

Independent Monitoring Report

Impartial Policing

Compliance Assessments by Paragraph

Specific compliance assessments, by paragraph, for the Impartial Policing 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 Impartial Policing section is available in *Comprehensive Assessment Part I* (which included *Independent Monitoring Report 8*): <https://cpdmonitoringteam.com/imr-8-1/>.

Impartial Policing: ¶62

62. CPD will require that officers comply with CPD policies related to officer response to allegations of sexual assault, sexual abuse, stalking, and domestic violence. All officers will receive in-service training every three years to ensure CPD's response to allegations of gender-based violence, including dispatch response, initial officer response, and on-scene and follow-up investigation, is both effective and unbiased.

Compliance Progress

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

Preliminary:	<i>In Compliance (NEW)</i>
Secondary:	<i>Not Yet Assessed</i>
Full:	<i>Not Yet Assessed</i>

During the twelfth reporting period, the City and the CPD achieved Preliminary compliance with ¶62.

In the eleventh reporting period, the City and the CPD continued to work on its policies related to Gender Based Violence, specifically the CPD's *Gender-Based Violence Incidents* policy (G04-XX). Although the draft policy was much improved from the previous version, the CPD did not provide documentation related to community engagement for review. As such, the IMT requested in the eleventh reporting period that the CPD seek community input on G04-XX and submit supporting documentation along with an updated policy for further review. Further, in conversations with the CPD, it was clarified that G04-XX, *Gender-Based Violence Incidents*, would serve as the CPD's standalone policy on gender-based violence incidents and include references to its standing policies on topics related to gender-based violence such as domestic violence, stalking, and sexual assaults.

During the twelfth reporting period, the CPD provided a revised *Gender-Based Violence Incidents* policy (G04-XX) for review. The IMT and OAG issued no-objection notices to the revised policy. The CPD also provided documentation related to community engagement with several community organizations on their review of the policy. This documentation supports Preliminary compliance with ¶62. To maintain Preliminary compliance with ¶62, the CPD should seek further public comment on the policy, gather and incorporate additional community feedback, and finalize and publish the *Gender-Based Violence Incidents* policy. Since several of the related policies referenced in G04-XX have not been updated in the past two years, the CPD should update the related policies as needed. Updating these policies so that they are reflective of current best practices and in alignment with G04-XX is essential to maintaining Preliminary compliance with the requirements of ¶62.

The IMT will assess Secondary compliance by examining the CPD’s efforts to train on gender-based violence incidents through its refresher the *Gender-Based Violence In-Service training* course. This training was initially delivered in 2022, before the policy was finalized. Now that the policy has been revised, refresher training should be updated to reflect the direction provided within the policy and delivered to at least 95% of the required personnel.

The IMT will assess Full compliance by measuring the CPD’s ability to respond and conduct on-scene and follow up investigations related to these incidents in an effective and unbiased manner. The IMT and OAG will work with the City and the CPD to define “effective and unbiased” and identify the performance metrics with which to make these assessments.

Paragraph 62 Compliance Progress History

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

Impartial Policing: ¶65

65. Within 180 days of the Effective Date, the City will designate a language access coordinator who will coordinate with CPD and review CPD's compliance with its language access policy and Section 2-40 of the Municipal Code of Chicago. The City's language access coordinator will assess the effectiveness and efficiency of CPD's policies on an ongoing basis and will report to the Superintendent or his or her designee any recommendations to revise policy, if necessary.

Compliance Progress

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

Preliminary:	<i>In Compliance</i> (SECOND REPORTING PERIOD)
Secondary:	<i>In Compliance</i> (NEW)
Full:	<i>Not Yet Assessed</i>

During the twelfth reporting period, the City and the CPD achieved Secondary compliance with ¶65.

In the second reporting period, the City and the CPD designated a language access coordinator (LAC), as well as a position for a Language Coordinator within the Department, who works closely and coordinates with the City Language Coordinator. The City and the CPD also previously developed the *Language Access Plan*.

On June 30, 2025, the last day of this reporting period, the City and the CPD provided a link to the Language Access page on the CPD's public-facing website. The website includes, the policy, S02-01-05, *Interactions with Persons with Limited English Proficiency*, which is available in English, Spanish, Polish, and Arabic, the *2024 Annual Report on Language Access*, and other resources related to language access (i.e., I-speak cards, Language Access Plan, Feedback forms). In the CPD's *2024 Annual Report on Language Access*, it does not currently include demographics of the City's community. It would be helpful if that information were noted within in future reports on language access. This will establish a foundation for the importance of this work and the related services it provides. The IMT looks forward to discussing this and other recommendations with the CPD to ensure that its future annual reports on language access are more comprehensive.

Additionally, this reporting period, the City and the CPD provided a *Standard Operating Procedure (SOP): Meetings Between City Language Access Coordinator and CPD Language Access Coordinator* for review that establishes the meeting cadence and other meeting requirements between the City's Language Access Coordinator and the CPD's Language Access Coordinator. Cementing the coordination in the SOP provides for continuity and continued sustainment of these efforts. This documentation supports Secondary compliance with ¶65.

Maintaining Secondary Compliance will be contingent on the City's and the CPD's LACs' efforts to demonstrate continued coordination. The IMT expects that the

City and the CPD will provide meeting notes, or other outcomes, from these quarterly meetings to support continued compliance.

Achieving Full Compliance will be contingent upon the City's and the CPD's efforts to demonstrate that both LACs are working together to produce the compliance report, which will review CPD's compliance with its language access policy and Section 2-40 of the Municipal Code of Chicago, to the Superintendent, as required by this paragraph.

Paragraph 65 Compliance Progress History

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

Impartial Policing: ¶67

67. Within 180 days of the Effective Date, and as necessary thereafter, CPD will translate its language access policy into any non-English language spoken by a limited or non-English proficient population that constitutes 5% or 10,000 individuals, whichever is less, in Chicago, as outlined in Section 2-40-020 of the Chicago municipal Code. CPD will publish translated versions of its language access policy on its website.

Compliance Progress

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

Preliminary:	<i>In Compliance</i> (SECOND REPORTING PERIOD)
Secondary:	<i>In Compliance</i> (THIRD REPORTING PERIOD)
Full:	<i>In Compliance</i> (NEW)

During the twelfth reporting period, the City and the CPD achieved Full compliance with ¶67.

In the second reporting period, the City and the CPD achieved Preliminary compliance because the CPD translated its Special Order S02-01-05 into Spanish, Polish, Chinese, and Arabic. In the third reporting period, the City and the CPD achieved Secondary compliance by providing evidence that it has the managerial practices in place to confirm that the languages selected for translations represent all groups that meet the criteria outlined in this paragraph. The CPD approved its Language Access Coordinator’s Language Access Plan during the fourth reporting period. The Plan outlines an annual schedule and system to review language access data to determine if additional translations are needed.

During this reporting period, the CPD posted its updated translated Language Access policy, S02-01-05 *Interactions with Persons with Limited English Proficiency* and produced the Department’s *2024 Annual Report on Language Access*.¹ By providing these materials for review, along with discussions with the Department’s Language Access Coordinator on their activities and review of language access needs, the CPD achieved Full compliance with ¶67 this reporting period.

To maintain full compliance, the City and the CPD must continue producing its *Annual Report on Language Access* and document its reassessment of language needs to ensure that the policy is updated as necessary and translated into any non-English language spoken by a limited or non-English proficient population that constitutes 5% or 10,000 individuals, as outlined in the City of Chicago Municipal Code (Section 2-40-020). The demographics of the City of Chicago are fluid, and the CPD must ensure that it continually assesses the needs of the community it

¹ *Language Access*, CHICAGO POLICE DEPARTMENT (last visited July 30, 2025), <https://www.chicagopolice.org/languageaccess/>.

serves and references the Municipal Code when determining if additional translations of the policy are needed.

Paragraph 67 Compliance Progress History

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

Impartial Policing: ¶71

71. Within 180 days of the Effective Date, CPD will develop a policy for transporting arrested or detained individuals that requires CPD officers to notify OEMC of the start and end of a transport and whether the individual is a juvenile or adult.

Compliance Progress

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

Preliminary: *In Compliance (THIRD REPORTING PERIOD)*
Secondary: *In Compliance (NINTH REPORTING PERIOD)*
Full: *Under Assessment*

During the twelfth reporting period, the City and the CPD are Under Assessment with Full compliance with ¶71.

In the ninth reporting period, the City and the CPD produced revisions to its Recruit Juvenile Processing training and revised materials related to its Recruit Training Curriculum Custody, Arrests, Booking and Detention training. The City and the CPD further submitted evidence that 95% of its officers received its *Constitutional Policing In-Service* training, *Custody Arrest, Booking, and Detention (Recruit BLE)* training, and *Recruit Juvenile Processing* training, meeting the requirements for Secondary compliance with ¶71. Maintaining secondary compliance depends on the City and the CPD's efforts to maintain training requirements with these related courses.

To assess Full compliance, the IMT reviewed the City and the CPD's *Audit of Transport Report*, conducted by the CPD's Audit Division. The IMT assessed whether the CPD has sufficiently implemented the requirement by evaluating the CPD's efforts to ensure that officers are complying with the requirements of ¶71. The audit found low numbers in the practical application of this paragraph requirement, related policies, and training. The process of conducting such an audit is demonstrative of CPD's efforts to self-monitor and ensure compliance with these requirements. Additionally, it shows an overall commitment to continuous self-correcting and self-monitoring/auditing. However, additional work needs to be completed to ensure that officers are operationalizing the policy and training and making proper notifications as required by ¶71.

To achieve Full compliance, the City and the CPD must demonstrate that it is incorporating and addressing the feedback and recommendations noted in the *Audit of Transport Report*. Upon review of the audit report, the CPD identified adjustments to training, technology, and other mechanisms to reinforce the importance of CPD officers notifying OEMC of the start and end of a transport and whether the individual is a juvenile or adult. The IMT looks forward to reviewing how the CPD will address the gaps noted in the report as part of the assessment for Full compliance. To maintain Full compliance, the IMT will review the completion of future audit

reports, refresher training, and conduct a review of a sample of transport reports to determine continued operationalization of the policy and training.

Paragraph 71 Compliance Progress History

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

Impartial Policing: ¶73

73. The Parties acknowledge that CPD has developed, with the aid of subject-matter experts, a three-part course called Procedural Justice, which covers certain impartial policing subjects including the principles of procedural justice, the importance of police legitimacy, and the existence of and methods for minimizing the impact of implicit bias. By the end of the year 2020, all officers, including supervisors, will complete the Procedural Justice course.

Compliance Progress

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

Preliminary:	<i>In Compliance</i> (FOURTH REPORTING PERIOD)
Secondary:	<i>In Compliance</i> (SIXTH REPORTING PERIOD)
Full:	<i>In Compliance</i> (NEW)

In the twelfth reporting period, the City and the CPD achieved Full compliance with ¶73.

From 2018 to early 2021, the CPD offered a three-part Procedural Justice training as part of the CPD’s in-service program. The course embodied concepts of impartial policing. In the sixth reporting period, the CPD achieved Secondary compliance through the completion of the inclusive *Policing Procedural Justice III*. In the seventh reporting period, the CPD provided the final training records for the *Procedural Justice III* course. Overall, 10,416 officers (or 98% of CPD officers) completed the course and therefore achieved Secondary compliance.

At the end of the eleventh reporting period, the City and the CPD provided its finalized *2025 CPD Annual Training plan* to the IMT and OAG for review. Similar to the *2024 CPD Annual Training Plan*, the training plan identified *Impartial Policing* and *Procedural Justice* courses as key components of the plan.

During the twelfth reporting period, the IMT and the OAG engaged in discussions with the City and the CPD regarding the compliance methodology for ¶73. The Parties agreed that the ¶73 requirement is limited to the implementation of the *Procedural Justice* courses. The operational practice of this paragraph will be assessed as part of other paragraphs, such as paragraphs ¶¶53-55 and 72. Maintaining Full compliance with this paragraph will be contingent on the City and the CPD’s ongoing efforts to ensure that the principles of procedural justice are adequately incorporated into its annual training efforts.

Paragraph 73 Compliance Progress History

FIRST REPORTING PERIOD SEPTEMBER 1, 2019 – AUGUST 31, 2019 COMPLIANCE PROGRESS: Not Applicable	SECOND REPORTING PERIOD SEPTEMBER 1, 2019 – FEBRUARY 29, 2020 COMPLIANCE PROGRESS: 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: Secondary
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: Full

Impartial Policing: ¶75

75. OEMC currently provides diversity awareness training to all new telecommunicators which, among other things, addresses the existence of and methods for minimizing the impact of implicit bias. OEMC will continue to provide training on this topic to all new tele-communicators and, beginning in 2020, will provide all tele-communicators with refresher training every two years on this topic that is adequate in quantity, quality, type, and scope.

Compliance Progress

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

Preliminary:	<i>In Compliance</i> (ELEVENTH REPORTING PERIOD)
Secondary:	<i>In Compliance</i> (NEW)
Full:	<i>Not Yet Assessed</i>

In the twelfth reporting period, the City and the OEMC achieved Secondary compliance with ¶75.

In the eleventh reporting period, the OEMC delivered the updated *2025 Diversity Awareness Training/Refresher* training materials and *Diversity Awareness and Implicit Bias Training Program Standard Operating Procedure* in the last month of the reporting period. The IMT and the OAG provided no-objection notices to the updated *Diversity Awareness and Implicit Bias Training Program Standard Operating Procedure* and related training materials.

To assess Secondary compliance, the IMT reviewed the OEMC’s materials related to the delivery of the updated *2025 Diversity Awareness Training/Refresher* training program. These materials included training attendance lists, pre- and post-training self-assessments, and the training program materials. Additionally, the OEMC provided attendance records that demonstrated that the training was delivered to at least 95% of the required personnel. This documentation fulfilled the requirement of training for both new and current telecommunicators, thereby achieving Secondary Compliance with ¶75. The IMT appreciates the City and OEMC’s efforts to work collaboratively in clarifying its procedures in producing the training and in revising the training to address the feedback provided.

To assess Full compliance, the IMT will examine the OEMC’s sustainability of the training program and continued efforts to deliver the training to new telecommunicators and to current telecommunicators via a refresher training provided every two years and incorporation of such efforts into its annual training plans.

Paragraph 75 Compliance Progress History

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