

Independent Monitoring Report 12

Data Collection, Analysis & Management

Compliance Assessments by Paragraph

Specific assessments, by paragraph, for the Data Collection, Analysis & Management section are available here. This includes paragraphs where the City gained or lost compliance in the twelfth reporting period, as well as paragraphs with significant developments toward or away from compliance. 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/>.

Data Collection, Analysis & Management: ¶569

569. CPD must collect, track, and maintain all available documents related to use of force incidents, including: a. TRRs, or any other similar form of documentation CPD may implement for initial reporting of reportable use of force incidents; b. TRR-Is, or any other similar form of documentation CPD may implement to document supervisory investigation of reportable use of force incidents; c. Tactical Response Reports – Review (“TRR-Rs”), or any other similar form of documentation CPD may implement to document review or auditing of reportable use of force incidents; d. arrest reports, original case incident reports, and investigatory stop reports associated with a reportable use of force incident; e. administrative investigative files, including investigative materials generated, collected, or received by BIA, or COPA, or any similar form of documentation CPD may implement for misconduct allegations or civilian complaints; and f. all reasonably available documentation and materials relating to any reportable use of force, in-custody injury or death, or misconduct allegation, including body-worn, in-car, or known third-party camera recordings, and statements, notes, or recordings from witness and officer interviews.

Compliance Progress

(Reporting Period: January 1, 2025, through June 30, 2025)

Preliminary:	<i>In Compliance (FOURTH REPORTING PERIOD)</i>
Secondary:	<i>In Compliance (ELEVENTH REPORTING PERIOD)</i>
Full:	<i>Under Assessment</i>

In the twelfth reporting period, the City and the CPD maintained Preliminary and Secondary compliance with the requirements of ¶569. The City and the CPD remain under assessment for Full compliance.

To assess Preliminary compliance with ¶569, the IMT reviewed the CPD’s directives and forms that demonstrated data collection efforts required by this paragraph. To assess Secondary compliance, we evaluated whether CPD officers received sufficient training on each policy and form. To assess Full compliance, we evaluated whether the CPD’s data collection processes “facilitate transparency and accountability regarding those practices” as required by ¶568.

The City and the CPD achieved Preliminary compliance with ¶569 in the fourth reporting period by providing several policies that demonstrated the data collection process required by this paragraph.¹ The City and the CPD achieved Secondary compliance in the eleventh reporting period by providing the IMT with a list of

¹ These policies include the following: (1) *Tactical Response Report (TRR)*, G03-02-02; (2) *Tactical Response Investigation Report (TRR-I)*, G03-02-08; (3) *Tactical Response Report Review (TRR-R)*, G03-02-08; (4) *Processing Persons Under Departmental Control*, G06-01 (including *Arrest Report* and *Field Arrest Procedures*, G06-01-01, and *Restraining Arrestees*, G03-02-02); (5) *Case Incident Report: Field Reporting Manual*, S04-13-06, D20-03, and G03-02-02; (6) *Investigatory Stop Report*, S04-13-09; (7) *Administrative Case Files*, G08-01; (8) *Body-Worn Camera*, S03-14; (9) *In-Car Camera*, S03-05; (10) *Third-Party Recordings*, G03-02-02; (11) *Witness Interviews*, G03-02-02; (12) *Officer Interviews*, G03-02-02.

trainings, related to the data and records required by ¶¶568 and 569, evidencing that officers have received instruction in the range of data forms and documents that are required following a use-of-force event.

To maintain Secondary compliance in future reporting periods, the CPD must produce a list of trainings and associated attendance records on an ongoing basis that are relevant to each subsection of this paragraph. *See also* ¶¶290–91. In the latest reporting period, the CPD produced an Audit Report of Use of Force Data, which sought to address subparagraphs a–c. To achieve Full compliance, however, the CPD must demonstrate its processes to “collect, track, and maintain” not only the data required by subparagraphs a–c (as demonstrated by a 2024 audit conducted by CPD’s Audit Division), but also the data required by subparagraphs d–f.

Paragraph 569 Compliance Progress History

FIRST REPORTING PERIOD MARCH 1, 2019 – AUGUST 31, 2019 COMPLIANCE PROGRESS: None	SECOND REPORTING PERIOD SEPTEMBER 1, 2019 – FEBRUARY 29, 2020 COMPLIANCE PROGRESS: None	THIRD REPORTING PERIOD MARCH 1, 2020 – DECEMBER 31, 2020 COMPLIANCE PROGRESS: None
FOURTH REPORTING PERIOD JANUARY 1, 2021 – JUNE 30, 2021 COMPLIANCE PROGRESS: Preliminary	FIFTH REPORTING PERIOD JULY 1, 2021 – DECEMBER 31, 2021 COMPLIANCE PROGRESS: Preliminary	SIXTH REPORTING PERIOD JANUARY 1, 2022 – JUNE 30, 2022 COMPLIANCE PROGRESS: Preliminary
SEVENTH REPORTING PERIOD JULY 1, 2022 – DECEMBER 31, 2022 COMPLIANCE PROGRESS: Preliminary	EIGHTH REPORTING PERIOD JANUARY 1, 2023 – JUNE 30, 2023 COMPLIANCE PROGRESS: Preliminary	NINTH REPORTING PERIOD JULY 1, 2023 – DECEMBER 31, 2023 COMPLIANCE PROGRESS: Preliminary
TENTH REPORTING PERIOD JANUARY 1, 2024 – JUNE 30, 2024 COMPLIANCE PROGRESS: Preliminary	ELEVENTH REPORTING PERIOD JULY 1, 2024 – DECEMBER 31, 2024 COMPLIANCE PROGRESS: Secondary	TWELFTH REPORTING PERIOD JANUARY 1, 2025 – JUNE 30, 2025 COMPLIANCE PROGRESS: Secondary

Data Collection, Analysis & Management: ¶572

572. CPD will regularly review citywide and district-level data regarding reportable uses of force to: a. assess the relative frequency and type of force used by CPD members against persons in specific demographic categories, including race or ethnicity, gender, age, or perceived or known disability status; and b. identify and address any trends that warrant changes to policy, training, tactics, equipment, or Department practice.

Compliance Progress(Reporting Period: January 1, 2025, through June 30, 2025)

Preliminary:	In Compliance (NINTH REPORTING PERIOD)
Secondary:	Not In Compliance
Full:	Not In Compliance

In the twelfth reporting period, the City and the CPD maintained Preliminary compliance with the requirements of ¶572 but did not achieve Secondary or Full compliance.

The City and the CPD achieved Preliminary compliance with ¶572 in the ninth reporting period by memorializing the requirements of this paragraph in General Order G03-02-02, *Incidents Requiring the Completion of a Tactical Response Report*, and have maintained this policy in subsequent reporting periods.² Additionally, the City and the CPD have demonstrated that the Tactical Review and Evaluation Division (TRED) continues to be responsible for suggesting changes to policy, training, tactics, equipment, or CPD practice based on its review of use-of-force events.

In the twelfth reporting period, the IMT reviewed *Use of Force Data Analysis Project: Results Report* (authored by Professors Michael R. Smith and Rob Tillyer at the University of Texas San Antonio and John MacDonald at the University of Pennsylvania) and its corresponding *Executive Summary*. This report was a significant milestone for the City and the CPD, but the CPD has not yet used the results of the report to “identify and address any trends that warrant changes to policy, training, tactics, equipment, or Department practice,” as required by ¶572(b).

To achieve Secondary compliance, the City and the CPD must demonstrate that it has sufficient personnel or resources dedicated to conduct regular reviews of citywide and district-level data regarding reportable uses of force for each of the demographic categories listed in (a) of this paragraph. The City and the CPD must also identify a cadence and process for regular review and trend identification required by (a) and (b) of this paragraph.

² The IMT notes that the effective date of the current version of this policy is June 28, 2023. Per ¶636 of the Consent Decree, the CPD must conduct subsequent reviews of policies every two years. To maintain Preliminary compliance, the CPD should plan to review this policy in the next reporting period.

This paragraph requires the CPD to review citywide and district-level use of force data by “race or ethnicity, gender, age, or known disability status.” See ¶572(a). While the *Results Report* analyzed citywide and district-level use of force data by race, it did not include a similarly robust analysis of each of the specific demographic categories required by ¶572(a). For example, based on our review, the report appears to only analyze *gender* as a subset of race and does not include an analysis of age.³

For Full compliance, the City and the CPD will need to include a more robust analysis of gender and age in future analyses consistent with ¶572 and demonstrate the ability to consistently meet ¶572(a) and (b).

Moreover, to achieve additional levels of compliance, the CPD must demonstrate “evidence of ongoing and regular review of data and identifying and addressing trends that warrant changes per the requirements of this paragraph consistent with the approved ¶573 methodology that comports with published, peer-reviewed methodologies and the Consent Decree.”

Paragraph 572 Compliance Progress History

FIRST REPORTING PERIOD MARCH 1, 2019 – AUGUST 31, 2019 COMPLIANCE PROGRESS: None	SECOND REPORTING PERIOD SEPTEMBER 1, 2019 – FEBRUARY 29, 2020 COMPLIANCE PROGRESS: None	THIRD REPORTING PERIOD MARCH 1, 2020 – DECEMBER 31, 2020 COMPLIANCE PROGRESS: Status Update
FOURTH REPORTING PERIOD JANUARY 1, 2021 – JUNE 30, 2021 COMPLIANCE PROGRESS: None	FIFTH REPORTING PERIOD JULY 1, 2021 – DECEMBER 31, 2021 COMPLIANCE PROGRESS: None	SIXTH REPORTING PERIOD JANUARY 1, 2022 – JUNE 30, 2022 COMPLIANCE PROGRESS: None
SEVENTH REPORTING PERIOD JULY 1, 2022 – DECEMBER 31, 2022 COMPLIANCE PROGRESS: None	EIGHTH REPORTING PERIOD JANUARY 1, 2023 – JUNE 30, 2023 COMPLIANCE PROGRESS: None	NINTH REPORTING PERIOD JULY 1, 2023 – DECEMBER 31, 2023 COMPLIANCE PROGRESS: Preliminary
TENTH REPORTING PERIOD JANUARY 1, 2024 – JUNE 30, 2024 COMPLIANCE PROGRESS: Preliminary	ELEVENTH REPORTING PERIOD JULY 1, 2024 – DECEMBER 31, 2024 COMPLIANCE PROGRESS: Secondary	TWELFTH REPORTING PERIOD JANUARY 1, 2025 – JUNE 30, 2025 COMPLIANCE PROGRESS: Secondary

³ Regarding the additional demographic category required by ¶572(a)—*perceived or known disability status*—the professors explained that “incidents involving individuals with a reported disability were exceedingly rare—less than 1% of the total, with only 27 cases across 42 reports—making it statistically infeasible to conduct any meaningful subgroup analysis.”

Data Collection, Analysis & Management: ¶573

573. Prior to conducting the initial assessment required by Paragraph 572, CPD will share its proposed methodology, including any proposed factors to be considered as part of the assessment, with the Monitor for review and approval. The Monitor will approve CPD’s proposed methodology provided that the Monitor determines that CPD’s methodology comports with published, peer-reviewed methodologies and this Agreement.

Compliance Progress (Reporting Period: January 1, 2025, through June 30, 2025)

Preliminary:	In Compliance (TENTH REPORTING PERIOD)
Secondary:	In Compliance (NEW)
Full:	Under Assessment

In the twelfth reporting period, the City and the CPD achieved Secondary and is under assessment for Full compliance with the requirements of ¶573.

To assess Preliminary compliance, the IMT reviewed a draft of the proposed methodology for conducting the analysis of use of force required by ¶572 that was developed by research partners from the University of Texas San Antonio and the University of Pennsylvania. The City and the CPD achieved Secondary compliance by incorporating the IMT’s feedback on the draft proposed methodology and receiving subsequent no-objection notices on the methodology from both the IMT and the OAG. Additionally, per the IMT’s request, the City and the CPD provided a codebook related to the methodology for conducting the analysis of use of force.

While the City and the CPD finalized the methodology required by ¶573, as referenced in our assessment of ¶572, the *Use of Force Data Analysis Project: Results Report* produced by the City and the CPD analyzed citywide and district-level use of force data by race but did not include a similarly robust analysis of sex, age, or gender. While there was insufficient data to assess disability, it is our understanding from the approved methodology that sex and age should have been assessed the same way as race.⁴ See ¶572(a) (“race or ethnicity, gender, age, or known disability status”). Feedback from the City and the CPD suggest that the City and the CPD may disagree that the methodologies require this assessment moving forward. As a result, the City and the CPD remain under assessment for Full compliance until this discrepancy is resolved.

⁴ Regarding the additional demographic category required by ¶572(a)—*perceived or known disability status*—the Professors explained that “incidents involving individuals with a reported disability were exceedingly rare—less than 1% of the total, with only 27 cases across 42 reports—making it statistically infeasible to conduct any meaningful subgroup analysis.”

Paragraph 573 Compliance Progress History

FIRST REPORTING PERIOD
MARCH 1, 2019 – AUGUST 31, 2019

COMPLIANCE PROGRESS:
None

SECOND REPORTING PERIOD
SEPTEMBER 1, 2019 – FEBRUARY 29, 2020

COMPLIANCE PROGRESS:
None

THIRD REPORTING PERIOD
MARCH 1, 2020 – DECEMBER 31, 2020

COMPLIANCE PROGRESS:
None

FOURTH REPORTING PERIOD
JANUARY 1, 2021 – JUNE 30, 2021

COMPLIANCE PROGRESS:
None

FIFTH REPORTING PERIOD
JULY 1, 2021 – DECEMBER 31, 2021

COMPLIANCE PROGRESS:
None

SIXTH REPORTING PERIOD
JANUARY 1, 2022 – JUNE 30, 2022

COMPLIANCE PROGRESS:
None

SEVENTH REPORTING PERIOD
JULY 1, 2022 – DECEMBER 31, 2022

COMPLIANCE PROGRESS:
None

EIGHTH REPORTING PERIOD
JANUARY 1, 2023 – JUNE 30, 2023

COMPLIANCE PROGRESS:
None

NINTH REPORTING PERIOD
JULY 1, 2023 – DECEMBER 31, 2023

COMPLIANCE PROGRESS:
None

TENTH REPORTING PERIOD
JANUARY 1, 2024 – JUNE 30, 2024

COMPLIANCE PROGRESS:
Preliminary

ELEVENTH REPORTING PERIOD
JULY 1, 2024 – DECEMBER 31, 2024

COMPLIANCE PROGRESS:
Preliminary

TWELFTH REPORTING PERIOD
JANUARY 1, 2025 – JUNE 30, 2025

COMPLIANCE PROGRESS:
Secondary

Data Collection, Analysis & Management: ¶574

574. A designated unit at the CPD headquarters level will routinely review and audit documentation and information collected regarding each level 2 reportable use of force incident, a representative sample of level 1 reportable use of force, and incidents involving accidental firearms discharges and animal destructions with no human injuries to ensure: a. CPD members completely and thoroughly reported the reason for the initial stop, arrest, or other enforcement action, the type and amount of force used, the subject’s actions or other circumstances necessitating the level of force used, and all efforts to de-escalate the situation; b. the district-level supervisory review, investigation, and policy compliance determinations regarding the incident were thorough, complete, objective, and consistent with CPD policy; c. any tactical, equipment, or policy concerns are identified and, to the extent necessary, addressed; and d. any patterns related to use of force incidents are identified and, to the extent necessary, addressed.

Compliance Progress

(Reporting Period: January 1, 2025, through June 30, 2025)

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

To assess Preliminary compliance with ¶574, the IMT reviewed the CPD’s relevant policies and documents following the process described in the Consent Decree (¶¶626–41). To assess Secondary compliance with this paragraph, the IMT reviewed records demonstrating that the CPD has qualified personnel to meet the requirements of this paragraph, and reviewed the CPD’s training development, implementation, and evaluation (¶286).

As noted in previous reports, the IMT remains concerned about TRED’s ability to conduct all required reviews timely. The CPD’s Tactical Review and Evaluation Division (also known as TRED)—which is the “designated unit at the CPD headquarters level”—has struggled with completing reviews, maintaining needed staffing levels, and making progress on its backlog of cases to review.

The charts below illustrate these challenges: Figure 1 depicts TRED staffing over time and Figure 2 depicts TRED’s backlog over time.

Figure 1: Employees (sworn and civilian) Assigned to TRED July 2023 – June 2025

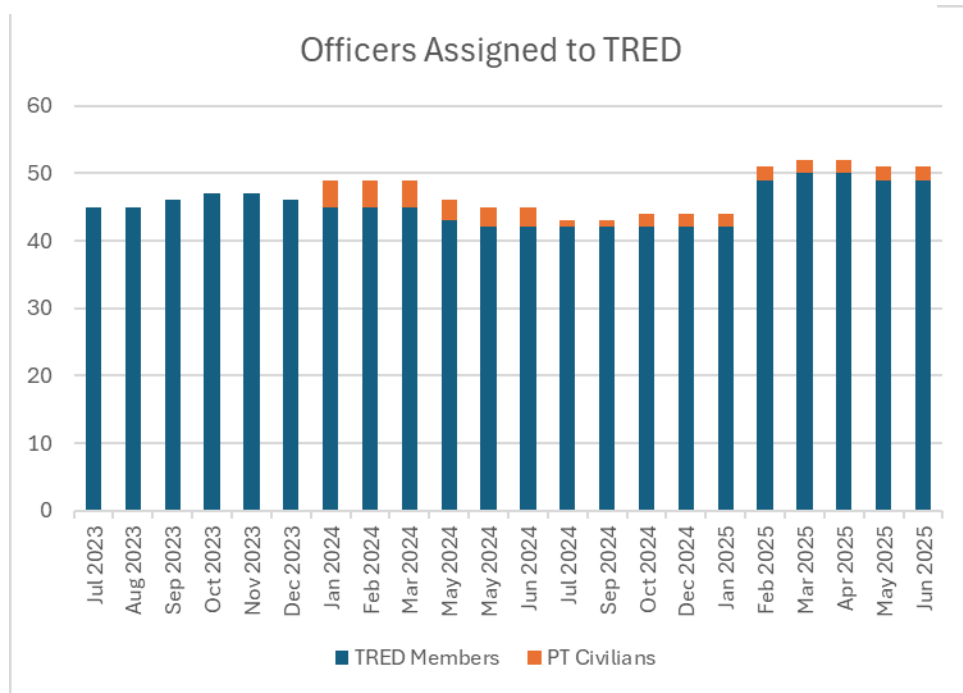
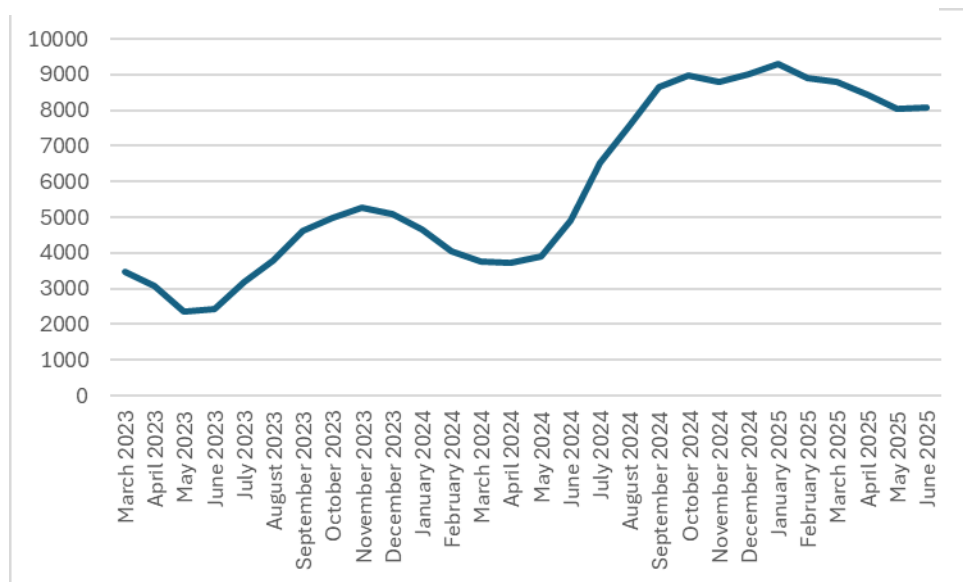


Figure 2: TRED's backlog by number of cases March 2023 – June 2025



To achieve Secondary compliance, the CPD must demonstrate adequate staffing of CPD's TRED to reduce its review backlog of cases and continued evidence that TRED personnel continue to receive sufficient training to carry out the tasks in accordance with its standard operating procedure.

Paragraph 574 Compliance Progress History

FIRST REPORTING PERIOD
MARCH 1, 2019 – AUGUST 31, 2019

COMPLIANCE PROGRESS:
None

SECOND REPORTING PERIOD
SEPTEMBER 1, 2019 – FEBRUARY 29, 2020

COMPLIANCE PROGRESS:
None

THIRD REPORTING PERIOD
MARCH 1, 2020 – DECEMBER 31, 2020

COMPLIANCE PROGRESS:
Preliminary

FOURTH REPORTING PERIOD
JANUARY 1, 2021 – JUNE 30, 2021

COMPLIANCE PROGRESS:
Secondary

FIFTH REPORTING PERIOD
JULY 1, 2021 – DECEMBER 31, 2021

COMPLIANCE PROGRESS:
Secondary

SIXTH REPORTING PERIOD
JANUARY 1, 2022 – JUNE 30, 2022

COMPLIANCE PROGRESS:
Preliminary

SEVENTH REPORTING PERIOD
JULY 1, 2022 – DECEMBER 31, 2022

COMPLIANCE PROGRESS:
Preliminary

EIGHTH REPORTING PERIOD
JANUARY 1, 2023 – JUNE 30, 2023

COMPLIANCE PROGRESS:
Preliminary

NINTH REPORTING PERIOD
JULY 1, 2023 – DECEMBER 31, 2023

COMPLIANCE PROGRESS:
Preliminary

TENTH REPORTING PERIOD
JANUARY 1, 2024 – JUNE 30, 2024

COMPLIANCE PROGRESS:
Preliminary

ELEVENTH REPORTING PERIOD
JULY 1, 2024 – DECEMBER 31, 2024

COMPLIANCE PROGRESS:
Preliminary

TWELFTH REPORTING PERIOD
JANUARY 1, 2025 – JUNE 30, 2025

COMPLIANCE PROGRESS:
Preliminary

Data Collection, Analysis & Management: ¶575

575. CPD recently established a Force Review Unit (“FRU”) and tasked the FRU with certain responsibilities described in the preceding paragraph. CPD will ensure that the FRU or any other unit tasked with these responsibilities has sufficient resources to perform them. CPD will ensure that the FRU or any other unit tasked with these responsibilities is staffed with CPD members, whether sworn or civilian, with sufficient experience, rank, knowledge, and expertise to: effectively analyze and assess CPD’s use of force practices and related reporting and review procedures; conduct trend analysis based on use of force data; identify tactical, equipment, training, or policy concerns based on analysis of use of force incidents and data; and develop recommendations regarding modifications to tactics, equipment, training, or policy as necessary to address identified practices or trends relating to the use of force.

Compliance Progress

(Reporting Period: January 1, 2025, through June 30, 2025)

Preliminary:

Secondary:

Full:

Not In Compliance

Not In Compliance

Not In Compliance

In the twelfth reporting period, the City and the CPD did not achieve any levels of compliance with ¶575.

To assess Preliminary compliance with ¶575, the IMT reviewed records demonstrating that the CPD has qualified personnel to meet the requirements of this paragraph. The City and the CPD achieved Preliminary and Secondary compliance with ¶575 in the fourth reporting period, but lost compliance in the sixth reporting period due to inadequate staffing.

As mentioned in previous reports, the IMT remains concerned about TRED’s ability to conduct all required reviews timely. The CPD’s Tactical Review and Evaluation Division (“designated unit at the CPD headquarters level”) has struggled with completing reviews, maintaining needed staffing levels, and making progress on its backlog of cases to review.

The charts below illustrate these challenges; Figure 1 depicts TRED staffing over time and Figure 2 depicts TRED’s backlog over time.

Figure 1: Employees (sworn and civilian) Assigned to TRED July 2023 – June 2025

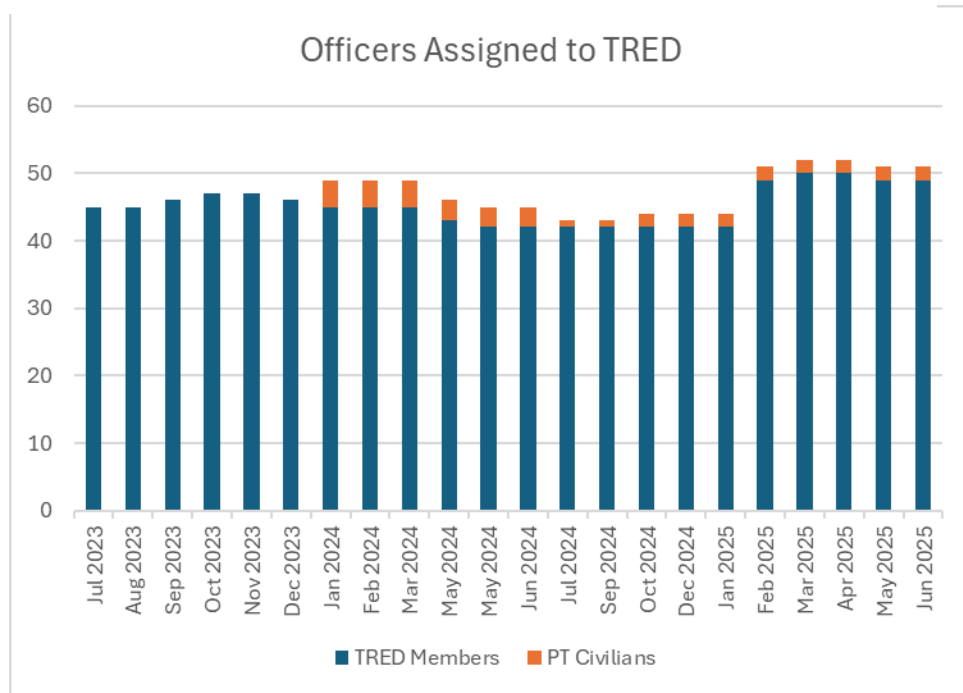
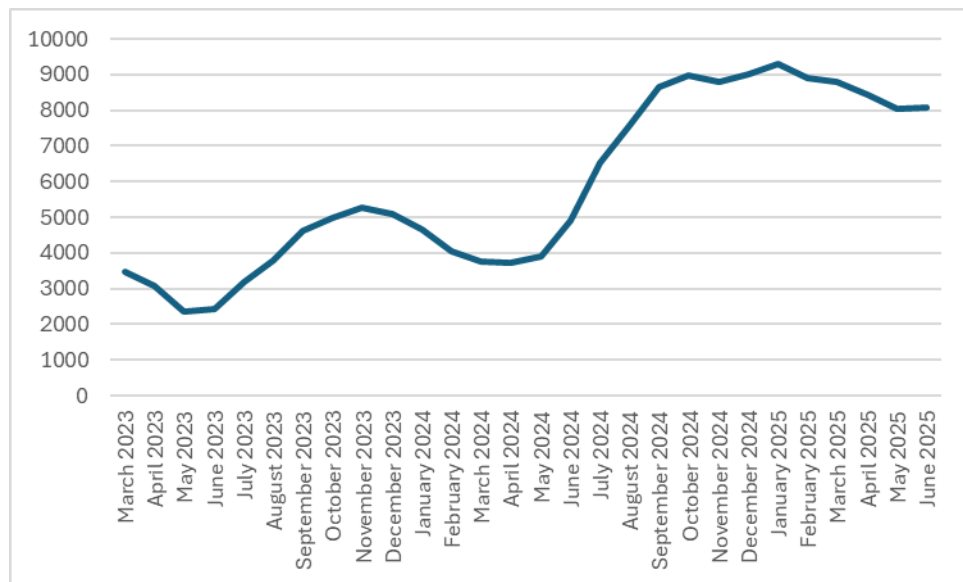


Figure 2: TRED's backlog by number of cases March 2023 – June 2025



To achieve Preliminary compliance, the CPD must demonstrate that it has qualified personnel to meet the requirements of this paragraph. To achieve Secondary compliance, the CPD must demonstrate adequate staffing of CPD's TRED to reduce its review backlog of cases and continued evidence that TRED personnel continue to receive sufficient training to conduct the tasks in accordance with the TRED's standard operating procedure.

Paragraph 575 Compliance Progress History

FIRST REPORTING PERIOD MARCH 1, 2019 – AUGUST 31, 2019 COMPLIANCE PROGRESS: None	SECOND REPORTING PERIOD SEPTEMBER 1, 2019 – FEBRUARY 29, 2020 COMPLIANCE PROGRESS: None	THIRD REPORTING PERIOD MARCH 1, 2020 – DECEMBER 31, 2020 COMPLIANCE PROGRESS: None
FOURTH REPORTING PERIOD JANUARY 1, 2021 – JUNE 30, 2021 COMPLIANCE PROGRESS: Secondary	FIFTH REPORTING PERIOD JULY 1, 2021 – DECEMBER 31, 2021 COMPLIANCE PROGRESS: Secondary	SIXTH REPORTING PERIOD JANUARY 1, 2022 – JUNE 30, 2022 COMPLIANCE PROGRESS: None
SEVENTH REPORTING PERIOD JULY 1, 2022 – DECEMBER 31, 2022 COMPLIANCE PROGRESS: None	EIGHTH REPORTING PERIOD JANUARY 1, 2023 – JUNE 30, 2023 COMPLIANCE PROGRESS: None	NINTH REPORTING PERIOD JULY 1, 2023 – DECEMBER 31, 2023 COMPLIANCE PROGRESS: None
TENTH REPORTING PERIOD JANUARY 1, 2024 – JUNE 30, 2024 COMPLIANCE PROGRESS: None	ELEVENTH REPORTING PERIOD JULY 1, 2024 – DECEMBER 31, 2024 COMPLIANCE PROGRESS: None	TWELFTH REPORTING PERIOD JANUARY 1, 2025 – JUNE 30, 2025 COMPLIANCE PROGRESS: None

Data Collection, Analysis & Management: ¶578

578. For any reportable use of force incident subject to an ongoing investigation by COPA, COPA will be exclusively responsible for recommending disciplinary action relating to the incident. The purpose of FRB’s review will be to: a. evaluate if actions by CPD members during the incident were tactically sound and consistent with CPD training; and b. if applicable, identify specific modifications to existing policy, training, tactics, or equipment that could minimize the risk of deadly force incidents occurring and the risk of harm to officers and the public.

Compliance Progress	(Reporting Period: January 1, 2025, through June 30, 2025)
Preliminary:	In Compliance (THIRD REPORTING PERIOD)
Secondary:	In Compliance (SEVENTH REPORTING PERIOD)
Full:	Not in Compliance

In the twelfth reporting period, the City and the CPD maintained Preliminary and Secondary compliance but did not achieve Full compliance with ¶578.

To assess Preliminary compliance with ¶578, the IMT reviewed the entities’ relevant policies and documents following the process described in the Consent Decree (¶¶626–41). To assess Secondary compliance, the IMT reviewed the CPD’s training development, implementation, and evaluation (¶286), including the implementation of a decision-point analysis. To assess Full compliance, 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 this paragraph.

During the twelfth reporting period, 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 member. As the FRB continues to be detailed in policy, the CPD has remained in Preliminary compliance with ¶578. Additionally, the CPD continues to possess Standard Operating Procedure (SOP) 2020-03, *Force Review Board*, which we have previously found to evidence Secondary compliance.

However, we continue to observe inconsistent execution of FRBs, and those which we observed in person during this monitoring period did not sufficiently evaluate each opportunity for operational improvement. As we have noted in our previous reports, 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. Yet, the FRBs we observed continue to be summary reviews of the force event without the nuance required by SOP 2020-03 and rarely any substantive discussion among the CPD command staff members required to participate on the FRB. We therefore continue to find

that FRBs, as they are presently conducted, continue to fall short of the requirements of this paragraph. The IMT continues to be available for consultation with the CPD about how they should be enhanced.

The City and the CPD maintained Preliminary and Secondary compliance with ¶578 in the twelfth reporting period. To achieve Full compliance with the requirements of ¶578, we will need to observe the FRB consistently engaging in a critical review of the incidents and making a decision-point analysis that enhances the CPD.

Paragraph 578 Compliance Progress History

FIRST REPORTING PERIOD MARCH 1, 2019 – AUGUST 31, 2019 COMPLIANCE PROGRESS: None	SECOND REPORTING PERIOD SEPTEMBER 1, 2019 – FEBRUARY 29, 2020 COMPLIANCE PROGRESS: None	THIRD REPORTING PERIOD MARCH 1, 2020 – DECEMBER 31, 2020 COMPLIANCE PROGRESS: Preliminary
FOURTH REPORTING PERIOD JANUARY 1, 2021 – JUNE 30, 2021 COMPLIANCE PROGRESS: Secondary	FIFTH REPORTING PERIOD JULY 1, 2021 – DECEMBER 31, 2021 COMPLIANCE PROGRESS: Secondary	SIXTH REPORTING PERIOD JANUARY 1, 2022 – JUNE 30, 2022 COMPLIANCE PROGRESS: Preliminary
SEVENTH REPORTING PERIOD JULY 1, 2022 – DECEMBER 31, 2022 COMPLIANCE PROGRESS: Preliminary	EIGHTH REPORTING PERIOD JANUARY 1, 2023 – JUNE 30, 2023 COMPLIANCE PROGRESS: Preliminary	NINTH REPORTING PERIOD JULY 1, 2023 – DECEMBER 31, 2023 COMPLIANCE PROGRESS: Preliminary
TENTH REPORTING PERIOD JANUARY 1, 2024 – JUNE 30, 2024 COMPLIANCE PROGRESS: Preliminary	ELEVENTH REPORTING PERIOD JULY 1, 2024 – DECEMBER 31, 2024 COMPLIANCE PROGRESS: Preliminary	TWELFTH REPORTING PERIOD JANUARY 1, 2025 – JUNE 30, 2025 COMPLIANCE PROGRESS: Preliminary

Data Collection, Analysis & Management: ¶580

580. The FRB will review each incident within its purview promptly, which will in no event be more than 96 hours after the incident occurs. Within 30 days after its review of an incident, the FRB will issue recommendations, if appropriate, to the Superintendent regarding any need for additional training or modifications to policies, tactics, equipment, or Department practices. Upon review and approval by the Superintendent, or his or her designee, the FRB will assign each approved recommendation to a specific CPD command staff member for implementation. CPD will promptly implement each approved recommendation.

Compliance Progress (Reporting Period: January 1, 2025, through June 30, 2025)

Preliminary:	<i>In Compliance (THIRD REPORTING PERIOD)</i>
Secondary:	<i>In Compliance (SEVENTH REPORTING PERIOD)</i>
Full:	<i>Not In Compliance</i>

In the twelfth reporting period, the City and the CPD maintained Preliminary and Secondary compliance but did not achieve Full compliance with ¶580.

To assess Preliminary compliance with ¶580, the IMT reviewed the entities’ relevant policies and documents following the process described in the Consent Decree (¶¶626–41). To assess Secondary compliance, the IMT reviewed the CPD’s training development, implementation, and evaluation (¶286), including the implementation of a decision-point analysis. To assess Full compliance, 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 this paragraph.

During the twelfth reporting period, 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 member. As the FRB continues to be detailed in policy, the CPD has remained in Preliminary compliance with ¶580. Additionally, the CPD continues to use Standard Operating Procedure (SOP) 2020-03, *Force Review Board*, which maintains Secondary compliance.

However, we continue to observe inconsistent execution of Force Review Boards, and some do not sufficiently evaluate opportunities for operational improvement. As we have noted in our past reports, Force Review Board 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 a need for additional training or opportunities for improvement to policy, tactics, equipment, or practices. Yet, the Force Review Boards that we observed continue to be summary reviews of the force event without the nuance required by SOP 2020-0—

and there is rarely any substantive discussion among the CPD command staff members that are required to participate in the FRB.

Moreover, the CPD is not consistently meeting the 96-hour (4 day) requirement of this paragraph. During this reporting period, the length of time between the use of force incident and the FRB meeting ranged between two and 14 days. While we recommended in our comprehensive assessment that the Parties consider revising this 96-hour requirement to, among other things, ensure meaningful review of each incident, the Parties have not revised this requirement. We therefore conclude that FRBs, as they are presently conducted, continue to fall short of the requirements of this paragraph.

The IMT continues to be available for consultation with CPD as to how they should be enhanced.

Paragraph 578 Compliance Progress History

FIRST REPORTING PERIOD MARCH 1, 2019 – AUGUST 31, 2019 COMPLIANCE PROGRESS: Not Applicable	SECOND REPORTING PERIOD SEPTEMBER 1, 2019 – FEBRUARY 29, 2020 COMPLIANCE PROGRESS: None	THIRD REPORTING PERIOD MARCH 1, 2020 – DECEMBER 31, 2020 COMPLIANCE PROGRESS: Preliminary
FOURTH REPORTING PERIOD JANUARY 1, 2021 – JUNE 30, 2021 COMPLIANCE PROGRESS: Preliminary	FIFTH REPORTING PERIOD JULY 1, 2021 – DECEMBER 31, 2021 COMPLIANCE PROGRESS: Preliminary	SIXTH REPORTING PERIOD JANUARY 1, 2022 – JUNE 30, 2022 COMPLIANCE PROGRESS: Preliminary
SEVENTH REPORTING PERIOD JULY 1, 2022 – DECEMBER 31, 2022 COMPLIANCE PROGRESS: Secondary	EIGHTH REPORTING PERIOD JANUARY 1, 2023 – JUNE 30, 2023 COMPLIANCE PROGRESS: Secondary	NINTH REPORTING PERIOD JULY 1, 2023 – DECEMBER 31, 2023 COMPLIANCE PROGRESS: Secondary
TENTH REPORTING PERIOD JANUARY 1, 2024 – JUNE 30, 2024 COMPLIANCE PROGRESS: Secondary	ELEVENTH REPORTING PERIOD JULY 1, 2024 – DECEMBER 31, 2024 COMPLIANCE PROGRESS: Secondary	TWELFTH REPORTING PERIOD JANUARY 1, 2025 – JUNE 30, 2025 COMPLIANCE PROGRESS: Secondary

Data Collection, Analysis & Management: ¶582

582. *The publicly accessible, web-based data platform will enable visitors to:*
a. identify where reportable uses of force occur through interactive maps depicting incident frequencies at a citywide, district, neighborhood, and ward level; b. identify the frequency, in the aggregate and by type, of reportable uses of force at the citywide, district, neighborhood, and ward level through graphs, charts, and other data visualizations; and c. review aggregate demographic information about the race, ethnicity, age, and gender of persons subjected to reportable uses of force at the citywide, district, neighborhood, and ward level through graphs, charts, and other data visualizations.

Compliance Progress

(Reporting Period: January 1, 2025, through June 30, 2025)

Preliminary:	<i>In Compliance</i> (THIRD REPORTING PERIOD)
Secondary:	<i>In Compliance</i> (NINTH REPORTING PERIOD)
Full:	<i>Not in Compliance</i>

In the twelfth reporting period, the City and the CPD maintained Preliminary and Secondary compliance but did not achieve Full compliance with ¶582.

During the twelfth reporting period, the CPD maintained its *Use of Force Dashboard*, which updates monthly. The elements of ¶582 continue to be incorporated into the aggregate-level data presented through the dashboard’s “graphs, charts, and other data visualizations,” as required.

During the eleventh reporting period, the CPD demonstrated the reliability of the *Use of Force Dashboard* data through a comprehensive audit approach of use-of-force events. The CPD’s Audit Division team concluded that “department members comply with the Department’s use of force reporting policy with minimal exceptions.” The audit team reviewed over 10,000 report narratives and of those report narratives, only 0.003% were identified as unreported use-of-force incidents. The IMT has had the opportunity to weigh in on the design of the audit and believe the analysis and findings indicate that the data available to the public are a reliable reflection of CPD force events.

However, during this reporting period, the IMT was again unable to verify that all community comments to the dashboard were properly handled by the CPD in accordance with Tactical Review and Evaluation Division (TRED) procedures. The IMT will continue to monitor that community comments are appropriately and timely addressed. Additionally, the IMT will also continue to monitor the CPD’s ability to demonstrate the reliability of the *Use of Force Dashboard* data.

Paragraph 582 Compliance Progress History

FIRST REPORTING PERIOD
MARCH 1, 2019 – AUGUST 31, 2019

COMPLIANCE PROGRESS:

Not Applicable

SECOND REPORTING PERIOD
SEPTEMBER 1, 2019 – FEBRUARY 29, 2020

COMPLIANCE PROGRESS:

None

THIRD REPORTING PERIOD
MARCH 1, 2020 – DECEMBER 31, 2020

COMPLIANCE PROGRESS:

Preliminary

FOURTH REPORTING PERIOD
JANUARY 1, 2021 – JUNE 30, 2021

COMPLIANCE PROGRESS:

Preliminary

FIFTH REPORTING PERIOD
JULY 1, 2021 – DECEMBER 31, 2021

COMPLIANCE PROGRESS:

Preliminary

SIXTH REPORTING PERIOD
JANUARY 1, 2022 – JUNE 30, 2022

COMPLIANCE PROGRESS:

Secondary

SEVENTH REPORTING PERIOD
JULY 1, 2022 – DECEMBER 31, 2022

COMPLIANCE PROGRESS:

Secondary

EIGHTH REPORTING PERIOD
JANUARY 1, 2023 – JUNE 30, 2023

COMPLIANCE PROGRESS:

Preliminary

NINTH REPORTING PERIOD
JULY 1, 2023 – DECEMBER 31, 2023

COMPLIANCE PROGRESS:

Secondary

TENTH REPORTING PERIOD
JANUARY 1, 2024 – JUNE 30, 2024

COMPLIANCE PROGRESS:

Secondary

ELEVENTH REPORTING PERIOD
JULY 1, 2024 – DECEMBER 31, 2024

COMPLIANCE PROGRESS:

Secondary

TWELFTH REPORTING PERIOD
JANUARY 1, 2025 – JUNE 30, 2025

COMPLIANCE PROGRESS:

Secondary

Data Collection, Analysis & Management: ¶607

607. Within 90 days of completion of the assessment described in the preceding paragraph, CPD will develop a plan, including a timeline for implementation, to prioritize and address the needs identified to enhance CPD’s information collection mechanisms and data management technology (“Data Systems Plan”). CPD will implement the Data Systems Plan in accordance with the specified timeline for implementation.

Compliance Progress	(Reporting Period: January 1, 2025, through June 30, 2025)
Preliminary:	In Compliance (ELEVENTH REPORTING PERIOD)
Secondary:	Under Assessment
Full:	Not Yet Assessed

In the twelfth reporting period, the City and the CPD maintained Preliminary compliance with the requirements of ¶607.

To evaluate Preliminary compliance, the IMT reviewed records demonstrating that the CPD has qualified personnel to meet the requirements of this paragraph and looked for demonstrated progress in developing a *Data Systems Plan* that is responsive to the needs identified from the assessment required by ¶606.

To evaluate Secondary compliance, the IMT reviewed the CPD’s *Data Systems Plan*, which includes some implementation timelines as required by this paragraph. The CPD developed a plan, which provides some details about the CPD’s plans for building and implementing systems including personnel records management; law enforcement records management; legacy and custom applications. It also provides a helpful matrix that depicts CPD’s priorities for system migration, but overall, we are concerned about the lack of detail in the *Plan* regarding specific implementation approaches. Moreover, much of the *Plan* is redundant of the ¶606 *Final Assessment Report*. We also note that the *Data Systems Plan* is included in ¶638i, which requires the CPD to submit it for “review and approval.”

The IMT understands that the City and the CPD are in various stages of preparations for implementation, including that systems being developed by the CPD’s vendor *Benchmark Analytics* are underway and that the procurement process for a new records management system (RMS) is also underway. A new RMS is a critical resolution to many of the data system needs identified in the ¶606 assessment.

The IMT will assess Full compliance based on the CPD’s full implementation of the *Data Systems Plan*. We look forward to our continued observations of the CPD’s Information Systems Development Group (ISDG) meetings and note that the ISDG is responsible for “ensuring implementation of the Data Systems Plan” per ¶608.

Paragraph 582 Compliance Progress History

FIRST REPORTING PERIOD MARCH 1, 2019 – AUGUST 31, 2019 COMPLIANCE PROGRESS: Not Applicable	SECOND REPORTING PERIOD SEPTEMBER 1, 2019 – FEBRUARY 29, 2020 COMPLIANCE PROGRESS: Not Applicable	THIRD REPORTING PERIOD MARCH 1, 2020 – DECEMBER 31, 2020 COMPLIANCE PROGRESS: Status Update
FOURTH REPORTING PERIOD JANUARY 1, 2021 – JUNE 30, 2021 COMPLIANCE PROGRESS: None	FIFTH REPORTING PERIOD JULY 1, 2021 – DECEMBER 31, 2021 COMPLIANCE PROGRESS: None	SIXTH REPORTING PERIOD JANUARY 1, 2022 – JUNE 30, 2022 COMPLIANCE PROGRESS: None
SEVENTH REPORTING PERIOD JULY 1, 2022 – DECEMBER 31, 2022 COMPLIANCE PROGRESS: None	EIGHTH REPORTING PERIOD JANUARY 1, 2023 – JUNE 30, 2023 COMPLIANCE PROGRESS: None	NINTH REPORTING PERIOD JULY 1, 2023 – DECEMBER 31, 2023 COMPLIANCE PROGRESS: None
TENTH REPORTING PERIOD JANUARY 1, 2024 – JUNE 30, 2024 COMPLIANCE PROGRESS: None	ELEVENTH REPORTING PERIOD JULY 1, 2024 – DECEMBER 31, 2024 COMPLIANCE PROGRESS: Preliminary	TWELFTH REPORTING PERIOD JANUARY 1, 2025 – JUNE 30, 2025 COMPLIANCE PROGRESS: Preliminary