As the Report notes, and OAG has highlighted in past reporting periods, the City and CPD must ensure that critical units are adequately staffed. The Consent Decree requires the City and

¹ The results of this analysis are available at <https://www.chicagopolice.org/stories/cpd-wfa-cpa/>.

CPD to hire or transfer qualified Department members to the units chiefly responsible for putting the reforms of the Consent Decree into practice on the ground. Those units include CPD's Crisis Intervention Unit, Bureau of Internal Affairs investigators and district accountability sergeants, Tactical Review and Evaluation Division. The City and CPD must also ensure that there are a sufficient number of data analysts to identify, collect, and analyze the data required by the Consent Decree.

Conclusion

Overall, we encourage the City and CPD to accelerate their progress towards implementing the reform requirements so that Chicagoans see change on the ground. We remain committed to working with the City, the CPD, IMT, the Coalition, and community members and organizations who work towards constitutional policing in Chicago every day.

Respectfully,

s/ Mary J. Grieb

Mary J. Grieb

Deputy Chief, Civil Rights Bureau

Office of the Illinois Attorney General

115 S. LaSalle St.

Chicago, Illinois 60603

(773) 590-7959

Mary.Grieb@ilag.gov

cc: Danielle Clayton, Allan Slagel, Counsel for the City of Chicago (via email)

Attachment B:
City of Chicago
Comments
(October 6, 2026)



City of Chicago
Brandon Johnson, Mayor

Department of Law

Renee Camille Hatcher
Acting Corporation Counsel

121 North LaSalle Street
Suite 600
Chicago, Illinois 60602
(312) 744-0220
(312) 744-5185 fax

www.cityofchicago.org

October 6, 2026

Independent Monitoring Team
c/o Maggie Hickey, Independent Monitor
233 South Wacker Drive, Suite 7100
Chicago, IL 60606
Maggie.Hickey@afslaw.com

Office of the Attorney General of Illinois
c/o Christopher Wells, Chief of Public Interest Division
115 S. LaSalle St.
Chicago, IL 60603
Christopher.Wells@ilag.gov

VIA EMAIL

RE: Independent Monitoring Team's Second Draft of IMR-14 Report

Counsel –

The City writes to provide its preliminary response and comments to the IMT's extensive IMR-14 Draft Report. The City's comments fall into the following general categories:

1. ***Needs Clarification / Compliance Assessment:*** The City's position is that additional compliance is warranted based upon the evidentiary record. This includes materials produced to the IMT that reflect work done in the reporting period. This also includes paragraphs where the City and CPD produced materials to achieve new levels of compliance and the IMT's draft is silent on the paragraph and fails to address why the identified deliverable failed to achieve new compliance. The City, also through this designation, seeks some other clarifications on the comments provided by the IMT.
2. ***Methodology:*** The City disputes the methodology applied, or seeks additional detail regarding the methodology applied, or seeks additional detail for the methodology described for a future level of compliance, or the City has questions or concerns about a future methodology that the IMT has identified or described.
3. ***Factually Inaccurate:*** The City has identified factual corrections or clarifications in the report that the City believes are substantive and/or relevant to the compliance assessment.
4. ***Narrative Corrections or Inconsistencies:*** The City has identified factual corrections or clarifications in the assessment narrative that the City believes are substantive and/or relevant to the compliance assessment.

2 NORTH LASALLE STREET * SUITE 400
CHICAGO, ILLINOIS 60602
312.744.2784 • Danielle.Clayton@CityofChicago.org

The City's comments and responses below highlight certain Consent Decree sections and paragraphs as they relate to the involved City entities, including the Chicago Police Department (CPD), Office of Emergency Management Communications (OEMC), Civilian Officer of Police Accountability (COPA), and the City as a whole. The City's comments and responses address both the paragraphs that the IMT wrote about in the draft and the paragraphs they did not.

IMPARTIAL POLICING

CRISIS INTERVENTION

The City and OEMC disagree with the IMT's methodology for paragraph 140. OEMC SOP 23-004 states that dispatch will not hold CIT Calls (section V). Therefore, the IMT's comment withholding of Full Compliance because they are "awaiting analysis of data regarding length of time to dispatch CIT officers" is misguided. Calls are not held and the data produced demonstrates that calls, identified as CIT calls, are not held and are dispatched when received.

The City and OEMC seek clarification of methodology for Full Compliance for paragraph 149 of the Consent Decree. On page 34 of IMR-14 the IMT lists paragraph 149 as not having any level of compliance. However, the City and OEMC have and continue to produce evidence of compliance with paragraph 149. Paragraph 149 requires "OEMC supervisors, on an ongoing basis, will 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." At the IMR-14 site visits, the City and OEMC explained that the supervisors audit is the CIT Quality Assurance Audit (conducted by supervisors) detailed in SOP 23-003, titled the Mental Health Audit, originally produced June 2021 MONITOR00232750. In support of 149 the City and OEMC have also produced the CIT Quality Assurance Statistics (11/26/25 2025 produced MONITOR2862) and documentation of the Supervisors Audit (12/18/25; MONITOR2909) which includes feedback to call takers. The OEMC Quality Assurance (QA) Team is comprised of two dedicated Quality Assurance (QA) Supervisors. At the IMR-14 site visit OEMC demonstrated where the requirements of paragraph 149 were addressed in produced documents and explained that the QA Supervisors have daily meetings with telecommunicators to discuss CIT call processing, and any found discrepancies. Additionally, there are weekly and monthly reports generated to show the number of calls audited, the specific issues with said calls, and the plan of action to correct discrepancies, as demonstrated in productions. Accordingly, the City and OEMC believe paragraph 149 should be in Full Compliance.

USE OF FORCE

RECRUITING, HIRING, AND PROMOTIONS

TRAINING

SUPERVISION

The City and CPD seek clarification of methodology for Preliminary Compliance for paragraph 357. CPD believes Preliminary Compliance has been achieved via the Workforce Allocation Study. (MONITOR3006).

OFFICER WELLNESS AND SUPPORT

ACCOUNTABILITY AND TRANSPARENCY

The City continues to dispute the IMT's position that any entity other than COPA has obligations under paragraph 445. The paragraph directs COPA to open an investigation upon receiving evidence that an officer has been found to be untruthful. Because COPA, not CPD, has jurisdiction over Rule 14 violations, CPD has no obligations to obtain the information described in the paragraph. Accordingly, the City as a whole should be in Full Compliance with paragraph 445.

DATA COLLECTION, ANALYSIS, AND MANAGEMENT

The City and CPD seek clarification of methodology for Secondary Compliance for paragraph 574. CPD believes secondary compliance has been achieved. CPD produced the District Level In-Service Training (MONITOR3171), the Executive Level DLRP Training (MONITOR3128), and produced the TRED Mid and Year End Reports (MONITOR3029 & MONITOR3233) to demonstrate documentation, training, and review of reportable Use of Force. The City and CPD believe secondary should have been achieved in IMR-14.

The City and CPD seek clarification of methodology for Secondary Compliance for paragraph 575. CPD believes Secondary Compliance has been achieved, via the TRED On-Boarding Training. CPD is requesting clarification on the comment, "To achieve Secondary Compliance, the CPD must continue to deliver this training to TRED members and must demonstrate ongoing development, evaluation, and as applicable, improvement and implementation of its training materials." CPD has produced the TRED On-boarding materials (MONITOR3177) and achieved No Objection Letters from the IMT (21 NOV 25) and OAG (26 SEP 25). The City and CPD believe preliminary and secondary were should have been restored in IMR-14 increased staffing and reduction of TRED backlog.

INVESTIGATORY STOPS, PROTECTIVE PAT DOWNS, AND ENFORCEMENT OF LOITERING ORDINANCES

The City and CPD seek clarification of methodology for Secondary Compliance for paragraphs 805, 806, 807, 808, 809, 810, 811, 812, 813, 814, 815, 817, 818, 819, and 820. IMT methodology states that Secondary Compliance is achieved when the CPD receives IMT/OAG no-objection notices for the applicable training curriculum and demonstrates successful completion of the approved training and 95% compliance demonstrated. During the IMR-14 period CPD produced 95% compliance demonstrations with the ISR Policy eLearning (Fourth Amend. Stops) (MONITOR2982) and the Stop Application eLearning (MONITOR3061). The City and CPD believe the requirements for Secondary Compliance with 805, 806, 807, 808, 809, 810, 811, 812, 813, 814, 815, 817, 818, 819, and 820 have been achieved.

The City and CPD seek clarification of methodology for Secondary Compliance for paragraph 823. The City and CPD believe Secondary Compliance requires approved curriculum and documented completion by at least 95% of the identified personnel (MONITOR3062). The methodology does not condition Secondary compliance upon completion of every anticipated supervisory or promotional training course. Those are implementation and sustainment activities associated with Operational Compliance rather than the threshold for Secondary Compliance.

The City and CPD seek clarification of methodology for Secondary Compliance for paragraph 826. CPD believes the methodology still establishes Secondary Compliance through approval of the curriculum and completion by the identified personnel. The methodology does not require completion of all future promotional or Pre-Service supervisory courses before Secondary Compliance may be achieved. (MONITOR3062). Those activities represent ongoing implementation and sustainment consistent with Operational Compliance expectations.

Sincerely,

/s/ Danielle Alvarez Clayton
Assistant Corporation Counsel III Supervisor
City of Chicago Department of Law
Public Safety Reform Division

cc: Allan Slagel
Matthew Axelrod
Alexander MacMillan
Scott Spears
Christopher Wells
Mary Grieb
Maggie Hickey
Rodney Monroe
Anthony-Ray Sepulveda
Bridgette Clements

