

**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 11

The Independent Monitor Margaret A. Hickey and the Independent Monitoring Team submit the attached *Independent Monitoring Report 11*.

Dated April 11, 2025

/s/Margaret A. Hickey

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CERTIFICATE OF SERVICE

The undersigned attorney hereby certifies that, on April 11, 2025, she caused a true and correct copy of the foregoing ***Independent Monitoring Report 11*** 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.

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INDEPENDENT MONITORING REPORT 11

(Reporting Period: July 1, 2024, through December 31, 2024)

Report Date: April 11, 2025

Independent Monitoring Team | Chicago Police Department Consent Decree

This report, *Independent Monitoring Report 11*, provides our assessments of compliance efforts between July and December 2024. It reflects a significant increase in Consent Decree compliance: In addition to maintaining compliance, the City of Chicago (City) and the Chicago Police Department (CPD) achieved additional levels of compliance with about 25% of paragraphs under review—or 150 paragraphs, including 42 paragraphs where the City achieved Full compliance.

Overall, the City has now achieved at least some level of compliance with about 92% of the paragraphs under review, including Full compliance with about 16% of paragraphs.



Monitor Maggie Hickey

This is the result of years of consistent efforts building the foundations required to cross key thresholds before January 2025.¹ For example, the City and the CPD's yearslong investment in policy development, training, community engagement, and officer support paid significant dividends for the 2024 Democratic National Convention during the eleventh reporting period. As previewed in our last report, this event demonstrated that the tireless and ongoing Consent Decree efforts by members of the City, the CPD, the Office of the Illinois Attorney General (OAG), and Chicago's communities are making a difference: the CPD was better prepared for the DNC than they would have been before the Consent Decree in February 2019.²



Chief Rodney Monroe, Ret.

As reflected throughout this report, the CPD is working to continue this approach into 2025, not only for large pre-planned events but spontaneous challenges and everyday policing.

¹ Moving forward, the City and the CPD may continue to make meaningful progress without the same numerical increase in compliance. In addition to compliance metrics, we will continue to report on the City and the CPD's underlying compliance progress each reporting period.

² As we highlighted in our last report, leading up to the DNC, the City and the CPD worked closely with the OAG and other members of Chicago communities and stakeholders to ensure that the CPD's efforts would align with the Consent Decree and effective practices. Despite various internal and external perspectives and significant disagreements, the CPD incorporated meaningful feedback into its policies, post-Consent Decree training infrastructure, and practices, including recommendations from our *2021 Special Report* regarding responses to protests and unrest in 2020. See *Special Report: The City of Chicago's and the Chicago Police Department's Responses to Protests and Unrest under the Consent Decree (May 2020 – November 2020)*, Independent Monitoring Team (July 20, 2021) https://cpdmonitoring-team.com/wp-content/uploads/2024/03/2021_07_20-Independent-Monitoring-Team-Special-Report-filed.pdf.

In our last report, we noted that the City was experiencing a budget crisis, and there were discussions and proposals that included cutting a significant number of positions that are key to Consent Decree compliance. We highlighted that the Consent Decree requires the City to provide “necessary and reasonable financial resources . . . to fulfill its obligations under this Agreement.” Consent Decree ¶1700. As a result, the City and the CPD must provide sufficient resources to ensure constitutional and effective policing consistent with all sections of the Consent Decree, including community and impartial policing. This also includes providing officers and personnel with sufficient resources and support systems to enable them to perform at their best and to meet these high, yet reasonable, expectations.



Dr. Theron Bowman

Since then, the City, the CPD, and the OAG reported shared efforts to ensure that the City and the CPD continued to provide necessary resources toward CPD reforms. We continue to monitor these efforts, and the City and the CPD’s ability to demonstrate increased compliance in the eleventh reporting period—particularly in the Use of Force section of the Consent Decree—is encouraging.

The City and the CPD have also invested in new and transparent efforts toward meaningful reform, including the CPD’s ongoing workforce allocation study.³ In fact, just this week, on April 7, 2025, the CPD released its three-year *Strategy for Organizational Excellence*, which seeks to combine the CPD’s vision, mission, and core values with its path toward reaching full and effective compliance with the Consent Decree.⁴

The CPD appears to be gaining momentum, and critical opportunities for improvement are now within reach. Moving forward, the City and the CPD must implement a meaningful *Community Engagement Plan* and its long-overdue *Suicide Prevention Initiative*.⁵ The City and the CPD must also work to establish consistent oversight of its traffic-stop policies and practices to ensure that they are promoting community and officer safety through transparent and reliable data collection.⁶

³ See *Workforce Allocation Study*, CHICAGO POLICE DEPARTMENT, <https://chicagopolice.civilspace.io/en/projects/workforce-allocation-study>.

⁴ See *Strategy for Organizational Excellence*, CHICAGO POLICE DEPARTMENT, <https://www.chicagopolice.org/policy-review/cpd-strategy-for-organizational-excellence/>.

⁵ Tragically, Chicago has continued to lose CPD officers to suicide in 2024 and 2025. We offer our condolences to their families, the CPD, and everyone impacted by these losses.

⁶ See *Comprehensive Assessment, Part II*, INDEPENDENT MONITORING TEAM (October 11, 2024), <https://live-chicago-imt.pantheonsite.io/wp-content/uploads/2024/10/2024.10.11-Independent-Monitoring-Team-Comprehensive-Assessment-Part-II-amended-and-filed.pdf>. Additionally, the IMT is aware and concerned that the CPD recently acknowledged that there was a *significant* discrepancy in the reported numbers of traffic stops made in 2024 and is closely monitoring the situation for compliance with existing Consent Decree requirements. See, e.g., the Community Policing, Impartial Policing, and Investigatory Stops, Protective Pat Downs, and Enforcement of Loitering Ordinances sections of the Consent Decree.

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Common Abbreviations

| | |
|----------------|---|
| BIA | Bureau of Internal Affairs within the Chicago Police Department |
| CPD | Chicago Police Department |
| BWC | Body Worn Camera |
| CIT | Crisis Intervention Team |
| CCMHE | Chicago Council on Mental Health Equity |
| CCPSA | Community Commission for Public Safety and Accountability |
| COPA | Civilian Office of Police Accountability |
| 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 |
| 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) in federal court regarding civil rights abuses by the Chicago Police Department (CPD). The lawsuit led to a Consent Decree, effective March 1, 2019.⁷ 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.⁸

This is *Independent Monitoring Report 11*. As in previous monitoring reports, this is an update to the Court and the public on compliance efforts during the eleventh

⁷ For more information on the Consent Decree, see the [Background section](#) below. More information is also available on the Independent Monitoring Team’s website (cpdmonitoringteam.com/) and on the Illinois Attorney General Office’s Consent Decree website (chicagopoliceconsentdecree.org/about/). The Consent Decree is available on the Independent Monitoring Team’s website: cpdmonitoringteam.com/wp-content/uploads/2024/02/FINAL-CONSENT-DECREE-SIGNED-BY-JUDGE-DOW.pdf.

⁸ As a party to the Consent Decree, the City is ultimately responsible for compliance. See ¶1720. Unless otherwise specified, references to the City include its relevant entities. See ¶1736.

reporting period: from July 1, 2024, through December 31, 2024.⁹ 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, the Office of the Illinois Attorney General (OAG), and the IMT. See ¶661.¹⁰

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 11*, 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.¹¹

⁹ 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 tenth 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://cpdmonitoring-team.com/wp-content/uploads/2024/03/2022.03.25-Stipulation-Regarding-Search-Warrants-Consent-Decree-Timeline.pdf>.

¹⁰ In August 2023, we filed the Monitoring Plan for Year Five, which outlined the projected monitoring efforts under the Consent Decree for Year Five (July 1, 2023, through June 30, 2024). The IMT’s Monitoring Plan for Year Five is available on the IMT’s website. See *Reports and Information*, INDEPENDENT MONITORING TEAM (August 21, 2023), <https://cpdmonitoring-team.com/wp-content/uploads/2024/04/2023.08.21-Monitoring-Plan-for-Year-5-filed.pdf>. The Monitoring Plan for Year Six is included in the Conclusion section of *Independent Monitoring Report 9*.

¹¹ This report represents a six-month assessment of the City’s compliance efforts from July 1, 2024, through December 31, 2024. 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 December 31, 2024, and before the date we submit this report. Importantly, we have not assessed efforts made after December 31, 2024, in this report. We will do so in the monitoring report for the twelfth reporting period (January 1, 2025, through June 30, 2025). Moreover, an overview of the IMT’s assessment process and priorities for the eleventh reporting period, including deadlines and status updates, and a summary of the IMT’s activities are available on our website: <https://cpdmonitoring-team.com/>.

Under the Consent Decree, the City, the CPD, or other relevant entities are not in compliance with any of the requirements of the Consent Decree until the IMT determines that the City provided sufficient proof that the City, the CPD, or other relevant entities are in compliance. See ¶1720. Even if the City has made significant efforts toward complying with a requirement—which in some cases it has—the City still has the additional burden of providing sufficient proof of its efforts with sufficient time for the IMT and the OAG to review the information.

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.¹² 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.¹³



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 ¶¶714–15.¹⁴ Although not required,

¹² 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.

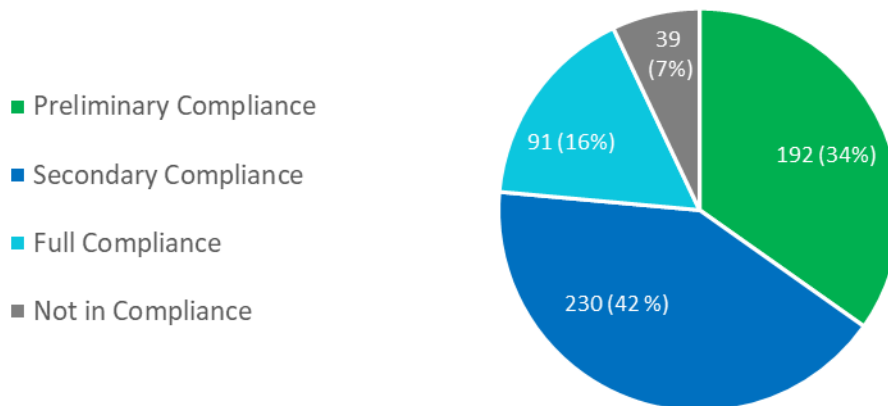
¹³ Some requirements in the Consent Decree demand more effort to comply with than others. The number of requirements—and the amount of work necessary under each requirement—can vary substantially within each paragraph and topic area.

¹⁴ See *Stipulation Regarding Search Warrants, Consent Decree Timelines, and the Procedure for “Full and Effective Compliance,” Illinois v. Chicago*, Case No. 17-cv-6260 (March 25, 2022),

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

The current compliance level for each original monitorable paragraph is reflected in [Conclusion Figure 3 \(All Compliance Levels, By Paragraph\)](#). For the original monitorable paragraphs (552), the City has achieved at least Preliminary compliance with 504 paragraphs (or about 93%). Specifically, at the end of the eleventh reporting period, the City remained in Preliminary compliance with 192 paragraphs (about 34%), Secondary compliance with 230 paragraphs (about 42%), and Full compliance with 91 paragraphs (about 16%)—leaving 39 paragraphs with no levels of compliance (about 7%). Of those, the City is under assessment for Preliminary compliance with eight paragraphs.

**Consent Decree Compliance with
Original Consent Decree Paragraphs
by December 31, 2024**

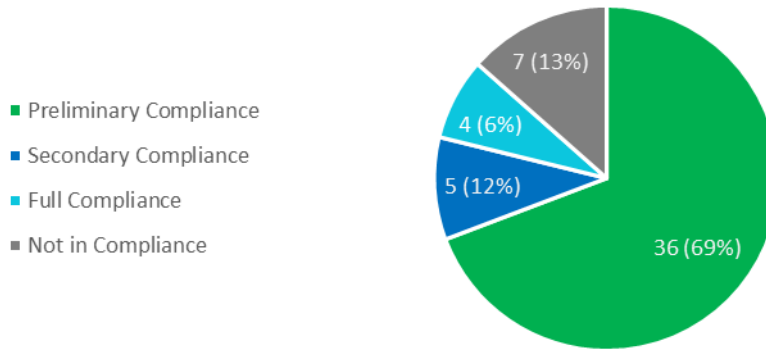


In the eleventh reporting period, the IMT continued to assess new monitorable paragraphs in the recently added Investigatory Stops, Protective Pat-Downs, and Enforcement of Loitering Ordinances section of the Consent Decree. Specifically, as reflected below, the IMT assessed the City’s compliance with 52 of these paragraphs in the eleventh reporting period. By December 31, 2024, the City has achieved Preliminary compliance with 36 paragraphs, Secondary compliance with five paragraphs, and Full compliance with four paragraphs. As a result, the City does not have compliance with the remaining seven paragraphs under review to date. In the coming reporting periods, the IMT will continue to assess additional

<https://cpdmonitoringteam.com/wp-content/uploads/2024/03/2022.03.25-Stipulation-Regarding-Search-Warrants-Consent-Decree-Timeline.pdf>

monitorable paragraphs in this section until all 65 monitorable paragraphs are under review.

Investigatory Stops, Pat Downs, and Loitering Compliance Progress by December 31, 2024



Overall, including all monitorable paragraphs in the eleventh reporting period, the City has achieved Preliminary compliance with 226 paragraphs (about 37%), Secondary compliance with 238 paragraphs (about 39%), and Full compliance with 94 paragraphs (about 16%)—leaving 46 paragraphs with no levels of compliance (about 8%).

This represents a significant increase in Consent Decree compliance: In addition to paragraphs where the City and the CPD maintained compliance, the City achieved additional levels of compliance with about 150 paragraphs—or about 25% of paragraphs under review—including 42 paragraphs that moved into Full compliance.

Major Developments and Principal Achievements and Challenges Impacting Compliance

In the Consent Decree, the City committed “to ensuring that police services are delivered to all of the people of Chicago in a manner that fully complies with the Constitution and laws of the United States and the State of Illinois, respects the rights of all of the people of Chicago, builds trust between officers and the communities they serve, and promotes community and officer safety.” The City also committed “to providing CPD members with the resources and support they need, including improved training, supervision, and wellness resources.” ¶16.

Executive Summary Figure 1, below, provides a sample of principal achievements and challenges across the 10 topic areas of the Consent Decree. In the eleventh reporting period, the City and the CPD achieved major accomplishments related

to their planning, preparation, implementation, and evaluation of the City's hosting of the 2024 Democratic National Convention. For this reason, we have also provided a summary of related efforts below [Executive Summary Figure 1](#).

Executive Summary Figure 1. Sample of Principal Achievements & Challenges

| Section | Sample of Principal Achievements | Sample of Principal Challenges |
|---------------------|---|---|
| Community Policing | <ul style="list-style-type: none"> The CPD continued to consistently track progress in their implementation of the Community Policing Advisory Panel’s (CPAP’s) recommendations and has made substantial progress toward implementing recommendations. The CPD initiated pilot programs to assess the efficacy of their newly developed proposed policies and programming for youth deflection and diversion. | <ul style="list-style-type: none"> The CPD continues to develop its digitized resource directory, which will be made available to CPD officers and used for connecting residents to essential services. Until this directory is completed, training and deployment cannot occur. The CPD has not yet produced results of an audit into its policy prohibiting the transport of individuals with the intent to display. The CPD’s Interactions with Youth eLearning was postponed to the twelfth reporting period (January through June 2025). |
| Impartial Policing | <ul style="list-style-type: none"> The City and the OEMC delivered updated <i>Diversity Awareness</i> training materials and standard operating procedure, making critical inroads on its diversity efforts. The CPD has continued in its efforts to engage communities on its <i>Gender-Based Violence Incidents</i> policy suite, including maintaining ongoing partnerships with community organizations such as the Chicago Hearing Society. The CPD has begun establishing its Equity Office and continued to further develop the framework and strategic plans for the office. | <ul style="list-style-type: none"> In the eleventh reporting period, the City and the CPD’s progress towards compliance with this section’s requirements remained largely unchanged as the IMT and the CPD continue to work towards finalizing vital policies and trainings. The City and the CPD must work to provide sufficient resources towards reforms, policies, and trainings related to the Impartial Policing section and continue its work to establish its new Equity Office. |
| Crisis Intervention | <ul style="list-style-type: none"> The CPD assigned a new CIT Coordinator, who has demonstrated leadership and an eagerness to learn about national best practices, to lead the Crisis Intervention Unit. The CPD made significant progress towards completing its eligibility review process to identify voluntary Certified CIT Officers. This reporting period, the CPD and the OEMC initiated collaborative, bi-weekly meetings with the IMT to discuss ongoing compliance efforts under the Consent Decree. | <ul style="list-style-type: none"> The City, the CPD, and the OEMC have struggled to develop a reliable process for the Chicago Council on Mental Health Equity’s review of relevant policies and training. The City and the CPD must consistently produce course and instructor evaluations, as well as accurate attendance records, for the CIT Basic training and <i>CIT Refresher</i> training. The City, the CPD, and the OEMC must produce the <i>Crisis Intervention Plan</i> and the <i>Crisis Intervention Officer Implementation Plan</i>, neither of which have been produced since the third reporting period. |

| Section | Sample of Principal Achievements | Sample of Principal Challenges |
|----------------------------------|--|---|
| Use of Force | <ul style="list-style-type: none"> The City and the CPD’s extensive planning resulted in very few instances of use of force during the Democratic National Convention (DNC), including no use of batons or oleoresin capsicum (OC) spray. The City and the CPD initiated a firearm pointing pilot program that will move responsibility for reviewing firearm pointing incidents to CPD district captains. The CPD activated the Incident Debriefing Report (IDR) Supervisory Dashboard and added TRED training recommendations to its CompStat process. | <ul style="list-style-type: none"> TRED’s backlog of review of IDRs continued during this reporting period, despite previous attempts to hire officers and civilians to the unit. The CPD must not only revise and clarify S03-14, <i>Body Worn Cameras</i>, but must also address the persistent violations of the policy at both the front-line and supervisory levels. The CPD has not issued D19-01, <i>Firearm Pointing Incidents</i>, in accordance with the two-year review required by ¶1636 and the Court Order on Search Warrants that impacts the policy. |
| Recruitment, Hiring & Promotions | <ul style="list-style-type: none"> The City and the CPD procured and are developing systems that provide real-time insights into the DCI Consulting Group, Inc. (DCI) implementation plan. | <ul style="list-style-type: none"> The City and the CPD should adopt a timely cadence for monthly meetings to work towards further levels of compliance. |
| Training | <ul style="list-style-type: none"> The CPD increased the cadre of Field Training Officers (FTOs) through additional positions and FTO recruitment cycles. The CPD expanded the <i>2025 Annual Training Plan</i> to include a five-year plan, interweaving core principles into multiple courses, helping officers experience training across multiple disciplines as they experience when policing in the field. The CPD launched a new civilian supervisory training this period for non-sworn personnel reinforcing professional requirements of their positions. | <ul style="list-style-type: none"> The CPD failed to achieve significant compliance improvements in paragraphs related to training evaluations. |
| Supervision | <ul style="list-style-type: none"> The CPD provided supervision training to more than 95% of all eligible personnel. The CPD produced an executed vendor agreement and scope of work for the Workforce Allocation Study. The CPD developed Bureau of Patrol Special Order (BOPSO) 24-06.02, <i>District Tactical Teams</i>. | <ul style="list-style-type: none"> The CPD continues to struggle with Unity of Command and Span of Control in the three pilot districts. Progress on revising the Supervisor’s Management Log significantly slowed. |

| Section | Sample of Principal Achievements | Sample of Principal Challenges |
|---|---|--|
| Officer Wellness & Support | <ul style="list-style-type: none"> The CPD provided on-site counseling to members during the Democratic National Convention The CPD implemented an internal communication strategy prior to initiating its first needs assessment survey to help ensure increased participation. | <ul style="list-style-type: none"> The CPD is still unable to identify timeframes for members’ receipt of services. The CPD continued to rely on manual data collection as opposed to establishing a technology-based system. While the quiet rooms are currently operational and available for use, the CPD has not yet created a policy for their use. |
| Accountability & Transparency | <ul style="list-style-type: none"> The CPD delivered several BIA trainings in support of Secondary compliance with numerous paragraphs. COPA conducted another cohort of its People’s Academy, which continued to be an effective and valuable means of interacting and increasing transparency. The City and COPA developed a new policy and plan for Phase 3 of the Community-Police Mediation Pilot Program. The CCPSA successfully filled vacant Police Board positions. The Police Board collaborated with the CPD and COPA to develop a training on topics required by the Consent Decree. | <ul style="list-style-type: none"> Many Accountability Sergeants continue to have other responsibilities that significantly compete with their Accountability Sergeant duties, which must be their primary responsibility. Due to pending litigation between a police union and the City regarding arbitration of serious police discipline cases, the Police Board only heard cases in which an officer consented to the Police Board’s procedures. |
| Data Collection, Analysis & Management | <ul style="list-style-type: none"> The City and the CPD are reliably and validly collecting data and documents after a use-of-force event. CPD supervisors are conducting random audits of body-worn and in-car camera recordings. The City and the CPD have demonstrated progress on developing and implementing a <i>Data Systems Plan</i>. | <ul style="list-style-type: none"> The CPD should develop a policy memorializing COPA’s access to CPD data systems to ensure ongoing access and to maintain future compliance. The CPD continues to struggle to incorporate decision-point analysis into Force Review Board practices. The CPD should develop training and evaluation material for the upcoming <i>Early Intervention and Support System</i>. |
| Investigatory Stop Reports, Protective Pat Downs, & Enforcement of Loitering Ordinances | <ul style="list-style-type: none"> The CPD has nearly finalized its policies regarding investigatory stops and protective pat downs, and the enforcement of Loitering Ordinances. The 4th Amendment Stop Review Unit (also referred to as 4ASRU) finalized its Needs Assessment, which has created a strong foundation for streamlining and enhancing their processes. | <ul style="list-style-type: none"> The City and the CPD have yet to develop an effective community engagement strategy that includes direct community feedback on new or revised policies, forms, and training. |

2024 Democratic National Convention (DNC)

Preparations

In 2021, the IMT provided a special report on the City of Chicago's and the Chicago Police Department's Responses to Protests and Unrest between May 2020 and November 2020.¹⁵ In that report, we provided recommendations under the Consent Decree for the City and the CPD to drastically improve responses to protests and unrest for the safety and wellbeing of the City, its communities, and its officers.

Although under a significant time crunch, leading up to the eleventh reporting period, the City and the CPD dedicated significant efforts to prepare for the DNC. This included deliberate efforts to address our earlier recommendations. Early on, the CPD also sought and meaningfully engaged with significant technical assistance from the IMT.

This resulted in developing and implementing significantly revised policies while receiving IMT, OAG, and community feedback, testing changes for effectiveness consistent with the CPD's mission, and developing corresponding training related to responding to First Amendment activity, use of force, reporting, data collection, body-worn camera use, supervision, and coordinated responses to large gatherings:

¹⁵ *The City of Chicago and the Chicago Police Department's Responses to Protests and Unrest under the Consent Decree (May 2020-November 2020)*, Chicago Independent Monitoring Team (July 20, 2021), https://cpdmonitoringteam.com/wp-content/uploads/2024/03/2021_07_20-Independent-Monitoring-Team-Special-Report-filed.pdf.

❖ Policies

- S06-06, *Response to Crowds, First Amendment Assemblies, and Civil Disturbances*
- S06-06-01, *Declaration of a Coordinated Multiple Arrest Incident;*
- S06-06-02, *Alternative Arrest Procedures During Coordinated Multiple Arrest Incidents*
- S06-06-03, *Alternate Tactical Response Reporting During Coordinated Multiple Arrest Incidents*
- G02-02, *First Amendment Rights*
- S03-14, *Body Worn Cameras*
- U01-13, *Polycarbonate Shields for Crowd Responses*

❖ Training

- *Wellness and Law Enforcement Medical and Rescue Training*
- *De-escalation, Response to Resistance, Use or Force, and Coordinated Multiple Arrest Training*
- *Coordinated Multiple Arrests eLearning, Public Order and Public Safety*
- *Basic (POPS-B) Training*
- *Field Force Operations (FFO) Training*
- *Taser T-10 Training*
- *In-Service Supervisors Training*
- *FTX Field Training*

Additionally, the Civilian Office of Police Accountability (COPA) provided updates of its preparations leading up to the DNC. Some of those preparations included observing CPD training sessions and conducting COPA-specific training for investigators and intake specialists. COPA leadership also expanded access for complaint intake during the DNC.

Protests at the DNC and the CPD's response

The IMT monitored the City and the CPD's actions and compliance with the Consent Decree during the leadup to and throughout the Convention. This included monitoring efforts at the Emergency Operations Center, as well as in the field during protests and arrest processing and complaint intake. *See, e.g.*, ¶177.

Between August 18 and August 22, the CPD responded to multiple planned and unplanned demonstrations and protests each day. The CPD responded to group gatherings, both large and small, including marches and rallies. Throughout each event, the IMT observed the CPD as they identified fluid vulnerabilities and course corrected. This included, for example, stationing more foot patrol and bike patrol after a security fence was breached on August 19.

At various events throughout the DNC week, the IMT observed CPD officers remain professional and disciplined, exemplifying the training each officer received leading up to the DNC. While working long shifts and often being subject to verbal taunts, we observed officers remain professional, de-escalate tensions, support each other, and work together to identify, solve, and prevent problems. *See, e.g.*, (¶¶153, 157, and 161).

Consistent CPD leadership was key. Throughout the demonstrations, Superintendent Snelling, CPD command staff, and leaders of the Office of Community Policing were consistently present and engaged with community members and officers at nearly every event the IMT observed. They led effective problem-solving efforts to allow community members to engage in their First Amendment rights, while also protecting protesters, counter-protestors, and Chicago. *See, e.g.*, ¶¶161–63, 183, 236–41.

We also observed officers being provided with proper nutrition and support, including water, meals, rest locations, counselors and clinicians, and mobile vans for quick breaks.

While the IMT was on the ground observing the CPD's operations, COPA was also actively involved in the complaint intake process. As of September 2024, COPA reported that only eight complaints were received during the week of the DNC, and since then, they received 17. Of the 17, four were duplicate complaints, 10 went to BIA's jurisdiction, and three remained in COPA's jurisdiction. COPA also had a dedicated webpage for complaints specific to the DNC.

The low number of complaints, as in comparison to 2020, underscores the successful planning efforts the City, the CPD, COPA, and all other City entities engaged in leading up to the Convention.

Compliance Considerations

Our observations were anchored in observing whether the City and the CPD acted in accordance with the Consent Decree’s requirements, especially as it relates to community policing; impartial policing; use of force; training; supervision; officer wellness and support; and accountability and transparency.

The CPD’s ability to incorporate lessons learned and successfully facilitate one of the largest events of 2024 is commendable. After the DNC, the City and the CPD conducted additional assessments to identify areas for further improvement and have continued to prioritize similar and consistent preparation and training into 2025 and the years ahead. As detailed throughout this report, the CPD has made significant strides toward implementing various Consent Decree requirements, which has paid dividends in achieving Consent Decree compliance. It is our hope that the City and the CPD maintain this momentum and continue to build on these successes.

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 Pad-Downs, and Enforcement of Loitering Ordinances

I. Community Policing

In the eleventh reporting period, the IMT assessed compliance with the community policing paragraph requirements by reviewing relevant policies, training curricula and attendance records, records pertaining to training delivery, and community meetings. The IMT participated in monthly meetings concerning community policing requirements with a cross section of CPD leadership and bi-weekly meetings with the Office of Community Policing and the CPD reform staff assigned to community policing. The IMT also observed various community meetings and listening sessions.

The CPD made significant progress in advancing compliance levels this reporting period. Most notably, the CPD achieved Secondary compliance for several paragraphs pertaining to the CPD's partnerships with community organizations.

Specific developments in the eleventh reporting period are highlighted below:

- The CPD developed a tracking template for community partnerships that allows each of the 22 districts to identify, categorize, assess, and track progress in improvements for each of their partnerships with community organizations. To implement this tracking system, the CPD developed and delivered the *Community Partnerships eLearning* training to at least 95% of CPD staff, thereby achieving Secondary compliance for relevant paragraphs (¶¶16, 23–24, 27, and 47).
- The CPD developed a tracking template for compiling and standardizing the collection of records for District Advisory Council (DAC) and Beat meetings. The CPD developed and implemented training guidance to implement the new procedures, thereby achieving Secondary compliance with ¶25.
- The CPD continued to consistently track progress in their implementation of the Community Policing Advisory Panel's (CPAP) recommendations. The CPD has made substantial progress in implementing a preponderance of these recommendations—thereby achieving Full compliance with ¶13.
- The CPD made awards to officers acknowledging their exemplary work in implementing community policing principles and practices in their field work including exercising problem-solving techniques and partnership building. With the development and implementation of the new awards system, the CPD achieved Full compliance with ¶48.
- The CPD has consistently used reductions in crime as a primary measure of police performance instead of the number of arrests. Most notably in the 22

district crime reduction strategies the primary measure for performance is the number of reported crimes.

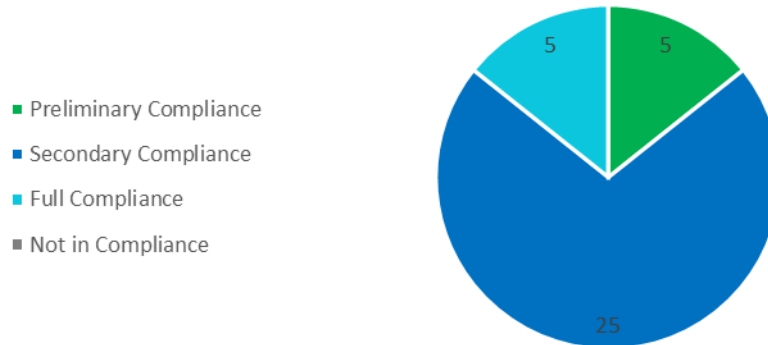
- The CPD initiated pilot programs, which assess the efficacy of newly developed proposed policies and programming for youth deflection and diversion. The pilots and their assessments are expected to continue throughout the twelfth reporting period (January through June 2025).
- The CPD continues to develop its digitized resource directory, which will be made available to CPD officers for connecting residents to needed services. The CPD expects to complete this directory and training on its utilization in the twelfth reporting period.
- The CPD continued its development of a comprehensive community engagement policy and plan which provides more specificity in the various ways it can provide information and ascertain feedback from community members. The CPD expects to finalize this policy and more fully operationalize and assess the engagement plan in future reporting periods.

Community Policing Progress through Eleven Reporting Periods

Overall, the IMT assessed the City's compliance with 35 Community Policing paragraphs in the eleventh reporting period (¶¶13–20, 22–37, and 45–48). The City and the CPD maintained Preliminary compliance for five paragraphs (¶¶19, 22, 32–33, and 37), maintained Secondary compliance for 18 paragraphs (¶¶14–15, 18, 20, 26, 28–29, 31, 34–36, 38–43, and 46), achieved Secondary compliance for seven paragraphs (¶¶16, 23–25, 27, 45, and 47), maintained Full compliance with two paragraphs (¶¶30 and 44), and achieved Full compliance with three paragraphs (¶¶13, 17, and 48).¹⁶

¹⁶ In response to an earlier draft of this report, the CPD identified that paragraphs related to school-assigned officers should not be included in this tally because the City no longer utilizes School Resource Officers. The IMT agrees that this change should be reflected and welcomes additional input and discussion between the Parties to ensure—consistent with the requirements of the Consent Decree—that the City and the CPD receive credit for the work achieved to date and that officers in schools comply with the requirements of the Consent Decree.

Community Policing Compliance Progress by December 31, 2024



Looking Ahead to the Twelfth Reporting Period

In the twelfth reporting period, the IMT expects the CPD to build upon progress made in the eleventh reporting period:

- Continuing the districtwide strategic development process with efforts to expand participation by marginalized groups in the “community conversations” used to set crime reduction priorities.
- Completing the digitized community partnership resource directory and developing and delivering the training on its usage to CPD officers.
- Continuing the Youth Intervention Pilot Project including the development of new policy and practices concerning diversion and deflection of juvenile offenders through referrals for comprehensive services.
- Finalizing the CPD’s community engagement policy and plan and disseminating these documents to community stakeholders.
- Implementing tracking systems for community partnership activities in each district and integrating the DAC and Beat meeting minutes template to standardize the collection and reporting out of DAC and Beat meeting activities and outcomes.

Additional policies or revisions for the twelfth reporting period may include:

- Revised D22-08, *Community Engagement* policy

The Consent Decree also requires additional training development. At the end of the eleventh reporting period, the City and the CPD continued developing training materials related to the following:

- *Interactions with Youth* eLearning
- Training on the *Community Partnerships Tracking Template*

We look forward to reporting on these finalized materials, as well as evidence that the City and the CPD have implemented reforms into practice in the next reporting period.

Specific compliance assessments, by paragraph, for the Community Policing section are available here: <https://cpdmonitoringteam.com/wp-content/uploads/2025/04/1-IMR11-Community-Policing-final.pdf>. This includes paragraphs where the City gained or lost compliance in the eleventh reporting period, as well as paragraphs with significant developments toward or away from compliance.¹⁷

For reference, all IMT reports and appendices are available here: <https://cpdmonitoringteam.com/reports-information/>.

¹⁷ 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/>.

II. Impartial Policing

In the eleventh reporting period, the City's and the CPD's progress toward compliance with these important requirements remained largely unchanged from the previous reporting period. The City and the CPD produced various policies and training materials for review. These included the following CPD policies: *Interaction with Persons with Limited English Proficiency* (S02-01-05); *Interactions with Persons with Disabilities* (S02-07); *Interactions with Persons Who are Deaf, Hard of Hearing, or Deaf-Blind* (S-02-07-00XX); *Gender-Based Violence Incidents* (G04-XX); and D22-08 *Community Engagement in Policy Development* Directive. The CPD has begun establishing its Equity Office and continued to further develop the framework and strategic plans for the office, much of which will guide the Department in its implementation of the paragraphs within the Impartial Policing section.

During this reporting period, the CPD also delivered the updated D22-08 policy, *Community Engagement in Policy Development*, for consideration toward the requirements of ¶52. The IMT noted the requirement for the CPD to demonstrate community engagement in the review of the draft of the policy. Finalization of this policy will ensure that CPD maintains Preliminary compliance with ¶52. Also, during this reporting period, the City and the CPD continued to refine and build upon the *Equity Framework* in the development of the *Equity Action Plan* for consideration with the requirements of ¶¶53 and 72. The development of this draft plan demonstrates the CPD is working towards continuing to ensure that the principles of impartial policing are incorporated throughout its policies and training.

Also, this reporting period, the City and the CPD delivered an updated G04-XX *Gender-Based Violence Incidents* policy suite for review with ¶62's requirements. The CPD clarified to the IMT in discussions that policy G04-XX *Gender-Based Violence Incidents* would serve as a global policy and include references to its standing policies on topics related to gender-based violence such as domestic violence, stalking, and sexual assaults. Additionally, the City and CPD continued to develop and revise its *Persons with Disabilities* policy suite for consideration with ¶68. The CPD has informed the IMT of its efforts toward community engagement on this policy suite, including ongoing partnerships with community organizations such as the Chicago Hearing Society.

Finally, the City and the OEMC achieved Preliminary compliance with ¶75. The OEMC delivered the updated *Diversity Awareness Training* materials and Standard Operating Procedure, and the IMT and the OAG issued no-objection notices.

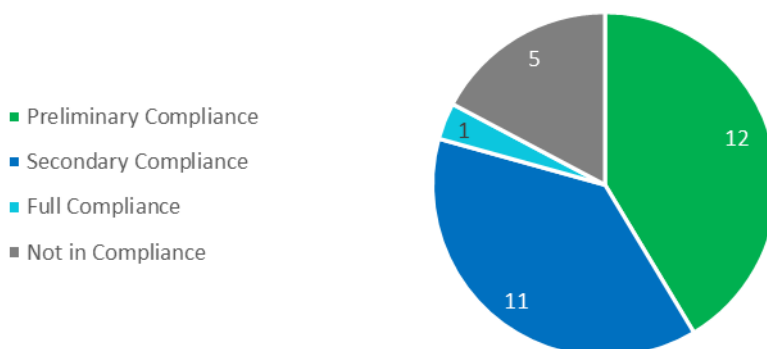
The IMT looks forward to continuing to review progress on related policies and trainings, including those related to interactions with people with disabilities and gender-based violence. This must include sufficient demonstration of the CPD's

efforts to engage the community in this process and in its efforts toward articulating qualifications for its multilingual officers. We also look forward to the CPD’s continued efforts to establish its Equity Office and finalize its overarching community engagement plan.

Impartial Policing Progress through Eleven Reporting Periods

In the eleventh 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). The City maintained Preliminary compliance for 11 paragraphs (¶¶52–53, 57, 60–61, 63–66, 70, and 72), met Preliminary compliance for one paragraph (¶75), maintained Secondary compliance for 11 paragraphs (¶¶54–56, 58–59, 67, 71, 73–74, and 76–77), and maintained Full compliance for one paragraph (¶78). The City failed to reach Preliminary compliance with the remaining five paragraphs assessed (¶¶62, 68–69, and 79–80).

Impartial Policing
Compliance Progress by December 31, 2024



Looking Ahead to the Twelfth Reporting Period

As noted above, the City and the CPD have not reached any level of compliance with five paragraphs in the Impartial Policing section, which is concerning. Moving forward, we urge the City and the CPD to provide sufficient resources toward reforms related to the Impartial Policing section (as required by ¶706) and to continue its work in establishing the Equity Office. It is our hope that these efforts will assist the City and the CPD in propelling compliance with this section in several areas.

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

- *Search Warrants*;
- *Interactions with People with Disabilities*;
- *Community Engagement Plan*; and
- *Gender-Based Violence Policy Suite*.

At the end of the eleventh reporting period, the City and the CPD continued developing, for example, the following new or revised courses:

- *Sexual Misconduct* training curriculum;
- *Language Line Training Bulletin*; and
- *Hate Crimes Refresher eLearning*.

We look forward to reporting on these materials in the twelfth reporting period, as well as evidence that the City and the CPD have implemented reforms into practice.

Specific compliance assessments, by paragraph, for the Impartial Policing section are available here: <https://cpdmonitoringteam.com/wp-content/uploads/2025/04/2-IMR11-Impartial-Policing.pdf>. This includes paragraphs where the City gained or lost compliance in the eleventh reporting period, as well as paragraphs with significant developments toward or away from compliance.¹⁸

For reference, all IMT reports and appendices are available here: <https://cpdmonitoringteam.com/reports-information/>.

¹⁸ 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/>.

III. Crisis Intervention

During the eleventh reporting period, the CPD, the Office of Emergency Management and Communications (OEMC), and the Chicago Council on Mental Health Equity continued their work to implement the requirements in the Crisis Intervention section of the Consent Decree related to policy, training, practices, and community engagement. The IMT has observed several notable improvements this reporting period. Not only did the CPD make significant progress toward compliance with the Consent Decree, but the City and the CPD were critically focused on improving staffing and processes in the Crisis Intervention Unit (CIU).

Chicago Police Department

During this reporting period, the CPD and the IMT engaged in regular meetings to discuss compliance with the Consent Decree. These discussions were quite productive, both in clarifying requirements with the Consent Decree and in strengthening understanding between the IMT and the CPD. At the end of the reporting period, the IMT and the OEMC began similar discussions.

During this reporting period, the CPD assigned a new CIT Coordinator to lead the CIU. The full-time, dedicated Lieutenant (*see* ¶115) has demonstrated leadership, and an eagerness to learn about national best practices, the CIU's purpose and function, and Consent Decree requirements. The new CIT Coordinator also recently attended the CIT International Conference and has demonstrated ongoing qualifications necessary to achieve Full compliance with ¶116.

For the first time since 2021, the CPD increased the number of staff dedicated to the CIU. In 2021, the CIU's staff was cut in half; however, at the end of the eleventh reporting period, the CPD added 10 full-time, dedicated staff including one sergeant who serves an administrative role, four officers dedicated to assist with Crisis Intervention-related training, and five full-time CIT District, Operations, and Community Support (CIT DOCS) members dedicated to field support.

Crisis Intervention Figure 1:
Crisis Intervention Unit Staffing over Several Reporting Periods

| Reporting Period | Commander | Lieutenants | Sergeants | Officers | Community Outreach Coordinator | Data Analyst | Totals |
|------------------|-----------|-------------|-----------|----------|--------------------------------|--------------|--------|
| IMR-4 | 1 | 1 | 7 | 46 | 1 | 0 | 56 |
| IMR-5 | 0 | 1 | 7 | 39 | 1 | 0 | 48 |
| IMR-6 | 0 | 1 | 7 | 38 | 0 | 1 | 47 |
| IMR-7 | 0 | 1 | 4 | 24 | 0 | 1 | 30 |
| IMR-8 | 0 | 1 | 5 | 22 | 0 | 1 | 29 |
| IMR-9 | 0 | 1 | 5 | 20 | 1 | 1 | 28 |
| IMR-10 | 0 | 1 | 5 | 20 | 1 | 1 | 28 |
| IMR-11 | 0 | 1 | 7 | 32 | 0 | 1 | 41 |

The CPD has made significant progress this reporting period toward achieving Secondary compliance with ¶¶92–93 and 105, which include requirements for CIT officer certification and eligibility. The CPD nearly completed its eligibility review process to identify voluntary Certified CIT Officers but has yet to validate the data. The IMT anticipates that the CPD may achieve Secondary compliance once the CPD migrates the data regarding eligibility for the CIT Program into the CIT Dashboard, validates the data, and begins issuing quarterly reports concerning the same.

The CPD’s overarching directive S05-14, *Crisis Intervention Team (CIT) Program*, which was revised during this reporting period, outlines the requirements to become and to remain a Certified CIT Officer (see ¶¶92–95). The CPD’s eligibility review process cross checks disciplinary-related criteria with the Bureau of Internal Affairs (BIA), as well as determines those officers who wish to volunteer for the Certified CIT Officer designation. The CPD made this determination via a survey that it circulated to officers asking them to opt in or opt out of the program. Through this process, the CPD identified 1,374 officers who opted in as Certified CIT Officers. An additional 2,890 members are considered CIT *trained* (largely from the period of time that CPD operated under a mandatory model).

The IMT has discussed this eligibility process with the CPD. We understand that the CPD intends to populate and validate the above data into the CIT Dashboard during the next reporting period and produce a quarterly report to the IMT. When it completes this process, the CPD will likely achieve Secondary compliance with several paragraphs (e.g., ¶¶92–93, 105, and 141).¹⁹ For example, the Consent Decree requires the CPD to establish an appropriate response ratio of the number of

¹⁹ In response to an earlier draft of this report, the City sought clarification for why the CPD did not achieve additional levels of compliance with these paragraphs. See [Attachment B](#) (City of Chicago Comments, April 4, 2025). Specifically, the City highlighted that there were some issues with a production related to training materials, which was subsequently resolved. This

Certified CIT officers in each district to timely respond to at least 50% of the calls for service involving an individual in crisis. See ¶108. The CPD is unable to establish an appropriate response ratio without first knowing which officers are qualified to serve as a Certified CIT officers. The CPD is also working to populate its CIT dashboard with this information, which the CPD can use to confirm how many Certified CIT Officers are serving in a patrol function, and where these officers should be prioritized to establish the appropriate response ratios.²⁰

CPD Policies and Training

The CPD updated its overarching directive S05-14, *Crisis Intervention Team (CIT) Program*, during this reporting period. To achieve Secondary compliance with ¶89, the CPD must identify the relevant mental health related policies subject to an annual review, and then share those policies to the Chicago Council on Mental Health Equity for comment. See ¶¶103, 130. The CPD may achieve Secondary compliance with ¶89 and ¶130 when it establishes a consistent cadence for its annual review and outlines its plans for assessing the CIT Program in the CIT Coordinator report and CIT Officer Implementation Plan.²¹

During this reporting period, the CPD began to update its 8-hour *CIT Refresher* training, which is delivered every three years (see ¶¶97, 101) and is designed to refresh skills taught in the 40-hour *Basic CIT* course, as well as update officers on evolving best practices. This progress is crucial to achieving further compliance under the Consent Decree.²²

production is not what prevented the City and the CPD from reaching additional levels of compliance. Instead, the CPD is still working to validate and provide data reflecting its efforts consistent with these paragraphs. In the twelfth reporting period, the CPD confirmed that this validation process is still underway, and we look forward to reviewing the data when it is available.

²⁰ This reporting period, the IMT discussed ongoing work with the CPD data analyst working on the CPD's dashboard. The data analyst reports being confident in the data they have obtained, but has yet to validate the data and publish the dashboard. The IMT looks forward to the validation of pertinent data required under this section.

²¹ We recommend that the CPD insert into the CIT Coordinator Report and CIT Officer Implementation Plan the relevant policies under review (e.g., S04-20, *Recognizing and Responding to Individuals in Crisis*; S04-20-02, *Persons Not Under Arrest But in Need of Involuntary or Voluntary Admission*; S04-20-05, *Persons Under Arrest in Need of Mental Health Treatment*; S06-08, *Approved Medical Facilities*; CPD-15.520, *Crisis Intervention Report*; CPD-15.521, *Mental Health Incident Notice*).

²² Since the onset of the Consent Decree, the IMT has expressed concern about the significant number of officers who received the 40-hour Basic CIT training over 10 years ago without any refresher training since. The CIT Refresher training that the CPD has been delivering did not sufficiently refresh identifying common mental and behavioral health conditions, signs and

We understand that revisions to the *CIT Refresher* training will be completed during the twelfth reporting period. These revisions will be crucial to the CPD's ability to achieve further levels of compliance with the Consent Decree and we look forward to reviewing the updated version.

Additionally, the CPD has completed the review, revision, and development of several new and existing trainings related to crisis intervention, including the *Neurobiology of Trauma* training, the *CIT Recruit Concepts* training, and the *Mental Health Awareness and Response* training which were delivered to new recruits. See ¶¶103 and 127. The CPD also developed a new training course entitled *Crisis Intervention and Officer Wellness* to deliver to all officers during their 2025 annual in-service. With this new training, the CPD has maintained Secondary compliance with ¶126.²³

In recent discussions, the CPD has expressed its commitment to enrolling all supervisors, including command staff, in *CIT Basic* and *CIT Refresher* training. To date, 85% (or approximately 1,740) of all sworn supervisors have received this training. This is commendable and the IMT looks forward to observing the CPD's continued progress.

Moreover, the CPD has developed a training dashboard that will track training required by ¶¶100–02, and the IMT looks forward to a demonstration of that dashboard in the next reporting period.

CPD Plans

The City and the CPD have produced neither the *Crisis Intervention Plan* (¶¶122–23) nor the *Crisis Intervention Officer Implementation Plan* (¶¶108–12) since the third reporting period. We understand that the City and the CPD intend to produce

symptoms, and the best ways to interact with people in crisis. The CPD is updating its *CIT Refresher* training to reflect our recommendation and the conversations we had throughout this reporting period.

²³ We note that the *Crisis Intervention and Officer Wellness* training is eight hours and includes four distinct modules addressing (1) crisis intervention, (2) officer wellness, (3) community policing, and (4) scenarios. The first module is dedicated to responding to individuals in crisis. See ¶126. We have expressed concern that in 2024, this portion of the training was eight hours, but it has now been reduced to 50 minutes for 2025. The training's content is well done and adequately covers the topics identified in ¶126, and we plan to observe the training delivery during the twelfth reporting period. The IMT notes that many of the scenarios in the training include people in crisis, which is encouraging.

The CPD provided the IMT with course and instructor evaluations and attendance records for the *CIT Basic* training and the *CIT Refresher* training, which has not been done in several reporting periods, delaying compliance. We appreciate the CPD providing these evaluations, which are necessary to maintain Secondary compliance, and we look forward to the CPD continuing to produce these materials on a regular cadence in the next reporting period.

these plans in the twelfth reporting period. The City and the CPD cannot achieve Preliminary compliance with ¶¶122–23 and 108–112 until these Plans are produced. However, the CPD demonstrated significant efforts this reporting period to inform the accuracy of the plans.

Definition of “Timely”

Last reporting period, the OEMC produced complete and thorough training. Several Consent Decree paragraphs state that when a Certified CIT officer responds to a mental health related call, that officer’s response must be “timely.” *See, e.g.,* ¶107. To date, the CPD has not defined “timely.” Therefore, it is impossible for the CPD to establish baseline data and accountability for this “timely” standard. Without a working definition of “timely,” the IMT is unable to assess additional levels of compliance for several paragraphs. *See* ¶¶107–112.

The Chicago Council on Mental Health Equity (CCMHE)

The IMT reiterates its strong recommendation that the CPD and the OEMC plan strategically to develop a reliable process for the Chicago Council on Mental Health Equity’s (CCMHE) review of relevant policies and trainings. The CCMHE’s review of such policies and trainings is essential for achieving further levels of compliance.

During this reporting period, the CPD briefed the CCMHE on important trainings provided to recruits and all officers, but the IMT remains concerned about the smooth functioning of this important committee. Since the onset of the Consent Decree, the IMT has advised the City that all CCMHE members should receive all materials that will be covered at the CCMHE’s quarterly meeting *in advance* of that meeting. By providing the materials in advance to the CCMHE, the CPD and the OEMC create an opportunity for meaningful review and dialogue with the CCMHE. We have also observed ongoing technology issues with respect to conducting CCMHE meetings, which hinder their productivity, including poor camera positioning and issues with Live Stream links.

We note that one of the required CCMHE meetings (*see* ¶129) was canceled at the last minute this reporting period. While we understand that unexpected issues may arise, we recommend that the City attempt to avert these issues whenever possible.

The Office of Emergency Management and Communications (OEMC)

During the eleventh reporting period, the OEMC demonstrated that 97% of telecommunicators received the annually required *CIT Refresher* training. *See* ¶146. Additionally, the OEMC sent 34 telecommunicators to the CPD’s 40-hour *Basic CIT* training.

During the CCMHE meeting on September 16, 2024, the OEMC presented helpful information about the roles of telecommunicators, including the difference between call takers and dispatchers. The OEMC also provided an overview of event codes and disposition codes, including the mental health z-code, and explained that new telecommunicators receive eight hours of mental health awareness training and four hours of refresher training on an annual basis. This was an important, high-level overview of the 911 call center's functions related to crisis intervention, and the IMT appreciates the increased communication.

CCMHE members also appeared to appreciate this presentation, as evidenced by members' observations and questions posed to the OEMC who committed to providing members with responses to their questions at a future meeting. For example, one CCMHE member noted not recalling reviewing the OEMC's policies over the last several years, which is required annually. See ¶147. The IMT has routinely encouraged both the OEMC and the CPD to establish a regular policy and training review cadence with the CCMHE, inclusive of a meaningful process similar to how the CPD interacts with its Training Community Advisory Committee. It will be crucial for the OEMC and the CPD to formalize this review process in the next reporting period.

In October 2024, the OEMC added two new clinicians to its staff. This staff will serve as support for call takers and dispatchers, an important function for employee wellness.

The OEMC and the IMT began informal meetings at the end of this reporting period to work collaboratively on a revised refresher training that meets the requirements of ¶¶144–45. This is a significant change. The OEMC has worked hard to revise relevant training. These efforts will not only assist with achieving compliance under the Consent Decree, but also provide its telecommunicators with the best training.

The OEMC also maintained Secondary compliance with ¶138, which requires OEMC call-takers to identify calls for service involving an individual known, suspected, or perceived to be in crisis. To achieve Full compliance with this paragraph, the City and the OEMC must demonstrate that the data contained in its auto-generated reports is being reviewed by the OEMC and is used to inform its practices and protocols on an ongoing basis.²⁴

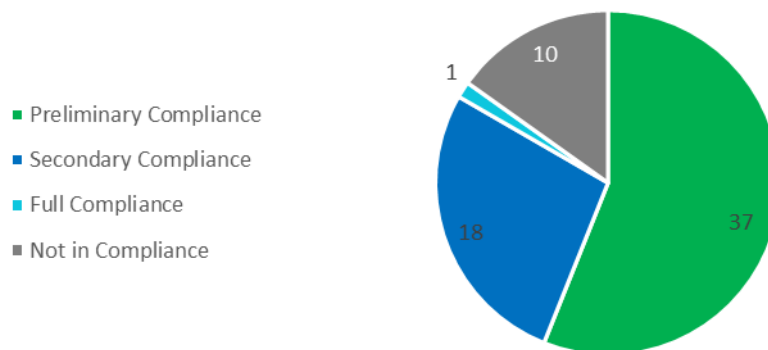
²⁴ The City and OEMC note that it currently produces data that demonstrates calls for service involving an individual known, suspected, or perceived to be in crisis. However, it is not clear that the OEMC reviews this data or uses it to inform its practices and protocols. If the auto-generated reports are not useful to the OEMC and the CPD, these entities are encouraged to identify a useful format that can be used to inform practices and protocols on an ongoing basis, so that the systems implemented are verified as effective and last beyond the Consent Decree.

Finally, the City and the OEMC maintained Preliminary compliance with ¶150. To achieve additional levels of compliance with this paragraph, the IMT will need to review evidence of the OEMC’s regular meetings with the CPD and the CCMHE (e.g., meeting dates, agendas, meeting minutes, attendees). We currently do not have evidence demonstrating that such meetings are regularly occurring, other than the OEMC’s meetings with CCMHE. Additionally, ¶150 requires the OEMC to meet regularly with the CPD and appropriate members of the Advisory Committee “to review and assess data and information regarding the identification of, the dispatch of, and response to calls for service involving individuals in crisis by OEMC telecommunicators.”²⁵

Crisis Intervention Progress through Eleventh Reporting Periods

During this reporting period, the IMT assessed the City’s compliance with 66 Crisis Intervention paragraphs: ¶¶87–152. The City maintained Preliminary compliance with 36 paragraphs (¶¶87–95, 100–03, 105, 114, 117, 119–21, 124–25, 128–32, 136–37, 141–45, 147, and 150–51), maintained Secondary compliance with 16 paragraphs (¶¶96–99, 106, 113, 118, 126, 133–35, 138–40, 146, and 152), achieved Secondary compliance with three paragraphs (¶¶104, 115 and 127), and achieved Full compliance with one paragraph (¶116). At the end of the eleventh reporting period, the City did not have any level of compliance with 10 paragraphs (¶¶107–12, 122–23, and 148–49).

Crisis Intervention
Compliance Progress by December 31, 2024



²⁵ The IMT will also look for evidence that this review and assessment is taking place. Such data should also include the data relevant to ¶138. Full compliance will require evidence that topics are being acted on in a collaborative manner. For example, if policy concerns are identified, policies are revised. If data insufficiencies arise, efforts are made collaboratively to address insufficiencies. A bi-annual summary report could be considered highlighting topics identified and collaboratively addressed, or included in the required Crisis Intervention Plan.

Looking Ahead to the Twelfth Reporting Period

In the twelfth reporting period, the City and the CPD should continue to prioritize its efforts to increase staffing of the Crisis Intervention Unit; complete the required *Officer Implementation Plan* and *Crisis Intervention Plan*; define “timely”; and complete the process of CIT eligibility by populating the CIT Certified Officers who passed eligibility criteria into the Dashboard, which will establish a baseline for Consent Decree required response ratios.

The CPD and OEMC should develop and implement an annual cadence for the review and revision of policies and trainings with the CCMHE; complete the updated revisions to their Refresher trainings and begin delivering the training; and establish a regular cadence for completing course and instructor training evaluations and produce them monthly to the IMT. The City and the OEMC should also demonstrate that the data contained in its auto-generated reports is being reviewed by the OEMC and is used to inform its practices and protocols on an ongoing basis. The OEMC should also provide evidence of the OEMC’s regular meetings with the CPD and the CCMHE.

Finally, the City should facilitate and promote meaningful dialogue among the CCMHE by posting quarterly meeting materials in advance of the meeting to permit sufficient review. The IMT looks forward to continuing discussions about paths toward compliance with both the OEMC and the CPD in future reporting periods.

Specific compliance assessments, by paragraph, for the Crisis Intervention section are available here: <https://cpdmonitoringteam.com/wp-content/uploads/2025/04/3-IMR11-Crisis-Intervention.pdf>. This includes paragraphs where the City gained or lost compliance in the eleventh reporting period, as well as paragraphs with significant developments toward or away from compliance.²⁶

For reference, all IMT reports and appendices are available here: <https://cpdmonitoringteam.com/reports-information/>.

²⁶ 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/>.

IV. Use of Force

In the eleventh reporting period, the City and the CPD made significant progress toward compliance with requirements in the Use of Force section, including achieving Full compliance for numerous paragraphs while maintaining all levels of compliance previously achieved.

We met regularly with the City, the CPD, and the OAG to address the Use of Force requirements in the Consent Decree and received documentation from the City and the CPD of efforts towards compliance. As a result of constant dialogue between the City, the CPD, and the IMT, the CPD produced a consistent flow of documents to answer the IMT's questions or concerns related to compliance. The CPD's ability to provide these records quickly helped it to maintain and achieve additional levels of compliance. These discussions were productive and resulted in progress toward greater compliance. For example, near the end of the reporting period, the IMT, the CPD and the OAG reached agreement on the appropriate percentage of Level 1 use of force incidents to be reviewed by TRED. The IMT looks forward to additional productive conversations between the Parties in the next reporting period.

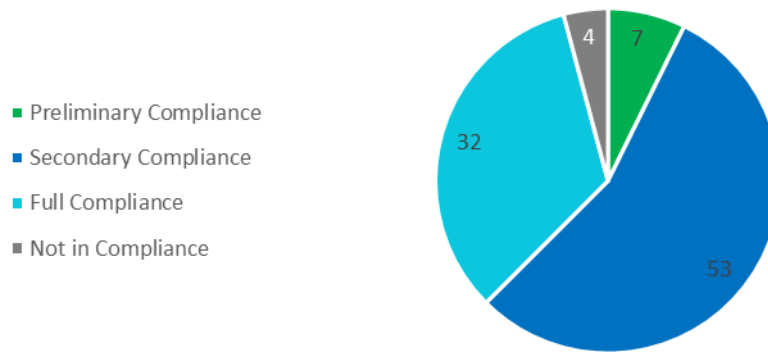
At the beginning of this reporting period, the Court issued an order directing the CPD to clarify its *Body Worn Cameras* policy, S03-14. Since that time, the Parties have been working diligently toward a resolution relating to the deactivation of cameras for recording of public safety briefings. We look forward to continuing to work toward resolving this issue in the next reporting period.

The IMT also continued to review and comment on drafts of revised CPD policies and trainings on use of force during this reporting period. For example, the IMT provided comments on *D19-01, Firearm Pointing Incidents* and looks forward to additional discussions on that policy update. The IMT also reviewed and provided no-objection notices for several trainings, including *BWC eLearning* and *2025 Supervisors In-Service Training*. The IMT looks forward to discussions on *D24-06, Firearm Pointing Incidents District-Level Review – Pilot Program* and other policies in the next reporting period.

We also reviewed TRED's *2024 Mid-Year Report*, which was published near the end of the reporting period, and CPD's *2023 Annual Use of Force Report*. Additionally, the IMT reviewed yearly and quarterly reports from the Civilian Office of Police Accountability (COPA) and the CPD's dashboards, conducted interviews with CPD personnel and reviewed a significant number of CPD Tactical Response Reports (TRRs) and corresponding videos.

During this reporting period, the IMT assessed the City’s compliance with 96 Use of Force paragraphs. At the end of the eleventh reporting period, the City maintained Preliminary compliance for six paragraphs (¶¶153, 156, 158–59, 217, and 228), and achieved Preliminary compliance with one paragraph (¶242). The City maintained Secondary compliance for 51 paragraphs (¶¶154–55, 157, 161–68, 171, 173, 175–78, 182–84, 186–87, 189, 191–92, 196, 198–200, 204, 207, 209, 212–14, 216, 220–24, 226–27, 231–34, 241, 243–44, and 247) and achieved Secondary compliance for three paragraphs (¶¶193 and 239–40). The City maintained Full compliance for fourteen paragraphs (¶¶170, 180–81, 185, 188, 194–95, 197, 201, 206, 235, 245–46, and 248) and achieved Full compliance with seventeen paragraphs (¶¶169, 172, 174, 179, 190, 202–03, 205, 208, 210–11, 215, 218–19, 225, and 229–30). The City’s Preliminary compliance for four paragraphs remained under assessment at the end of the eleventh reporting period (¶¶160 and 236–38).

**Use of Force
Compliance Progress by December 31, 2024**



The City and the CPD made positive strides with respect to the Use of Force requirements of the Consent Decree in the eleventh reporting period. For example, the City and the CPD took active steps to address the backlog at TRED by implementing a pilot program that places responsibility for supervisory review of Firearm Pointing Incidents (FPIs) with CPD captains in five CPD districts. The IMT looks forward to the expansion of the pilot program to all CPD districts during 2025. The CPD also made progress toward enhancing accountability by activating the IDR Supervisory Dashboard and incorporating TRED training recommendations into its CompStat process.

The City and the CPD also achieved Full compliance with a number of paragraphs relating to Use of Force due to TRED’s work on data collection and analysis during this reporting period. For example, the City and the CPD achieved Full compliance with ¶169, which requires the review of all foot pursuits to identify any tactical, equipment, or training concerns. TRED began reviewing foot pursuits on January

1, 2023, and the data collected and analyzed in its subsequent reports including the *2024 Mid-Year Report* makes clear that the City and the CPD are not only collecting data on foot pursuits as required by ¶169, but they (through TRED) are analyzing that data to ensure that failures are caught and addressed.

Similarly, TRED and the CPD's audit team helped the City and the CPD achieve Full compliance with ¶219 which requires that all use of force incidents be reported. TRED tracked and analyzed thousands of TRRs for the last several years. The data collected showed that in 2022 and 2023, CPD officers reported most uses of forces. For the small number of instances where officers did not report use of force incidents, TRED flagged those cases and recommended corrective action be taken at the district level. Similarly, the CPD's audit team reviewed thousands of report narratives and found only a small portion where a use of force TRR was warranted but not completed.

The IMT also wishes to commend the City and the CPD for its work during the Democratic National Committee (DNC) meeting this past summer, which among other successes, resulted in very few instances of use of force.

Looking Ahead to the Twelfth Reporting Period

While the City and the CPD made progress with respect to several paragraphs relating to Use of Force this reporting period, the IMT has identified several areas that it hopes the City and the CPD can address in the twelfth reporting period.

The IMT is concerned about the increase of TRRs reflected in TRED's *2024 Mid-Year Report*. The TRED 2024 mid-year report identifies a 47% increase in TRRs compared to the first half of 2023 and that trend continued into the last half of 2024. The CPD has agreed to conduct a detailed analysis of the potential cause or causes of the increase in TRRs. For example, the IMT has requested data indicating whether the increase is attributable to rising numbers of arrests or increases in reporting. The IMT would also appreciate any insight on the historical trends in TRRs that may also shed light on the recent increase.

The IMT looks forward to progress on the CPD's use of body-worn cameras, which could impact its compliance levels with several paragraphs including ¶¶236, 237, and 238. The IMT appreciates the City's and the CPD's efforts to revise and clarify its S03-14, *Body Worn Cameras* policy, according to the Court's Order at the beginning of the eleventh reporting period. The IMT also appreciates the City's and the CPD's community engagement efforts regarding body-worn cameras, including the CPD's public webinars on its body-worn camera use.

The IMT recognizes that these efforts have been slowed by the issues relating to public safety briefings. These issues are delicate and the IMT appreciates the Parties' efforts to address them in a way that prioritizes public transparency and safety. The IMT understands that the resolution of these issues may take time. However, there are other aspects of the City's and the CPD's use of body-worn cameras that can be addressed in the meantime. For example, TRED's data and analysis shows that the most common debriefing points continue to relate to BWC activation, and front-line supervisors are often failing to address BWC violations when reviewing reportable use of force incidents.

In fact, the IMT continues to be concerned about the limited role played by front-line supervisors more generally. The TRED 2024 mid-year report indicates that district supervisors took corrective action with respect to only about 3% of Incident Debriefing Reports (IDRs) in any given month. Improvement in this metric and other evidence of corrective action at the district-level (including continuation and expansion of the FPI pilot program) will help the City and the CPD progress toward Full compliance with additional paragraphs in future reporting periods. *See e.g.*, ¶¶191 and 228.

The IMT also looks forward to receiving additional data and reporting in the twelfth reporting period that will assist in assessing compliance for additional paragraphs. For example, there are several paragraphs for which the IMT requires more information from COPA and the Bureau of Internal Affairs (BIA). *See* ¶¶175, 213, and 216. The IMT has also requested but not received additional data regarding the timeliness of supervisors' response to the scene of a level 2 or level 3 reportable use-of-force incident to assess Full compliance with ¶222. Finally, the IMT also looks forward to receiving additional data on foot pursuits following the CPD's planned audit in the next reporting period, which will enable the IMT to assess Full compliance with ¶168.²⁷

Additionally, TRED's four-month backlog for reviewing IDRs continued throughout this reporting period. As noted above, the IMT is hopeful that the pilot program, which will move responsibility for reviewing firearm pointing incidents to district captains, is a step toward clearing the backlog. However, the IMT believes that the City and the CPD need to take additional steps to provide TRED with more resources in the next reporting period.²⁸

²⁷ In response to an earlier draft of this report, the City sought clarification for why the CPD did not achieve Full compliance with ¶171. *See Attachment B* (City of Chicago Comments, April 4, 2025). Paragraph 171 requires the CPD to provide sufficient scenario-based training regarding foot pursuits, which has not yet demonstrated.

²⁸ The IMT also anticipates the CPD achieving additional levels of compliance in the next reporting period (*see* ¶189) after updating its *Firearm Pointing Incidents* policy (S03-22). *See Firearm Pointing Incidents – Revised Directive*, CHICAGO POLICE DEPARTMENT (posted for public comment

Lastly, the Consent Decree requires the City and the CPD to engage in stronger community engagement efforts on its Use of Force policies and practices, which we look forward to in the twelfth reporting period. *See, e.g.*, ¶¶158–60.²⁹ The IMT also looks forward to receiving D22-08, *Community Engagement in Policy Development*, in the next reporting period, which it hopes will lead to a trend of better community engagement across all Use of Force paragraphs.

Specific compliance assessments, by paragraph, for the Use of Force section are available here: <https://cpdmonitoringteam.com/wp-content/uploads/2025/04/4-IMR11-Use-of-Force.pdf>. This includes paragraphs where the City gained or lost compliance in the eleventh reporting period, as well as paragraphs with significant developments toward or away from compliance.³⁰

For reference, all IMT reports and appendices are available here: <https://cpdmonitoringteam.com/reports-information/>.

from March 11, 2025, through March 31, 2025), <https://www.chicagopolice.org/policy-review/firearm-pointing-incidents-revised-directive/>.

²⁹ In response to an earlier draft of this report, the City sought clarification for why the CPD did not achieve additional levels of compliance with ¶¶158–59. *See Attachment B* (City of Chicago Comments, April 4, 2025). While the CPD has achieved some level of compliance with these paragraphs, consistent with the Consent Decree, the CPD is required to implement and demonstrate the necessary community engagement related to its use-of-force policies.

³⁰ 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/>.

V. Recruitment, Hiring & Promotion

In the eleventh reporting period, the City and the CPD demonstrated continued efforts progress towards implementation of the Consent Decree requirements by maintaining compliance levels achieved in previous reporting periods for all paragraphs.

During this reporting period, the City and the CPD procured and are developing systems that provide real-time insights into the DCI implementation plan. In 2020, DCI delivered 32 recommendations to the City regarding its Sergeant and Lieutenant promotional processes. Since their last assessment in 2023, DCI has found 12 recommendations to be completed.

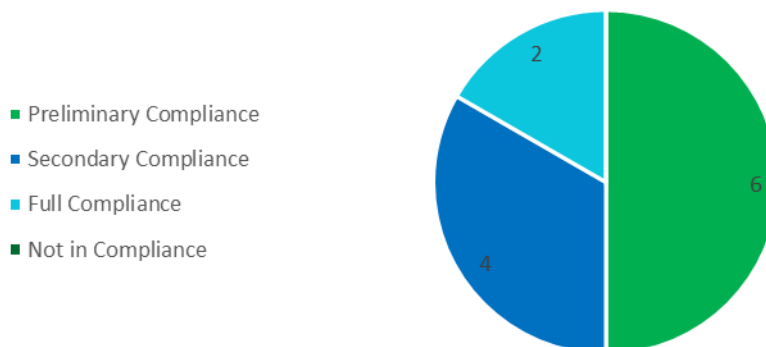
Additionally, the interagency participation on recruitment and promotional committees facilitates ongoing workflow and accountability for achieving Recruitment, Hiring and Promotions policy mandates. The IMT also commends the City and the CPD for mastering the process of regularly updating job descriptions and the continued efforts to define criteria more clearly for promotion decisions.

The City and the CPD experienced challenges maintaining regular cadence of meetings with hiring and promotions committees, along with the IMT and the OAG to provide updates on progress being made due to competing demands. However, the City and the CPD continued to engage the IMT throughout the reporting period. Through this time, we have observed progress on developing a new project management software to more readily track implementation efforts in real time and the continuation of testing and promotional processes.

Recruitment, Hiring, and Promotion Progress through Eleven Reporting Periods

The City and the CPD maintained Preliminary compliance for six paragraphs (¶¶253–54, 256, 260, 262, and 264), maintained Secondary compliance for four paragraphs (¶¶255, 258–59, and 263), and maintained Full compliance for two paragraphs (¶¶257 and 261).

Recruitment, Hiring, and Promotions Compliance Progress by December 31, 2024



Looking Ahead to the Twelfth Reporting Period

Looking ahead to the twelfth reporting period, the City and the CPD should adopt a more predictable cadence of monthly meetings to work towards meaningful progress towards further levels of compliance. The IMT also looks forward to the City and the CPD commencing the process for the timely submission of the report in line with the requirements of ¶260.³¹

For reference, all IMT reports and appendices are available here: <https://cpdmonitoringteam.com/reports-information/>.

³¹ 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/>.

VI. Training

In the eleventh reporting period, the CPD continued to make progress in many areas of training, as required by the Consent Decree. Notably, the CPD's Training and Support Division exemplified many promising practices in shepherding CPD's Training Oversight Committee oversight for department-wide training needs and in providing critical leadership to other CPD divisions in the development and design of new specialized training courses and hosted trainer development sessions for new Field Training Officers and new Instructors.

This reporting period, the CPD concluded the implementation of the *2024 Training Plan*, which included a minimum of 40 hours of In-Service Training based on the previously published *2024 Needs Assessment*. The 2024 IST courses were designed to meet the training needs identified in the *2024 Training Needs Assessment* and scheduled to prioritize the most critical training needs and audiences ahead of the 2024 Democratic National Convention in Chicago.

The CPD expanded the *Training Needs Assessment* process during the previous reporting period, which had a direct impact on the CPD's ability to build out a comprehensive Annual Training Plan for 2025 during this reporting period. The *2025 Annual Training Plan* details out CPD's annual 40-hour *In Service Training (IST)* program, eLearning courses, recruit training, promotional training, and all other training needs, incorporating the training courses and principles required by the Consent Decree (*e.g.*, impartial policing, procedural justice), the requirements of the Illinois Law Enforcement Training and Standards Board (ILETSB), and the Commission on Accreditation for Law Enforcement Agencies (CALEA), among others. For the first time, the CPD expanded the *2025 Annual Training Plan* to include a five-year plan to demonstrate how these courses and topics will be scheduled together to ensure appropriate refresher opportunities. The 2025 IST program leverages the CPD's core principles in interleaving core ideas into various training offerings, allowing officers to experience the training across multiple connected disciplines much like they experience when policing in the field. The civilian supervisory training added this period was a great asset to non-sworn personnel and helped to reinforce professional requirements of their positions.

As the CPD began to develop new training courses in preparation for 2025 and in alignment with the *2025 Annual Training Plan*, the CPD demonstrated proactive and collaborative practices with community organizations and external entities in the training design, creation, and delivery of in-service training courses during this reporting period.

Further, the CPD made additional strides in ensuring the sustainability and quality of the Field Training and Evaluation Program (FTEP), which is tasked with providing Probationary Police Officers (PPOs) with sufficient field training before becoming

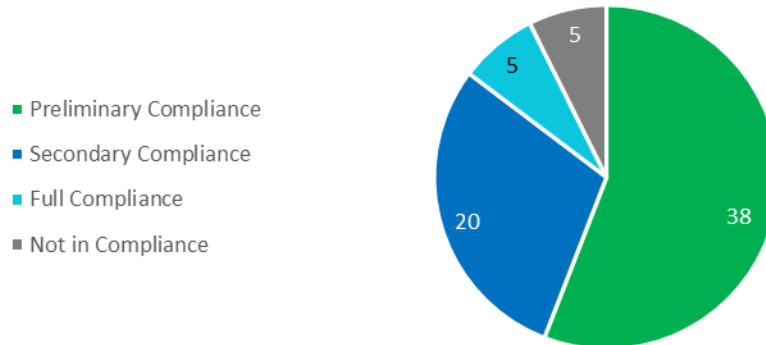
field qualified and receiving field assignments as Chicago Police Officers. As noted in the tenth reporting period, the City and the CPD were successful at the beginning of 2024 in expanding the number of Field Training Officer (FTO) positions to 450 FTOs, as needed due to the CPD's expanded recruiting efforts which subsequently led to larger CPD recruit and Probationary Police Officers (PPO) numbers. At the beginning of this reporting period, FTEP began with 15 ACT-Ups to supplement the FTO cadre, which were converted to full FTOs during the final FTO exams of 2024 with the addition of new FTOs. A fully staffed FTO cadre is crucial for the sustainability of the FTEP and to ensure that PPOs are adequately trained and prepared before becoming field qualified.

The IMT is concerned with the CPD's lack of progress with ¶¶277, 279, 282, 284, 285 and 287. For example, the City and the CPD has maintained Preliminary compliance with ¶277 for six consecutive reporting periods as they have not developed a published policy that dictates the benchmarks for evaluating whether outside experts are appropriately qualified for selection and retention. The remaining paragraphs suffer from similar deficiencies where little to no progress has been made towards providing sufficient evidence to meet the next level of compliance. The IMT is open to working with the City and the CPD to take the necessary steps to producing the required evidence and developing the requisite policies for these paragraphs.

Training Progress through Eleven Reporting Periods

In the eleventh reporting period, we assessed the City's compliance with 68 Training paragraphs. Specifically, in the eleventh reporting period, the City and the CPD maintained Preliminary compliance for 38 paragraphs (¶¶277, 279–85, 289, 291, 296, 298–300, 303–04, 307–18, 324, 326–29, 331–34, and 338), maintained Secondary compliance with 10 paragraphs (¶¶272, 292, 301–02, 305–06, 322, 337, 339, and 340), achieved Secondary compliance with 10 paragraphs (¶273–76, 278, 295, 297, 319, and 335–36), maintained Full compliance with one paragraph (¶271), and achieved Full compliance for four paragraphs (¶¶270, 320, 321, and 323). The City and CPD failed to reach Preliminary compliance for five paragraphs (¶¶286–88, 290, and 294).

Training Compliance Progress by December 31, 2024



Looking Ahead to the Twelfth Reporting Period

Through 11 reporting periods, the City and the CPD have developed or updated many training materials to incorporate requirements across the Consent Decree sections. Many of these trainings are reflected in the corresponding sections of this report.

Looking ahead to the next reporting period, the IMT anticipates enhanced and more substantive compliance reviews in several areas based on the progress the City and the CPD have made in meeting and maintaining compliance levels. 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 will likely aid the CPD in achieving higher compliance levels 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/2025/04/6->

[IMR11-Training.pdf](#). This includes paragraphs where the City gained or lost compliance in the eleventh reporting period, as well as paragraphs with significant developments toward or away from compliance.³²

For reference, all IMT reports and appendices are available here: <https://cpdmonitoringteam.com/reports-information/>.

³² 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://cpdmonitoringteam.com/imr-8-1/>.

VII. Supervision

The IMT and the CPD met regularly during the eleventh reporting period. The IMT successfully gathered valuable information to assess compliance with the Consent Decree requirements. Meetings during this period focused on the Unity of Command and Span of Control pilot programs, the TRR Supervisory Dashboard, the Watch Sheet Application, and the Supervisor Management Logs. Interactions between the IMT, the CPD command staff, and the CPD project managers fostered increased collaboration and partnership. This approach incorporated diverse perspectives, leading to more creative and effective solutions. As a result, these discussions improved communication, clarified expectations, and minimized misunderstandings regarding Supervision paragraphs, methodologies, work product, and compliance goals.

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 ¶1358. Span of control limits the number of officers any one sergeant can supervise daily. See ¶1358. The Consent Decree requires the CPD to create a consistent span-of-control ratio of 10 officers to 1 sergeant to encourage effective supervision.

The Unity of Command and Span of Control Pilot Program was launched to implement these concepts to enable more effective and efficient supervision, mentoring, officer support, and policing. Through a pilot program, the City and the CPD have tested different models and undergone technical assistance with the IMT to determine the most effective way to implement the concepts. The *Unity of Command and Span of Control Pilot Program* began in the 6th District during the second reporting period (September 2019 – February 29, 2020), the 4th district in the ninth reporting period (July 2022 – December 2022), and the 7th district in the tenth reporting period (January 2024 – June 2024). The current model for the program, implemented in the ninth reporting period, focuses on three tenets: (1) geographic familiarity, (2) high-quality supervision, and (3) resource flexibility.

As the CPD strategically staggered implementation, the supervision pilot programs are in various stages of completion. Table 1 shows the progress of the pilots in active districts. Districts in the "Implementation Underway" phase have begun operating under the model and are tracking compliance with the pre-determined success metrics. Districts in the "Implementation Complete" phase have achieved and maintained compliance with pre-determined success metrics.

Supervision Table 1. Progress of Supervision Pilot Programs

| CPD District (<i>in order of implementation</i>) | Unity of Command/ Span of Control | Performance Evaluation System |
|---|--|--------------------------------------|
| 006 – Gresham | Implementation Underway | Implementation Underway |
| 004 – South Chicago | Implementation Underway | Implementation Underway |
| 007 – Englewood | Implementation Underway | Implementation Underway |

During monthly calls, the City and the CPD shared information about the progress of the pilot program. The CPD-determined target goal for Span of Control, or the frequency with which the CPD is meeting the 10 to 1 ratio of members compared to sergeant working within a sector/watch is 70%.³³ The CPD-determined target goal for the Unity of Command by sector, or the frequency with which a member is working within their assigned sector is also 70%. 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%. Since the launch of the new staffing model in the ninth reporting period (July 2023 – December 2023), compliance rates with the CPD-determined target goals have fluctuated, and this has continued in the eleventh reporting period.

The CPD has especially struggled to achieve and maintain the Unity of Command by reviewer goal. To address this, the CPD has informed the IMT that they plan to institute secondary supervisors to ensure that when a member’s primary supervisor is not present, supervisory activities are taken over in a more consistent and systematic way. The IMT hopes to see further documentation about how these supervisors will be assigned and tracked.

During the eleventh reporting period, the IMT held meetings with commanding officers from the three pilot districts to discuss the challenges and successes of implementing and maintaining the Unity of Command and Span of Control model. The commanders expressed concerns about the number of supervisors on long-term medical leave, detailed to other assignments for extended periods, and or transferred out of the pilot districts. While details and transfers remain significant challenges, the commanders reaffirmed their commitment to supporting supervisors’ career advancement opportunities. Despite these challenges, each commander stated that they were effectively managing the resources available to them. The IMT acknowledges the CPD’s efforts but looks forward to unity of command, span of control, and unity of command by reviewer stabilizing across all periods and shifts.

³³ Before the tenth reporting period (starting in January 2024), the CPD-determined target goal was 80%.

Supervision Table 2.

Compliance with CPD-Determined Target Goals in the Eleventh Reporting Period

| CPD District (<i>in order of implementation</i>) | Span of Control (% Range) | Unity of Command by Sector (% Range) | Unity of Command by Reviewer (% Range) |
|--|---------------------------|--------------------------------------|--|
| 006 – Gresham | 64 – 75% | 73 – 81% | 33 – 46% |
| 004 – South Chicago | 55 – 79% | 68 – 76% | 20 – 31% |
| 007 – Englewood | 43 – 82% | 73 – 80% | 12 – 20% |

The CPD has also convened a *Unity of Command and Span of Control Pilot Program* Evaluation Committee, which is to meet at least quarterly to discuss implementation progress and share feedback from CPD personnel. This committee has the potential to play an important role in the programs’ effective implementation. The IMT believes that this committee can work to anticipate and address some of the possible challenges to ensure a smoother implementation process. These meetings have been restructured as opportunities for members of pilot districts, department leadership, and relevant stakeholders to engage in more robust, constructive conversations at the request of the IMT. In the eleventh reporting period’s committee meeting, members were much more vocal about pilot implementation successes and challenges. The CPD’s Bureau of Patrol leadership also solicited feedback on the potential of implementing the secondary sergeant model. We hope that these discussions continue in future reporting periods.

Additionally, the CPD has continued to provide updates on the staffing dashboard’s management tools for making staffing and operational decisions, which the IMT believes would enhance unity of command and span of control. We look forward to these percentages of time increasing and remaining stable over time. The IMT has observed through conversation with CPD members and command staff that the CPD members in the pilot districts and in the patrol chain of command are dedicated to achieving compliance in this area, not only because it is required by the Consent Decree, but because they understand that these requirements are fundamental pieces of the structure and accountability required to be able to effectively and constitutionally police Chicago.

The Performance Evaluation System (PES), the Officer Support System (OSS), and the Early Intervention and Support System (EISS)

The CPD originally chose to also begin implementing the pilots for the Performance Evaluation System (PES) and Officer Support System (OSS) in the same districts as the *Unity of Command and Span of Control Pilot Program*. However, the department halted the OSS pilot in the eleventh reporting period. The CPD is working to combine the OSS with the legacy officer intervention systems. The IMT is supportive of this streamlined approach and has continued to provide technical assistance for this effort at the CPD’s request. In the eleventh reporting period, the

City and the CPD moved forward with identifying a vendor for the Early Intervention and Support System (EISS) application, finalizing the contract, and holding a kick-off meeting to begin development in December 2024. A full implementation plan for the project is forthcoming. The IMT urges the CPD to maintain (and expand) efforts to engage with collective bargaining units, officers, supervisors, and subject matter experts to ensure that the EISS results in officers receiving appropriate interventions to avoid future adverse events.

During a December 2024 meeting, the City and the CPD shared that the PES will be combined into a larger management system that the department is currently working to implement. The management system will combine over forty home-grown applications, streamlining access for officers and supervisors. Additionally, the CPD shared that the lack of evaluation customization for non-sworn members of the department, one of the shortcomings of the current PES system, will be rectified in the new system. The IMT is supportive of technological advancements within the department that allow supervisors to conduct their duties more effectively. However, the implementation of this system is closely tied to the rollout of the CPD's new records management system, and the completion of the performance evaluation modules will take at least a year. The City and the CPD have shared that they plan to maintain the current PES and the legacy Performance Review System (PRS) as methods for evaluating and providing formal feedback to CPD members while the management system is being developed. During the eleventh reporting period, the City and the CPD internally evaluated the current PES pilot. The IMT has not yet been provided with the results of this evaluation but looks forward to receiving them. We encourage the City and the CPD to use these results to inform relevant aspects of the new management system.

[General Updates: Supervisor's Management Log, CPD Member Training, and the Workforce Allocation Study](#)

During the eleventh reporting period, progress on revising the Supervisor's Management Log significantly slowed. The log is a vital tool for documenting supervisors' daily activities and tasks corresponding to the responsibilities outlined in ¶1353. The IMT expects that the CPD will renew its focus on the Supervisor's Management Log during the twelfth reporting period.

Furthermore, 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 supervisors on how to perform their duties. The CPD conducted its *2024 In-Service Supervisors Training* and *Pre-Service Training* for newly promoted sergeants and lieutenants. The IMT specifically observed the pre-service training in the eleventh reporting period for supervisors of varying ranks. The instructors adhered to the lesson plans, actively engaged with their students, and fostered a collaborative learning environment.

They impressed upon the students of being effective supervisors and holding their subordinates accountable while also being mindful of their subordinates' well-being. Additionally, for the first time, the CPD conducted supervisory in-service training for non-sworn supervisors. We commend the CPD for their inclusion of this group, which has been historically left out of these opportunities. Their training focused on leadership skills and, while the IMT acknowledges the importance of this topic, we look forward to operational components of non-sworn supervisors being included in future iterations of the training. During past focus groups, these supervisors have expressed confusion about their role equivalencies with sworn members, their ability to discipline sworn members, and other facets of their duties. It is important that the CPD address these concerns through training for both sworn and non-sworn members.

Finally, the City and the CPD are in the process of initiating a Workforce Allocation Study (WFA Study), which will allow the City and the CPD to evaluate the CPD's current staffing and organizational structure and implement recommendations to bring the CPD in line with best staffing practices and further compliance with the Consent Decree. In previous focus groups and interviews, CPD supervisors have expressed that staffing shortages and heavy workloads prevent them from managing all their duties, including adherence to administrative functions that can affect the overall efficiency and effectiveness of the CPD. Insufficient staffing can delay or prevent supervisors from responding to scenes, mentoring, and counseling their supervisees, and conducting timely performance evaluations. These are important responsibilities that are essential for officer growth and CPD's effectiveness. Supervisors must not only be effectively overseeing officers—which requires not supervising too many officers at one time—but also must reinforce the importance of officers engaging in community policing: truly solving problems on individual blocks and in communities. The IMT is hopeful that the results of the workforce allocation study and its long-term implementation strategies by the CPD will address the concerns shared by supervisors.

During the eleventh reporting period the IMT provided written and verbal feedback on a draft scope of work for the forthcoming WFA Study. During the eleventh reporting period, the City and the CPD produced an executed vendor agreement and scope of work. The City and the CPD have stated that they expect the WFA Study to be completed in December 2025.

The CPD, the vendor, and the CCA will hold bi-weekly meetings to discuss the progress of the WFA Study. The IMT looks forward to receiving regular updates from this group and continuing to collaborate with the City and the CPD as the WFA Study commences. Collaboration between the IMT and the CPD is especially critical as the CPD works to expand the *Unity of Command and Span of Control Pilot Program* to additional districts. The IMT believes that programs required by the Supervision section of the Consent Decree are being thoughtfully developed and

implemented by the City and the CPD as a pilot. To test and develop strategies to implement Unity of Command and Span of Control, the Performance Evaluation System, and the Officer Support System pilot programs in all CPD districts, the 6th District became the central location and focus of the IMT and the Parties as the pilot district.

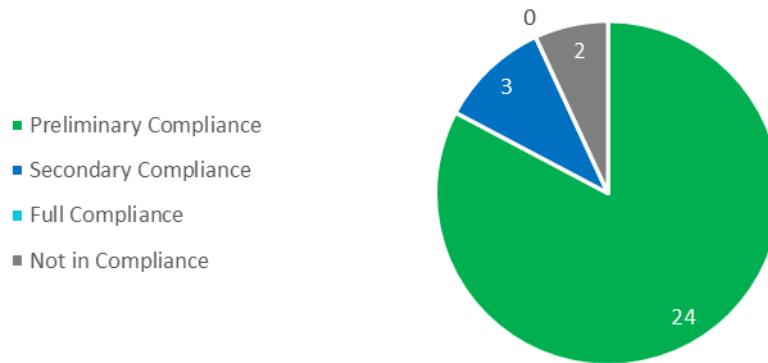
We recognize the progress that has been made and the pilot in the 6th District helped the CPD to achieve Preliminary compliance. We understand that policies and processes have been developed and are at various stages of implementation. However, the Consent Decree requires that many of the paragraphs within the Supervision section be implemented and measured for compliance in all 22 districts. Therefore, while the City and the CPD achieved Preliminary compliance in the 6th District, further levels of compliance cannot be achieved until the pilot continues to expand and is able to be successfully replicated and implemented in other districts. The IMT may be able to consider these levels of compliance once evidence of successful implementation is observable and measurable in multiple districts with unique challenges. 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.³⁴

Supervision Progress through Eleven Reporting Periods

Overall, we assessed the City's compliance with 29 Supervision paragraphs during the eleventh reporting period (¶¶347–57 and 359–76). In the eleventh reporting period, the City and the CPD achieved Preliminary compliance for two paragraphs (¶¶356 and 366), maintained Preliminary compliance for 22 paragraphs (¶¶347–48, 351–55, 359–64, 367, and 369–76), achieved Secondary compliance for one paragraph (¶349), and maintained Secondary compliance for two paragraphs (¶¶350 and 368). The City and the CPD did not reach any level of compliance with two paragraphs (¶¶357 and 365).

³⁴ In response to an earlier draft of this report, the City sought clarification for why the CPD did not achieve Secondary compliance with ¶347. See [Attachment B](#) (City of Chicago Comments, April 4, 2025). We acknowledge the CPD's submission of the revised TRR Supervisory Debriefing Point Dashboard eLearning with the new IDR, as well as the notes from the Supervision Pilot Evaluation Committee Meeting. For Secondary compliance, we determine whether the CPD sufficiently trains supervisors on all policies involving supervisory responsibilities *and* whether the CPD has created a plan to regularly evaluate the extent to which supervisors consistently apply CPD policies. The CPD has not yet created a plan to regularly evaluate the extent to which supervisors consistently apply CPD policies across *all* shifts, units, and geographic areas of Chicago consistent with ¶347.

Supervision Compliance Progress by December 31, 2024



Looking Ahead to the Twelfth Reporting Period

In the twelfth reporting period, the IMT expects to review data relevant to the *Unity of Command and Span of Control Pilot Program* such as assignment sheets, transfer orders, and other relevant records. The IMT also looks forward to receiving access to the Watch Sheet Application and Unity of Command and Span of Control Tableau Dashboard. While the numbers and staffing are important, the IMT emphasizes the importance of seeing discussions related to the pilot shift to include the guiding concepts.

We hope to continue working collaboratively 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. This is particularly relevant to the supervisory log digitization process and the Workforce Allocation Study. Regular communication and input exchange amongst all relevant stakeholders will be integral to their success. Additionally, the IMT looks forward to receiving a plan which outlines the development and implementation activities for the new PES within the Benchmark system.

The IMT anticipates conducting further interviews and focus groups with members and supervisors across the entire department. The IMT also looks forward to observing any pilot program, pre-service supervisors, and in-service supervisors training along with evaluations of that training. Further, we plan to observe future evaluation committee meetings and hope to see the shift to a collaborative and conversational structure continue.

Specific compliance assessments, by paragraph, for the Supervision section are available here: <https://cpdmonitoringteam.com/wp-content/uploads/2025/04/7-IMR11-Supervision.pdf>. This includes paragraphs where the City gained or lost compliance in the eleventh reporting period, as well as paragraphs with significant developments toward or away from compliance.³⁵

For reference, all IMT reports and appendices are available here: <https://cpdmonitoringteam.com/reports-information/>.

³⁵ 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/>.

VIII. Officer Wellness and Support

During the eleventh reporting period, the City and the CPD made notable progress towards compliance in several areas of the Consent Decree, showing perseverance and a commitment to promoting member wellness.

For example, the CPD ensured that members of the Professional Counseling Division were available to provide on-site counseling to members during the Democratic National Convention; maintained Full compliance with three paragraphs with which it achieved Full compliance during the eleventh reporting period (see ¶¶387, 392, and 396); continued a partnership with the University of Chicago to design and initiate the *Needs Assessment* (see ¶¶382–83); continued to circulate newsletters highlighting member support services (see ¶¶385–86); partnered with a technology vendor to establish a technology-based system to support data collection; produced data being collected manually in support of ¶¶381–83, 394, 398–99, and 404; produced an executed vendor agreement and scope of work for its forthcoming *Workforce Allocation Study* (WFA Study); and prioritized civilian wellness training (¶¶381, 385–86, 402, and 414).

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

The City and the CPD continued to face challenges related to several areas in this reporting period. Obstacles to advancing toward further compliance include the following:

- Inability to determine timeframes for members' receipt of services, as required by the Consent Decree (see ¶¶383, 389, 395, and 407); and
- Reliance on manual data collection as opposed to establishing a technology-based system (see ¶¶381–83, 394–95, 398–99, and 404).

As in prior reporting periods, during the eleventh reporting period, data collection continued to be a challenging issue for the City and the CPD. While the CPD is currently manually collecting data, which has afforded them certain levels of compliance, to reach Full compliance in several paragraphs, the CPD must implement a reliable, technology-based, and data driven system to collect, analyze, and produce key data points relevant to specific paragraph requirements, such as the number of one-on-one clinician, chaplain, or per support sessions completed in a given period; the number of group interactions; the number of internal referrals

(*i.e.*, instances in which peer support personnel or the chaplains unit refer members to Office of Community Policing clinicians); the number of external referrals (*i.e.*, instances in which clinicians and counselors refer members to external clinicians);³⁶ the frequency of debriefings following traumatic incidents;³⁷ the time between an appointment request and an appointment. See ¶¶381–83, 394–95, 398–99, and 404.³⁸

Currently, the Professional Counseling Division captures data relating to officer wellness by completing handwritten forms. The forms are then submitted to an administrator, who manually inputs the data into a computer. The CPD has informed the IMT that the Professional Counseling Division has partnered with a new technology services provider, Column Case, to develop a system to collect, report, and produce this data. The IMT expects that Column Case will begin collecting and analyzing data in early 2025.

Notably, the Professional Counseling Division uses a manual process to track the times of requests for services, offers of appointments, and the actual times scheduled for appointments. The IMT does not currently know whether Column Case will provide this service. If Column Case cannot, the IMT strongly recommends that the Professional Counseling Division use a computerized system to automatically record these touchpoints. Such a computerized system would allow the Professional Counseling Division to reliably measure response times to requests for service, which will help the CPD achieve further compliance with several paragraphs (*e.g.*, ¶¶381, 383, 389, and 395).

In addition to assessing response times, the CPD continues to face challenges assessing the caseloads of the Professional Counseling Division. The IMT recognizes and appreciates the continued increase in mental-health clinicians since the inception of the Consent Decree. The CPD has informed the IMT that the Professional Counseling Division is “almost fully staffed,” with 21 mental health clinicians currently employed. The IMT looks forward to seeing further data regarding staffing,

³⁶ While the CPD has shown the IMT data on internal and external referrals during the standing monthly meeting, the CPD has not produced this data for review.

³⁷ While the IMT receives information regarding traumatic incident debriefings in the annual *Traumatic Incident Stress Management Program* (TISMP) audit, we request that the CPD provide data regarding the number of debriefings under the program directly to us on a quarterly or semiannual basis in conjunction with the other data points listed.

³⁸ In response to an earlier draft of this report, the City sought clarification for why the CPD did not achieve Full compliance with ¶394. See [Attachment B](#) (City of Chicago Comments, April 4, 2025). Specifically, the CPD notes that it has provided referral numbers in slide deck presentations to the IMT. Those slides do not provide the level of detail required by the paragraph, such as referrals to private therapist, specialists, outside agencies, or hospitals. The CPD must also demonstrate the reliability of this data.

workload, and current and future capacity.³⁹ Furthermore, the CPD must demonstrate that the data-driven results and analyses of the forthcoming needs assessment and *Officer Support Systems Plan* inform the CPD on future staffing levels. These systems and processes will help to ensure that the Professional Counseling Division has sufficient staff to meet the wellness needs of all members (see ¶¶390, 391, 395, and 399).

During the eleventh reporting period, the CPD continued to make progress toward developing an improved needs assessment (¶383), *Officer Support Systems Plan* (¶384), communication strategy (¶¶385–86), and *Suicide Prevention Initiative* (¶388). The CPD is collaborating with the University of Chicago to develop the next needs assessment, which will be the basis for a future *Officer Support Systems Plan*, communications strategy, and *Suicide Prevention Initiative*. The CPD has implemented an internal communication strategy regarding the upcoming needs assessment to help ensure increased participation in the needs assessment survey (see ¶383(f)). The CPD expects to produce a needs assessment in the twelfth reporting period.⁴⁰

Progress has stalled on the production of documents in support of ¶397, which requires that the “CPD will continue to ensure that licensed mental health professionals employed by the [Professional Counseling Division] do not participate in fitness for duty.” During the ninth reporting period, the OPSA provided the IMT with a flowchart explaining the fitness for duty evaluation process. The CPD informed the IMT that the CPD planned to produce a policy containing the fitness for duty flowchart during the eleventh reporting period. The CPD has not yet done so. The IMT notes that it has observed a confusion regarding the fitness for duty process among CPD members and anticipates that a fitness for duty policy and flowchart would reduce this confusion.

During the eleventh reporting period, the CPD made great strides in training all members on wellness topics. The City and the CPD submitted attendance records showing that over 95% of eligible members completed the *2024 Annual In-Service Supervisors Training*, the *Civilian Supervisor Leadership Training*, the *Traumatic Incident Stress Management (TISMP) eLearning*, the *Law Enforcement Medical and Rescue Training/Officer Wellness and Resilience* training (“LEMART Training”), the *2024 De-Escalation, Response to Resistance, and Use of Force*, and *Coordinated Multiple Arrests Training*, and the *CPD WELMART Training Enhancements*.

³⁹ The IMT notes that the Professional Counseling Division will be reviewed under the forthcoming Workforce Allocation Study.

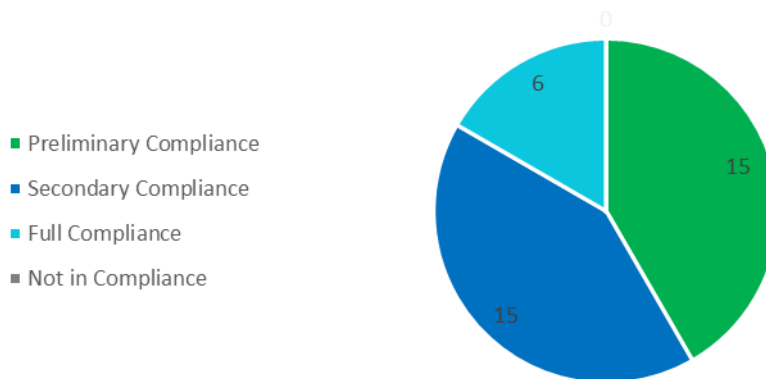
⁴⁰ Following the needs assessment, the IMT encourages the Professional Counseling Division to collaborate with the Office of Public Safety Administration (OPSA) on the Suicide Prevention Initiative because OPSA maintains data on member suicides.

In future reporting periods, the IMT looks forward to learning about the process by which the CPD identifies and consults subject matter experts in the creation of wellness training (see ¶¶412–13). The IMT understands that the CPD currently develops certain wellness training curricula in cooperation with subject matter experts, but the IMT is currently unaware of the process by which the CPD selects those subject-matter experts. Compare ¶¶282–286. The IMT looks forward to further discussion on this process.

Officer Wellness and Support Progress through Eleven Reporting Periods

Overall, the IMT assessed the City’s compliance with 36 Officer Wellness and Support paragraphs in the eleventh reporting period (¶¶381–402, 404, and 406–18). The City and the CPD maintained Preliminary compliance with 15 paragraphs (¶¶384, 388–89, 395, 399, and 407–13, 415–17), maintained Secondary compliance with 11 paragraphs (¶¶381, 383, 385–86, 390–91, 393–94, 397, 404, and 406), achieved Secondary compliance with 4 paragraphs (¶¶398, 402, 414, and 418), maintained Full compliance with 3 paragraphs (¶¶387, 392, and 396), and achieved Full compliance with 3 paragraphs (¶¶382, 400, and 401).

Officer Wellness and Support
Compliance Progress by December 31, 2024



Looking Ahead to the Twelfth Reporting Period

Moving forward, the City and the CPD should focus on (1) improving its data collection and analysis; (2) producing a comprehensive needs assessment, which will inform the next *Officer Support Systems Plan*, communications strategy, and *Suicide Prevention Initiative*; (3) ensuring that it identifies and tracks all members who qualify for referral to the TISMP referral program.

The IMT also expects to see significant efforts put into remedying the issues identified in the TISMP audits⁴¹. It is crucial that all members—particularly members responsible for making referrals—understand the referral requirements for the TISMP. It is also crucial that the CPD have an automated system to identify and track members who qualify for referral to the TISMP.

Specific compliance assessments, by paragraph, for the Officer Wellness and Support section are available here: <https://cpdmonitoringteam.com/wp-content/uploads/2025/04/8-IMR11-Officer-Wellness-and-Support.pdf>. This includes paragraphs where the City gained or lost compliance in the eleventh reporting period, as well as paragraphs with significant developments toward or away from compliance.⁴²

For reference, all IMT reports and appendices are available here: <https://cpdmonitoringteam.com/reports-information/>.

⁴¹ In response to an earlier draft of this report, the City sought clarification for why the CPD did not achieve additional levels of compliance with ¶¶407–08 and 410–11 based on its TISMP audits. See [Attachment B](#) (City of Chicago Comments, April 4, 2025). The TISMP audits produced to date have identified key areas of improvement for the mandatory referral program. The IMT looks forward to the continued effort by the CPD to ensure that they adequately addressed the recommendations and findings of the audits and prioritized those concerns. It will be important throughout the suite of the TISMP related paragraphs to show continued progress—including sufficient means and systems that support an efficient and effective TISMP program.

⁴² 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/>.

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, as shown above (¶¶419–23).

The Accountability and Transparency section explicitly sets obligations for the following City entities: the Chicago Police Department (CPD) and the CPD’s Bureau of Internal Affairs (BIA), the Civilian Office of Police Accountability (COPA), and the Police Board.⁴³ 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.

The City’s complex accountability system requires consistent communication and collaboration among all entities. As noted in prior reports, there was a sharp decline in collaboration between the CPD and COPA in the ninth reporting period with regard to report access, data access, and regularly occurring conversations. In the tenth and eleventh reporting periods, the entities appeared to improve their collaborative relationship, and COPA reported improved access to data. We hope to see continued efforts to improve consistent communications and seamless access to reports and data between the entities.

For the past several reporting periods, the CPD, COPA, and the Police Board have conducted regular meetings with the IMT and the OAG. In the eighth reporting period, the CCPSA began conducting monthly meetings as well, but the vast majority of these meetings were canceled by the City. In an effort to foster a more collaborative process, in addition to these monthly meetings, the IMT continued to regularly meet individually with the City entities and the OAG. The increased individual meetings and direct communications allowed the IMT to hear challenges and concerns, to explain compliance methodologies, and to provide tech-

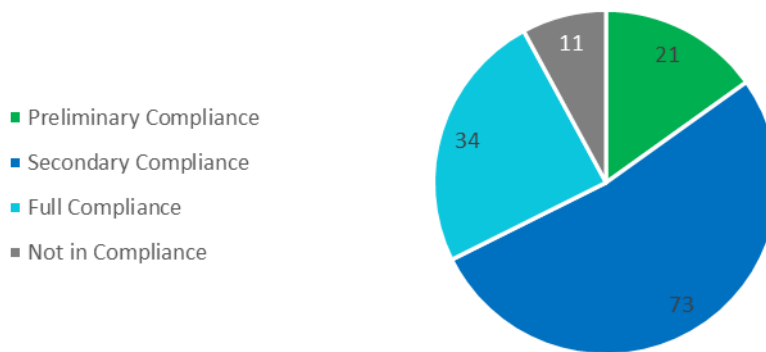
⁴³ The Deputy PSIG achieved Full compliance with all requirements pertaining to its office in the fourth reporting period (January 2024 – June 2021) and maintained that Full compliance during subsequent reporting periods. In the eighth reporting period (January 2023 – June 2023), the Deputy PSIG successfully 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.

nical assistance (see ¶656). Moving forward, we feel the enhanced, less-rigid communications will further assist the City in achieving and maintaining compliance with the Consent Decree.

Accountability and Transparency Progress through Eleven 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 19 paragraphs (¶¶445, 459, 461, 463, 476, 481–82, 493, 495, 501, 522, 526, 531, 540–42, 544, and 548–49) and met Preliminary compliance with two paragraphs in the eleventh reporting period (¶¶521 and 529). The City also maintained Secondary compliance with 38 paragraphs (¶¶427–28, 431–35, 440, 443, 446–47, 449–50, 452, 457, 462, 469, 472, 474, 477–78, 496, 498, 500, 502, 505–09, 511, 513–15, 525, 532, 552, and 560) and met Secondary compliance with 35 paragraphs (¶¶444, 448, 453–56, 460, 464–68, 471, 475, 479–80, 483–84, 486–87, 497, 499, 503–04, 516–19, 523–24, 527–28, 530, 553, and 564). The City also maintained Full compliance with 25 paragraphs (¶¶430, 441–42, 473, 485, 533–39, 543, 550–51, 554–59, 561–63, and 565) and met Full compliance with nine paragraphs (¶¶424–26, 429, 436–39, and 470). The City did not reach any level of compliance with 11 paragraphs (¶¶451, 488–92, 494, 512, and 545–47), two of which are under assessment for Preliminary compliance (¶¶546–47).

Accountability & Transparency
Compliance Progress by December 31, 2024



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 eleventh reporting period, the CPD made substantial progress toward compliance with Accountability and Transparency requirements⁴⁴ by delivering several BIA in-service training modules and an eLearning, allowing the CPD to achieve Secondary compliance with numerous paragraphs. The CPD delivered the following BIA trainings this reporting period:

- BIA's *Accountability Supplemental eLearning*; and
- BIA's In-Service Training Modules: Module 3, *Credibility, Standards of Proof, and Disciplinary Decision Making*; Module 8, *Audio Recording Interview Guidelines*; Module 9, *Interviewing Department Members*; Module 10, *Mistakes and Updates; Collection of Evidence and Interviews with Non-Department Members*; and *Investigation Assignment and Timelines*.

During the ninth and tenth reporting periods (July 2023 – June 30, 2024), the CPD developed several BIA in-service training modules based on previous discussions about the format and purpose of the training. During the eleventh reporting period, BIA delivered training on many of the in-service training modules and developed several onboard training modules to be delivered in the twelfth reporting period (January – June 2025).

The CPD also continued to make progress toward finalizing its *Officer-Involved Shooting and Officer-Involved Death Incident* policy series (G03-06, G03-06-01, and G03-06-02), which is arguably one of the most important requirements of the Consent Decree. The CPD continued to work closely with the IMT and the OAG in the eleventh reporting period to discuss and revise the policy series. While the IMT continues to have no objection to the policy series, the CPD must address the OAG's additional comments before implementing the policy series. Additionally, the CPD must revise the policy series to comply with the Court's July 1, 2024 Order Regarding the Special Order S03-14, *Body Worn Camera Policy*, and Public Safety Investigations.

⁴⁴ The City takes the position that ¶1445 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 member 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.

Additionally, the CPD produced its *2024 BIA Quarter 2 Report*⁴⁵ and its *2024 BIA Quarter 3 Report*⁴⁶ during the eleventh reporting period. The reports include all necessary aggregate data regarding investigations conducted by BIA and Accountability Sergeants, as required by ¶¶550–51.⁴⁷ The IMT appreciates the CPD’s effort to create and publish the reports in a timely manner. The reports demonstrate a commitment to transparency and building trust in BIA’s operations.

As previously noted, the IMT continues to have some concerns regarding the pace of compliance with some reform requirements of the accountability and disciplinary process. We continue to learn about the realities and challenges that BIA Investigators and Accountability Sergeants face when performing their duties. Even though ¶494(b) requires two Accountability Sergeants to be assigned in each district, we have continued to learn this is not occurring in practice. Although most districts have now allocated more than one sergeant as an Accountability Sergeant, the majority of the districts still classify them as a “primary” and a “backup.” In many districts, the “backup” Accountability Sergeant performs other assignments in the district and only has cases assigned during the absence of the Primary Accountability Sergeant. This continues to create a very high caseload for the one designated Accountability Sergeant. This is not a new issue. We have noted this issue going back to at least the sixth reporting period (January 2022 – June 2022). We continue to encourage the CPD to designate two Accountability Sergeants with their **primary responsibility** being receiving, processing, and investigating complaints against CPD members (as required by ¶¶493–94) rather than other duties like serving as the desk sergeant or the field sergeant for the day.

Although Accountability Sergeants’ caseloads have begun to trend in the right direction with lower caseloads, we continue to note that the numbers may not continue to improve until personnel are primarily dedicated to investigating cases in the districts. We are encouraged by BIA’s use of informal sessions with Accounta-

⁴⁵ See *2024 BIA Quarter 2 Report*, <https://home.chicagopolice.org/wp-content/uploads/BIA-Quarter-Q2-2024-Report.pdf>.

⁴⁶ See *2024 BIA Quarter 3 Report*, <https://www.chicagopolice.org/wp-content/uploads/BIA-Quarter-Q3-2024.pdf>.

⁴⁷ The *2024 BIA Quarter 2 Report* was also produced for Full compliance review with ¶¶456, 462, 476, and 526–27, and the *2024 BIA Quarter 3 Report* was also produced for Full compliance review with ¶¶431, 433, 443, 456, 462, 476–77, and 526–27. However, the reports alone are insufficient for Full compliance with those paragraphs. To reach Full compliance with those paragraphs, the CPD must produce the underlying data relevant to those paragraphs rather than a summary of that data.

bility Sergeants and discussions regarding assignment strategies to reduce case inventories and promote job enhancement and enrichment. In future reporting periods, we look forward to BIA working to address its current backlog of cases.⁴⁸

Civilian Office of Police Accountability

In the eleventh 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, case management system (CMS) reports, final summary reports, CMS notes and screenshots, interview transcripts, and other documentation from a random sample of cases.

COPA also produced its *2024 Second Quarter Report*⁴⁹ and its *2024 Third Quarter Report*⁵⁰ this reporting period. The reports include all necessary aggregate data regarding investigations conducted by COPA, as required by ¶1550. The reports also demonstrate COPA's commitment to transparency in its operations.

Additionally, COPA took efforts to address the IMT's concerns regarding training improvements. As noted in our last report, we hoped to see all instructors teaching in alignment with the lesson plans; COPA utilizing adult-learning techniques throughout each training session to elicit more engagement from the training attendees (*see* ¶1284); COPA discussing the answers to post-test questions with the attendees to ensure comprehension of training materials (*see* ¶1272(g)); and a mechanism in place to ensure that training evaluation feedback is received, analyzed, and reviewed (*see* ¶1287). During the eleventh reporting period, COPA developed a plan to address these concerns in future trainings. We look forward to COPA implementing its plan in the next 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

⁴⁸ In response to an earlier draft of this report, the City sought clarification for why the CPD did not achieve additional levels of compliance with ¶¶481–82. *See Attachment B* (City of Chicago Comments, April 4, 2025). While ¶¶481–82 are covered in the CPD's *BIA Accountability Supplemental eLearning*, the eLearning alone is insufficient for Secondary compliance because BIA has not yet identified the responsible personnel for meeting the requirements of these paragraphs for training.

⁴⁹ *See COPA 2024 Second Quarter Report*, <https://www.chicagocopa.org/wp-content/uploads/2024/07/COPA-2024-Q2-5.pdf>.

⁵⁰ *See COPA 2024 Third Quarter Report*, <https://www.chicagocopa.org/wp-content/uploads/2024/10/COPA-2024-Q3-Final-1.pdf>.

also look forward to continuing positive discussions about compliance in future reporting periods.

The Chicago Police Board

In the eleventh reporting period, the Police Board continued to make progress toward compliance with Accountability and Transparency section requirements. For example, to meet its training requirements, the Police Board has sought the help of the CPD and COPA to provide relevant and thorough training on topics required by the Consent Decree (see ¶¶540–42).

Throughout the eleventh reporting period, the IMT met with the Police Board on a monthly 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.⁵¹ That litigation is currently pending appeal, and pursuant to the court’s decision, the Police Board only heard cases in which the officer consented to the Police Board’s procedures in the eleventh 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.⁵²

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).⁵³

The CCPSA was first tasked with filling vacant Police Board positions in the ninth reporting period (July – December 2023). We expressed concerns that the CCPSA did not follow the established selection process and criteria previously developed by the Police Board and the City. The CCPSA addressed our concerns in the tenth reporting period (January 2024 – June 2024) by following the established selection

⁵¹ 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.

⁵² In response to an earlier draft of this report, the City sought clarification for ¶564. See [Attachment B](#) (City of Chicago Comments, April 4, 2025). In the twelfth reporting period, the Police Board has developed a plan to demonstrate Full compliance with ¶564, which was discussed during a meeting with the City, the Police Board, the OAG, and the IMT in February 2025.

⁵³ As noted in our *Comprehensive Assessment Part II*, the IMT recommends incorporating the CCPSA into the Consent Decree to reflect current City entity responsibilities.

process and criteria in filling additional vacant positions despite challenges related to gaining interest from qualified applicants. During the eleventh reporting period, the CCPSA again had an opportunity to select additional Police Board members. The CCPSA undertook extensive outreach efforts to promote the vacant positions, and in turn, received more applications than ever before. We appreciate the CCPSA's efforts to ensure the established selection process and criteria in nominating candidates is closely followed.

Additionally, in the eleventh reporting period, the CCPSA continued its outreach efforts and produced survey responses from three anonymous surveys regarding the qualities necessary for a COPA Chief Administrator and for Police Board members. While the response rate was low, the CCPSA is hopeful that the surveys will gain traction in the future. Additionally, the CCPSA anticipates holding listening sessions in 2025. We appreciate the CCPSA's community outreach efforts and look forward to seeing the continuing results of those efforts in future reporting periods.

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.

On October 1, 2022, the City launched its *Community-Police Mediation Pilot Program*, which offers a meaningful opportunity to build trust and facilitate honest discussions between community members and CPD officers. The pilot ran through December 31, 2023. The City produced reports regarding the Community-Police Mediation Pilot Program in the tenth reporting period (January – June 2024). During the first two pilot phases, even though there were a small number of cases that were mediated, the participants were overall satisfied with the program. However, some challenges remained such as scheduling issues and the lack of a virtual option.

During the eleventh reporting period, the City and COPA created a new Director of Mediation position, housed within COPA, to oversee the City's mediation program. In the eleventh reporting period, COPA produced a draft policy and implementation plan outlining phase three of the City's Community-Police Mediation Pilot Program. The implementation plan includes obtaining input from community members, the legal community, and the public safety community. The IMT appreciates the City's and COPA's efforts and looks forward to further updates on the program in the twelfth reporting period.

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 with regard to 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). As noted in our last report, the City previously started discussions with the Illinois State Police in 2020 to potentially contract the Illinois State Police’s services to investigate CPD officer-involved death incidents. However, the City and the Illinois State Police were unable to reach an agreement. Therefore, in the eleventh reporting period, the City began efforts to reach out to other law enforcement agencies to gauge interest and begin discussions. We look forward to additional updates next reporting period.

Specific assessments, by paragraph, for the Accountability and Transparency section are available here: <https://cpdmonitoringteam.com/wp-content/uploads/2025/04/9-IMR11-Accountability-and-Transparency.pdf>. This includes paragraphs where the City gained or lost compliance in the eleventh reporting period, as well as paragraphs with significant developments toward or away from compliance.⁵⁴

For reference, all IMT reports and appendices are available here: <https://cpdmonitoringteam.com/reports-information/>.

⁵⁴ 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/>.

X. Data Collection, Analysis & Management

During the eleventh reporting period, the City and the CPD continued to make progress on several reforms required by the Data Collection, Analysis, and Management section. These efforts allowed the City and the CPD to achieve Full compliance with ¶568, achieve Secondary compliance with ¶569 (which is Under Assessment for Full compliance), achieve Full compliance with ¶571, achieve Secondary compliance with ¶576, and achieve Preliminary compliance with ¶607.

During this reporting period, the City achieved Full compliance with ¶568, which requires data and documents to be reliably and validly collected after a use of force event. Relatedly, the City achieved Secondary compliance with ¶569 and is Under Assessment for Full compliance with this paragraph. Additionally, the CPD provided us with evidence that officers have received instruction in the range of forms and documents that are required following a use of force event. The CPD also provided the findings of an audit conducted by the CPD's Audit Division, demonstrating that officers consistently collect use of force data following a use of force event. Therefore, publicly available data on the CPD's use of force practices can be viewed as a valid picture of such practices and we continue to see evidence that such data and records are available for the Civilian Office of Police Accountability (COPA), the Bureau of Internal Affairs (BIA), and the Tactical Review and Evaluation Division (TRED) to facilitate accountability. Although we recognize additional reforms are required related to force review and accountability processes, the data collection requirements of ¶568 are now being met.⁵⁵

The findings of the Audit Division also resulted in the CPD achieving Full compliance with the requirements of ¶571, which requires the CPD to maintain an electronic system that accurately and reliably tracks all data derived from reportable use of force incidents. According to the audit conducted by the CPD Audit Division, the audit team reviewed over 10,000 report narratives and, from this review, identified only 30 unreported use of force incidents. Based on these findings, the Audit

⁵⁵ The City and CPD have also made progress related to ¶575, which requires the CPD to ensure that the Tactical Review and Evaluation Division (TRED) has sufficient resources to perform the responsibilities outlined in ¶574, including staffing. Previously, the City and the CPD achieved Preliminary and Secondary compliance with ¶575 in the fourth reporting period, but lost compliance with this paragraph in the sixth reporting period due to inadequate staffing. In *Independent Monitoring Report 8*, we acknowledged the significant steps TRED took at that time to increase staffing but noted that the process of ensuring "sufficient resources to perform" the tasks TRED is required to perform is ongoing and those resources were not in place on a permanent basis. We explained that, to regain Preliminary compliance with ¶575, we would need to see "a permanent solution implemented and evidence of further reductions in the backlog." We appreciate CPD's ongoing efforts to ensure that TRED is sufficiently staffed and to reduce the backlog. To regain Preliminary compliance with ¶575, we will continue to look for adequate staffing and further reductions in the backlog.

Division concluded that “Department members comply with the Department’s use of force reporting policy with minimal exceptions.” The IMT had the opportunity to weigh in on the methodology prior to the audit being conducted and agree with the conclusions drawn by the Audit Division. However, we encourage the City and the CPD to develop an audit approach to analyze how many over-reported Tactical Response Reports (TRRs) exist, an issue raised in the Audit Division’s report.

During this reporting period, the CPD also achieved Secondary compliance with ¶1576 which requires supervisors to conduct random audits of body-worn and in-car camera recordings. The CPD provided the IMT with an updated version of S03-05, *In-Car Video Systems*, which served as the remaining requirement for Preliminary compliance after we had previously provided a no-objection notice for S03-14, *Body Worn Cameras*. Furthermore, we had previously provided a no-objection notice regarding CPD Form 21.130, *Random Video Review*, which provides a standardized process for conducting the random reviews required by ¶1576 and therefore serves as a training mechanism for watch lieutenants.

Further, the CPD achieved Preliminary compliance with ¶1607 during this reporting period by demonstrating progress on developing and implementing a Data Systems Plan. As detailed in the CPD’s ¶1606 assessment (*see Independent Monitoring Report 10*), several of the CPD’s data collection processes were hindered by the lack of a comprehensive records management system (RMS). During this reporting period, the CPD provided us with a contract between the City and an RMS vendor that will result in a new RMS for the CPD. Additionally, the CPD provided the IMT with an overall timeline for implementing the new RMS, identifying key milestones during implementation. As a new RMS is a critical resolution to many of the data system needs identified from the ¶1606 assessment, and the CPD has provided an overall timeline for its implementation, we believe the City has taken the preliminary steps needed to comply with this paragraph.

We note here too that the new RMS is an important component of the forthcoming Early Intervention and Support System (EISS) that the CPD is in the process of developing. However, we continue to urge the CPD to develop robust training for the EISS process and create a strong evaluation framework to ensure that it is successfully providing officers the interventions and supports they may need. While the RMS is important in the context of identifying potentially problematic officers, the EISS’ success also hinges on the ability of supervisors to hold meaningful conversations with those officers and connect them with the services they may need. This will require comprehensive training on the EISS, both for supervisors and officers to ensure familiarity with the purpose and process of the EISS. Additionally, the success of the CPD’s EISS will need to be regularly evaluated through both process audits and outcome assessments. During the eleventh reporting period, the IMT was not provided with any draft trainings or evaluation frameworks, which we will need to see prior to the EISS’ department-wide implementation.

Finally, this reporting period, the City and the CPD maintained Preliminary and Secondary compliance with ¶¶578 and 580, and is Under Assessment for Full compliance with ¶580.⁵⁶ The CPD maintained General Order G03-02-08, *Department Review of Use of Force*, which memorializes the role of the Force Review Board (FRB) in reviewing Level 3 uses of force and reportable uses of force by a CPD command staff members. The CPD also continued to utilize Standard Operating Procedure (SOP) 2020-03, *Force Review Board*. However, we continue to observe inconsistent execution of FRBs, and those which we observed during this monitoring period did not sufficiently evaluate each opportunity for operational improvement. FRB reviews should be designed to look at each decision during an event to understand how they contributed to the outcome and whether, from an operational perspective, there is an opportunity to improve. The FRBs we observed continue to be summary reviews of the force event without the nuance required by SOP 2020-03. To achieve Full compliance with these paragraphs, we will look for evidence that the FRB is consistently engaging in a critical review of the incidents and making a decision-point analysis that enhances the CPD.⁵⁷

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

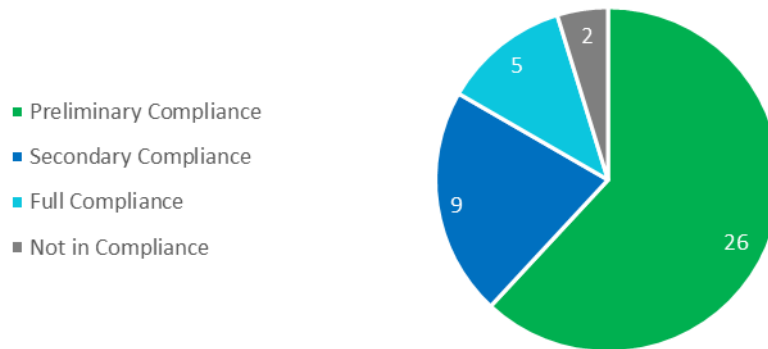
Overall, the IMT assessed the City's compliance with 42 Data Collection, Analysis, and Management paragraphs. At the end of the eleventh reporting period, the City achieved Preliminary compliance with one paragraph (¶607), maintained Preliminary compliance for 25 paragraphs (¶¶572–74, and 583–604), achieved Secondary compliance with two paragraphs (¶¶576 and 569), maintained Secondary compliance with six paragraphs (¶¶570, 578, 580–82, and 608), achieved Full compliance

⁵⁶ To assess Full compliance with ¶¶578 and 580, the IMT reviewed the entities' data collection and evaluated whether the Force Review Board consistently engaged in a critical review of incidents and made a decision-point analysis per the requirements of these paragraphs.

⁵⁷ In response to an earlier draft of this report, the City sought clarification for why the CPD did not achieve Full compliance with ¶¶578 and 580. See [Attachment B](#) (City of Chicago Comments, April 4, 2025). The City and CPD have provided the IMT with a PowerPoint template used by TRED during FRBs, which was developed to follow SOP 2020-03. This is a useful tool for consistent reviews, but it is not alone sufficient to demonstrate Full compliance with this paragraph, which requires a critical review of the incidents that identifies opportunities to improve. To assess Full compliance with ¶¶578 and 580, the IMT will continue to review whether the Force Review Board is meeting—within 96 hours after the incident—the requirements of these paragraphs, including identifying whether tactics are sound and consistent with CPD training and identify specific modifications to existing policy, training, tactics, or equipment that could minimize risk of harm to officers and the public. (In our *Comprehensive Assessment*, we identified that there are often legitimate reasons to delay Force Review Board meetings beyond 96 hours after an incident, but as of the date of this report, the Parties have not yet agreed to modify the Consent Decree in response to our *Comprehensive Assessment*. See, e.g., *Comprehensive Assessment, Part II*, Independent Monitoring Team (October 11, 2024), <https://live-chicago-imt.pantheonsite.io/wp-content/uploads/2024/10/2024.10.11-Independent-Monitoring-Team-Comprehensive-Assessment-Part-II-amended-and-filed.pdf>.)

with three paragraphs (¶¶568, 571, and 577), maintained Full compliance with three paragraphs (¶¶579, 606, and 609), and failed to reach any level of compliance with two paragraphs (¶¶575 and 605).

Data Collection, Analysis, and Management Compliance Progress by December 31, 2024



Looking Ahead to the Twelfth Reporting Period

Moving forward, the CPD should continue to work collaboratively and consistently to address the Data Collection, Analysis, and Management section of the Consent Decree. Consistent with our past reports, we look forward to the CPD continuing to make progress as it develops its EISS system and accompanying training. We also look forward to the CPD developing a policy that memorializes COPA’s access to CPD data systems, as this remains a barrier to compliance with ¶570. Finally, we look forward to improvement in Force Review Board proceedings, a long-standing concern, particularly with their ability to incorporate decision-point analysis into their practices.

We look forward to continuing to monitor the City and the CPD’s progress in meeting the requirements of the Consent Decree in the next reporting period.

Specific assessments, by paragraph, for the Data Collection, Analysis & Management section are available here: <https://cpdmonitoringteam.com/wp-content/uploads/2025/04/10-IMR11-Data.pdf>. This includes paragraphs where the City

gained or lost compliance in the eleventh reporting period, as well as paragraphs with significant developments toward or away from compliance.⁵⁸

For reference, all IMT reports and appendices are available here: <https://cpdmonitoringteam.com/reports-information/>.

⁵⁸ 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/>.

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

In the eleventh reporting period, the City and the CPD achieved new levels of compliance for several paragraphs in the Investigatory Stops, Protective Pat-Downs, and Enforcement of Loitering Ordinance section. Specifically, the City and the CPD achieved Preliminary compliance for several paragraphs after they issued their updated drafts of CPD policies related to investigatory stops, protective pat downs, and the enforcement of the 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, 861–64, and 873) during the tenth reporting period. This reporting period, the IMT began to monitor an additional 16 paragraphs (¶¶827–33, 836–37, 839–40, 860–61, 869–70, and 872).⁵⁹ The remaining 13 paragraphs (¶¶822–26, 844–51) will be monitored beginning in the thirteenth reporting period.

During this reporting period, we met regularly with the City, the CPD, and the OAG to discuss the monitorable paragraphs relating to investigatory stops, protective pat-downs, and enforcement of Loitering Ordinances. Many of our discussions centered on drafts of relevant policies, including G03-08, *Police Encounters and the Fourth Amendment* policy suite⁶⁰ and S10-02, *Gang and Narcotics-Related Loitering* policy suite.⁶¹ The City and the CPD posted pre-implementation drafts of these policy suites on December 31, 2024.⁶²

We also reviewed the Tactical Review and Evaluation Division's (TRED) *2024 Mid-Year Report*, which was published near the end of the reporting period. TRED's

⁵⁹ As set out below, the IMT is proposing a revision to the Monitoring Plan for investigatory stops. The Amended Monitoring Plan states that the IMT will begin to monitor ¶¶822–26 during the thirteenth reporting period (July – December 2025) instead of the eleventh reporting period.

⁶⁰ This policy suite includes: G03-08, *Police Encounters and the Fourth Amendment*, G03-08-01, *Investigatory Stops*, G03-08-03, *Reporting Temporary Detentions*, and G03-08-04, *Department Review of Temporary Detentions*.

⁶¹ This policy suite includes: S10-02, *Gang and Narcotics-Related Loitering Suite*, S10-02-02, *Selection of Designated Enforcement Areas*, and S10-02-03, *Gang and Narcotics-Related Enforcement*.

⁶² The IMT looks forward to receiving the finalization packets for these new policy suites in the next reporting period.

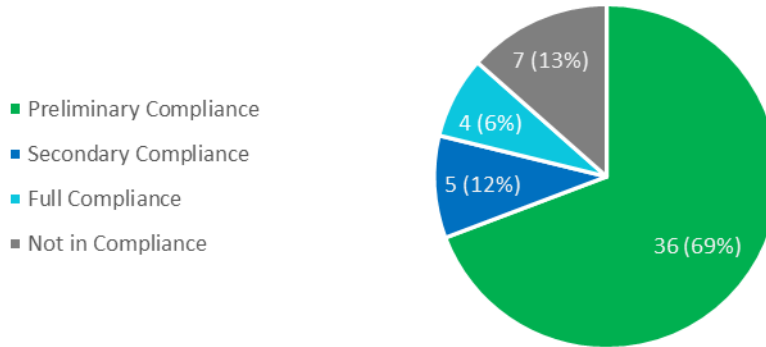
collection of data and its analyses in their semi-annual reports have assisted the IMT in assessing compliance with several of these paragraphs and the IMT wishes to express its gratitude for TRED's continued hard work and commitment to identifying helpful trends and patterns in the CPD's reporting data.

Investigatory Stops, Protective Pat-Downs, and Enforcement of Loitering Ordinances Progress in the Eleventh Reporting Periods

During this reporting period, the IMT assessed the City's and the CPD's compliance with 52 paragraphs relating to Investigatory Stops, Protective Pat-Downs, and Enforcement of Loitering Ordinances. Through the issuance of the policies and forms related to investigatory stops, protective pat downs, and the enforcement of the Loitering Ordinances, the City and the CPD achieved Preliminary compliance with 31 paragraphs this reporting period (¶¶803–21, 828–33, 853, 860, 862–64, and 866) and maintained Preliminary compliance with five paragraphs (¶¶841, 857–59, and 873). The City and CPD achieved Secondary compliance with four paragraphs (¶¶827, 834, 839, and 852) and maintained Secondary compliance with one paragraph (¶838). The City and the CPD achieved Full compliance with three paragraphs (¶¶835, 854, and 856). The City and CPD also maintained Full compliance with one paragraph (¶868). There are seven paragraphs that are not in compliance (¶¶836, 837, 840, 861, 869–70, and 872). The IMT's original Monitoring Plan anticipated that the IMT would begin to monitor ¶¶822–26 during this reporting period.⁶³ 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 this reporting period 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 is amending the Monitoring Plan to begin monitoring ¶¶822–26 in the thirteenth reporting period (July – December 2025). [ISR Stipulation Figure 1](#) below sets out the Amended Monitoring Plan for investigatory stops, protective pat-downs, and enforcement of Loitering Ordinances.

⁶³ See *Independent Monitoring Report 9* (May 23, 2024) at 83.

Investigatory Stops, Pat Downs, and Loitering Compliance Progress by December 31, 2024



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) | ¶¶803–821, 834–835, 838, 841, 852–853, 856–859, 862–864, 873 +33 paragraphs (Total = 36) |
| Eleventh Reporting Period (July 1, 2024–December 31, 2024) | ¶¶827–833, 836–837, 839–840, 860–861, 869–870, 872 +16 paragraphs (Total = 52) |
| Twelfth Reporting Period (January 1, 2025–June 30, 2025) | None +0 paragraphs (Total = 52) |
| Thirteenth Reporting Period (July 1, 2025–December 31, 2025) | ¶¶822–826, 844–851 +13 paragraphs (Total = 65) |

Overall, the City and the CPD made steady progress toward the Investigatory Stops, Protective Pat-Downs, and Enforcement of Loitering Ordinances requirements of the Consent Decree in the eleventh reporting period. This includes the ongoing Consent Decree policy development process for the G03-08 *Police Encounters and the Fourth Amendment* policy suite and the S10-02 *Gang and Narcotics-Related Loitering* policy suite. The collection and analysis of data by TRED, including its 2024 *Mid-Year Report*, also helped the City and the CPD to achieve Secondary and Full compliance with additional paragraphs this reporting period.

Looking Ahead to the Twelfth Reporting Period

In the next reporting period, we look forward to receiving the results of community feedback for the newly issued policy suites relating to investigatory stops, protective pat-downs and enforcement of Loitering Ordinances and the incorporation of these policies into the City's and the CPD's public awareness campaign. We also anticipate receiving draft training materials relating to these policies and discussing the same with the parties, including the *Constitutional Policing* training, and the *2025 De-escalation, Response to Resistance, Use of Force/High-Risk, Transitional Vehicle Stops* training. Finally, we also look forward to progress on the implementation of the City's and the CPD's Universal Stop Application which we hope will facilitate additional progress on paragraphs relating to reporting and data analysis.

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/2025/04/11-IMR11-ISR-Stipulation.pdf>.

For reference, all IMT reports and appendices are available here: <https://cpdmonitoringteam.com/reports-information/>.

Conclusion, Looking Ahead to *Independent Monitoring Report 12*

We have concluded our monitoring efforts for the eleventh reporting period (July 1, 2024, through December 31, 2024). 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 12*, will cover the reporting period from January 1, 2025, through June 30, 2025. As with previous reports, we will continue to work with the City and the OAG to implement all the Consent Decree's requirements. We will also continue to engage with Chicagoans to determine whether these reforms are being felt in their communities.

Moving forward, in the twelfth and thirteenth reporting periods, we will continue to assess the City's compliance with *all paragraphs with requirements* in the Consent Decree or "monitorable paragraphs."⁶⁴

The number of monitorable paragraphs may change as the City and its relevant entities begin to achieve full and effective compliance by sustaining Full compliance for the requisite periods.⁶⁵ In those cases, the IMT will stop assessing those requirements and paragraphs for compliance unless we derive information or evidence "showing that compliance with such requirements has materially lapsed." ¶716.

⁶⁴ Our previous Monitoring Plans are available on our website. See *Reports*, INDEPENDENT MONITORING TEAM, <https://cpdmonitoringteam.com/reports-information/>.

⁶⁵ To achieve full and effective compliance with Consent Decree requirements, the City and its relevant entities must maintain Full compliance for either one or two years, depending on the section of the Consent Decree. See ¶714.

Conclusion Figure 1. Reporting Periods for Years One through Six

| 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 ⁶⁶ (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, Spring 2024) |
| 10th Reporting Period | January 1, 2024 – June 30, 2024 (Independent Monitoring Report 10, Autumn 2024) |
| Year Six | |
| 11th Reporting Period | July 1, 2024 – December 31, 2024 (Independent Monitoring Report 11, Spring 2025) |
| 12th Reporting Period | January 1, 2025 – June 30, 2025 (Independent Monitoring Report 12, Autumn 2025) |
| Year Seven | |
| 13th Reporting Period | July 1, 2025 – December 31, 2025 (Independent Monitoring Report 11, Spring 2025) |
| 14th Reporting Period | January 1, 2026 – June 30, 2026 (Independent Monitoring Report 12, Autumn 2025) |

⁶⁶ Because of the shutdowns in response to the COVID-19 pandemic, the City and the Office of the Illinois Attorney General 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 Six.

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

Conclusion Figure 2. Monitoring Plan for Year Six (July 1, 2024 – June 30, 2025)

| Topic Area | Year Six 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, 598, 597, 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, 834, 835, 836, 837, 839, 840, 841, 852, 853, 854, 855, 856, 858, 859, 860, 865, 861, 862, 863, 864, 866, 868, 869, 870, 873 (Total = 57) |
| TOTAL | 609 |

Conclusion Figure 3. All Compliance Levels, By Paragraph



Attachment A:
Office of the Illinois Attorney General
Comments
(April 7, 2025)



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

**KWAME RAOUL
ATTORNEY GENERAL**

April 7, 2025

Margaret A. Hickey
Independent Monitor
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**Re: OAG Comments on the Eleventh 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 eleventh Monitoring Report (Report) before the Independent Monitoring Team (IMT) files it with the Court. The Report covers July 1, 2024, through December 31, 2024, a period in which the City of Chicago and the Chicago Police Department (CPD or Department) continued to make slow progress towards overall implementation of the Consent Decree. The City and CPD have reached full compliance with about 16% of the original Consent Decree requirements and have reached preliminary compliance or secondary compliance with approximately 76%. Though we continue to see incremental progress, the path to overall implementation has been far too long and, as the IMT's recent survey demonstrates, the slow pace is degrading public trust in the process. Still, IMR11 has shown us that real progress is possible when the City and the CPD invite collaboration, increase transparency, and effectively devote the appropriate time and resources.

Community Involvement and Transparency in the Process

Two of the guiding principles of the Consent Decree are meaningful community involvement and increasing the City and CPD's transparency with the public. Unfortunately, the IMT's recent Community Survey Report, published in January 2025, demonstrated that

Chicagoans' confidence in the lasting and positive impact of reform efforts has decreased.¹ While we know that the slow and steady work of reform continues, and that progress has been made, what community members most impacted by policing feel is a vital measure of overall success for this effort. The City and CPD must listen to Chicagoans and heed their message, regardless of how community members choose to share, whether through the public input hearings, other community engagement opportunities, the Community Survey Report, or through their day-to-day interactions with CPD officers.

The Consent Decree is Working, but Progress Remains Slow

Since the Consent Decree took effect in March 2019, progress towards its implementation has been slow and, at times, frustrating. While we acknowledge that institutional and culture changes take time, the City and CPD must remain firm in their commitment to reform. We appreciate Superintendent Snelling's leadership and collaboration with the OAG and IMT, and hope that this commitment from the top makes its way through the Department as a whole.

The progress seen in IMR11 demonstrates that effective and transparent collaboration is critical to forward progress. Specifically, in August 2024, the City and CPD were faced with the incredible task of hosting the Democratic National Convention (DNC). As the Report acknowledges, the City and CPD, in constructive collaboration with IMT and OAG, demonstrated substantial progress in two main areas of the Consent Decree: Use of Force and Officer Wellness. Regarding Use of Force, the Department used force in very few instances (which included no use of batons or OC spray),² and in Officer Wellness, CPD facilitated and provided on-site counseling to members.³ These successes may not have been possible years ago. Rather, this was the result of substantial collaboration, time, resources, and dedication on behalf of the City and CPD.

But the City and CPD cannot just rise to the occasion when the eyes of the nation are on them—they must be committed to that standard in every interaction with a member of the public. We encourage the CPD to use its handling of the DNC as a guide in its efforts to comply with the Consent Decree: when appropriate resources are allotted and collaboration is prioritized, demonstrable change happens.

CPD's and the City's Staffing Allocation Choices Have Hindered Reform

Although the Report highlights notable progress, it also continues to emphasize the need for appropriate staffing, including in the Crisis Intervention Unit and Professional Counseling Division. Further, insufficient staffing impacts the Department supervisors' ability to effectively supervise, mentor, and counsel their subordinates. Put plainly, lack of appropriate resource allocation and staffing impacts the Department's ability to constitutionally and effectively police, care for the well-being of its own members, and comply with the Consent Decree's necessary and

¹ Community Survey Report (March 2024 – April 2024), ECF No. 1255, available at <https://cpdmonitoringteam.com/wp-content/uploads/2025/01/2025.01.27-IMT-Community-Survey-Report-DRAFT-March18-2024-%E2%80%93-April-22-2024-filed.pdf>.

² Independent Monitoring Report 11, at 8.

³ *Id.* at 9.

mandated reforms. We appreciate that the City reconsidered proposed budget cuts to necessary, reform-oriented positions within the Department, but in light of the slow-moving progress, we must all acknowledge that the status quo may be insufficient to accelerate progress in 2025.

In IMR11, the City and CPD executed a contract with Matrix Consulting Group to conduct a Workforce Allocation Study (WFA Study) of the Department, which will evaluate the staffing and organizational structure, implement recommendations, and bring the Department in line with best staffing practices. The WFA study is critical to CPD's compliance with the Consent Decree. We commend the City and CPD for following through on this commitment. The City and CPD must treat the WFA Study as an opportunity, rather than merely an obligation; its results and recommendations will shape the Department for years to come.

Further, as OAG identified at the August 13, 2024, public status hearing, the Department's decisions about who is qualified to supervise its officers has a direct and tangible impact on its ability to comply with the Consent Decree, including its ability to build community trust. Indeed, as part of its obligations under the Consent Decree, in 2023 the City and Department retained an expert to conduct an expert assessment of its promotional processes.⁴ Thereafter, the City and CPD adopted these recommendations and created an Implementation Plan to meet these obligations. We encourage CPD and the City to prioritize the Implementation Plan to foster a promotional process that both Department members and the community can rely on and trust.

We look forward to seeing the results of the WFA Study and the Implementation Plan and urge the City and Department to use these critical tools to continue their efforts to comply with the Consent Decree.

Conclusion

As 2025 progresses, we hope the City and CPD learn from their successes, and challenges, in IMR11. We further encourage the City and CPD to invest in and to take full advantage of the opportunities that the WFA Study and Implementation Plan present, as these resources provide a direct path forward for many reforms called for by the Consent Decree. Overall, we encourage the City and CPD to accelerate their progress towards implementing the reform requirements so that Chicagoans begin to feel change in their day to day lives. We remain committed to working with the City, the CPD, IMT, the Coalition, and community members and organizations who work towards changing policing in Chicago every day.

⁴ Every three years, CPD is required to obtain an independent expert assessment of its promotions process for the ranks of Sergeant and Lieutenant. *See* Consent Decree ¶ 261. Accordingly, this expert was also retained in 2020. A copy of the 2020 DCI Report is available here:

[https://www.chicago.gov/content/dam/city/sites/police-reform/docs/CPD%20Sgt%20and%20Lt%20Promotion%20Recommendations_12.30.2020_final%20\(1\).pdf](https://www.chicago.gov/content/dam/city/sites/police-reform/docs/CPD%20Sgt%20and%20Lt%20Promotion%20Recommendations_12.30.2020_final%20(1).pdf).

Respectfully,

KWAME RAOUL
Attorney General of the State of Illinois

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

Attachment B:
City of Chicago
Comments
(April 4, 2025)

April 4, 2025



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Department of Law

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VIA EMAIL

RE: Independent Monitoring Team's Second Draft of IMR-11 Report

Counsel –

The City writes to provide its response and comments to the IMT's Second IMR-11 Draft Report. The City's comments were drafted prior to site visits, but the City withheld their response to the IMT's Second IMR-11 Draft Report until after site visits, with the intention of discussing any issues in person. 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.

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The City's comments and responses below highlight certain consent decree sections and paragraphs as they related to the involved City entities, including CPD, OEMC, COPA, the Police Board, and the City as a whole. The City's comments and responses address both the paragraphs that the IMT wrote about in the draft report and the paragraphs they did not.

CRISIS INTERVENTION

1. CPD

The City and CPD disagree with the IMT withholding compliance and are seeking clarification on the IMT's Methodology for Secondary Compliance for paragraphs 92, 93, 104, 105, 106, and 141. Specifically, the IMT noted that the comprehensive list of all members' current CIT status, produced on December 12, 2024, as a part of the CIT Coordinator Summary Report, bates stamped MONITOR2331, was incorrect and therefore is withholding compliance (IMR11 Appendix 3 pg.15-19); however, this contrasts with the CPD's view and conflicts with explanations provided to the IMT. In January, the IMT sent CPD personnel an email asking several clarifying questions related to the report's content. Among these inquiries, the IMT noted that there appeared to be "many entries where the date of the Basic 40-hour CIT course was the exact same date listed for the CIT Refresher training." The IMT requested clarification as to why the entries for Basic and Refresher were the same, noting that it may have been a data error, and it could be corrected in IMR-12. CPD then clarified in bi-weekly meetings with the IMT on January 13, 2025, and January 27, 2025, that the quantitative data itself is correct and updated, however the name of the columns was not. In various instances the Basic and Refresher Class Dates appeared to have the same date, in reality this meant that the officer had only taken the Basic CIT course and not the Refresher. To address and clarify this issue CPD personnel manually modified the title of the column. The IMT asked at a following meeting if this modification had been made, and CPD personnel confirmed the column name had been manually changed. The IMT then requested a formal re-production of this documentation to clarify the record. CPD personnel reiterated that due to the issue detailed above, the data itself is correct, but the title of the column was misleading. The IMT finished this line of discussion requesting personnel from the Department's Strategic Initiatives Division (SID) to review this on a future next bi-weekly call. Secondary compliance for paragraphs ¶92, 93, 104, 105, 106, and 141 was then withheld solely due to the IMT's request for a list with a corrected column identifier to be produced. As detailed above, the data itself has not changed, and the change made was clerical in nature. Therefore, CPD feels that Secondary Compliance should not have been withheld, when the list of all members' current CIT status, produced on December 12, 2024, as a part of the CIT Coordinator Summary Report, bates stamped MONITOR2331, was not incorrect. To do the IMT would be elevating form over substance.

The City and CPD requests clarification as to the IMT's methodology for Preliminary Compliance, and clarification on why Preliminary Compliance was withheld for paragraphs 107, 108, 109, 110, 111, and 112 (IMR11 Appendix 3 pg. 17-18). The City and CPD acknowledge that a working definition of "timely" is an important element to further and receive compliance from its production of the Officer Implementation Plan; however, CPD previously submitted policy S05-14 Crisis Intervention Team (CIT) Program which codifies the requirements of these paragraphs into Department policy which received no objections from the IMT and OAG. The withholding of preliminary compliance S05-14 codifies the requirements of these paragraph's conflicts with the City and CPD's understanding of preliminary compliance methodology. Therefore, the City and CPD

request that the IMT grant Preliminary compliance on these paragraphs due to well established methodology. CPD is happy to discuss this further with IMT members during upcoming site visits.

2. OEMC

The City and OEMC are seeking clarification for paragraph 138. Specifically, OEMC believes they should have obtained full compliance. Currently OEMC produces data which responds to paragraph 138 and demonstrates the call for service involving and individual known, suspected, or perceived to be in crisis. It is unclear what further the IMT needs to assess paragraph 138 for full compliance in addition to data.

The City and OEMC are seeking clarification for the IMT's methodology used for assessing OEMC's compliance with paragraph 150. OEMC presents at CCMHE meetings and seeks advice from the board members. OEMC meets with CPD regularly and has never had a deliverable deemed insufficient.

USE OF FORCE

The City and CPD seek clarification on the IMT's methodology for Secondary Compliance for paragraph 158. On November 5, 2024, CPD discussed Secondary Compliance with the IMT. Specifically, CPD detailed the production of the annual use of force training (bates stamped MONITOR 2397) and proof that 95% of members had received this training (MONITOR2340). IMT agreed CPD could expect to obtain secondary compliance during IMR11; however, the IMR11 draft is silent on paragraph 158 and fails to grant Secondary Compliance.

The City and CPD seek clarification on the IMT's methodology for full compliance for paragraph 159. During the bi-weekly meeting on 18 MAR 2025, the loss of secondary and full compliance was discussed with the IMT. It was determined during that meeting that a better understanding of the CALEA accreditation process would be beneficial. Additionally, during this meeting, ED Clark-Henson provided clarification on the annual and two-year requirements of this paragraph. The IMT was reminded of CPD's previously submitted documentation, CALEA Annual Status Report – Use of Force Review [MONITOR2202] which contained accreditation letters, full compliance reviews, and status reports. Regarding the review requirements, CALEA requires the use of force policies to be reviewed annually, while the comprehensive two-year review on use of force policies is conducted by CPD. Both the CALEA annual review and CPD two-year reviews have been, and continue to be conducted. In 2023, CPD submitted proof of having undergone the two-year review requirement for use of force policies, this was produced as [MONITOR1637]. Following the review in 2023, the next time the use of force policy suite requires review is 2025 - CPD is currently working on this review and has hired a consultant to assist with the community engagement aspect. CPD is expecting to complete the use of force policy suite two-year review requirement in IMR-13.

Provided with this response as additional supporting documentation is a To-From outlining the process for CALEA assessors, along with the CALEA standard for annual review of use of force policies (CALEA LE standard 4.2.4). CPD should be at full compliance as the requirements of the paragraph have been met. Department forms have been created for tracking foot pursuit incidents. TRED reviews and analyzes the foot pursuit, even if the pursuit was not related to a use of force incident. TRED reports out on this data in their reports – 2024 TRED Mid-Year Report [MONITOR2390, MONITOR375136-375140]; 2023 TRED Year-End Report [MONITOR2109, MONITOR343608-343612]; 2023 TRED Mid-Year Report [MONITOR1911, MONITOR325242-

325243]. CPD should be at full compliance as this paragraph outlines the foot pursuit training requirements, which have all been met. IMT indicates sustainment of full compliance would include periodic audits of foot pursuit data as CPD should be ensuring data is reliable and all pursuits are being reported. All foot pursuit data is and will continue to be included in TRED reports as they are responsible for reviewing all foot pursuits in which department members engage. Part of TREDs review includes ensuring all members who engaged in a pursuit complete a report.

IMT states full compliance will be maintained through evidence of sustained training on LEMART along with continued distribution and replenishment of an IFAK/MFAK as needed, however, distribution requirements are in ¶ 174, while replenishment requirements are in ¶ 175. CPD distributed an IFAK/MFAK to officers this year as part of WellMART and in preparation for the DNC. Distributions will continue as required by department policy (U04-04: Issuance and Replacement of First Aid Kits).

The City and CPD seek clarification on the IMT's methodology for Full compliance for paragraph 168. CPD believes Full compliance should have been granted because department forms have been created for tracking of foot pursuit incidents. TRED reviews and analyzes the foot pursuit, even if the pursuit was not related to a use of force incident. TRED reports out on this data in their reports, which are produced (*see*. 2024 TRED Mid-Year Report [MONITOR2390, MONITOR375136-375140]; 2023 TRED Year-End Report [MONITOR2109, MONITOR343608-343612]; 2023 TRED Mid-Year Report [MONITOR1911, MONITOR325242-325243]). These reports demonstrate that CPD is complying with its policies and procedures, and has operationalized the requirements of paragraph 168; however, the IMR11 draft is silent on paragraph 168 and fails to grant Full Compliance.

The City and CPD seek clarification on IMT's methodology for Full compliance for paragraph 171. CPD has produced evidence of foot pursuit training requirements (bates stamped MONITOR2364). CPD previously discussed receiving full compliance for paragraph 171 with the IMT. The IMT agreed that CPD should be in full compliance; however, the IMR11 draft is silent on paragraph 171 and fails to grant Full Compliance.

The City and CPD seek clarification as to the methodology for Full compliance for paragraph 175. CPD should be at full compliance based on deliverables submitted and discussions with IMT during IMR-11. Proof was submitted demonstrating that more than 95% of members completed WellMART training, and 99.19% of members were issued an IFAK/MFAK [MONITOR2356]. CPD has also implemented a new system to track the issuance and replenishments of an IFAK/MFAK [MONITOR2198]. Data demonstrating that CPD officers provide aid consistently with their training and regarding instances where medical aid is rendered is included in TRED reports, while instances of life-saving aid such as the use of tourniquets is included in the annual use of force report.

The City and CPD seek clarification on the IMT's methodology for paragraph 189. On November 5, 2024, during the bi-weekly meeting on, full compliance was discussed with the IMT. The requirements of paragraph 189 are codified in the firearm pointing incident policy, D19-01 Firearm Pointing Incident policy. CPD members have completed training regarding the firearm pointing incident policy [MONITOR2088]. Additionally, TRED reviews all firearm pointing incidents and reports this data out. IMT advised agreed and stated CPD could expect to obtain full compliance during IMR11.

The City and CPD are seeking clarification on the IMT's methodology for paragraph 191. The IDR Supervisory Debriefing Point Dashboard has already rolled out. During the monthly use of force meeting on March 20, 2025, there were clarifying discussions explaining that TRED, as well as the Captain's participating in the FPIR pilot districts, use the IDR supervisory debriefing point dashboard when determining what recommendation(s) to make. The City and CPD seek clarification on the IMT's withholding compliance.

The City and CPD seek clarification on the IMT's methodology for Full compliance for paragraph 199. On November 5, 2024, during the bi-weekly meeting, full compliance was discussed with the IMT. The requirements of paragraph 199 are outlined in the Taser use policy requirements; G03-02-04 Taser Use policy. This policy has been produced. CPD members completed training regarding the use of Tasers, such as the 2023 Annual Use of Force Training [MONITOR1895] and 2024 Taser 10 ABLE training [MONITOR2350]. Additionally, TRED reviews all level 2 Taser discharge incidents, while the FRB (or COPA when applicable) reviews all level 3 Taser discharges. This information is also included in TRED reports. The IMT advised that he agreed and CPD could expect to obtain full compliance in IMR11.

The City and CPD seek clarification on the IMT's methodology for Full compliance for paragraphs 213, 214, and 216. CPD should be obtained full compliance for these paragraphs during IMR11. CPD memorialized the requirements of these paragraphs in G03-02-07: Baton Use Incidents and trained on it as part of the 2024 Annual Use of Force/Coordinated Multiple Arrest and FFO-POPS training (MONITOR 2340, MONITOR 2279, AND MONITOR 2397). Operational compliance is demonstrated by the fact that CPD has systems in place to track baton use through submission of TRRs, TRED/FRB review the use of batons, and training or discipline is recommended based on the incident review which demonstrates there is a feedback loop and accountability for members violating policy. Data regarding impact weapons and their use is in the 2024 TRED mid-year report and the annual use of force report (*see*. MONITOR2390; MONITOR00375096-MONITOR00375200; MONITOR2401; MONITOR00376741-MONITOR00376745).

The City and CPD seek clarification on the IMT's methodology for Full compliance for paragraph 222. The paragraph remains under assessment, and the City and CPD believe Full compliance should be awarded. The IMT indicates they need CPD to provide them with data regarding use of force incidents that escalated from level 1 to a level 2. CPD produced a memo with relevant data that contains the level 2 incident breakdown information the IMT is requesting [MONITOR2301]. Additionally, CPD produced a memo containing an analysis and explanation for 2023 data in which a supervisor did not respond to the scene of a level 2 or level 3 incident [MONITOR2230]. Data regarding supervisor response to the scene and TRED debriefings for lack of response are located in TRED reports, which demonstrate this number is decreasing

The City and CPD seek clarification on the IMT's methodology for Full compliance for paragraph 228. CPD should have reached full compliance with this paragraph in IMR11, because the annual in-service supervisor training covers the topics required within this paragraph (MONITOR2347). Additionally, the CPD Captains District Review Pilots also pertains to this paragraph. Previous IMT concerns has been the limited role they believe supervisors are playing in the field and at the district-level. TRED includes in their reports that supervisors are reviewing incidents, identifying issues and making recommendations. This indicates supervisors are taking action within their unit to ensure they are providing effective front-line supervision and there is accountability

from their members. The City and CPD ask that the IMT provide methodology and clarification for withholding Full compliance.

The City and CPD seek clarification on the IMT's methodology for Secondary compliance for paragraphs 236 and 238. On February 4, 2024, during the bi-weekly meeting, secondary compliance was discussed because paragraphs 239, 240, and 241 are all related to BWC and have obtained secondary compliance. IMT advised compliance will not change until there were resolutions on the public safety questions and community input had been taken into account. The City and CPD do not agree with this methodology as CPD has already provided proof to the IMT of community engagement occurring [MONITOR1896]. Additionally, any changes related to public safety questions will be consistent with the law and are before the Court. The City and CPD ask that the IMT provide methodology and clarification for withholding Secondary compliance based on community engagement.

SUPERVISION

The City and CPD seek clarification on the IMT's methodology for Secondary compliance for paragraph 347. CPD Submitted the TRR Supervisory Debriefing Point Dashboard eLearning-Revised with new IDR on May 16, 2024 (MONITOR2012) and the Supervision Pilot Evaluation Committee Meeting was on May 23, 2024 (MONITOR2018) seeking Secondary Compliance. CPD would like clarification on why these submissions did not meet paragraph requirements.

OFFICER WELLNESS AND SUPPORT

The City and CPD seek clarification on the IMT's methodology for Full compliance for paragraph 394. During monthly meetings, CPD provided additional detailed data regarding referral numbers and the type of facilities to which members were referred, such as hospitals, rehabilitation facilities, and resident inpatient facilities. The IMT has requested this data in a formal production and has not yet received it. CPD has provided this data on a quarterly basis since 2023; it was only at the Officer Wellness Monthly Meeting on January 28, 2025 that the IMT clarified that it specifically wants the PowerPoint slides on the screen produced. It was not clear prior to the January 28, 2025, meeting that a formal production was needed for compliance to be granted.

The City and CPD seek clarification on the IMT's methodology for Secondary compliance for paragraphs 407, 408, 410, and 411. The Annual Audit of the TISMP was produced for full compliance with the listed paragraphs. However, the IMR-11 Draft Report does not mention this audit and compliance was not granted for these paragraphs. (MONITOR2367).

ACCOUNTABILITY AND TRANSPARENCY

The City and CPD seek clarification on the IMT's methodology for Full compliance for paragraph 456. The IMT requests additional underlying data. CPD produced MONITOR2289 "Documentation for Selection/ Vetting Materials" which provides exemplars of BIA's review of CPD members records, including disciplinary histories, prior to assignment within BIA as Accountability Sergeants. As these exemplars reflect BIA's standardized process, and should be sufficient to show CPD in Full Compliance with 456 without the need for some additional access to "underlying data", which would exceed the requirement of 456. The City and CPD seek clarification as to why underlying data is necessary for Full compliance.

The City and seek clarification as to paragraphs 481 and 482. In the IMT's first draft of IMR11 the IMT granted CPD secondary compliance with paragraphs 481 and 482. The IMT's second draft of IMR11 completely deletes the paragraphs. The City and CPD seek clarification as to why the paragraphs were deleted and if the IMT is now withholding secondary compliance.

1. COPA

The City and COPA are glad to see that paragraph 504 was granted Preliminary Compliance; however, the evidence produced demonstrates operational compliance and COPA expected full compliance. COPA produced (MONITOR2271: MONITOR00358601-MONITOR00358681) notification emails showing COPA sent logs to officers complying with the requirements of paragraph 504. The IMT states that "moving forward, we will look for documentation that the CPD and COPA are acting in accordance with ¶504's mandates. the IMT looks forward to and the CPD are having discussions with COPA to develop a production plan to demonstrate that the Final Summary Reports are timely sent to the involved CPD member and sent to the CPD, as required by this paragraph on what documentation is needed for Full compliance." The City and COPA request clarification as to what the IMT means by a "production plan," currently COPA produces the requested information within the allotted IMR period. The City and CPD seek clarification on how to achieve Full Compliance.

2. Police Board

The City and Police Board were glad to see that Secondary Compliance had been granted for paragraph 564; however, the IMT states "moving forward, we will also determine whether the CPD and the Police Board have systems in place to detect and report any interference and implement appropriate penalties." The City and Police Board are asking the IMT to provide further guidance as to how to obtain full compliance. The penalty set by paragraph 564 for not complying with PSIG requests states "any person that knowingly interferes with the Deputy PSIG's performance of his or her duties will be subject to the penalties set forth in Municipal Code of Chicago Sections 2- 56-140, 145, 270." Thus, failure to comply is governed by the Municipal Code and initiated by PSIG.

3. City

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

The City and CPD seek clarification on the IMT's methodology for Preliminary and Secondary compliance with paragraph 575. CPD should have re-gained preliminary and secondary compliance. The IMT states their assessment of preliminary is based on CPD having qualified personnel as part of the FRU (now known as TRED). CPD continues to ensure that all TRED reviewers have the skills to meet the requirements outlined in this paragraph. For secondary compliance, the IMT stated this assessment is based on staffing and the backlog. While TRED has become responsible for the review

of all firearm pointing incidents and foot pursuits, this was not the initial intent of the unit. CPD has taken the initiative to begin a pilot program where firearm pointing incidents not related to a use of force are reviewed by district Captains. Additionally, there has been an agreement between CPD, IMT, and OAG which will lead to additional TRED staffing to work exclusively on the backlog. TRED staffing numbers are reported out monthly on the use of force monthly call; TREDs training is reported out in TRED reports. It is unclear why CPD lost compliance with paragraph 575. The City and CPD seek clarification on the IMT's methodology for Preliminary and Secondary compliance with paragraph 575.

The City and CPD seek clarification on the IMT's methodology for Full compliance for paragraphs 578 and 580. In IMR11, Appendix 10 page 12, the "IMT indicates that the FRBs are inconsistent and do not properly capture the requirements of this paragraph and of SOP 2020-03 FRB;" however, the FRB consistently engages in critical review of incidents to ensure requirements of this paragraph are captured. It is unfair to deem the FRBs as inconsistent as the IMT has been provided with the PPT template used by TRED during their presentation which was created following the above-referenced SOP. CPD has yet to receive any feedback from the IMT regarding the PPT for how to better conduct decision point analyses or critical reviews. Additionally, there are times when an FRB cannot occur within the 96-hour requirement. CPD should be able to maintain their compliance by continuing to demonstrate this process occurs. The City and CPD request a formal response clarifying what is required to obtain Full compliance with paragraphs 578 and 580.

IMPLEMENTATION, ENFORCEMENT, AND MONITORING

The City and CPD seek clarification for paragraph 852 and why Full compliance was not granted. The IMR 11 Appendix, page 71, lists paragraph 852 in Secondary, but the Compliance Progress History (pg. 72) and the summary spreadsheet erroneously summarizes it as Preliminary; however, CPD believes 852 is in Full compliance. CPD maintains the agreed upon representative sample and presents it for discussion at the monthly meetings with the IMT and the OAG (*see* MONITOR2201). The City and CPD seek clarification why Full compliance wasn't granted for paragraph 852.

The City and CPD seek clarification on the IMT's methodology for Secondary compliance for paragraph 860. The draft IMR-11 report, Appendix 11 (IMR-11) Pg. 79, states the IMT is lacking "(1) The number of officers who had multiple ISRs and Stop Reports rejected (§860d); (2) The number of officers who had multiple ISRs and Stop Reports rejected for a lack of sufficient description of reasonable articulable suspicion (§860e)." However, the 2024 TRED Midyear report provides some data which relates to this paragraph. The City and CPD believe the IMT's statements do not fully take into consideration or acknowledge the data that is being provided, and CPD's continued efforts to provide data in the granularity needed.

Additionally, the City and CPD ask that the IMT provide a formal response either in letter form or in the final IMR11 draft specifically addressing the City and CPD's comments.

Sincerely,

/s/ Danielle Alvarez Clayton
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