

**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 12

The Independent Monitor Margaret A. Hickey and the Independent Monitoring Team submit the attached *Independent Monitoring Report 12*.

Dated October 15, 2025

/s/Margaret A. Hickey

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CERTIFICATE OF SERVICE

The undersigned attorney hereby certifies that, on October 15, 2025, she caused a true and correct copy of the foregoing ***Independent Monitoring Report 12*** to be filed electronically with the Court's CM/ECF system, which caused an electronic copy of this filing to be served on counsel of record.

/s/Margaret A. Hickey

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Independent
Monitoring Team | Chicago Police
Department
Consent Decree



INDEPENDENT MONITORING REPORT 12

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

Report Date: October 15, 2025

Independent Monitoring Team | Chicago Police Department Consent Decree

This report, *Independent Monitoring Report 12*, provides our compliance assessments for efforts from the first half of 2025: January 1 through June 30, 2025. As detailed in this report, the City of Chicago (City) and the Chicago Police Department (CPD) continued to make progress with the Consent Decree. While considerable work remains, CPD leadership continues to prioritize the Consent Decree, and it is making a meaningful difference. Sustained focus, transparency, and partnership with Chicago's communities will be essential to turn this momentum into self-sustaining compliance.

Overall, the City has now achieved at least Preliminary compliance with about 94% of the original monitorable paragraphs (or 518 paragraphs), at least Secondary compliance with about 66% of paragraphs (or 365 paragraphs), and Full compliance with about 23% (or 128 paragraphs). In addition to paragraphs where the City and the CPD maintained compliance, the City gained additional levels of compliance with about 82 of these paragraphs—or about 15% of the original monitorable paragraphs—including 36 paragraphs that moved into Full compliance.

In the last reporting period, the CPD sought to explicitly address many of the requirements we identified as falling behind in previous reporting periods. This included, for example, revising its policy for *Community Engagement in Policy and Training Development*, Special Order S02-08, to incorporate self-sustaining engagement efforts within CPD and Chicago's communities when developing policies and training. The City and the CPD also continue to update the Independent monitoring Team (IMT), the Office of the Illinois Attorney General (OAG), and the Court on efforts to ensure that the CPD has the "necessary support and resources . . . to enable CPD to fulfill its obligations under this Agreement." (Consent Decree ¶706).



Chief Rodney Monroe, Ret.



Monitor Maggie Hickey

The CPD also sought to address elements of the IMT's *Comprehensive Assessment*, which included, among other things, strategies for accelerating full and effective compliance.¹ (Consent Decree ¶¶657–59). While the IMT may not unilaterally modify the Consent Decree—and the City and the OAG continue to consider whether to make modifications—the CPD sought to implement some strategies now.² For example, in furtherance of its community engagement and transparency efforts, the CPD dedicated significant

¹ See *Comprehensive Assessment, Part II*, INDEPENDENT MONITORING TEAM (October 11, 2024), <https://cpd-monitoringteam.com/wp-content/uploads/2024/10/2024.10.11-Independent-Monitoring-Team-Comprehensive-Assessment-Part-II-amended-and-filed.pdf>. These included, for example, streamlining efforts to address requirements related to the Illinois Police and Community Relations Improvement Act (PCRIA).

² The Parties continue, for example, to discuss and consider whether and how to explicitly add language governing traffic stops to the Consent Decree. While these questions were not resolved by the end of the twelfth reporting period, the IMT is hopeful that there will be some identified path toward resolution before the end of the year.



Dr. Theron Bowman

resources to providing opportunities for community members to observe, participate in, and provide feedback for CPD training.³

Moreover, in the twelfth reporting period, the CPD continued to make significant investments and efforts that, while not fully reflected in compliance levels yet, are necessary for full and effective compliance with the Consent Decree. For example, the CPD continues to work toward a data-driven *Crisis Intervention Officer Implementation Plan*. While still in development, the CPD has been transparent with the IMT and the OAG throughout this process, and we continue to be encouraged by the progress. We hope that the implementation of the plan will lead the CPD toward Full compliance for several Crisis Intervention paragraphs and make a tangible difference in the interactions between the CPD and Chicago's communities.

As the Parties agree, the CPD has come a long way under the Consent Decree, and there is still much work to do. After the end of the twelfth reporting period, for example, the Parties and the Coalition began to meet to address concerns related to the rise in reported uses of force, including the CPD's self-assessments, current strategies, and future plans. We are hopeful that these discussions will help further progress toward shared goals of a safer Chicago with enduring community trust and self-sustaining constitutional and effective policing.

These goals also require a healthy police department that has sufficient support to meet the high expectations of Chicago and the Chicago Police Department. CPD officers continue to face "significant danger, high stress, and a wide range of human tragedy" (Consent Decree ¶1377), and according to the CPD's most recent annual report, 62 officers were shot at in 2024.⁴ In June 2025, CPD Officer Krystal Rivera was tragically killed on duty. In the twelfth reporting period, the CPD made significant progress toward addressing Officer Wellness and Support requirements by developing a *Suicide Prevention Strategy* after soliciting and receiving significant officer feedback. It is our hope that this strategy makes a meaningful difference to Chicago's officers, their families, and all of Chicago's communities.

As we file this report, Chicago communities and officers also face new and unprecedented challenges related to federal law enforcement, City ordinance, Illinois law, and the U.S. Constitution. We want to thank the public servants, CPD officers, and community members who have dedicated and continue to dedicate themselves to safeguarding the rights and safety of people in Chicago. We will continue to provide independent assessments of the City and the CPD's ability to comply with the Consent Decree and their ongoing efforts to advance community and officer safety, transparent and constitutional policing, and community trust.

³ Specifically, the CPD also began hosting "Community Training Observation Days." The first set of days were held on April 12 and April 19, 2025. The CPD's website explained that the initiative "is designed to foster transparency, strengthen police-community relationships, and provide valuable insights into the training standards that drive professional and accountable policing in our city." The City and the CPD most recently hosted another Community Training Observation Day on October 4 and intends to hold another on October 25, 2025.

⁴ See 2024 Chicago Police Department Annual Report, CHICAGO POLICE DEPARTMENT (2025) at 175, <https://www.chicagopolice.org/wp-content/uploads/2024-CPD-Annual-Report-Final-For-Publishing.pdf>. The CPD reported that 68 officers were shot or shot at in 2023, 56 officers in 2022, 74 officers in 2023, and 79 officers in 2020. *Id.*

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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
PCD	Chicago Police Department's Professional Counseling Division
PPO	Probationary Police Officer for the Chicago Police Department
PSIG	Public Safety Inspector General for the Office of Inspector General
R&D	Research and Development for the Chicago Police Department
TOC	Training Oversight Committee
TRED	Tactical Review and Evaluation Division for the Chicago Police Department
TRR	Tactical Response Report for the Chicago Police Department
TRR-I	Tactical Response Investigation Report for the Chicago Police Department
TRR-R	Tactical Response Report Review for the Chicago Police Department
WOL	Watch Operations Lieutenant for the Chicago Police Department

Executive Summary

In August 2017, the Office of the Illinois Attorney General (OAG) sued the City of Chicago (City)—collectively, “the Parties”—in federal court regarding civil rights abuses by the Chicago Police Department (CPD). The lawsuit led to a Consent Decree, effective March 1, 2019.⁵ 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.⁶

This is *Independent Monitoring Report 12*. As in previous monitoring reports, this is an update to the Court and the public on compliance efforts during the twelfth

⁵ More information is also available on the Independent Monitoring Team’s website (cpdmonitoringteam.com/) and on the Illinois Attorney General Office’s Consent Decree website (chicagopoliceconsentdecree.org/about/). The Consent Decree is also available on the Independent Monitoring Team’s website: cpdmonitoringteam.com/wp-content/uploads/2024/02/FINAL-CONSENT-DECREE-SIGNED-BY-JUDGE-DOW.pdf.

⁶ As a party to the Consent Decree, the City is ultimately responsible for compliance. See ¶720. Unless otherwise specified, references to the City include its relevant entities. See ¶736.

reporting period: from January 1, 2025, through June 30, 2025.⁷ Among other things required by the Consent Decree, this report also includes the following:

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

Per ¶661 of the Consent Decree, the IMT will issue semiannual reports until the Consent Decree ends. See ¶¶693 and 714–15. With the agreement of the Parties, this report, *Independent Monitoring Report 12*, 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.⁸

Under the Consent Decree, the City, the CPD, or other relevant entities are not in compliance with any of the requirements of the Consent Decree until the IMT determines that the City has provided sufficient proof that the City, the CPD, or other relevant entities are in compliance. See ¶720. Even if the City has made significant efforts toward complying with a requirement—which in some cases it has—the

⁷ 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://cpdmonitoringteam.com/wp-content/uploads/2024/03/2022.03.25-Stipulation-Regarding-Search-Warrants-Consent-Decree-Timeline.pdf>.

⁸ This report represents a six-month assessment of the City's compliance efforts from January 1, 2025, through June 30, 2025. It does not reflect all the efforts of the City, the CPD, or the other relevant City entities to date. While we report on the compliance efforts within defined reporting periods (see ¶661), we stress that work is ongoing by the City, its relevant entities, the OAG, the IMT, and Chicago's communities. In many cases, relevant City entities have continued to develop policies and train personnel after June 30, 2025, and before the date we submit this report. Importantly, we have not assessed efforts made after June 30, 2025, in this report. We will do so in the monitoring report for the thirteenth reporting period (July 1, 2025, through December 31, 2025). Moreover, an overview of the IMT's assessment process and priorities, including deadlines and status updates, and a summary of the IMT's activities are available on our website: <https://cpdmonitoringteam.com/>.

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.⁹ 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.¹⁰



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 ¶¶714–15.¹¹ Although not required, the Court may retroactively determine the start of the one- or two-year sustainment period when the IMT files a report finding those requirements in Full compliance.

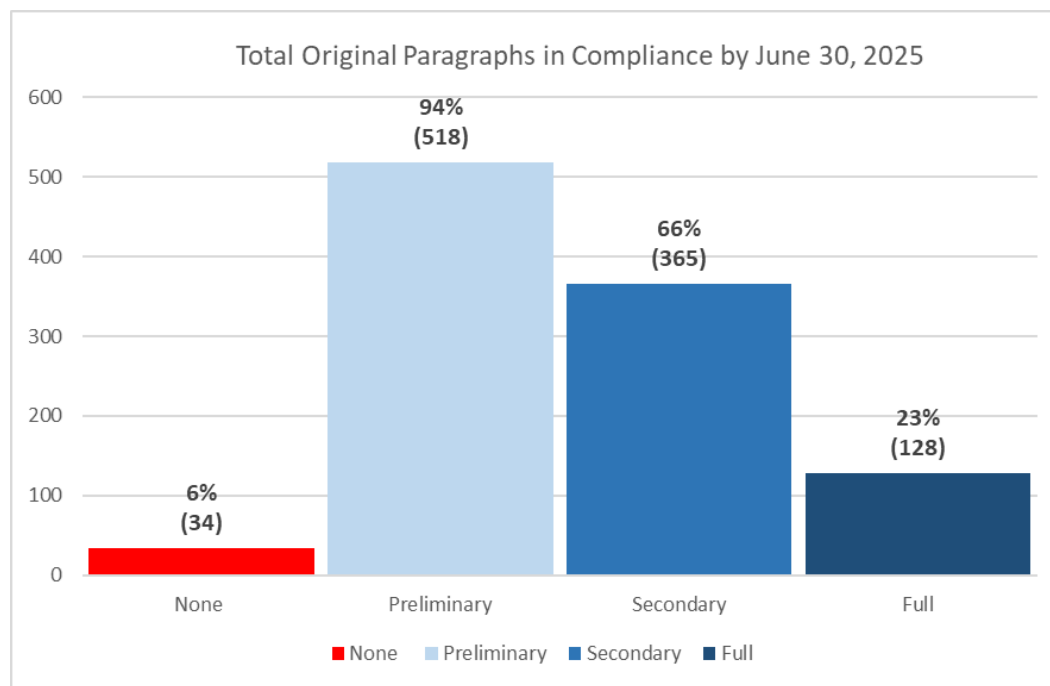
⁹ There are, however, many paragraphs that do not include policy or training elements. In those circumstances, the three levels may follow a different trajectory, such as (1) whether the City or its relevant entities have established the framework and resources to achieve the reform, (2) whether the 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.

¹⁰ 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.

¹¹ See *Stipulation Regarding Search Warrants, Consent Decree Timelines, and the Procedure for “Full and Effective Compliance,” Illinois v. Chicago*, Case No. 17-cv-6260 (March 25, 2022), <https://cpdmonitoringteam.com/wp-content/uploads/2024/03/2022.03.25-Stipulation-Regarding-Search-Warrants-Consent-Decree-Timeline.pdf>.

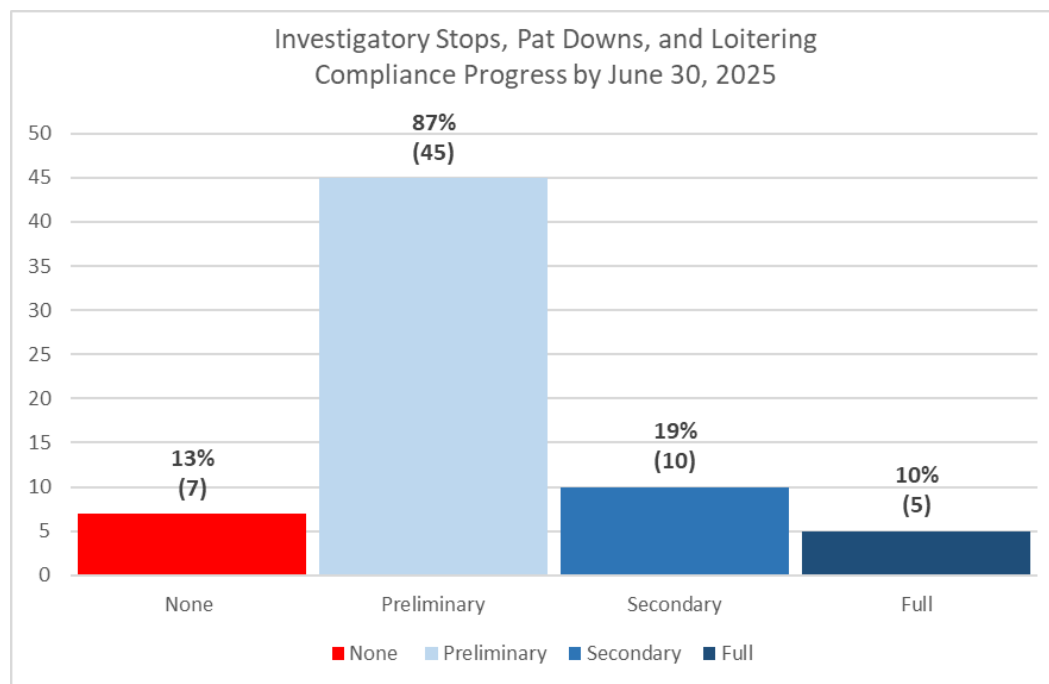
For the original monitorable paragraphs (552), the City has achieved at least Preliminary compliance with 518 paragraphs (or about 94%), at least Secondary compliance with 365 paragraphs (or about 66%), and Full compliance with about 128 paragraphs (or about 23%). More specifically, at the end of the twelfth reporting period, the City remained in Preliminary compliance with 153 paragraphs, remained in Secondary compliance with 237 paragraphs, and achieved Full compliance with 128 paragraphs—leaving 34 paragraphs with no levels of compliance. Of those, the City remains under assessment for Preliminary compliance with six paragraphs.

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



In the twelfth reporting period, the IMT continued to assess monitorable paragraphs in the more recently added Investigatory Stops, Protective Pat-Downs, and Enforcement of Loitering Ordinances section of the Consent Decree. As reflected below, the IMT assessed the City's compliance with 52 of these paragraphs in the twelfth reporting period, and by June 30, 2025, the City received at least Preliminary compliance with 45 paragraphs (or about 87%), at least Secondary compliance with 10 paragraphs (or about 19%), and Full compliance with six paragraphs (or about 12%). More specifically, the City and the CPD remained in Preliminary compliance with 35 paragraphs, Secondary compliance with 4 paragraphs, and Full compliance with 5 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 paragraphs.¹²



As a result, including all monitorable paragraphs in the twelfth reporting period, the City has achieved Preliminary compliance with 563 paragraphs (about 93%), Secondary compliance with 375 paragraphs (about 62%), and Full compliance with 133 paragraphs (about 22%)—leaving 41 paragraphs with no levels of compliance.

Major Developments and Principal Achievements and Challenges Impacting Compliance

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

[Executive Summary Figure 1](#), below, provides a sample of principal achievements and challenges across the 11 topic areas of the Consent Decree.

¹² See [ISR Stipulation Figure 1](#) for additional information about which paragraphs will be monitoring in future reporting periods.

Executive Summary Figure 1. Sample of Principal Achievements & Challenges

Section	Sample of Principal Achievements	Sample of Principal Challenges
Community Policing	- The City and the CPD produced a report covering five years of public awareness work through its “Know Your Rights” campaign. These campaigns used a wide range of modalities to deliver vital information for community members when interacting with law enforcement. - The City and the CPD enhanced its district strategy development process by expanding opportunities for input from a broader cross section of community members and stakeholders. - Over the last several years, the City and the CPD have developed a range of ways to solicit input from community members and respond to feedback and recommendations in districts. The CPD has in place a robust district wide strategy development process that provides for community input from those community members who participate in community conversations.	- The City and the CPD must demonstrate that they are reaching greater numbers of at-risk youth from marginalized communities and improve tracking and documentation of youth engagement programming including feedback from participants and youth-serving agencies. - While the City and the CPD have advanced community policing practices by beginning deployment on the digitized resource directory, it can be made more useful by including more specific information on available services in areas served by patrol officers.
Impartial Policing	- The City and the OEMC delivered the <i>2025 Diversity Awareness Training/Refresher</i> training, 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 and <i>Persons with Disabilities</i> policy suite, including maintaining ongoing partnerships with community organizations such as the Chicago Hearing Society. - The CPD has begun developing related trainings on its <i>Persons with Disabilities</i>, <i>Religious Interactions</i>, and <i>Language Access</i> policies.	- The City and the CPD must further engage the community in policy and training development, implement its Community Engagement Plan and Equity Action Plan, and improve its tracking and recording of such efforts. - The City and the CPD must work to provide sufficient resources towards reforms, policies, trainings, and data collection and management related to the Impartial Policing section and continue developing the operating procedures for the Equity Office.

Section	Sample of Principal Achievements	Sample of Principal Challenges
Crisis Intervention	- The CPD completed the process of vetting its Certified CIT Officers—approximately 2,000 serving in patrol—ensuring these officers meet the requirements outlined in policy to serve in this specialized role. - The CPD updated both its 40-hour <i>Basic CIT Training</i> and its 8-hour <i>CIT Refresher Training</i> courses, adding key content to its <i>CIT Refresher Training</i> that aligns with best practices. - The CPD produced a robust framework for the required <i>Crisis Intervention Officer Implementation Plan</i>, and produced the required <i>CIT Coordinator Report</i>. The CPD plans to produce the full <i>Crisis Intervention Officer Implementation Plan</i> in the next reporting period. - The OEMC embarked on a heavy revision of its 4-hour <i>Crisis Intervention and Mental Health Awareness</i> course, aligning it with best practices for telecommunicators. Once finalized, this 911 call center training will launch in the third quarter of 2025.	- The CPD’s Crisis Intervention Unit (CIU) continues to face significant challenges related to staffing. - The City, the CPD, and the OEMC must develop a reliable process for the Chicago Council on Mental Health Equity (CCMHE) to review relevant policies and training on a regular basis that aligns with CPD policy, CCMHE bylaws, and the Consent Decree’s requirements. - 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. - The CPD must develop a framework to define “timely” and memorialize it in writing to achieve additional levels of compliance with ¶¶107–12.
Use of Force	- The City and the CPD finalized and implemented S03-22, <i>Firearm Pointing Incidents</i> (formerly D19-01). - The City and the CPD developed and finalized, S02-08, <i>Community Engagement in Policy and Training Development</i>, which requires the CPD to engage the community on de-escalation and use of force. - The Firearm Pointing Pilot Program is advancing, with additional district captains receiving training on Incident Debriefing Reviews (IDRs) that involve a firearm pointing incident.	- TRED’s backlog of review of IDRs continued during this reporting period, despite the firearm pointing pilot program which moved review of IDRs involving firearm pointing incidents to the district-level. - The CPD must not only revise and clarify S03-14, <i>Body Worn Cameras</i>—including to address the ongoing disagreement before the Court regarding public safety briefings—but also must address the persistent violations of the policy at both the front-line and supervisory levels.

Section	Sample of Principal Achievements	Sample of Principal Challenges
Recruitment, Hiring & Promotion	- The City and the CPD procured and are developing systems that provide real-time insights into the DCI Consulting Group, Inc. (DCI) implementation plan. - The City and the CPD completed a full promotional cycle for the Captains position, including review and updates to the job description, testing, and communications related to the promotional process.	The City and the CPD should adopt a timely cadence for monthly meetings to work towards further levels of compliance.
Training	- The CPD implemented a new ACADIS software module and refined evaluation criteria for the Field Training and Evaluation Program's Daily Observation Reports (DOR) to track Probationary Police Officer's developmental progression through field training. - The CPD implemented a new Training Division Instructor Evaluation Pilot Program to collect, analyze, and review course and instructor evaluations to document and improve training delivery. - The CPD's Training and Support Group created a dedicated Community Engagement Section (CES) to further community engagement within the training context.	The training division underwent some leadership and organizational changes, as CPD's recruitment function moved under Training and Support Group (TSG) during this reporting period. The IMT believes this will bring positive benefits in the future, but clarity is needed to outline roles, responsibilities, and communication and collaboration expectations in conjunction with the Recruitment, Hiring, and Promotion section.
Supervision	- The CPD announced its plan to expand its Unity of Command and Span of Control Pilot Program to the 14th, 17th, and 24th Districts. - The CPD revised E05-01, <i>Performance Evaluations of All Sworn and Civilian Department members Below the Rank of Superintendent</i>, to be a more robust policy for evaluations.	- The City and the CPD made limited progress on revising and digitizing the Supervisor's Management Log, which is a key tool for documenting supervisory activities and responsibilities. - The CPD struggled to achieve and maintain the Unity of Command by Reviewer goal of 50% driven by turnover and staffing instability.
Officer Wellness & Support	- The CPD has improved its data management capabilities and is implementing new data-management platforms and tools to improve how the CPD assesses how it provides wellness services. - Since the inception of the Consent Decree, the CPD has drastically improved its staff of mental health counselors and intends to further improve its staffing.	- The City and the CPD have struggled to regularly produce and maintain annual reports as required by the Consent Decree. - The CPD has struggled to ensure it is meeting Consent Decree requirements for speed-of-service to CPD members in non-emergency and emergency counseling.

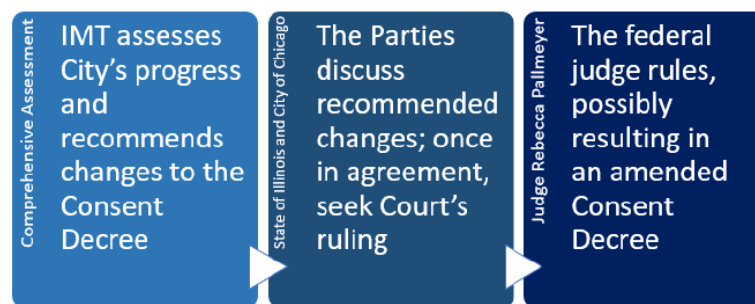
Section	Sample of Principal Achievements	Sample of Principal Challenges
Accountability & Transparency	- The CPD demonstrated Full compliance with several paragraphs by providing various data sources to demonstrate compliance with each paragraph's requirements. - The City and COPA began to implement a new policy and plan for Phase 3 of the Community-Police Mediation Pilot Program, as well as develop training on the policy. - The CCPSA began its search for a new COPA Chief Administrator and began related community outreach.	- Many Accountability Sergeants continue to have other responsibilities that significantly compete with their Accountability Sergeant duties, which the Consent Decree requires to 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	- The CPD completed its required <i>Data Systems Plan</i>, which will help guide its implementation of updates to many CPD systems to collect, manage, analyze, and learn from CPD data. - The CPD analyzed its district-level use-of-force data, considering demographic categories. - The CPD Audit Team plays a critical role in the CPD's ability to become a learning organization that identifies areas for improvement and sustained compliance with the Consent Decree. The Audit Team's efforts are reflected in this report, and their work is on track to becoming increasingly emphasized in reports to come.	- The CPD continues to struggle with the review of use-of-force incidents: the TRED unit still has a backlog of cases requiring review; and the Force Review Board reviews do not consistently provide sufficient evaluations from its command staff members regarding CPD tactics or identifications of "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." ¶1578. - The CPD should develop training and evaluation materials for the upcoming <i>Early Intervention and Support System</i>.
Investigatory Stop Reports, Protective Pat Downs, & Enforcement of Loitering Ordinances	- The Parties resolved disagreements regarding searches of vehicles based on the smell of cannabis under recent Illinois Supreme Court decisions. Accordingly, the CPD revised its G03-08, <i>Police Encounters and the Fourth Amendment</i> policy suite and posted revised pre-implementation drafts of the policy to its website for public comment. The IMT looks forward to the finalization and implementation of the policies. - The CPD has made substantial progress toward implementation of the One Stop Application, which will greatly increase efficiency and decrease confusion around the documentation of police encounters. The IMT looks forward to the implementation of the application.	The City and the CPD have yet to provide specific information surrounding their plan for community engagement on investigatory stops, protective pat-downs, and enforcement of the loitering ordinances. The IMT looks forward to the City and the CPD identifying the events at which they will engage the community on these topics, the materials they intend to utilize on the topics in the "Know Your Rights" campaign, and the specific community groups from whom they will solicit feedback on these topics.

Update on the Status of Independent Monitoring Team's Comprehensive Assessment

Under the Consent Decree, the IMT may “recommend any modifications to this Agreement necessary to achieve and sustain intended results.” ¶¶657–59. In October 2024, the IMT filed its *Comprehensive Assessment Part II*, which included

- ❖ whether the outcomes intended by the Consent Decree are being achieved; and
- ❖ whether any modifications to the Consent Decree are necessary “in light of changed circumstances or unanticipated impact (or lack of impact) of the requirements,” including strategies for accelerating full and effective compliance. ¶¶657–59.¹³

While the IMT may not unilaterally modify the Consent Decree, the Parties to the Consent Decree—the City of Chicago and the State of Illinois—may move to modify the Consent Decree. See ¶¶659.



The Parties and the IMT continue to discuss and consider the IMT’s recommendations, including potential changes to the Consent Decree and solutions without modifications to the Consent Decree.

Since the filing of the *Comprehensive Assessment Part II*, for example, the Parties continue to engage on whether and how to explicitly add language governing traffic stops to the Consent Decree. The City has also engaged Chicago’s communities in various ways to receive input on traffic-stop-related policies and concerns. For example, the CPD posted a draft policy for public comment from April 24, 2025,

¹³ See *Comprehensive Assessment, Part II*, INDEPENDENT MONITORING TEAM (October 11, 2024), [2024.10.11-Independent-Monitoring-Team-Comprehensive-Assessment-Part-II-amended-and-filed.pdf](#).

through July 14, 2025. The Community Commission for Public Safety and Accountability (CCPSA) has also held several “Traffic Stops Listening Sessions” and continues to host a “feedback form” about the CPD’s traffic stop policy on its website.

While these questions were not resolved by the end of the twelfth reporting period, the IMT is hopeful that there will be some identified path toward resolution in the thirteenth reporting period.

Likewise, efforts to address other areas of stalled progress—such as compliance with the Illinois Police and Community Relations Improvement Act (PCRIA), progressive discipline, specified procedures of engagement with the Coalition—are ongoing. While the City and the CPD have documented some attempts to explore solutions to come into compliance with ¶492 and PCRIA, the IMT continues to encourage the City and the CPD to renew their efforts to identify an achievable path forward.

Importantly, the CPD has been responsive to many of the IMT’s concerns and recommendations and has implemented changes to existing requirements and without Consent Decree changes.

For example, *without a Consent Decree change*, the CPD has dedicated significant resources to providing opportunities for community members to observe, participate in, and provide feedback for CPD training. Specifically, the CPD also began hosting “Community Training Observation Days.”¹⁴ The first set of days were held on April 12 and April 19, 2025, to—according to the CPD’s website at the time—provide an “opportunity for Chicagoans to gain a first-hand understanding of our in-service training through an innovative new program.” The CPD’s website explained that the initiative “is designed to foster transparency, strengthen police-community relationships, and provide valuable insights into the training standards that drive professional and accountable policing in our city.” The City and the CPD hosted an additional Community Training Observation Days on October 4 and intends to host another on October 25, 2025, during the thirteenth monitoring period. The IMT appreciates these opportunities for Chicago’s communities to learn more about CPD training and understands that the CPD intends to continue hosting these opportunities regularly.¹⁵

¹⁴ See, e.g., *Community Training Observation Days*, CHICAGO POLICE DEPARTMENT (last visited September 23, 2025), <https://chicagopolice.civilspace.io/en/projects/community-training-observation-days>.

¹⁵ The CPD also followed through on its commitment to release a follow up regarding its response to Police Executive Research Forum (PERF) Observations and Recommendations. See Bureau of Detectives, *Strengthening Homicide Investigations in the Chicago Police Department: A Review of CPD’s Response to Police Executive Research Forum (PERF) Observations and Recommendations*, CHICAGO POLICE DEPARTMENT (posted April 24, 2025), <https://www.chicagopolice.org/news/perf-2025-update/>.

The City, the CPD, and the OAG continue to focus on ways to meet the existing commitments of the Consent Decree, and we encourage them to continue to consider ways to accelerate full, effective, and sustained compliance, including potential changes to the Consent Decree.

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 twelfth reporting period, the IMT assessed compliance with community policing paragraphs by reviewing relevant policies, training curricula, records reflecting training delivery, and through virtually attending numerous community meetings. The IMT led monthly meetings with the CPD, City, and the OAG about community policing issues and progress in achieving compliance with community policing requirements. Additionally, the IMT participated in bi-weekly meetings with staff from the Office of Community Policing (OCP) and the CPD reform staff assigned to Community Policing to work through compliance issues and challenges. The IMT also conducted a site visit that included holding discussions with staff and supervisors in District Five regarding community policing practices and the implementation of Consent Decree requirements.

The CPD continued to advance compliance levels for its community policing requirements in the twelfth reporting period. Most notably, the CPD achieved Full compliance for four paragraphs (¶¶15, 28, 31, and 46) while maintaining compliance levels on the remaining paragraphs.

The City and the CPD continued to refine and enhance their district strategy development processes by expanding opportunities for input from a broader cross section of community members and stakeholders. The CPD has now fully implemented a stringent quarterly review process for the district strategic plans that consider progress in implementing elements of each plan and adjusts the plans based on outcomes from these reviews. This review process utilizes a standardized rubric to maintain consistency and accountability across all 22 districts, with room for revisions before final approval. The enhanced comprehensive strategic development process and the quarterly reviews involve senior staff. The IMT expects the CPD to continue to make further refinements based on annual reviews of the district strategic development process.

Also during this reporting period, the City and the CPD completed the development of the first iteration of the digitized resource directory and began deployment. This directory provides officers in the field immediate access to information about available services in their respective districts and beats. Officers may now easily share information about these services with community members and make appropriate referrals as required. This additional tool advances community policing practices.

The City and the CPD also provided for review a report covering five years of public awareness work through its “Know Your Rights” campaigns. These campaigns used a wide range of modalities to deliver information for community members when interacting with law enforcement. These modalities include group discussions hosted by community-based organizations in high-contact areas, billboards, and

signage on Chicago Transit Authority buses, attending community events, distributing pamphlets, and a comprehensive social media campaign to provide ongoing accessibility to “Know Your Rights” campaign information. The City and the CPD were successful in leveraging community resources to help with their campaigns, most notably DePaul University, which partnered with the CPD to help develop the campaign, the Chicago Transit Authority, and the Chicago Public Library system. As a result, the City and the CPD achieved Full compliance with the requirements of ¶128. The IMT expects the CPD to provide continued program metrics in future reporting periods to maintain Full compliance.

The City and the CPD also advanced their activities on youth engagement. The IMT and OAG reviewed a CPD Youth Engagement Report that captured activities over the last five years demonstrating growth and alignment within their strategic goals resulting from their work with select community partners. A key component of their youth engagement was the further development of their Youth District Advisory Councils (YDACs). YDACs help the City and the CPD organize youth summits in many districts, increasing youth input on CPD policing activities and practices. Included below is an example of a flyer from the 12th District showcasing the types of initiatives these YDACs engage in.

012TH DISTRICT

YOUTH DISTRICT ADVISORY COUNCIL

1. Make a Real Impact– YDAC offers a platform to actively shape and influence your community, addressing issues that matter to you and your peers.
2. Develop Leadership Skills– Gain valuable experience in leadership, teamwork, and problem-solving while working alongside passionate, like-minded individuals.
3. Network and Build Connections – Meet new people, connect with community leaders, and build relationships that will support your personal and professional growth.
4. Monthly Meetings and Flexible Participation– Stay engaged with monthly meetings, either in-person or via Zoom, making it easy for everyone to participate, no matter where you are.
5. Be Part of a Diverse, Empowered Group– Join a team that values your voice, your ideas, and your unique perspective. YDAC embraces diversity and is driven by the energy and creativity of its members.

PO CRUZ 312-746-8306
AMANDA.CRUZ@CHICAGOPOLICE.ORG

YDAC

SCHEDULE 2025

01 FEB	ZOOM MEETING Join us for the YDAC Introductory Zoom Meeting! Learn about the program, meet fellow members, and discover how you can make an impact in your community.
01 MAR	MEET AND GREET Meet and Greet is to connect with fellow members and discuss important community topics. Share your ideas, build relationships, and help shape future initiatives!
05 APR	IN-PERSON MEETING A follow-up meeting to review progress, share updates, and plan upcoming initiatives. Let's keep the momentum going and continue making a difference!
17 MAY	IN-PERSON MEETING We continue to discuss and brainstorm ideas for upcoming initiatives. Let's work together to create meaningful change in our community!

1412 S BLUE ISLAND | 12PM - 1 PM

MUST REGISTER WITH PO CRUZ at

amanda.cruz@chicagopolice.org

As a result of these efforts, the CPD maintained Secondary compliance with ¶127. Moving forward, the City and the CPD must demonstrate that they are reaching greater numbers of at-risk youth from marginalized communities and improve tracking and documentation of youth engagement programming including feedback from participants and youth-serving agencies.

The IMT also reviewed CPD documentation tracking access to telephone calls by arrestees. This documentation took the form of written records logging the outcomes of all arrests, with information on whether every arrestee was offered a phone call and the reasoning if they were not. In nearly all instances, records showed that arrestees were granted telephone calls in the required three-hour time frame from point of arrest, with limited exceptions due to arrestees being asleep or heavily intoxicated. As a result, the City and the CPD achieved Full compliance with the requirements of ¶31. The IMT will continue to request records for future IMT reports for maintaining Full compliance with this paragraph.

Over the last several years, the City and the CPD have developed a range of ways to solicit input from community members and respond to feedback and recommendations in each district. The CPD has in place a robust district wide strategy development process that provides for community input from those community members who participate in community conversations, District Advisory Councils, Youth District Advisory Councils, and Beat meetings. For polices and trainings with greater community interest, the CPD holds focus groups and, if necessary, forms working groups to ensure community input.

The CPD also conducts surveys and maintains a robust social media presence to create more opportunities for community engagement, including through its Blockwise survey series. Results from these surveys can be accessed on the CPD's Sentiment Dashboard.¹⁶ As a result, the City and the CPD achieved Full compliance with the requirements of ¶46. To maintain Full compliance, CPD must further refine and improve its policy and training review processes while continuing to seek ways for additional input from marginalized groups.

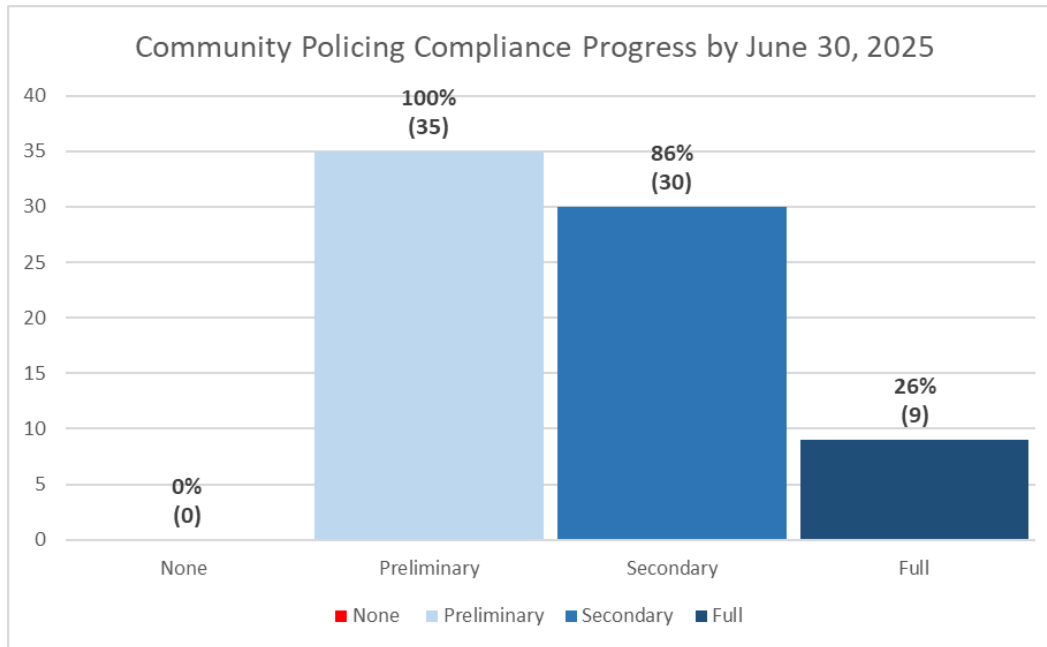
Community Policing Progress through Twelve Reporting Periods

Overall, the IMT assessed the City's compliance with 35 Community Policing paragraphs in the twelfth reporting period (¶¶13–20 and 22–48). The City and the CPD maintained Preliminary compliance for five paragraphs (¶¶19, 22, 32–33, and 37), maintained Secondary compliance for 21 paragraphs (¶¶14, 16, 18, 20, 23–27, 29, 34–36, 38–43, and 45–47), maintained Full compliance with five paragraphs (¶¶13, 17, 30, 44, and 48), and achieved Full compliance with four paragraphs (¶¶15, 28, 31, and 46).¹⁷

¹⁶ See *Sentiment Dashboard*, CHICAGO POLICE DEPARTMENT (last visited September 24, 2025), <https://www.chicagopolice.org/statistics-data/data-dashboards/sentiment-dashboard/>

¹⁷ In response to an earlier 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

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



Specific compliance assessments, by paragraph, for the Community Policing section are available here: <https://cpdmonitoringteam.com/wp-content/uploads/2025/10/1-IMR12-Community-Policing.pdf>. 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.¹⁸

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.

¹⁸ A fuller description of the history of compliance efforts, methodologies, compliance determinations for each original monitorable paragraphs in the Community Policing section is available in *Comprehensive Assessment Part I* (which included *Independent Monitoring Report 8*): <https://cpdmonitoringteam.com/imr-8-1/>. For reference, all IMT reports and appendices are available here: <https://cpdmonitoringteam.com/reports-information/>.

II. Impartial Policing

In the twelfth reporting period, the City's and the CPD's progress toward compliance with these important requirements increased from the previous reporting period. The City and the CPD provided various policies and training materials for IMT and OAG 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 the *Constitutional Policing Foundations* Course. The CPD continued building its Office of Equity and Engagement, hired staff, defined its organizational structure, and finalized its [Equity Action Plan](#), which outlines the mission of the Office as well as its priorities in policy, training, and community engagement for the remaining months in 2025.

During this reporting period, the CPD also delivered the *Language Access* eLearning, for consideration toward the requirements of ¶64 and 65. The IMT noted that the training should be revised to include practical exercises as well as modify the organization of the modules within the eLearning to improve comprehension. Additionally, the City and the CPD updated G04-XX *Gender-Based Violence Incidents* and provided it for review with ¶62's requirements. The CPD clarified to the IMT and OAG in discussions that in continuation of its work on this topic, it would also review and revise, as needed, the policies referenced within G04-XX *Gender-Based Violence Incidents*. This would ensure that all related policies are reflective of current practice. Further, the CPD recently hired a new Assistant Director in their Office of Victim Services, which is housed within the Equity Office. The IMT hopes that this position will further the CPD's collaboration with community organizations involved in providing resources around gender-based violence and domestic violence incidents.

Additionally, the IMT reviewed initial iterations of the CPD's *Persons with Disabilities* eLearning course. Further work to refine the training to be consistent with policy, incorporate practical exercises, and include input from community organizations such as the Chicago Hearing Society are necessary. Further, the CPD is also working towards developing in-person training on its *Interactions with Persons with Disabilities Policy Suite*.

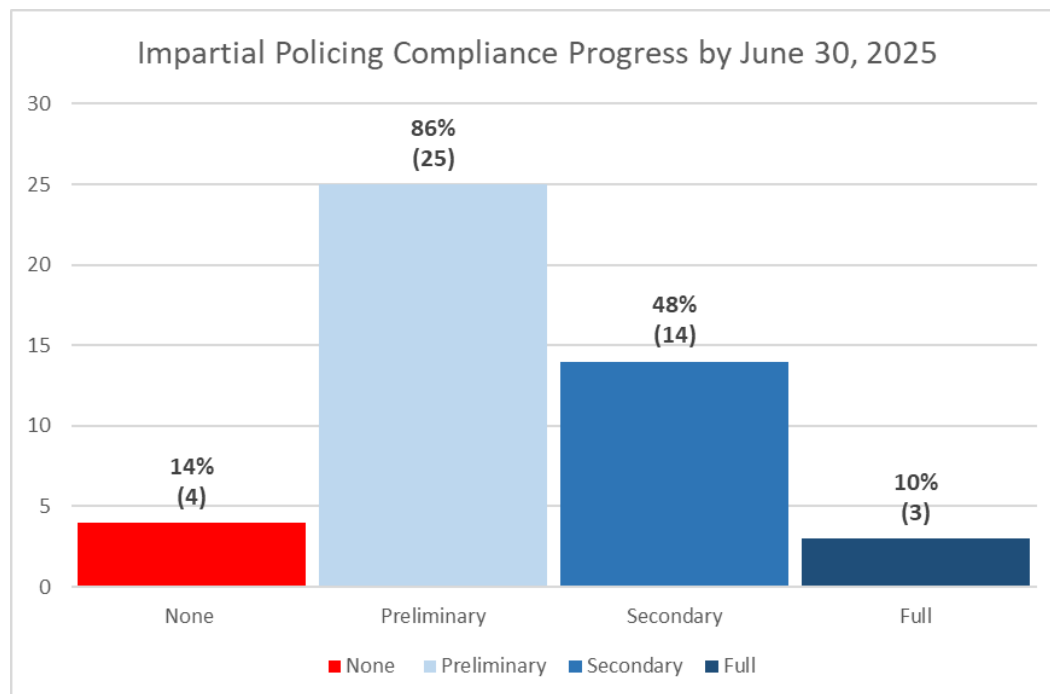
Finally, the City and the OEMC achieved Secondary compliance with ¶75 through delivery of the updated *Diversity Awareness Training* course and materials demonstrating that all new telecommunicators and current telecommunicators who were due for the refresher received this training.

The IMT looks forward to continued progress on related policies and training, including those related to language access and interactions with people with disabilities. We also look forward to the CPD's continued efforts to formalize the structure of its Office of Equity and Engagement and to reviewing its draft of the first annual report.

Impartial Policing Progress through Twelve Reporting Periods

In the twelfth 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 10 paragraphs (§§52–53, 57, 60–61, 63–64, 66, 70, and 72), achieved Preliminary compliance for one paragraph (§62), maintained Secondary compliance for nine paragraphs (§§54–56, 58–59, 71, 74, and 76–77), achieved Secondary compliance for two paragraphs (§§65 and 75), maintained Full compliance for one paragraph (§78), and achieved Full compliance for two paragraphs (§§67 and 73). The City failed to reach Preliminary compliance with the remaining four paragraphs assessed (§§68–69 and 79–80).

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



Looking Ahead to the Thirteenth Reporting Period

As noted above, the City and the CPD have made increased progress during the current reporting period. We hope that this progress continues into the thirteenth reporting period, and we look forward to furthering discussions on measuring the practical application of the paragraph requirements to assess Full compliance. The CPD's commitment to data analysis, report and trend tracking, transparency with the community, and formalizing the structure of its Equity Office will be key to this continued success.

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

- *Interactions with People with Disabilities – Deaf and Hard of Hearing*
- *Gender-Based Violence Policy*

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

- *Sexual Misconduct* training curriculum;
- *Hate Crimes Refresher eLearning*;
- *Religious Interactions eLearning*; and
- *Language Access eLearning*.

We look forward to reporting on these materials in the thirteenth 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/2025/10/2-IMR12-Impartial-Policing.pdf>. 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.¹⁹

¹⁹ A fuller description of the history of compliance efforts, methodologies, compliance determinations for each original monitorable paragraphs in the Impartial Policing section is available in *Comprehensive Assessment Part I* (which included *Independent Monitoring Report 8*): <https://cpdmonitoringteam.com/imr-8-1/>. For reference, all IMT reports and appendices are available here: <https://cpdmonitoringteam.com/reports-information/>.

III. Crisis Intervention

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

The CPD achieved several major improvements this reporting period. For example, the CPD completed the process of vetting its Certified CIT officers—approximately 2,000 officers serving in districts—ensuring these officers meet the requirements outlined in policy to serve in this specialized role.

The CPD updated both its 40-hour *Basic CIT Training* and its eight-hour *CIT Refresher Training* courses, adding key content to its *CIT Refresher Training* that aligns with best practices and helps to address the IMT's concerns related to the significant number of Certified CIT Officers who had not received a Consent Decree approved training.

For the first time, the CPD also developed a framework for the required *Crisis Intervention Officer Implementation Plan*, which is a notable achievement. The CPD also discussed their plans to produce the *Crisis Intervention Officer Implementation Plan* in the next reporting period. The CPD also produced the required *CIT Coordinator Report*, which contains pertinent information related to the achievements of the Crisis Intervention Unit (CIU), along with quarterly reports for both the CIT Training Dashboard and the CIT Response Ratio Dashboard.

The OEMC worked to revise its four-hour *Crisis Intervention and Mental Health Awareness* course, aligning it with best practices for telecommunicators. The OEMC plans to launch this 911 call center training in the third quarter of 2025. The OEMC produced its full suite of policies and is in the process of seeking feedback from the CCMHE. The OEMC also produced its Telecommunicator Quality Assurance Audit and Monthly Mental Health Event Audit spreadsheet which tracks discrepancies in protocols telecommunicators are trained to follow on mental and behavioral health calls. The IMT looks forward to the OEMC finalizing its *Crisis Intervention and Mental Health Awareness* course and its policy revisions in the next reporting period, with CCMHE feedback, and the OEMC producing the Audit Spreadsheets monthly rather than annually.

Chicago Police Department

The CPD's CIT Coordinator continues to effectively lead the CIU and demonstrates the qualifications necessary to maintain Full compliance with ¶116. The full-time,

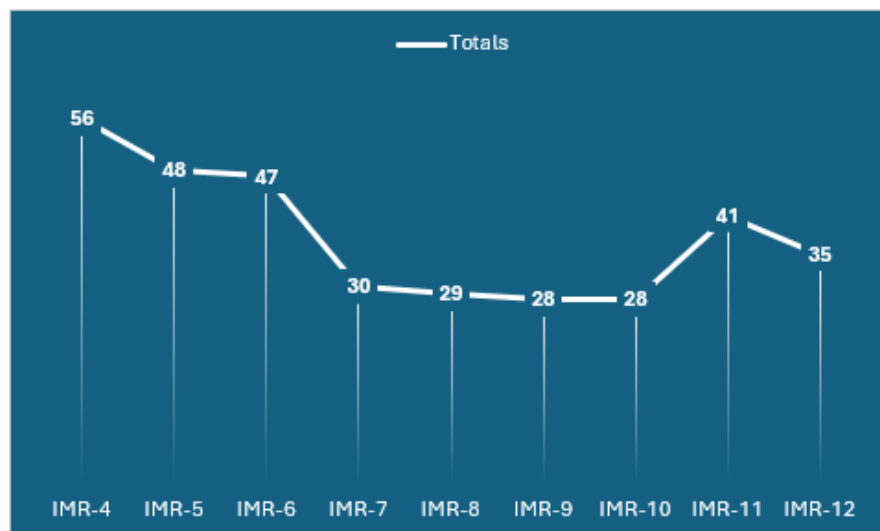
dedicated Lieutenant (§115) demonstrates an eagerness to learn about national best practices, the CIU's purpose and function, and the Consent Decree's requirements. The CIT Coordinator has also demonstrated progress this reporting period toward meeting the requirements of §117(a)-(j), which allowed the CPD to achieve Secondary compliance with this paragraph.

The CIT Coordinator works closely with a lead administrative Sergeant assigned to the CIU who brings extensive experience and commitment. Together, they have demonstrated significant progress in complying with the Consent Decree's requirements. To maintain this momentum, the IMT encourages the CPD to provide advancement and promotion opportunities within the CIU. The leadership of these two positions in the CIU has been crucial to establishing reliable data, developing and operationalizing strategy, and advancing levels of compliance.

Staffing

The CPD's CIU continues to face staffing challenges. In the previous reporting period, the CPD increased its staffing in the CIU by adding 10 full-time, dedicated staff. This reporting period, however, the number of CIU staff decreased from 41 to 35 dedicated personnel. The IMT has written nearly every reporting period about the CIU's low staffing levels, which prevents the CPD from fulfilling policy and Consent Decree requirements. It is apparent that the CIU lacks essential resources, including sufficient personnel, promotional opportunities within the unit, adequate office space, training resources, vehicles, and supplies. To comply with the Consent Decree and align with national best practices, the CPD must ensure that the CIU has adequate staffing and resources.

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



This reporting period, the CIU completed a qualitative staffing needs assessment. This assessment, which was based on interviews, workload analysis, and operational requirements, recommended an increase in CIU personnel to 60 positions (58 sworn, 2 civilian). Based on the requirements under the Consent Decree, the size of Chicago, and alignment with national best practices, the IMT believes this recommendation represents the minimum level of staffing required.²⁰

The CIU's CIT Training Division presently has eight officers and one sergeant responsible for coordinating and delivering the *Basic CIT*, *CIT Refresher*, *Advanced CIT (Veterans and Youth)*, and newly added in 2026, the *CIT Recruit Concepts* training courses. Though required by ¶187, due to staffing shortages, the CPD has not provided the *Advanced CIT Youth* training since 2019, or the *Advanced CIT Veteran* training since 2009. These training courses are not only required but are also an important component of a healthy CIT program which advances the knowledge and skills of Certified CIT Officers.²¹

The CIT District Operations and Community Support Area teams (DOCS), who are responsible for field-based services (e.g., reviewing CIT reports, engaging the community, doing follow-ups with high frequency utilizers of police services, connecting persons with community resources, doing district roll calls, etc.) presently have only one team in each of the five areas (each area is made up of several districts) in the City. The needs assessment recommends an additional 15 personnel to sufficiently meet job responsibilities and Consent Decree requirements.

Eligibility Review

The CPD achieved Secondary compliance with several paragraphs this reporting period (e.g., ¶¶92–93, 105, and 141), which include requirements for CIT officer certification and eligibility, by migrating and validating data regarding eligibility for the CIT Program into its CIT Dashboard, and issuing a quarterly report concerning

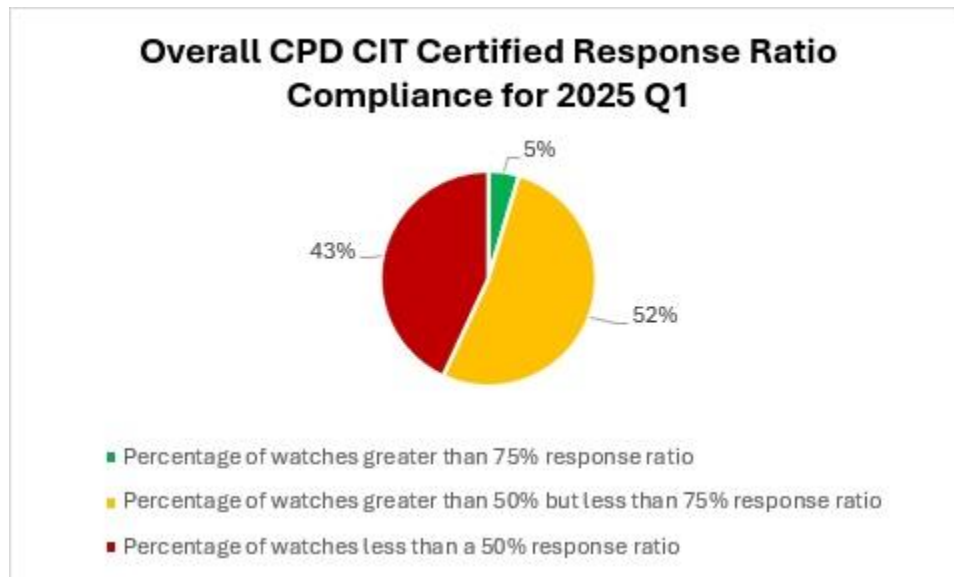
²⁰ At the onset of the Consent Decree, the CIU had 56 positions and struggled with consistent progress with Consent Decree requirements. At this time, there are only two Notice of Job Opportunities (NOJO's) posted, one for CIT training, and one for CIT District Operations and Community Support Area teams (DOCS), who are responsible for field-based services.

²¹ The CIT Training Division plays a central role in achieving compliance with the Consent Decree's requirements. To meet required response ratios, the CIT trainers must onboard new Certified CIT officers and ensure current Certified CIT officers receive Refresher training every three years to maintain eligibility. In addition, the Training Division is responsible for ensuring all Field Training Officers, Sergeants, Lieutenants, Captains, and exempt Department members complete the 40-hour *Basic CIT* training and stay updated with Refresher training. The needs assessment calls for an additional Sergeant and seven police officers in the Training Division.

the same.²² This is a significant accomplishment since this data will be used to track reliable response ratios by CIT Certified Officers to Crisis Calls.

The Consent Decree requires the CPD to meet an initial response ratio target of 50% of service calls involving individuals in crisis by Certified CIT officers by January 1, 2020, and a second response ratio of 75% by January 1, 2022 (*see* ¶108–09). Presently, out of a total of 65 watches across 22 districts, 3 watches have a greater than 75% response ratio; 34 watches have a greater than 50% but less than 75% response ratio; and 28 watches have under a 50% response ratio. The IMT continues to encourage transparency from the CPD by making the CIT Dashboard public, like its Use of Force Dashboard. The CIT Dashboard contains useful data, with no personal identifying information, that the public should be able to freely access.

Crisis Intervention Figure 2:
CPD's CIT Certified Response Ratio Compliance



²² The CPD's Special Order S05-14, *Crisis Intervention Team (CIT) Program*, outlines the requirements to become and remain a Certified CIT Officer (*see* ¶¶92–95). Certified CIT Officers are required to maintain a disciplinary history clear of any sustained allegation involving excessive use of force or a verbal or physical altercation related to a call for service involving an individual in mental or behavioral health crisis. The CPD's eligibility review process includes the Crisis Intervention Unit (CIU), the Reform Management Group, and the Strategic Initiatives Division, with input from the Bureau of Internal Affairs, to integrate electronic personnel systems that track and manage disciplinary history. The new integration ensures that a daily validation check is conducted of all Certified CIT Officers to confirm that they have not acquired one of the above sustained violations. Additionally, the volunteer status and maintenance of *CIT Refresher* training every three years is tracked through the CIT Dashboard. The daily validation check notifies OEMC if a department member is out of compliance.

CPD Policies and Training

The CPD demonstrated progress with ¶89, which requires the CIT Program, through the CIT Coordinator, to “annually review, and if necessary, revise its policies and practices to ensure the program’s compliance with the objectives and functions of the CIT Program.” See ¶89. Additionally, the City and the CPD outlined a review process by which the CPD intends to solicit input from the Chicago Council on Mental Health Equity (CCHME) on crisis response-related policies, procedures, and training (as required by ¶¶130 and 137) on a two-year basis per ¶636. However, CPD policy and the CCHME’s bylaws still appear to outline an annual review process.²³ Due to these apparent inconsistencies and need for clarification, the City and the CPD remain under assessment for Secondary compliance. To achieve Secondary compliance with ¶89, the City and the CPD should revise the relevant CPD policy and the CCHME’s bylaws as necessary to ensure consistency with the two-year review process outlined by the City and the CPD. Additionally, the City and the CPD should clarify the process by which the CIT Program will consider prior CCHME feedback when annually reviewing and revising its policies. (See ¶89 and ¶137). We expect the CPD to continue regularly engaging with the CCHME and seeking community input on an ongoing basis, as these efforts will enhance the CIT Program and are required by the Consent Decree. See, e.g., ¶¶103, 130–31, 135–37.

During this reporting period, the CPD nearly completed its update of the 8-hour *CIT Refresher* training, which is delivered every three years (see ¶¶97 and 101) and is designed to refresh skills taught in the 40-hour *Basic CIT* training, as well as update officers on evolving best practices. This progress is crucial to achieving further compliance under the Consent Decree. We anticipate its completion in the next reporting period once the IMT’s, the OAG’s, and the CCHME’s comments are addressed.²⁴ Additionally, the CPD CIU provided the IMT with course and instructor evaluations and attendance records for the *Basic CIT* training and the *CIT Refresher*

²³ See S05-14, *Crisis Intervention Team (CIT) Program*, X. Policy Review (“The Department will conduct an **annual review** of crisis intervention-related policies . . . and seek input in writing from members of the community, including the Chicago Council on Mental Health Equity.”) (emphasis added); *Review Process of the By-laws of the Chicago Council on Mental Health Equity* (“The Committee shall **annually review** and provide guidance to the City on crisis-response-related policies, procedures and training for City agencies.”) (emphasis added).

²⁴ The CPD has reviewed and made comprehensive revisions to both the *Basic CIT* and *CIT Refresher* trainings, incorporating best practices. These training revisions help address deficiencies related to Certified CIT officers trained before the onset of the Consent Decree and the IMT-approved CIT training. As required by the Consent Decree, all current Certified CIT officers who received the *Basic CIT* training before 2021 should have now received the *CIT Refresher* training. See, e.g., ¶¶95, 100–01. The IMT has worked closely with the CPD to update its *CIT Refresher* training to reflect best practices, refreshing key topics from the *Basic CIT* training.

training consistently this reporting period, an important achievement. We look forward to the CPD continuing to produce these materials on a regular cadence moving forward.

Last reporting period, the CPD completed the review, revision, and development of several trainings, 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 developed a new training entitled *Crisis Intervention and Officer Wellness* to deliver to all officers during their 2025 Annual In-Service training.

Additionally, the CPD developed a dashboard that tracks training required by ¶¶100–02 and produced its first quarterly report this reporting period based on this data. The CPD and its data analysts should be commended for this work. The IMT looks forward to receiving ongoing quarterly reports with training progress updates.

CPD and City Plans

The City and the CPD have not provided for review the *Crisis Intervention Plan* (¶¶122–23) or the *Crisis Intervention Officer Implementation Plan* (¶¶108–12) since the third reporting period. This reporting period, the CPD made notable progress by providing a *Crisis Intervention Officer Implementation Plan Framework*, which is intended to serve as a condensed version of the full *CIT Officer Implementation Plan*. This Framework provides key data and strategic priorities, which when operationalized, will meet key requirements of the Consent Decree. The City did not provide its portion of the *Crisis Intervention Plan* for review, which must be prioritized. The City and the CPD cannot achieve Preliminary compliance with ¶¶122–23 and 108–12 until these Plans are provided, which must include an informed framework for defining “timely” as well as a plan for analyzing the number of service calls involving individuals in crisis for every watch in each district to evaluate the number of Certified CIT Officers needed to timely respond.

Definition of “Timely”

Several Consent Decree paragraphs require that when a Certified CIT Officer responds to a mental health related call, that officer’s response must be “timely.” See, e.g., ¶¶107, 108, and 111. 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 ¶¶107–112.²⁵

To achieve additional levels of compliance with ¶¶107–112, the CPD should (1) develop a framework for defining “timely” in some capacity (knowing it will evolve as more data becomes available) and memorialize it in writing; and (2) complete the *CIT Officer Implementation Plan*, which was required within 180 days from the onset of the Consent Decree (and annually thereafter), and which the City and the CPD have yet to develop. See ¶¶108–112. The development of the *CIT Officer Implementation Plan* is needed, and the framework for what constitutes a “timely response” is just one necessary data source that is required. See ¶¶107, 108, 111. The CPD produced a thorough *CIT Officer Implementation Plan Framework* this reporting period but fell short of including a framework for defining “timely,” which is necessary to achieve additional levels of compliance.

The Chicago Council on Mental Health Equity (CCMHE)

The IMT continues to recommend that the CPD and the OEMC develop a reliable process for the CCMHE’s review of relevant policies and training. The CCMHE’s review of such policies and training is essential for achieving further levels of compliance with several paragraphs. The IMT encourages the CPD and the OEMC to

²⁵ This reporting period, the CPD discussed this issue with the IMT, and in its *CIT Officer Implementation Plan Framework*, the CPD outlined some of the challenges with determining a “timeliness” standard for response times and dispatch times. The CPD identified numerous “field-based variables” that influence officers’ response times to calls for service, which include (1) “fixed variables” such as geographic (e.g., square mileage of different districts), transportation infrastructure (e.g., railroad crossings, bridges (pedestrian and vehicular traffic), median barriers, bicycle lanes, residential versus commercial areas for vehicular traffic flow), and municipality infrastructure (e.g., park districts, school campuses, golf courses, beach facilities, sports venues, concert venues); (2) “dynamic variables” such as seasonality (e.g., summer versus winter months), standard traffic fluctuations (e.g., rush hour traffic increases, holiday weekend traffic, morning and evening traffic restrictions, school drop-off and dismissal times), and periodic traffic fluctuations (e.g., vehicular and pedestrian traffic for sporting events, concerns, festivals and concerts, block parties, etc.); and (3) “personnel variables” such as district personnel needs (e.g., staff shortages), watch personnel needs (e.g., multiple Priority 1 level jobs dispatched simultaneously), and department member experience (e.g., officer familiarity of district). The CPD also identified several “data-based variables” and challenges associated with a mathematical determination of a “timely” response. The IMT appreciates the CPD’s attention to this issue and looks forward to further discussion to ensure compliance with the Consent Decree’s requirements.

The IMT has encouraged the CPD to develop, at minimum, a framework for defining “timely response,” without necessarily tying the CPD into a specific number of minutes at this time. Historical data can account for many of these known complexities and variables outlined above when breaking the data down by district and watch. For example, the CPD could analyze response times by priority level, district, and watch, as the CPD has data (presently 56% of service calls) where the on-scene key is hit by officers and would permit basic calculations. We also note that CPD is not required to calculate in this manner and may propose a different framework that would best meet their needs.

discuss with the CCMHE the relevant Consent Decree paragraphs which involve the committee and to seek their ideas for how to best achieve these requirements in a timely and efficient manner.

This reporting period, the CPD and the OEMC made progress in soliciting feedback from the CCMHE on policies. For example, during the May 12, 2025 CCMHE meeting, the CPD reviewed S04-20-05, *Persons Under Arrest in Need of Mental Health Treatment*, and S04-20, *Recognizing and Responding to Individuals in Crisis*, and the OEMC discussed its policy TNG22-005, *988 Hotline*. The CPD also produced a memo to the IMT describing the process the CIU will undergo to solicit feedback from the CCMHE on policies and trainings, per ¶130. However, as discussed above, the IMT has expressed concerns that this process as currently outlined may not align with CPD policy or the current CCMHE bylaws, which outline an annual review requirement rather than a review every two years. The City and the CPD should revise CPD policy and the CCMHE bylaws as necessary to ensure consistency with the two-year CCMHE review process outlined by the City and the CPD.

The City met its requirement for quarterly meetings this reporting period (see ¶129), holding meetings and meeting quorum on February 10, 2025, and May 12, 2025. Given the City's struggle with meeting quorum for many years, the City's restructuring of the committee, moving from over 40 members to 16 voting members plus nine City members, has been effective. Paragraph 132 specifies the groups which must be active on the CCMHE, and the IMT has requested an updated list of which individuals represent each of the categories.

As we have noted for several years, the IMT strongly encourages the CPD and the OEMC to provide materials that will be covered at the CCMHE's quarterly meeting in *advance* of that meeting to provide a meaningful opportunity for review and dialogue.²⁶

The Office of Emergency Management and Communications (OEMC)

During the twelfth reporting period, the OEMC thoroughly revised its *Crisis Intervention and Mental Health Awareness* training required for telecommunicators. See ¶146. The revised training now covers all required content under ¶144. The OEMC plans to deliver its updated training for the first time in the third quarter of 2025. The OEMC should be commended for this work, which will advance the knowledge and skills of its telecommunicators to assist with responses to crisis

²⁶ The IMT also encourages the City to include links to the meetings in its agendas and on the City's website, and to include links in the meeting agendas to all publicly posted policies that will be reviewed. The IMT further encourages the City to consider alternate streaming platforms for these public meetings other than Facebook Live, which may create unnecessary barriers by requiring some members of the public to have Facebook login credentials.

calls. The revised training is presently being reviewed by the CCMHE, a requirement of ¶147. The IMT anticipates further levels of compliance will be achieved once CCMHE feedback is received and 95% of telecommunicators receive the training.

This reporting period, the OEMC produced all nine of its mental health related policies (three Special Orders and six Training Notices) to the IMT, and the IMT provided feedback on these policies.²⁷ We encourage the OEMC in the next reporting period to solicit feedback from the CCMHE on these same policies and incorporate feedback from the IMT, OAG and CCMHE into revisions of these policies to produce to the IMT and OAG. Once these policies are revised and finalized, the OEMC may achieve additional levels of compliance. *See, e.g.,* ¶149. The OEMC also produced its Telecommunicator Quality Assurance Audit and Monthly Mental Health Event Audit spreadsheet which tracks discrepancies in protocols telecommunicators are trained to follow on mental and behavioral health calls, which is relevant to ¶149. If the OEMC sufficiently embeds ¶149 into its revised policy and regularly produces the Monthly Mental Health Event Audit spreadsheet, the OEMC may achieve additional levels of compliance.

The OEMC 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 or identify an alternate source to achieve the same.

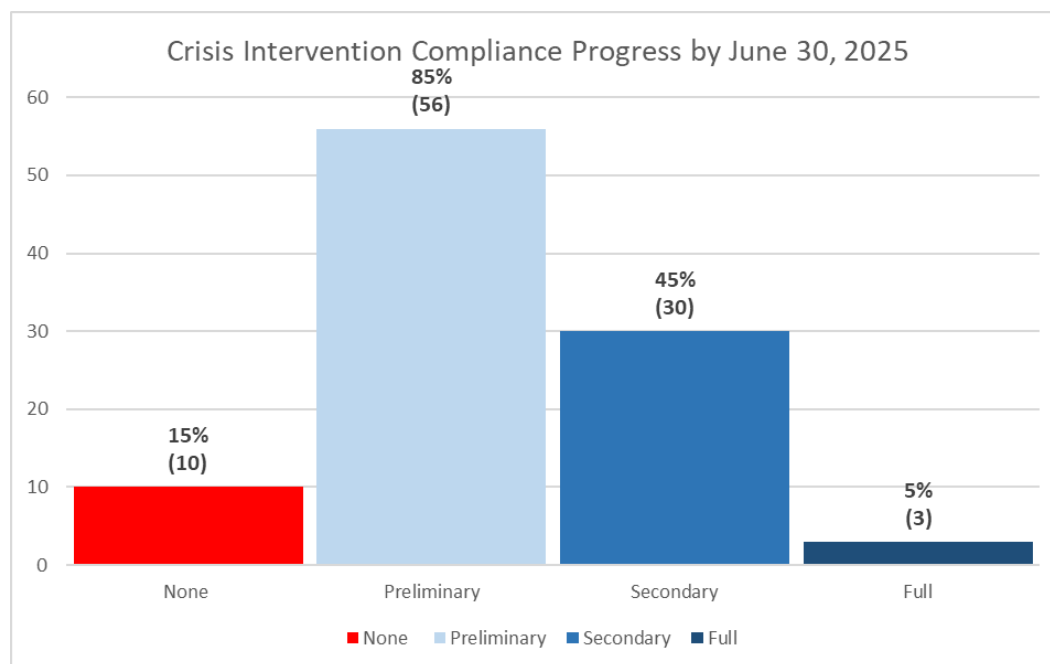
The City and the OEMC maintained Preliminary compliance with ¶150, which requires the OEMC to meet regularly with the CPD and the CCMHE. To achieve additional levels of compliance, the OEMC must provide evidence of their regular meetings with the CPD and the CCMHE (*e.g.,* dates, agendas, meeting minutes, attendees). Additionally, ¶150 requires the OEMC to meet regularly with the CPD and appropriate members of the CCMHE “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.”

²⁷ The OEMC produced, and the IMT reviewed, the following SOPs and TNGs in the twelfth reporting period: SOP 23-003, *Mental Health Event Audit*; SOP 23-004, *Crisis Intervention Team (CIT) Program*; SOP 23-005, *Mental Health Training*; TNG 22-002, *Visiting Clinicians at OEMC*; TNG 22-003, *CAD Enhancement – CIT Triage Questions*; TNG 22-005, *988 – Calls for Crisis Hotline*; TNG 23-006, *CARE 10-1*; TNG 25-001, *CIT Unit Z Attribute and Dispatch*; and TNG 25-002, *CARE (Crisis Assistance Response and Engagement)*.

Crisis Intervention Progress through Twelve Reporting Period

During this reporting period, the IMT assessed the City's compliance with 66 Crisis Intervention paragraphs: ¶¶87–152. The City maintained Preliminary compliance with 26 paragraphs (¶¶87–91, 94, 100, 102, 114, 119–20, 124–25, 128–32, 137, 142–45, 147, and 150–51), maintained Secondary compliance with 17 paragraphs (¶¶97–99, 106, 113, 115, 118, 126–27, 133–35, 138–40, 146, and 152), achieved Secondary compliance with ten paragraphs (¶¶92–93, 95, 101, 103, 105, 117, 121, 136, 141), maintained Full compliance with one paragraph (¶116), and achieved Full compliance with two paragraphs (¶¶96 and 104). At the end of the twelfth reporting period, the City did not have any level of compliance with 10 paragraphs (¶¶107–12, 122–23, and 148–49).

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



Looking Ahead to the Thirteenth Reporting Period

In the thirteenth 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*; develop a framework to define “timely”; and utilize the newly developed CIT Dashboard to inform a strategic plan that addresses required response ratios across districts and watches. The CPD and OEMC should finalize their newly revised Refresher training

courses and begin implementation, and the OEMC should further revise its policies, incorporating feedback from the IMT, the OAG, and the CCMHE.

The CPD and OEMC should develop and implement a regular cadence for the review and revision of policies and training with the CCMHE that aligns policy, CCHME bylaws, and Consent Decree requirements. The City and the OEMC should also demonstrate that the data contained in its auto-generated reports is being reviewed by the OEMC monthly and is shown to be 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.

Specific compliance assessments, by paragraph, for the Crisis Intervention section are available here: <https://cpdmonitoringteam.com/wp-content/uploads/2025/10/3-IMR12-Crisis-Intervention.pdf>. 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.²⁸

²⁸ A fuller description of the history of compliance efforts, methodologies, compliance determinations for each original monitorable paragraphs in the Crisis Intervention section is available in *Comprehensive Assessment Part I* (which included *Independent Monitoring Report 8*): <https://cpdmonitoringteam.com/imr-8-1/>. For reference, all IMT reports and appendices are available here: <https://cpdmonitoringteam.com/reports-information/>.

IV. Use of Force

In the twelfth reporting period, the City and the CPD achieved new levels of compliance for paragraphs in the Use of Force section, including achieving Full compliance for nine paragraphs while maintaining the same levels of compliance that they achieved in previous reporting periods. The City and the CPD made positive strides this reporting period, including with the development and implementation of the Firearm Pointing Incident Review pilot program and updates to its approach to community engagement. The IMT looks forward to additional progress in the next reporting period, including progress in clearing CPD's Incident Debriefing Review (IDR) backlog and providing evidence of CPD's biennial review of its use-of-force policies.

During this reporting period, we met regularly with the City, the CPD, and the OAG to address the Use of Force requirements in the Consent Decree and reviewed data and documentation from the City and the CPD. Our discussions were productive and resulted in progress toward compliance. For example, near the end of the reporting period and after several fruitful discussions, the CPD provided the OAG and the IMT with additional detail on use-of-force incidents that were reviewed by the Force Review Board (FRB). This information will assist the IMT in assessing compliance with several paragraphs in the next reporting period.

The City, the CPD, and the OAG also continued their discussions regarding whether to record public safety briefings, an issue that will impact the CPD's implementation of its *Body Worn Cameras* policy, S03-14. While that issue has not yet been resolved and the latest version of the policy has not been finalized, the Parties made important progress during the twelfth reporting period.

The IMT also reviewed the City and the CPD's new community engagement policy: S02-08, *Community Engagement in Policy Development*. The IMT appreciates the City and the CPD's work on the new policy, and particularly its inclusion of a three-step cycle. The policy requires the CPD to make initial outreach efforts with communities and community members earlier in the policy and training drafting process before actual engagement. The policy similarly requires the CPD to follow up with community-members *after* engagement. The IMT believes this three-step community engagement process will improve CPD's use-of-force policies and training and looks forward to the policy's implementation in future reporting periods. Finalizing S02-08, *Community Engagement in Policy and Training Development*, helped the CPD to achieve Preliminary compliance with ¶160, a paragraph with which CPD has struggled to advance in past reporting periods.

The IMT also continued to review and comment on drafts of revised CPD policies and training that impact some of the Use of Force paragraphs during this reporting

period. For example, the City and the CPD provided the IMT with its 2025 *In-Service Supervisor Training* materials, which included training on many requirements in the Use of Force paragraphs. The IMT also reviewed U04-04, *Issue and Replace First Aid Kits*, and G03-02-04, *Taser Use Incidents*, during this reporting period. Similarly, the CPD's revisions to S03-22, *Firearm Pointing Incidents* propelled it to Full compliance with ¶189.

We also reviewed data analyses conducted by the City and the CPD. For example, TRED's 2024 *Year-End Report* and CPD's 2024 *Annual Use of Force Report* were published near the end of the reporting period. Both reports contain analyses of patterns and trends that informed the IMT's assessment of many use-of-force requirements. The IMT also reviewed an audit of foot-pursuit data conducted by CPD's Audit Division, which was informative and led to advancing compliance (see ¶168).

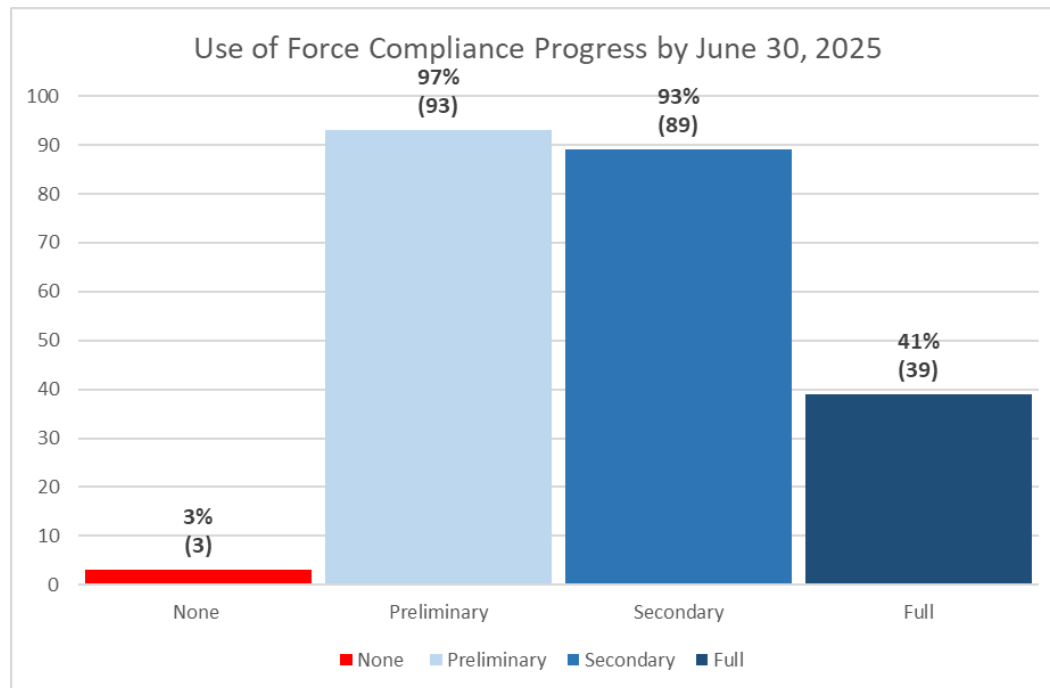
Finally, the IMT continued to access and utilize various data dashboards, including the *Use of Force Dashboard*, the *TRR Supervisory Dashboard*, and the *Incident Debriefing Report (IDR) Supervisory Dashboard* to obtain and monitor data relevant to the Use of Force paragraphs.

The CPD's analysis of use of force data was helpful again this reporting period. Specifically, data collected and analyzed by TRED on the deployment of Oleoresin Capsicum (OC) spray helped the City and the CPD achieve Full compliance with ¶1207, which requires that officers use OC spray only when it is objectively reasonable and proportional under the totality of the circumstances. Data provided by TRED, and records from COPA and BIA showed a decrease in the deployment of OC spray since last year.

Use of Force Progress through Twelve Reporting Periods

During this reporting period, the IMT assessed the City's compliance with 96 Use of Force paragraphs. At the end of the twelfth reporting period, the City maintained Preliminary compliance for three paragraphs (¶¶1559, 228, and 242) and achieved Preliminary compliance with one paragraph (¶160). The City maintained Secondary compliance for 46 paragraphs (¶¶154–55, 157, 161–67, 173, 175–78, 182–84, 186–87, 191–93, 198, 200, 204, 209, 212–14, 216, 220–24, 226–27, 232–34, 239–41, 243–44, and 247) and achieved Secondary compliance for four paragraphs (¶¶153, 156, 158, and 217). The City maintained Full compliance for 32 paragraphs (¶¶169, 170, 172, 174, 179–81, 185, 188, 190, 194–95, 197, 199, 201–03, 205–06, 208, 210–11, 215, 218–19, 225, 229–30, 235, 245–46, and 248) and achieved Full compliance with seven paragraphs (¶¶168, 171, 189, 196, 207, 213, and 231). The City's Preliminary compliance for three paragraphs remained under assessment at the end of the twelfth reporting period (¶¶236–38).

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



Looking Ahead to the Thirteenth Reporting Period

While the City and the CPD made significant progress this reporting period, there are also areas for improvement. Specifically, the sufficiency of resources provided to TRED and the persistent backlog of Incident Debriefing Reports (IDRs) awaiting review has long been a challenge.

Last reporting period, the City and the CPD committed to the creation and implementation of a pilot program that would move responsibility for reviewing incidents involving certain firearm pointing incidents from TRED to the district captains. This reporting period, the CPD made progress training the district captains to conduct the review. However, the pilot program has so far had little-to-no impact on the four-month backlog of IDR reviews.

The IMT is hopeful that an expansion of the pilot program to all 22 districts and completion of training of district captains will begin to show an impact on the backlog. The IMT also appreciates the Superintendent's commitment to provide additional personnel to TRED. However, the IMT continues to encourage the City and the CPD to consider reassigning some of TRED's current review responsibilities to the CPD districts to reduce their considerable backlog.

The CPD has also yet to produce evidence of its biennial review of its use-of-force policies under ¶159. The IMT appreciates that the CPD continues to satisfy its accreditation requirements for the Commission on Accreditation for Law Enforcement Agencies (CALEA). However, as discussed previously, ¶159 requires the CPD to undertake its own assessment of its policies every two years “to assess whether CPD’s use of force policies meet the requirements of [the Consent Decree], incorporate best practices, address observed trends and practices, as necessary, and reflect developments in applicable law.” The IMT needs evidence of this biennial review before it can assess the CPD for Full compliance with ¶159.

The City and the CPD are also close to achieving Full compliance with ¶161. However, the IMT needs evidence of accountability regarding adherence to de-escalation policies and principles. Specifically, the IMT requests that the City and the CPD perform an audit of a representative sample of Tactical Response Reports (TRRs) to assess CPD members’ effective use of de-escalation techniques and, when those techniques were not properly used, corrective actions by CPD supervisors.

The IMT also requested that the City and the CPD provide it with an analysis of the increase in TRRs from 2023 to 2024. We look forward to receiving that analysis in the next reporting period.

Finally, the IMT also expects progress on the CPD’s use of body-worn cameras, which could impact its compliance levels with several paragraphs, including ¶¶236–38. TRED’s data and analysis shows that the most common debriefing points continue to relate to body-worn-camera activation, and front-line supervisors are often failing to address BWC violations when reviewing reportable use-of-force incidents. The IMT would like to hear more from the City and the CPD about their plans to address these repeated deficiencies.

Specific compliance assessments, by paragraph, for the Use of Force section are available here: <https://cpdmonitoringteam.com/wp-content/uploads/2025/10/4-IMR12-Use-of-Force.pdf>. 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.²⁹

²⁹ A fuller description of the history of compliance efforts, methodologies, compliance determinations for each monitorable paragraph in the Use of Force section is available in Comprehensive Assessment Part I (which included Independent Monitoring Report 8): <https://cpdmonitoringteam.com/wp-content/uploads/2024/06/IMR8-Appendix-4-Use-of-Force-2023.11.01.pdf>. For reference, all IMT reports and appendices are available here: <https://cpdmonitoringteam.com/reports-information/>.

V. Recruitment, Hiring & Promotion

In the twelfth reporting period, the City and the CPD demonstrated continued progress towards implementation of the Consent Decree requirements by maintaining compliance levels achieved in previous reporting periods for all paragraphs but stalled in achieving significant progress in additional compliance levels.

During this reporting period, the City and the CPD reviewed and updated the Captains job descriptions and promotional processes. The City and the CPD continue to demonstrate attentiveness in continual improvement processes for each promotional cycle. For example, the City and the CPD have enhanced the application preparation materials, ensuring content is made available for multiple adult learning styles and that testing procedures are transparently described in advance. The IMT also acknowledges the City and the CPD's efforts to continually assess and improve the promotional process for candidates and the CPD.

The City and the CPD have continued to work towards enacting many of the recommendations resulting from the *Coleman Report*, which assessed the recruitment and hiring process in accordance with ¶¶258–59 requirements. In 2020, The City and the CPD engaged DCI Consulting Group, Inc. (DCI) to assess the Sergeant and Lieutenant promotional processes, resulting in a comprehensive implementation plan including 32 distinct recommendations. During the 2023 re-assessment of the Sergeant and Lieutenant promotional process as required by ¶261, DCI determined the City and the CPD had fully completed implementation of 12 recommendations, partially completed three recommendations and continued implementation of the remaining 18 recommendations as required by ¶262. During this reporting period, the City and the CPD continued to provide updates to the implementation efforts for remaining recommendations and created a project management system to track and report on implementation, as many of these recommendations are complex policy and procedural changes necessitating the involvement of numerous entities across the City and the CPD.

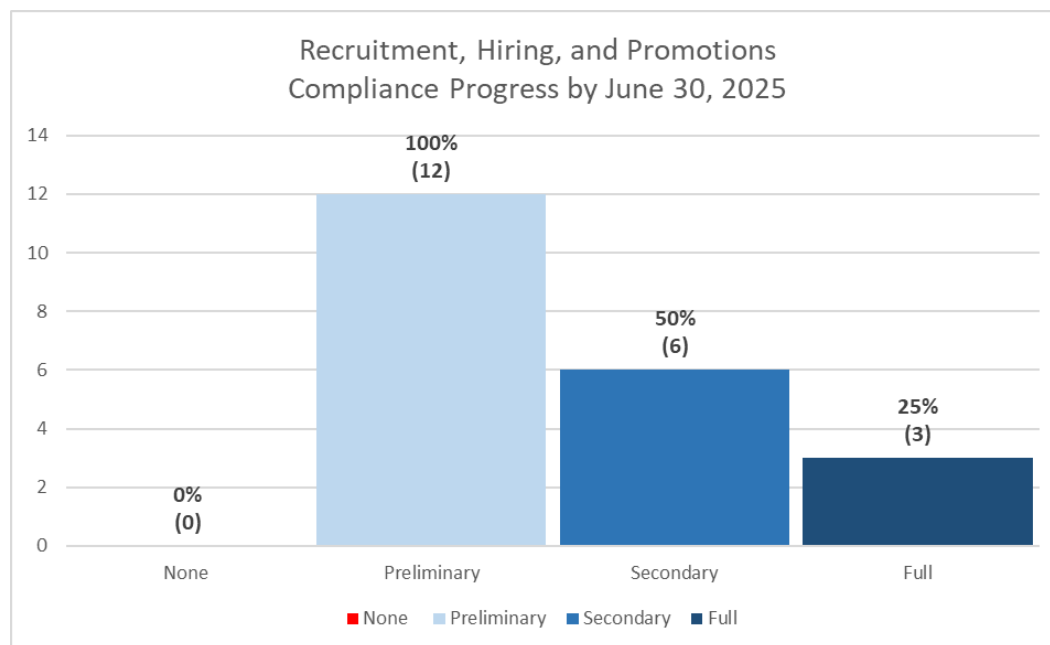
Additionally, the CPD experienced some staffing changes in leadership for the Recruitment, Hiring, and Promotion functions and relevant committees this reporting period. The CPD moved the recruitment unit from its prior location and chain of command in the Bureau of Internal Affairs to the Training and Support Group (TSG). As the CPD proceeds forward with integrating the recruitment unit into the TSG, it will be particularly important for the City and the CPD to clearly outline roles, responsibilities, communication expectations, and accountability measures to ensure a seamless transition for recruitment and efficient progress in implementing planned strategies to gain further compliance levels with the requirements of the Consent Decree.

Finally, following these leadership challenges, the City and the CPD made efforts to reestablish a regular cadence of meetings with hiring and promotions committees, along with monthly meetings with the IMT and the OAG to provide updates on progress across recruitment, hiring, and promotions working groups. The IMT appreciates the extent to which the City and the CPD continued to engage the IMT throughout the reporting period. Throughout this time, the IMT has 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, which will be important to track and report on progress being made throughout the reporting period toward the various implementation recommendations. The IMT recognizes that substantial effort is being made toward implementation of recommendations that will contribute towards achieving additional levels of compliance in future reporting periods.

Recruitment, Hiring, and Promotion Progress through Twelve Reporting Periods

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

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



Looking Ahead to the Thirteenth Reporting Period

Looking ahead to the thirteenth 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. Additionally, the CPD should further outline the responsibilities and roles for functions related to the Recruitment, Hiring and Promotion section requirements of the Consent Decree across the CPD. 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.

Specific compliance assessments, by paragraph, for the Recruitment, Hiring, and Promotion section are available here: <https://cpdmonitoringteam.com/wp-content/uploads/2025/10/5-IMR12-Recruitment-Hiring-and-Promotions.pdf>. 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.³⁰

³⁰ A fuller description of the history of compliance efforts, methodologies, compliance determinations for each original monitorable paragraphs in the Recruitment, Hiring, and Promotion section is available in *Comprehensive Assessment Part I* (which included *Independent Monitoring Report 8*): <https://cpdmonitoringteam.com/imr-8-1/>. For reference, all IMT reports and appendices are available here: <https://cpdmonitoringteam.com/reports-information/>.

VI. Training

In the twelfth reporting period, the CPD continued to make progress in many areas of training, as required by the Consent Decree. Notably, the CPD made notable movement in engaging the Bureau of Patrol and the Field Training and Evaluation Section (FTES) to advance compliance for the Field Training and Evaluation Program (FTEP). CPD's Training and Support Group (TSG) made significant progress to enhance Department training by requiring all department instructors to attend and successfully complete an Instructor's Academy to ground instructors in CPD's annual theme of respect and principles such as procedural justice, constitutional policing, de-escalation, and community policing, as interwoven throughout the annual training plan. The Instructor's Academy provided important opportunities for instructor teach backs, practicing adult learning techniques to engage participants and encourage knowledge integration and skills building. The TSG further implemented two new initiatives: the Training Division Instructor Pilot Program and the Community Engagement Section.

Field Training and Evaluation Program

This reporting period, the CPD demonstrated significant progress in implementing and improving FTEP processes and, therefore, achieved greater compliance across multiple paragraphs related to field training. The CPD continued to conduct surveys upon the completion of each field training cycle to solicit anonymous feedback from Field Training Officers (known as FTOs) and Probationary Police Officers (known as PPOs). During this reporting period, the CPD documented the full feedback loop, going beyond simple reporting of survey results, to including summaries of FTO and PPO feedback in the 2-24 Annual FTEP report to the CPD Training Oversight Committee (TOC) and describing in the *2026 Annual Training Plan* the changes being made for the 2026 recruit training and field training curricula and programs as a result of feedback from FTOs and PPOs.

The 2024 FTEP annual report also detailed other developments resulting from FTO feedback received early in the 2024 training cycle. FTOs reported feeling less familiar with the recent Basic Law Enforcement (BLE) curricula changes, and many expressed interest in supporting academy training. The CPD opened opportunities for interested FTOs to attend the annual Instructor's Academy to become qualified to assist with recruit training and pre-service FTO training.

Additionally, during this reporting period, the CPD completed the design and implementation of a new ACADIS software module to track field training progression of PPOs. The Field Training and Evaluation Section revised the evaluation categories, performance ratings, guidance, and FTO training to better highlight CPD principles through the evaluation process, including procedural justice, de-escalation,

and constitutional policing. The Training and Support Group developed eLearning training, quick guides, tutorial, and user guide to support use of the new DOR system. During 2025, FTOs began using the ACADIS system to complete Daily Observation Reports.

Training Division Instructor Evaluation Pilot Program

During this reporting period, the City and the CPD submitted a draft directive—DN25-TD *Training Division Instructor Evaluation – Pilot Program*—codifying a process to collect, analyze, and review course and instructor evaluations to document and improve the quality of future curriculum and training delivery. This pilot program is a significant step forward towards implementing best practices for training evaluation that have been priority for the IMT across the Consent Decree and follows up on technical assistance requested of the IMT in 2024 to conceptualize a comprehensive and sustainable evaluation mechanism for CPD training.

DN25-TD requires all instructors assigned to or detailed to the Training Division to “uphold the principles of procedural justice, de-escalation, impartial policing, and community policing, as well as the mission, vision, and core values of the CPD”. It outlines the process and criteria by which instructors assigned to the TSG will be evaluated, including the core competencies of effective communication, presentation and facilitation skill, professionalism, real world application, student engagement and validation, subject knowledge, and use of training materials or technology.

The IMT looks forward to seeing developments as the pilot program is completed and further efforts are made to institutionalize instructor evaluation in a systematic and self-sustaining manner.

Community Engagement Section

Over several reporting periods, the IMT has expressed concern that the CPD’s community engagement remained segmented, limiting the TSG’s ability to effectively collaborate with community organizations and exemplify problem-solving and collaboration strategies for CPD members participating in CPD training. The CPD has progressively increased engagement with community members and entities over recent reporting periods by expanding the reach of the annual CPD Training Needs Assessment, convening the Training Community Advisory Committee (TCAC), and reaching out to Chicago-based community groups for input during the instructional design phase of curricula development. At the beginning of the reporting period, TSG conducted individualized outreach to TCAC members to solicit feedback about TCAC and invited new members to join TCAC. Each month, TCAC members review training materials and provide meaningful feedback to CPD to enhance

training courses in development. The CPD also hosted two community training observation days during this reporting period, in which TCAC members were invited to attend the training they had previously reviewed that were now being led by TSG instructors. Feedback from participants and CPD instructors indicated the observation days provided meaningful opportunities to learn from one another and better prepare instructors for full delivery with CPD members.

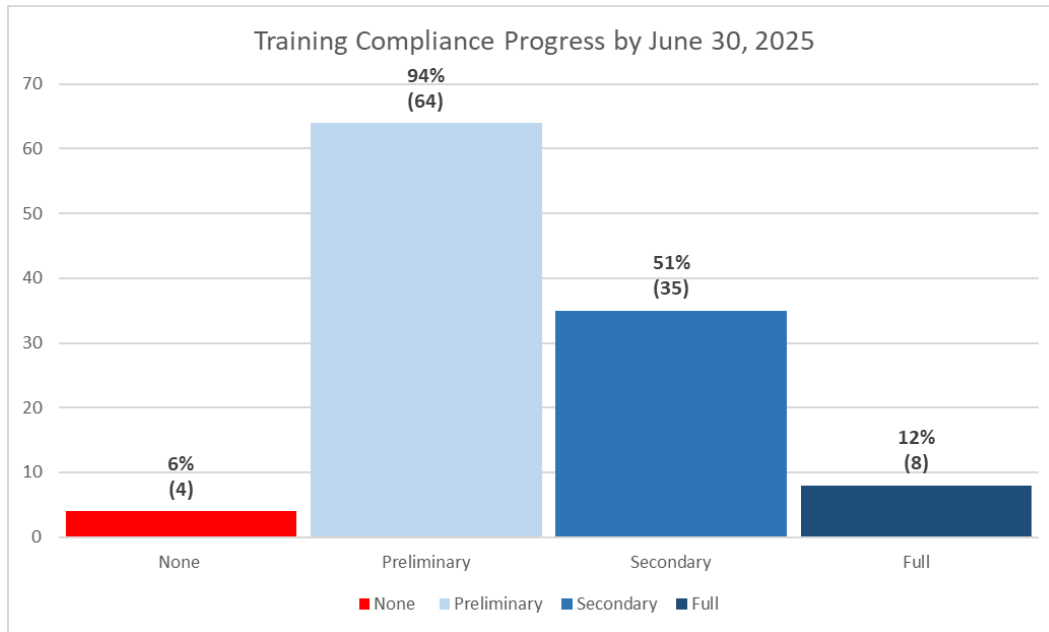
The *2026 Annual Training Plan* includes greater information than in past years about community organizations providing outside expertise for each relevant training. During this reporting period, the CPD made further inroads for community engagement, by creating a Community Engagement Section (CES) of the Training Support Group. This demonstrates CPD leadership commitment to engaging the community to improve training for CPD officers and to further the Department's goals for community policing. The CPD describes goals for the CES in the *2026 Annual Training Plan* as such:

Having the Department engage with our communities is an important component of policing. It is an initiative that seeks to build positive impacts, equitable decision-making processes, and deepen relationships and trust between the Department and our community members. The Department created the Community Engagement Section (CES) out of the Training and Support Group (TSG) Deputy Chief's office to further this relationship within the training context. The CES is responsible for facilitating the Training Community Advisory Committee meetings, creating and managing community engagement and community service projects, managing the TSG's social media page, and integrating community engagement into training, policy, and planning. In addition, the CES has been expanding its community outreach efforts to obtain input from individuals and groups not currently represented by the TCAC. This has included coordinating with the Office of Community Policing, and hosting or attending community outreach events and focus groups regarding training.

Training Progress through Twelve Reporting Periods

In the twelfth reporting period, we assessed the City's compliance with 68 Training paragraphs. Specifically, in the twelfth reporting period, the City and the CPD maintained Preliminary compliance for 28 paragraphs (§§ 279–85, 289, 291, 296, 300, 303–04, 308–12, 314, 326–29, 331–34, and 338), achieved preliminary compliance for one paragraph (§294), maintained Secondary compliance with 18 paragraphs (§§272–76, 278, 292, 295, 297, 301–02, 319, 322, 335–37, 339, and 340), achieved Secondary compliance with 9 paragraphs (§§277, 298–99, 307, 313, 315–17, and 324), maintained Full compliance with five paragraphs (§§270–71, 320–21, and 323), and achieved Full compliance for three paragraphs (§§305–06, and 318). The City and the CPD failed to reach Preliminary compliance for four paragraphs (§§286–88 and 290) with one of those paragraphs being under assessment (§286).

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



Looking Ahead to the Thirteenth Reporting Period

Through twelve reporting periods, the City and the CPD have consistently developed or updated many training policies, procedures, and 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 further compliance achievement, with particular emphasis on compliance levels related to training delivered during the 2025 calendar year. The IMT anticipates that the CPD will make progress towards the development of policy and practices guiding quality instructor selection, training delivery, instruction, and evaluation of participant outcomes. As noted in prior reporting periods, the development of the evaluation process is crucial to assessing the effectiveness of existing training and how to improve the quality and consistency of future instruction and curriculum. Efforts to implement enhanced evaluation processes through the Instructor Evaluation Pilot will likely aid the CPD in achieving 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/2025/10/6-IMR12-Training.pdf>. 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.³¹

³¹ 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/>. For reference, all IMT reports and appendices are available here: <https://cpdmonitoringteam.com/reports-information/>.

VII. Supervision

In the twelfth reporting period, the City and the CPD maintained compliance levels achieved in previous reporting periods for all paragraphs but stalled in achieving significant progress toward additional levels of compliance.

The IMT and the CPD maintained regular meetings during the twelfth reporting period and gathered valuable information to assess compliance with the Consent Decree requirements. Meetings focused on the Unity of Command and Span of Control pilot program, the development of the updated Performance Evaluation System, the Watch Sheet Application, and clarifications on the proposed methodologies for the twelfth reporting period. Interactions between the IMT, the OAG, CPD command staff, and CPD project managers have continued to help clarify paths toward future levels of compliance. This approach has led to effective communication, clearer expectations, and reduced misunderstandings regarding Consent Decree requirements, methodologies, deliverables, and goals set by the CPD for each reporting period.

Unity of Command and Span of Control

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

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, the 4th District in the ninth reporting period, and the 7th District in the tenth reporting period. 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.

The three districts currently operating under the Unity of Command and Span of Control Pilot Program are classified as "Tier 1", which refers to districts with a high volume of calls for service and an elevated crime rate. The CPD has faced challenges with meeting the requirements of the pilot programs in these districts, primarily due to turnover and staffing instability. Current pilot district 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. To better understand the effectiveness of the staffing model and ensure its’ replicability, during the twelfth reporting period, the CPD announced their plans to expand the Unity of Command and Span of Control Pilot Program to the 14th, 17th, and 24th districts which are classified as “Tier 3” and are more securely staffed. However, as of the drafting of this report, we understand the CPD no longer plans to expand to the 14th district at this time. Additionally, we understand the CPD plans to extend its expansion to the 8th, 15th, 16th, and 20th districts, as well.³² These expansions are targeted to occur in January 2026 (the beginning of the fourteenth reporting period), with training and operational preparation occurring in the thirteenth reporting period.

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

[Supervision 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
008 – Chicago Lawn	Implementation Planned (January 2026)	
015 – Austin	Implementation Planned (January 2026)	
016 – Jefferson Park	Implementation Planned (January 2026)	
017 – Albany Park	Implementation Planned (January 2026)	
020 – Lincoln	Implementation Planned (January 2026)	
024 – Rogers Park	Implementation Planned (January 2026)	

³² In the City’s comments to an earlier draft of this report, the CPD notes a discrepancy regarding the pilot programs, which the IMT is seeking to resolve in the thirteenth reporting period. The discrepancy, however, does not factor in favor of or against compliance levels in the twelfth reporting period.

During monthly calls, the City and the CPD shared data about the progress of the pilot program for three of the six periods which fell in the twelfth reporting period.³³ The CPD-determined target goal for Span of Control, or the frequency with which CPD is meeting the 10:1 ratio of members compared to sergeant working within a sector/watch, is 70% (¶¶358(d) and 359–68).³⁴ 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% (¶¶358(e) and ¶359–68). The CPD-determined target goal for Unity of Command by reviewer, or the frequency with which a member is working with the supervisor assigned to complete their performance review, is 50% (¶¶358(e) and 359–68). Since the launch of the new staffing model in the ninth reporting period, compliance rates with the CPD-determined target goals have fluctuated, and this has continued in the twelfth reporting period (see Table 2).

The IMT acknowledges the CPD's efforts but looks forward to these numbers stabilizing across all periods and shifts. The CPD has especially struggled to achieve and maintain the Unity of Command by reviewer goal, though the 6th district has had higher levels of success this reporting period. To address this, in the eleventh reporting period, the CPD 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. However, by the end of the twelfth reporting period, the IMT had not yet received further documentation about how these supervisors will be assigned and tracked.

Supervision Table 2.

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

CPD District <i>(in order of implementation)</i>	Span of Control <i>(% Range)</i>	Unity of Command by Sector <i>(% Range)</i>	Unity of Command by Reviewer <i>(% Range)</i>
006 – Gresham	71 – 80%	73 – 80%	32 – 40%
004 – South Chicago	69 – 86%	82 – 85%	57 – 63%
007 – Englewood	58 – 72%	81 – 87%	19 – 29%

³³ The CPD provides draft slide decks ahead of monthly calls which are expected to include period-by-period data about progress with Unity of Command and Span of Control Pilot Program. However, the slide deck that is presented during the meetings regularly differs from the version the IMT has access to and may contain additional information. The CPD also shares aggregated quarterly data about the program's progress. The IMT believes that the period data is a more accurate reflection of range of district compliance with CPD-determined target goals. Therefore, the data shown above reflects the data for Periods 1, 3, and 5 of 2025, which were present in draft monthly slide decks distributed to the IMT. However, the CPD did not provide data in a tangible format to the IMT for Periods 2, 4, and 6.

³⁴ In eighth reporting period, the CPD determined target goals were as follows: Span of Control: 70%, Unity of Command by Sector: 75%, Unity of Command by Reviewer for Tactical and CAPS units: 80%, and Unity of Command by Reviewer for all other Patrol Units: 50%.

Additionally, the CPD has continued to provide updates on the staffing dashboard's management tools for making staffing and operational decisions, which 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 the CPD members in the pilot districts and in the patrol chain of command be 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.

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

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

The CPD originally chose to 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 CPD halted the OSS pilot in the ninth reporting period. The CPD is working to combine the OSS with the legacy officer intervention systems into an Early Intervention Support System (EISS). In the twelfth reporting period, the City and the CPD instituted regular update meetings with the vendor for the EISS application and provided data to the vendor to begin analyzing as they develop the platform. The City and the CPD also shared in previous reporting periods that a full implementation plan for the project is forthcoming. We continue to look forward to reviewing that information. The IMT also 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.

In the eleventh reporting period, 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 streamline access for officers and supervisors and incorporate evaluations for non-sworn members. In the twelfth reporting period the CPD produced a draft of Policy E05-01, *Performance*

Evaluations of All Sworn and Civilian Department Members Below the Rank of Superintendent, which formalized the inclusion of civilian members, outlined responsibilities of evaluators, and introduced the new PES platform. The IMT and OAG provided comments that the City and the CPD are working to address for resubmission of the policy. 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 twelfth reporting period, the CPD expressed their intentions to share a PES expansion plan with the IMT. However, the CPD now intends to produce this plan for review in the thirteenth reporting period. We look forward to receiving this plan and expect that it is informed by internal evaluations that the CPD conducted of the PES pilot during the previous reporting periods. Though the IMT was not provided with an opportunity to review these evaluations, we stress the importance of using any available data and feedback from CPD members regarding previous iterations of the program to improve processes and outcomes in the new system.

The CPD has also convened a Unity of Command and Span of Control Pilot Program Evaluation Committee, which will meet at least twice a year 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 hopes this committee can work to anticipate and address some of the possible challenges to ensure a smoother implementation process.³⁵ The CPD set a meeting for the twelfth reporting period, but it was cancelled due to scheduling conflicts and was not re-scheduled before the end of the reporting period. We urge the CPD to arrange a meeting early in the thirteenth reporting period as the IMT believes the Committee, in addition to being required to meet by policy, provides valuable feedback about the pilot implementation successes and challenges. This is particularly relevant as the CPD plans to expand to new districts in future reporting periods.

General Updates: Supervisor's Management Log, CPD Member Training, and the Workforce Allocation Study

During the twelfth reporting period, progress on revising the Supervisor's Management Log was minimal. The log is a vital tool for documenting supervisors' daily activities and tasks corresponding to the responsibilities outlined in ¶1353. Although the CPD presented a demonstration of the electronic version of the Log,

³⁵ The IMT requested the Committee meetings be re-structured as opportunities for members of pilot districts, department leadership, and relevant stakeholders to engage in more robust, constructive conversations.

there were no subsequent updates or discussions regarding the progress throughout the rest of the reporting period. As we have previously noted, the IMT expects that the CPD will renew its focus on the Supervisor's Management Log during the thirteenth 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 *2025 Pre-Service Training* for newly promoted sergeants. The IMT observed this training in the twelfth reporting period. 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' wellbeing. We hope to see a stronger focus on operational components in this year's iterations of the *2025 In-Service Supervisors Training*. During past focus groups, non-sworn supervisors have expressed confusion about their role equivalencies with sworn members, their ability to discipline sworn members, and other facets of their duties.³⁶

Another important facet of the supervision section is ¶350, which requires that the CPD will regularly inform its members, including supervisors, of available training, professional development opportunities, and employee assistance resources. For several reporting periods, the CPD has used various platforms to implement this requirement, including roll call briefings and the "CPD & Me" newsletter. In the twelfth reporting period, the CPD included information relevant to the requirements of ¶350 in a newly available Cordico wellness application. Additionally, they have memorialized the requirement to include these resources in various policies.

Finally, the City and the CPD have continued to work through the Workforce Allocation Study (WFA Study) that is in progress, 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 effectiveness. Supervisors must not only be effectively overseeing officers—which requires not supervising too many officers at one time—but also must reinforce

³⁶ In an earlier version of this report, the IMT stated that it had not had the opportunity to review the training curriculum for non-sworn supervisors. The CPD has since clarified in the thirteenth reporting period that both sworn and non-sworn members will receive the same curriculum.

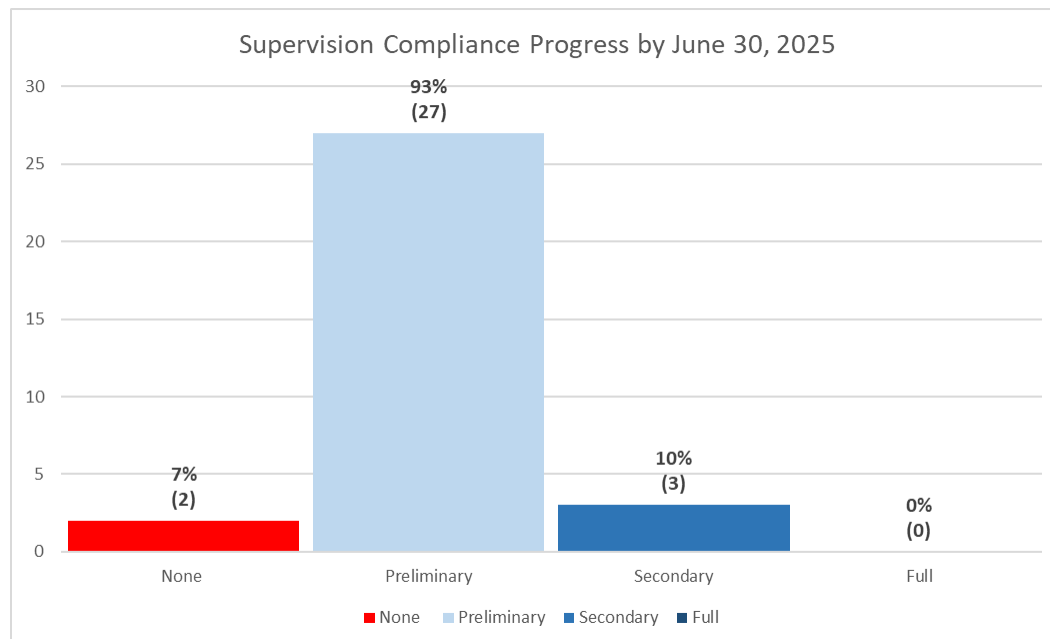
the importance of officers engaging in community policing: truly solving problems on individual blocks and in communities. The IMT is hopeful that the results of the workforce allocation study and its long-term implementation strategies by the CPD will address the concerns shared by supervisors.

During the twelfth reporting period, the WFA vendor has developed a preliminary organizational profile overview and begun working on the framework for the staffing analysis. The CPD, the vendor, and the Civic Consulting Alliance hold bi-weekly meetings to discuss the progress of the WFA Study. The IMT and the OAG have also received updates regarding the ongoing WFA study at monthly meetings. We look forward to continuing to receive these updates from the City and the CPD as the WFA Study progresses. The City and the CPD have stated that they expect the WFA Study to be completed during the thirteenth or fourteenth reporting periods.

Supervision Progress through Twelve Reporting Periods

Overall, we assessed the City's compliance with 29 Supervision paragraphs during the twelfth reporting period (¶¶347–57 and 359–76). In the twelfth reporting period, the City and the CPD maintained Preliminary compliance for 24 paragraphs (¶¶347–348, 351–56, 359–64, 366–67, and 369–76), maintained Secondary Compliance for three paragraphs (¶¶349–50 and 368). The City and the CPD did not achieve any level of compliance with two paragraphs (¶¶357 and 365).

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



Looking Ahead to the Thirteenth Reporting Period

In the thirteenth reporting period, the IMT looks forward to the CPD's preparation for expansion of Unity of Command and Span of Control Pilot Program into lower tier districts. We expect to review data relevant to the program, such as the current pilot districts' progress by period, training for newly added districts, and additional information about the use of secondary sergeants, including how those supervisors would be assigned and tracked. The IMT also looks forward to receiving consistent access to the Watch Sheet Application and Unity of Command and Span of Control Tableau Dashboard.

We hope to continue working cooperatively with the City and the CPD to identify and, if necessary, help develop data sources which accurately capture supervisory activities and show evidence of supervisors' ability to provide appropriate support and accountability. 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 PES and EISS within the Benchmark system. We also anticipate receiving additional data about the CPD's delivery of and members' access to training, professional development opportunities, and employee assistance resources.

The IMT expects to conduct further interviews and focus groups with members and supervisors across the CPD. The IMT also looks forward to observing any pilot program, pre-service supervisors, and in-service supervisors training, along with reviewing training evaluations. We are especially interested in the 2025 Civilian Supervisors In-Service Training, hoping to see a stronger focus on operational responsibilities. Further, we plan to observe future evaluation committee meetings and hope to see these meetings resume more consistently.

* * *

Specific compliance assessments, by paragraph, for the Supervision section are available here: <https://cpdmonitoringteam.com/wp-content/uploads/2025/10/7-IMR12-Supervision.pdf>. 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.³⁷

³⁷ A fuller description of the history of compliance efforts, methodologies, compliance determinations for each original monitorable paragraphs in the Supervision section is available in *Comprehensive Assessment Part I* (which included *Independent Monitoring Report 8*): <https://cpdmonitoringteam.com/imr-8-1/>. For reference, all IMT reports and appendices are available here: <https://cpdmonitoringteam.com/reports-information/>.

VIII. Officer Wellness and Support

During the twelfth reporting period, the City and the CPD made significant progress toward compliance with the requirements of the Officer Wellness and Support section of the Consent Decree, demonstrating a continuation of the enhancement and promotion of member wellness.

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

Although the City and the CPD have faced challenges with several requirements in previous reporting periods, the CPD has shown progress with numerous requirements of the Consent Decree.

Progress Towards Compliance

The Superintendent continues to emphasize wellness as a strategic priority, integrating wellness services and training for both sworn and civilian personnel. This demonstrated a commitment to advancing member wellness and address requirements of the Officer Wellness and Support section of the Consent Decree. Additionally, the CPD significantly expanded its mental health and wellness program, improving access to counseling and support services for all personnel. Currently, the CPD wellness program includes 21 mental health clinicians, six drug and alcohol counselors, six chaplains, and over 200 peer support members. These services are broad-reaching, culturally diverse, and accessible to active and retired CPD members and their families.

Currently, the CPD is conducting a CPD-wide workforce study. Since the inception of the Consent Decree, counselor staffing has significantly increased following the strategic plan to place one counselor in each of the 22 district stations. As we have discussed this reporting period, the IMT recommends using the workforce study’s findings to guide future staffing beyond the original plan, ensuring ongoing demands are met through empirically driven assessments aligned with Commission on Accreditation for Law Enforcement Agencies (CALEA) standards and the Consent Decree (¶¶391–94).

Throughout the twelfth reporting period, the CPD regularly made both internal and external referrals. The Professional Counseling Division (PCD) not only facilitates external referrals but also conducts site visits to ensure external providers meet the required care standards and maintain confidentiality.

Recognizing the need to better understand members' wellness needs, beginning in the tenth reporting period, the CPD partnered with the University of Chicago Survey Lab to develop a comprehensive *Wellness Needs Assessment Survey* of CPD members. This survey aimed to identify specific wellness needs within the CPD and streamline the delivery and effectiveness of mental-health services. In the twelfth reporting period, the CPD deployed and provided for review the *Needs Assessment Survey* and a summary report. The IMT, OAG and the PCD discussed critical wellness documents, such as the *Needs Assessment Survey*, *Communications Strategy*, *Officer Wellness Support Systems Plan*, and the *Annual Wellness Report*. These documents have become more concise, accessible, and practical in recent reporting periods, effectively communicating wellness priorities to all members, reducing stigma, and clarifying misinformation (see ¶¶381–86 and 388).

Additionally, this reporting period, the CPD provided its *Suicide Prevention Strategy* for review. The strategy is clear, practical, and responsive to CPD's specific challenges. It addresses suicide's complexities, outlines preventive, intervention, and post-intervention strategies, and underscores ongoing efforts to foster healing and support.

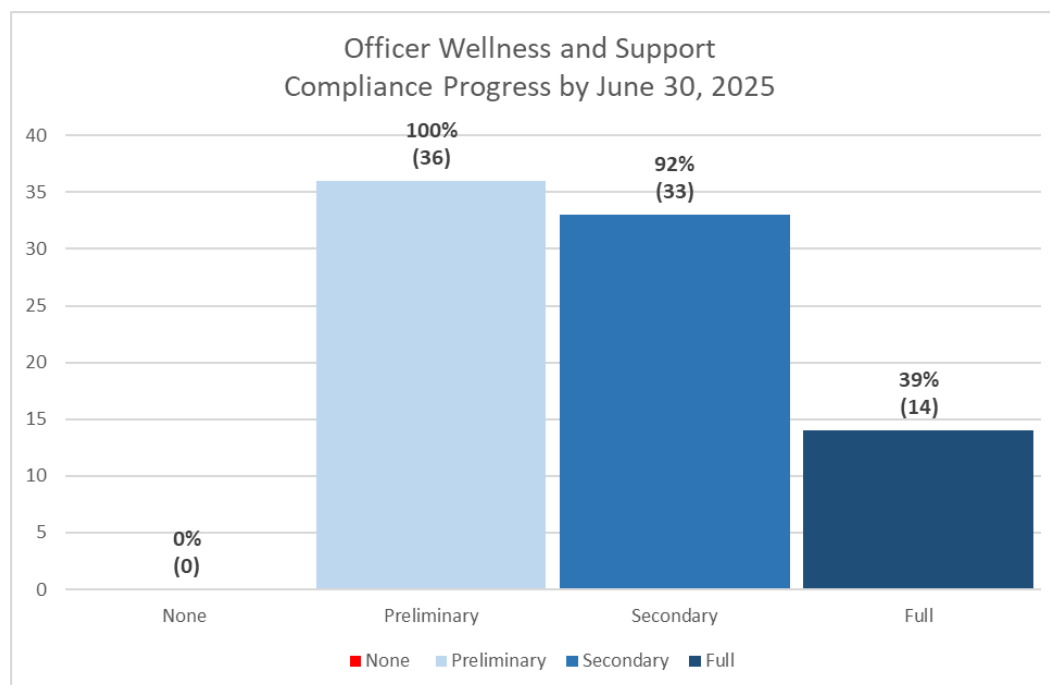
Although the CPD has historically faced challenges collecting data effectively, the CPD has worked to improve their data collection mechanisms. The CPD piloted several platforms and selected a new data-collection system to be implemented during the thirteenth reporting period. This platform will track response times for counseling requests and ensure compliance with response-time requirements, reducing the risk of human error and providing accurate, actionable data.

Although the CPD's new data collection mechanisms have not been fully implemented, the CPD produced quarterly trend analyses and policy directives showing that Professional Counseling Division units—including alcohol and drug counselors, peer support, and chaplains—recognize when members require services beyond their scope, referring members appropriately (see ¶¶404–06). Additionally, the CPD also began developing a QR-code system to gather real-time feedback directly from service recipients, complementing survey data and ensuring comprehensive evaluation of wellness services.

Officer Wellness and Support Progress through Twelve Reporting Periods

Overall, we assessed the City's compliance with 36 Officer Wellness and Support paragraphs during the twelfth reporting period (¶¶381–18). In the twelfth reporting period, the City and the CPD maintained Preliminary compliance with three paragraphs (¶¶399 and 416–17), reached Secondary compliance with 12 paragraphs (¶¶384, 388–89, 395, 407–413, and 415), maintained Secondary compliance with seven paragraphs (¶¶385–86, 390, 393, 397, 414, and 418), reached Full compliance with eight paragraphs (¶¶381, 383, 391, 394, 398, 402, 404, and 406), and maintained Full compliance with six paragraphs (¶¶382, 387, 392, 396, and 400–01).

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



Looking Ahead to the Thirteenth Reporting Period

Given the ongoing stress and trauma inherent in police work, CPD's mental health services must continually evolve. Moving forward, the City and the CPD should focus on consistently conducting audits of the CPD's wellness, peer support, equipment/facilities, and traumatic incident stress management program services, which are vital to demonstrate the CPD is maintaining its commitment to officer

wellness. These audits, as well as the comprehensive needs assessment and annual report to the superintendent, should not only document service delivery but identify deficiencies and highlight where corrective action was taken. The CPD should also focus on making progress through the implementation of new data management platforms, such as Column Case and a QR code Feedback tool, which will expand the information the CPD can use to verify it is appropriately staffed and CPD member's wellness needs are being met.

Looking ahead to the next reporting period, the CPD must continue providing evidence to sustain Full Compliance for relevant Consent Decree paragraphs. Finally, the CPD should develop sustainment plans for paragraphs moving into Full compliance.

Specific compliance assessments, by paragraph, for the Officer Wellness and Support section are available here: <https://cpdmonitoringteam.com/wp-content/uploads/2025/10/8-IMR12-Officer-Wellness-and-Support.pdf>. 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.³⁸

³⁸ A fuller description of the history of compliance efforts, methodologies, compliance determinations for each original monitorable paragraphs in the Officer Wellness and Support section is available in *Comprehensive Assessment Part I* (which included *Independent Monitoring Report 8*): <https://cpdmonitoringteam.com/imr-8-1/>. For reference, all IMT reports and appendices are available here: <https://cpdmonitoringteam.com/reports-information/>.

IX. Accountability and Transparency

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

The Accountability and Transparency section includes requirements 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.³⁹ 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 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 regarding report access, data access, and regularly occurring conversations. Since the tenth reporting period, the entities appeared to improve their collaborative relationship, and COPA has continued to report 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 have been—and continue to be—canceled by the City. 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 technical assistance (*see* ¶656). Moving forward, we feel the enhanced, less-

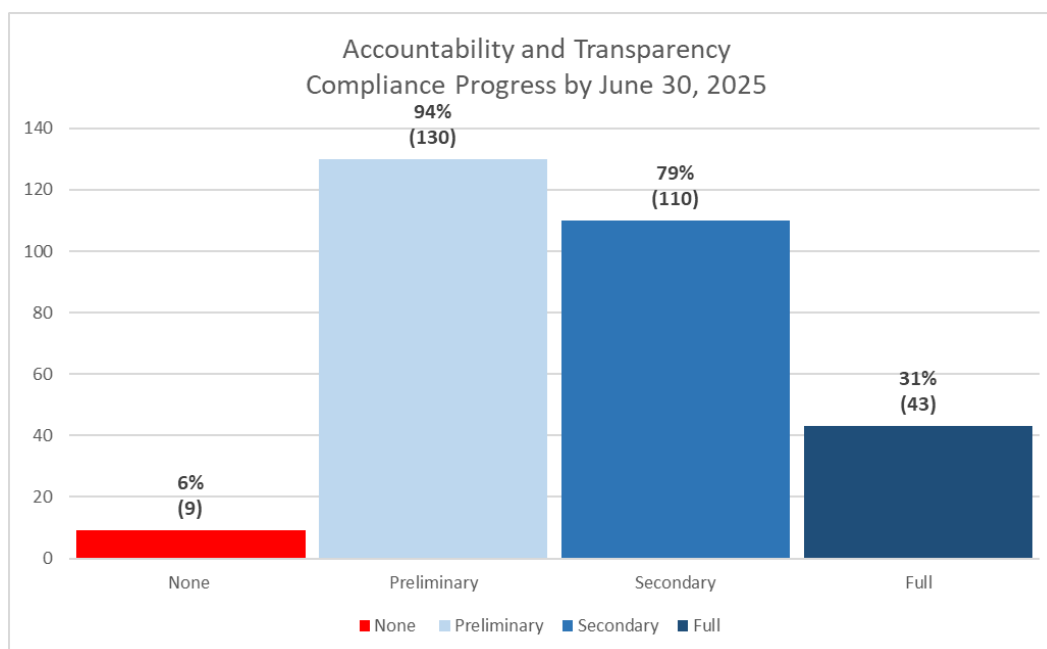
³⁹ The Deputy PSIG achieved Full compliance with all requirements pertaining to its office in the fourth reporting period (January 2024 – June 2021) and maintained that Full compliance during subsequent reporting periods. In the eighth reporting period (January 2023 – June 2023), the Deputy PSIG successfully 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.

rigid communications will further assist the City in achieving and maintaining compliance with the Consent Decree.

Accountability and Transparency Progress through Twelve 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 18 paragraphs (§§445, 463, 476, 481–82, 493, 495, 501, 521–22, 526, 529, 531, 540–42, 544, and 549) and met Preliminary compliance with two paragraphs in the twelfth reporting period (§§451 and 492). The City also maintained Secondary compliance with 64 paragraphs (§§427–28, 432–35, 440, 443–44, 446–49, 453–57, 460, 464–66, 468–69, 471–72, 474–75, 477–80, 483–84, 486–87, 496–98, 500, 503–09, 513–19, 523–25, 527–28, 530, 532, 552, 560, and 564), two of which are under assessment for Full compliance (§§446–47), and met Secondary compliance with three paragraphs (§§459, 461, and 548). The City also maintained Full compliance with 34 paragraphs (§§424–26, 429–30, 436–39, 441–42, 470, 473, 485, 533–39, 543, 550–51, 554–59, 561–63, and 565) and met Full compliance with 9 paragraphs (§§431, 450, 452, 462, 467, 499, 502, 511, and 553). The City did not reach any level of compliance with nine paragraphs (§§488–91, 494, 512, and 545–47), two of which are under assessment for Preliminary compliance (§§546–47).

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



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 twelfth reporting period, the CPD made progress toward compliance with Accountability and Transparency requirements⁴⁰ by delivering its BIA Intake Division training, allowing the CPD to achieve Secondary compliance with two paragraphs (¶¶459 and 461). The CPD also achieved Full compliance with several paragraphs (¶¶431, 447, 450, 452, 462, 467, 499, 502, 511, and 533) by providing various data sources to demonstrate compliance with each paragraph's requirements. Such data includes, for example, affidavit overrides, audio recordings of complainants and participants involved in log number investigations, confidential case examples, records of BIA department member interviews, and links to the CPD public safety website and Administrative Summary Reports.

During the ninth and tenth reporting periods (July 2023 – June 2024), the CPD developed several BIA in-service training modules based on previous discussions

⁴⁰ The City takes the position that ¶445 does not apply to the CPD. However, the IMT has consistently monitored both the CPD and COPA throughout the past reporting periods on the requirements of this paragraph. Because the paragraph says COPA will "initiate the intake process" does not exclude CPD from its requirements for leadership to know the process when a CPD 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.

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. During the twelfth reporting period, the CPD continued to develop BIA onboard training modules and in-service training modules, including eLearning versions of the training.

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 twelfth 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. At the end of the twelfth reporting period, the policy series is still pending before the Court.

Additionally, the CPD produced its *2024 BIA Annual Report*⁴¹ during the twelfth reporting period. The report includes all necessary aggregate data regarding investigations conducted by BIA and Accountability Sergeants, as required by ¶¶550–51. 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

⁴¹ See *2024 BIA Annual Report*, https://www.chicagopolice.org/wp-content/uploads/BIA-2024-Annual-Report_FINAL.docx.pdf

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

Civilian Office of Police Accountability

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

COPA also produced its *2024 Annual Report*⁴² and its *2024 First Quarter Report*⁴³ 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.

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

We acknowledge COPA's continued progress and encourage COPA to continue these efforts in future reporting periods to maintain and achieve additional levels

⁴² See COPA 2024 Annual Report, <https://www.chicagocopa.org/wp-content/uploads/2025/02/2024-Annual.pdf>

⁴³ See COPA 2025 First Quarter Report, <https://www.chicagocopa.org/wp-content/uploads/2025/04/2025-Q1-Report.pdf>

of compliance. The IMT appreciates the opportunity for continued conversations to discuss what documentation is necessary for full and effective compliance. We also look forward to continuing positive discussions about compliance in future reporting periods.

The Chicago Police Board

In the twelfth 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 COPA to provide relevant and thorough training on topics required by the Consent Decree (*see* ¶¶540–42).

Throughout the twelfth reporting period, the IMT met with the Police Board on a regular basis. During these meetings, the Police Board provided various updates on its compliance efforts and also provided updates regarding pending litigation between a police union and the City regarding arbitration of serious police discipline cases.⁴⁴ 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 twelfth reporting period.

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

The Community Commission for Public Safety and Accountability (CCPSA)

In 2021, the City of Chicago created the Community Commission for Public Safety and Accountability (CCPSA), a new entity for police oversight, accountability, and public safety. The CCPSA is now responsible for selecting a COPA Chief Administrator and Police Board members when vacancies occur (*see* ¶¶525 and 532).⁴⁵

In the twelfth reporting period, the CCPSA began its search for a new COPA Chief Administrator. As part of this process, the CCPSA continued its engagement activities, which included holding listening to sessions, administering a survey, and releasing educational materials about the role of COPA and the search process. In the next reporting period, the CCPSA anticipates continuing its engagement activities and working with a search firm in the next steps of their search for a new

⁴⁴ *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.

⁴⁵ As noted in our *Comprehensive Assessment Part II*, the IMT recommends incorporating the CCPSA into the Consent Decree to reflect current City entity responsibilities.

COPA Chief Administrator. 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 2024 – 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.

Additionally, 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.

During the twelfth reporting period, COPA produced evidence of their community engagement efforts with the public and CPD members over the past five years as well as a draft Community-Police Mediation policy (see ¶512). 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 regarding the criminal investigation of officer-involved death incidents. Specifically, PCRIA requires, among other things, that "[n]o investigator involved in the investigation may be employed by the law enforcement agency that employs the officer involved in the officer-involved death" 50 ILCS 727/1-10(b).

During the twelfth reporting period, the City provided documentation detailing the City's and the CPD's outreach efforts to various law enforcement agencies to

date. The City has explored—and is continuing to explore—three potential solutions for complying with PCRIA: (1) having the Illinois State Police (ISP) conduct all investigations of CPD officer-involved deaths; (2) creating a regional task force to conduct all investigations of CPD officer-involved deaths; or (3) seeking an exemption for COPA, the CPD, and the City from PCRIA.

As noted in our prior report, the City and the Illinois State Police were unable to reach an agreement. Therefore, in the twelfth reporting period, the City continued its efforts to either create a regional task force to conduct all investigations of CPD officer-involved deaths or to seek an exemption for COPA, the CPD, and the City from PCRIA. 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/2025/10/9-IMR12-Accountability-and-Transparency.pdf>. 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.⁴⁶

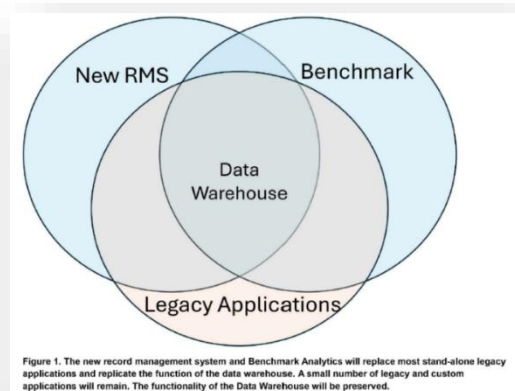
⁴⁶ A fuller description of the history of compliance efforts, methodologies, compliance determinations for each original monitorable paragraphs in the Accountability and Transparency section is available in *Comprehensive Assessment Part I* (which included *Independent Monitoring Report 8*): <https://cpdmonitoringteam.com/imr-8-1/>.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

X. Data Collection, Analysis & Management

During the twelfth 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 enabled the City and the CPD to achieve Secondary compliance with ¶573. This progress is noteworthy, as these compliance levels represent significant steps forward on two critical fronts.

First, the City and the CPD completed an analysis of “citywide and district-level data regarding reportable uses of force” as required by ¶572. The IMT reviewed *Use of Force Data Analysis Project: Results Report* (authored by professors at the University of Texas San Antonio and the University of Pennsylvania) and its corresponding Executive Summary; the IMT-approved methodology required by ¶573 guided these analyses, but the IMT has suggestions for improvement for future analyses. We appreciate these efforts and look forward to the CPD’s continued “regular review” and analysis.

Second, the City and the CPD completed an initial draft of its required *Data Systems Plan* (¶607), which stems from the required data needs assessment that was completed during the ninth reporting period (¶606). The draft *Data Systems Plan* includes some of the required implementation timelines and provides some details about the CPD’s plans for building and implementing systems including personnel records management; law enforcement records management; and legacy and custom applications. The draft *Plan* also includes information about the progress toward identifying and contracting with a vendor to develop and implement a new records management system (RMS), as well as information about the tasks before other vendors such as Benchmark Analytics and Salesforce, who are developing many tools, platforms, and interfaces to streamline the CPD’s data management technologies. The *Data Systems Plan* includes the graphic below, which represents how various systems will interface with the CPD’s data warehouse:



However, the draft *Data Systems Plan* does not provide a sufficient level of detail regarding specific implementation approaches, and much of the draft *Data Systems Plan* is redundant of the ¶606 *Final Assessment Report*. For this reason, the CPD remains under assessment for Secondary compliance with ¶607. We look forward to reviewing an updated draft of the *Data Systems Plan* in the next reporting period.

Additionally, the CPD provided the IMT with an overall timeline for implementing the new Record Management System (RMS), identifying key milestones during implementation. A new RMS is a critical resolution to many of the data system needs identified from the ¶606 assessment, the IMT looks forward to seeing the City's selection and contracting systems progress.

The new RMS is also 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 with the interventions and supports they may need. While the new 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 reporting period, the IMT was not provided with any draft trainings or evaluation frameworks, which we will need to see before the EISS' department-wide implementation.

Finally, this reporting period, the City and the CPD did not achieve additional levels of compliance with crucial TRED and Force Review Board paragraphs: ¶¶574, 575, 578 and 580. 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 CPD command staff members. The CPD also continued to utilize Standard Operating Procedure (SOP) 2020-03, *Force Review Board*.

The IMT continued to observe, however, 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 decisions leading up to and 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.⁴⁷

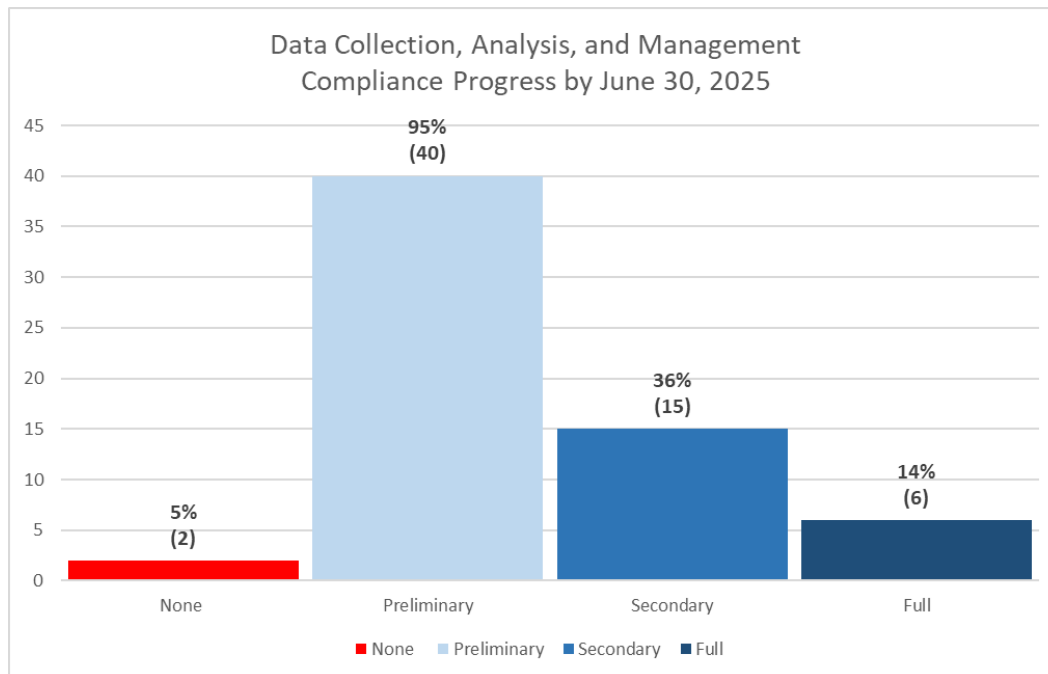
Further, we remain concerned about TRED staffing levels. As seen below, TRED's staffing levels continue to fluctuate, as does its backlog of cases requiring review. To make progress, the CPD must demonstrate that it has qualified personnel and adequate staffing to meet the required use-of-force reviews, per TRED's SOP.

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

Overall, the IMT assessed the City's compliance with 42 Data Collection, Analysis, and Management paragraphs. At the end of the twelfth reporting period, the City maintained Preliminary compliance with 25 paragraphs (¶¶572, 574, 583–604 and 607), achieved Secondary compliance with one paragraph (¶¶573), maintained Secondary compliance with eight paragraphs (¶¶569–70, 576, 578, 580–82, and 608), maintained Full compliance with six paragraphs (¶¶568, 571, 577, 579, 606, and 609), and failed to reach any level of compliance with two paragraphs (¶¶575 and 605).

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

⁴⁷ 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), [2024.10.11-Independent-Monitoring-Team-Comprehensive-Assessment-Part-II-amended-and-filed.pdf](#).)



Looking Ahead to the Thirteenth 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 Full compliance with ¶570. Finally, we look forward to improvement in Force Review Board proceedings, a long-standing concern, particularly with the incorporation of decision-point analysis into FRB 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/2025/10/10-IMR12-Data-Collection-Analysis-and-Management.pdf>. This in-

cludes 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.⁴⁸

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

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

The Investigatory Stops, Protective Pat-Downs, and Enforcement of Loitering Ordinances paragraphs were added to the Consent Decree by stipulation during the eighth reporting period, on June 27, 2023. The IMT began to monitor the Investigatory Stops, Protective Pat-Downs, and Enforcement of Loitering Ordinances paragraphs (namely, ¶¶854, 866, and 868) during the ninth reporting period. The IMT began to monitor 33 additional paragraphs (¶¶803–21, 834–35, 838, 841, 852–53, 856–59, 861–64, and 873) during the tenth reporting period and an additional 16 paragraphs (¶¶827–33, 836–37, 839–40, 860–61, 869–70, and 872) during the eleventh reporting period.⁴⁹ Beginning in the thirteenth reporting period, five additional paragraphs will be monitored (¶¶822–26).⁵⁰ The remaining eight paragraphs (¶¶844–51) will be monitored beginning in the fourteenth reporting period.

In the twelfth reporting period, the City and the CPD achieved new levels of compliance for a few paragraphs in the Investigatory Stops, Protective Pat-Downs, and Enforcement of Loitering Ordinance section. Specifically, the City and the CPD achieved Full compliance for three paragraphs related to their continued data collection efforts, which included posting de-identified investigatory stop data derived from Investigatory Stop Reports (ISRs) on its website, as well as collecting the data and records required by various requirements in this section.

During the twelfth 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.

Policy Development

Some of our discussions focused on areas for improvement in the CPD's path towards compliance with paragraph requirements. For example, we continued our

⁴⁹ As set out below, the IMT previously proposed a revision to the Monitoring Plan for investigatory stops. The Amended Monitoring Plan stated that the IMT will begin to monitor ¶¶822–26 during the thirteenth reporting period (July – December 2025).

⁵⁰ 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 ¶¶844–51 during the fourteenth period (January – June 2026) instead of the thirteenth reporting period to allow for the completion of the IMT's assessment of data regarding investigatory stops and Loitering Ordinance dispersals completed by CPD officers through and including the period ending December 31, 2024 (See ¶843).

discussions from the last reporting period regarding the City's and the CPD's finalization of policies, including G03-08, *Police Encounters and the Fourth Amendment* policy suite⁵¹ and S10-02, *Gang and Narcotics-Related Loitering* policy suite.⁵² The City and the CPD posted pre-implementation drafts of these policy suites on December 31, 2024, at the end of the eleventh reporting period.⁵³ As a result, the City and the CPD achieved Preliminary compliance for several paragraphs.

On June 30, 2025, the last day of the twelfth reporting period, the City and the CPD published revised pre-implementation versions of the two policy suites.⁵⁴ However, the IMT continues to note that the CPD must finalize and implement both policy suites and demonstrate community engagement on the policy suites before they will be assessed for Secondary compliance with several paragraphs. (See ¶¶803–21, 828–33, 857, 859–60, 862–64, and 873).

Training Development

Additionally, the City and the CPD have been developing and revising new training to make progress in this section. For example, by the end of the twelfth report period, the City and the CPD continued developing the following new or revised courses:

- *2025 Constitutional Policing Foundations training curriculum;*
- *Police Encounters and Fourth Amendment Suite eLearning;*
- *Cannabis Recognition Training Program; and*
- *Universal Stop Application eLearning.*

Throughout the twelfth reporting period, the IMT discussed training expectations (see ¶1276) for some of the training courses under development with the parties. Specifically, the IMT recommended that the City and the CPD incorporate adult

⁵¹ 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*.

⁵² 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*.

⁵³ The IMT did not receive the finalization packets for these policy suites in the twelfth reporting period and looks forward to receiving the finalization packets for these new policy suites in the next reporting period.

⁵⁴ The IMT commends the City, the CPD, and the Coalition for resolving their dispute about the inclusion of recent Illinois Supreme Court decisions on the odor of cannabis in its draft of G03-08, *Police Encounters and the Fourth Amendment*. With respect to training of officers on these decisions, the IMT continues to strongly recommend that the City and the CPD should assess the officers' abilities to distinguish between raw and burnt cannabis consistent with the Illinois Supreme Court's decisions in *People v. Redmond*, 2024 IL 129201 and *People v. Molina*, 2024 IL 129237.

learning techniques throughout each training the CPD develops and implements. This includes utilizing the ADDIE model in the development of all training courses and incorporating more scenario-based training. Lastly, training courses should never be a verbatim reiteration of the associated policy as that is not a proper adult learning technique.

Additionally, the IMT discussed the CPD's path towards compliance and ensuring that each step is taken to achieve Secondary compliance. In addition to the CPD finalizing and implementing the above policy suites and demonstrating community engagement, the CPD must also do the following to be fully assessed for Secondary compliance with multiple paragraphs (see ¶¶803–21, 828–33, 857, 859–60, 862–64, and 873):

1. The CPD must receive no objection notices from the IMT and OAG on each of the above training courses.
2. The CPD must demonstrate all community engagement conducted during the training development phase, including the associated revisions to the trainings based on community feedback. This should include community feedback received through the CPD's Training Community Advisory Council (TCAC).
3. The CPD must deliver the final training courses to 95% of the required personnel.
4. The CPD must provide evidence to the IMT and OAG demonstrating that 95% of the required personnel attended the training courses.

Additional compliance progress

During the twelfth reporting period, the City and the CPD made positive strides towards compliance with data collection requirements. The CPD continued to post on its website and maintain de-identified investigatory stop data derived from ISRs, as well as collect and maintain many of the required data and records required by this section of the Consent Decree.

We reviewed the Tactical Review and Evaluation Division's (TRED) *2024 Mid-Year Report*, which was published at the end of the reporting period. TRED's collection of data and its analyses in their semi-annual reports—identifying helpful trends and patterns in the CPD's reporting data—have demonstrated compliance with several paragraphs.

We also reviewed the CPD's *Know Your Rights Campaign Comprehensive Summary (2021-2025)*. In the eleventh reporting period, we noted the CPD needed to ensure that the specific topics of investigatory stops, protective pat downs, and enforcement of the loitering ordinances were directly addressed in the public awareness

campaign. Although the CPD generally noted that investigatory stops, protective pat-downs, and enforcement of the loitering ordinances would be included in the Know Your Rights Campaign, it failed to provide a detailed plan for the engagement. The IMT requests that the City and the CPD provide more information, including, for example, the community groups with whom they plan to engage, the materials they plan to disseminate, and the events they plan to organize. All that information is required to assess Secondary compliance with ¶866. For Full compliance, the CPD must provide evidence of how they implemented all the above components.

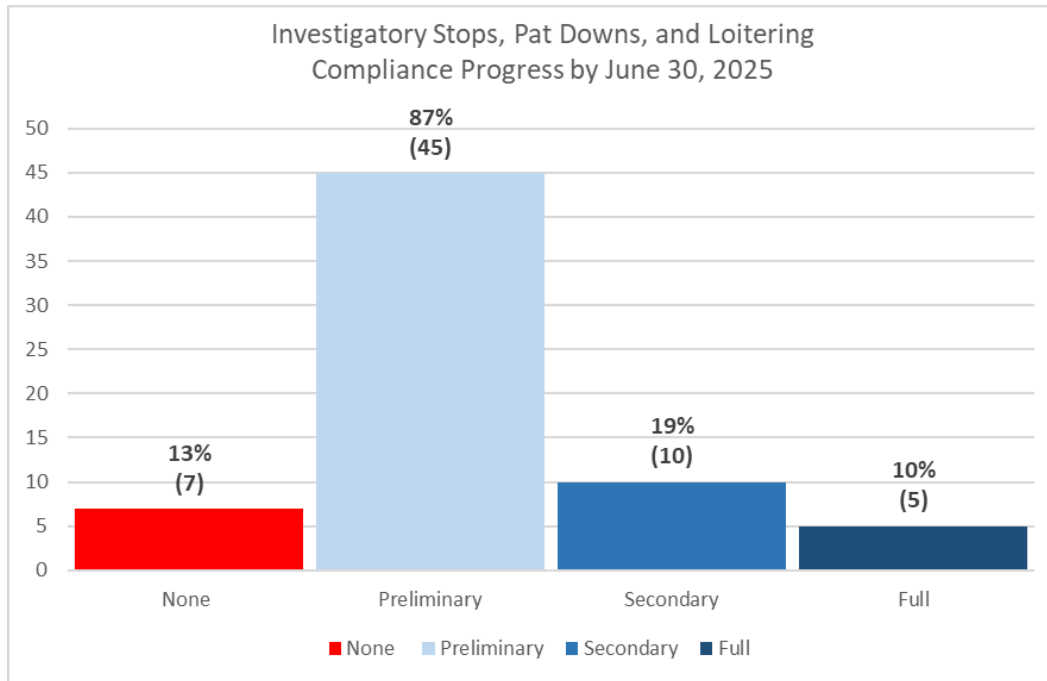
Also, during the twelfth reporting period, the IMT conducted a site visit that focused on improving communications about compliance expectations, as well as working on paths toward additional levels of compliance. The CPD provided a demonstration of its newly created draft Universal Stop Application form, which provided the IMT and the OAG with the opportunity to ask questions. The CPD also provided updates related to its data collection efforts. Lastly, the IMT discussed with the CPD the need to continue to work towards implementing and demonstrating effective feedback loops from supervisors to CPD members regarding investigatory stop, protective pat down and loitering enforcement practices. For example, the CPD did not achieve Full compliance with the requirements of ¶839 in the twelfth reporting period because the CPD has not yet demonstrated a feedback loop from supervisors to CPD members.

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

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 section. The City and the CPD did not achieve Preliminary compliance with any paragraphs this reporting period but maintained Preliminary compliance with 35 paragraphs (¶¶803–21, 828–33, 841, 853, 857, 859–60, 862–64, 866, and 873). The City and the CPD achieved Secondary compliance with one paragraph (¶858) and maintained Secondary compliance with four paragraphs (¶¶827, 838, 839, and 852). The City and the CPD achieved Full compliance with one paragraph (¶834). The City and the CPD also maintained Full compliance with four paragraphs (¶¶835, 854, 856, and 868). There are seven paragraphs that are not in compliance (¶¶836–37, 840, 861, 869–70, and 872).⁵⁵

⁵⁵ The IMT's original Monitoring Plan for these new paragraphs anticipated that the IMT would begin to monitor ¶¶822–26 during the eleventh reporting period. *See Independent Monitoring Report 9* (May 23, 2024) at 83. Each of these paragraphs requires the CPD to design and implement training for officers relating to investigatory stops, protective pat-downs, and enforcement of the Loitering Ordinances. The City and the CPD made progress in the eleventh and

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



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

twelfth reporting periods toward implementing revised policies in these areas. However, to give them sufficient time to develop training on the yet-to-be-implemented policies, the IMT amended the Monitoring Plan to begin monitoring ¶¶822–26 in the thirteenth reporting period (July – December 2025). Additionally, to allow for the completion of the IMT’s assessment of data regarding investigatory stops and Loitering Ordinance dispersals completed by CPD officers through and including the period ending December 31, 2024 (See ¶843), the IMT amends the Monitoring Plan to begin monitoring ¶¶844–51 in the fourteenth reporting period (January – June 2026).

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)	¶¶80321, 834–35, 838, 841, 852–53, 856–59, 862–64, 873 +33 paragraphs (Total = 36)
Eleventh Reporting Period (July 1, 2024–December 31, 2024)	¶¶827–33, 836–37, 839–40, 860–61, 869–70, 872 +16 paragraphs (Total = 52)
Thirteenth Reporting Period (July 1, 2025–December 31, 2025)	¶¶822–26 +5 paragraphs (Total = 57)
Fourteenth Reporting Period (January 1, 2026–June 30, 2026)	¶¶844-51 +8 paragraphs (Total = 65)

Overall, the City and the CPD made progress toward the Investigatory Stops, Protective Pat-Downs, and Enforcement of Loitering Ordinances requirements of the Consent Decree in the eleventh reporting period. The collection of data by the 4ASRU, including its posting of data to the public website and the continued review of the representative sample also helped the City and the CPD to achieve Full compliance with additional paragraphs this reporting period. Throughout the reporting period, the CPD was willing to hold meetings to discuss issues or provide updates to the IMT and OAG and showed a dedication toward making significant progress in this section.

Looking Ahead to the Thirteenth Reporting Period

In the next reporting period, we expect the CPD to achieve several new levels of compliance with requirements in this section. Below we specify several requirements with which the CPD is very close to demonstrating compliance. For example, the CPD are likely to gain Secondary compliance with several paragraphs when it finalizes its newly developed policy suites relating to investigatory stops, protective pat-downs and enforcement of loitering ordinances and incorporates these policies into the City's and the CPD's public awareness campaign. We also expect to receive the results of community feedback for the newly developed policy suites. Additionally, we anticipate receiving and reviewing the CPD's training materials relating to these policies in the next reporting period, as well as evidence of community engagement on those materials. Finally, we also look forward to continued 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.

Relevant ¶s	Expectations for the Thirteenth Reporting Period
¶¶803–21, 827–33, 857, 859–60, 862–64, 873	The CPD must complete the six steps below for each of these paragraphs to achieve Secondary compliance: 1. The G03-08, <i>Police Encounters and the Fourth Amendment</i> policy suite and S10-02, <i>Gang and Narcotics-Related Loitering</i> policy suites must be finalized and implemented incorporating all the provisions outlined in the eleventh monitoring report. 2. The CPD must demonstrate all community engagement conducted during the policy development phase, including the associated revisions to the two policy suites based on community feedback. 3. The CPD must receive no-objection notices from the IMT and OAG on each of the above trainings. 4. The CPD must demonstrate its community engagement conducted during the training development phase, including the associated revisions to the trainings based on community feedback. This should include community feedback received through the CPD’s Training Community Advisory Council (TCAC). 5. The CPD must finalize and deliver the trainings to 95% of the required personnel. 6. The CPD must provide evidence to the IMT and OAG demonstrating that 95% of the required personnel attended the courses.
¶¶836–37, 861, 869–70	The CPD must codify in department policy the Universal Stop Application to achieve Preliminary compliance.
¶860	To achieve Secondary compliance, the 4ASRU needs to perform a more fulsome data analysis according to each of the metrics set out in ¶860. Additionally, the IMT expects evidence of the City’s and the CPD’s efforts to address any deficiencies identified by the 4ASRU. Further, the CPD should consider tracking and reporting on officers who consistently have multiple rejections across periods. Although the TRED Report goes into some level of detail, it is unclear if there are officers who consistently have rejected ISRs across different reporting periods.
¶862–64	• To achieve Secondary compliance with ¶862, the City and the CPD must provide the IMT with their plans to establish mechanisms to facilitate community engagement on investigatory stop policies and forms consistent with ¶862. • To achieve Secondary compliance with ¶863, the City and the CPD must ensure that the data derived from the community engagement process is used effectively in the review of its training, not just its policy, including TCAC review. Moreover, the CPD must provide documentation of feedback received from the public that was utilized to revise or enhance the policies. • To achieve Secondary compliance with ¶864, the City and the CPD must provide the IMT with their plans to conduct the regular community engagement required by ¶864.

¶839	To achieve Full compliance with the requirements of ¶839, the CPD must demonstrate a feedback loop from supervisors to CPD members regarding investigatory stop, protective pat down, and loitering enforcement practices.
¶¶837, 840	To achieve Preliminary compliance with ¶840, the CPD must finalize the policy suites noted above, in addition to developing and implementing the Universal Stop Application. The CPD also must receive approval and implement the data plan provided for in ¶837. That plan must also be documented in policy to achieve Preliminary compliance with ¶837.

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/2025/10/11-IMR12-ISR-Stipulation.pdf>.⁵⁶

⁵⁶ For reference, all IMT reports and appendices are available here: <https://cpdmonitoringteam.com/reports-information/>.

Conclusion, Looking Ahead to *Independent Monitoring Report 13*

We have concluded our monitoring efforts for the twelfth reporting period (January 1, 2025, through June 30, 2025). 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 13*, will cover the reporting period from July 1, 2025, through December 31, 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 thirteenth and fourteenth reporting periods, we will continue to assess the City's compliance with paragraphs with requirements in the Consent Decree or "monitorable paragraphs."⁵⁷

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.⁵⁸ 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.

⁵⁷ Our previous Monitoring Plans are available on our website. See *Reports*, INDEPENDENT MONITORING TEAM, <https://cpdmonitoringteam.com/reports-information/>.

⁵⁸ 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 Seven

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 ⁵⁹ (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 2026)
14th Reporting Period	January 1, 2026 – June 30, 2026 (Independent Monitoring Report 12, Autumn 2026)

⁵⁹ 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 Seven.

Finally, Conclusion Figure 3, reflects the current compliance status of all monitorable paragraphs to date.

Conclusion Figure 2. Monitoring Plan for Year Seven
(July 1, 2025 – June 30, 2026)

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, 828, 829, 830, 831, 832, 833, 834, 835, 836, 837, 838, 839, 840, 841, 844, 845, 846, 847, 848, 849, 850, 851, 852, 853, 854, 855, 856, 857, 858, 859, 860, 865, 860, 861, 862, 863, 864, 866, 868, 869, 870, 872, 873 (Total = 65)
TOTAL	617

Attachment A:
Office of the Illinois Attorney General
Comments
(October 8, 2025)



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

**KWAME RAOUL
ATTORNEY GENERAL**

October 8, 2025

Margaret A. Hickey
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**Re: OAG Comments on the Twelfth 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 twelfth Monitoring Report (Report) before the Independent Monitoring Team (IMT) files it with the Court. The Report covers January 1, 2025, through June 30, 2025, 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 23% of the original Consent Decree requirements, which is a 7% increase from the last monitoring period. The road to unbiased, constitutional policing in Chicago remains long, but the OAG encourages the City and CPD to continue to devote the necessary resources towards reform, improve its data collection and analysis, and put its revised policies into practice throughout the city.

CPD Has Made Substantial Progress With Nearly All Required Policy Revisions

CPD is in preliminary compliance with 94% of the original Consent Decree requirements. As the Report explains, obtaining preliminary compliance usually requires that the City and CPD develop and publish a policy incorporating changes required by the Consent Decree. Although publishing a new or revised policy is only the first step towards reform, OAG commends CPD for putting nearly all the Consent Decree's requirements into written, publicly available policies. This

monitoring period, CPD finalized S02-08, Community Engagement in Policy and Training Development and posted the G03-08, Police Encounters and the Fourth Amendment policy suite, for public feedback. CPD continues to refine its policies governing interactions with people with disabilities and its investigations into officer-involved shootings and deaths to ensure compliance with the Consent Decree. That said, OAG disagrees with IMT's assessment that the City is in preliminary compliance with Paragraph 492 of the Consent Decree, which requires that the City use best efforts to comply with the Police and Community Relations Improvement Act, 50 ILCS 727/1-1 *et seq.* (PCRIA). Based on the documentation produced by the City, and information shared with the OAG about steps the City has taken, OAG does not agree that the City has used its best efforts to comply with PCRIA. OAG urges the City and CPD to prioritize complying with PCRIA, and to finalize these important policies.

Critical Units Must Maintain Staffing and Conduct Timely, Meaningful Reviews

For CPD to become a learning organization, it must identify trends and undertake critical, timely self-analysis for both individual officers and the Department as a whole. Several crucial units, such as the Bureau of Internal Affairs (BIA), Crisis Intervention Unit (CIU), the Tactical Review and Evaluation Division (TRED), and the Force Review Board (FRB), continue to face challenges implementing required reforms.

OAG commends CPD for publishing its use of force data in a transparent, publicly accessible database. As the IMT notes, however, CPD continues to struggle with reviewing use of force incidents: TRED continues to have a large backlog of reviews and the FRB reviews do not consistently provide sufficient evaluations from CPD command staff regarding tactics or identify necessary modifications to policies, trainings, and tactics to minimize the risk of deadly force incidents occurring and harm to officers.¹ OAG strongly encourages CPD to ensure that the FRB conducts consistent reviews of deadly force incidents and, based on such reviews, identifies areas where the Department must modify its policies, training, and tactics, to minimize safety risks to Department members and the public. Additionally, CPD, IMT, and the OAG have discussed potential ways to decrease TRED's backlog while ensuring consistent and timely reviews; OAG looks forward to seeing a reduction of the backlog.

Similarly, the persistent inadequate staffing in the CIU has led to stalled progress with important requirements of the Crisis Intervention section. While OAG appreciates that the CIU completed a qualitative staffing needs assessment this monitoring period, OAG is concerned that there are only 35 positions filled, out of the recommended minimum of 60. CPD made commendable progress by developing a promising framework for the Crisis Intervention Plan, but further progress towards compliance will require deep commitment to increasing the staffing levels of the CIU.

Finally, though BIA has made some strides toward improving compliance levels with the Consent Decree in the last few reporting periods, its functional performance as an accountability body for CPD continues to be stymied by the same staffing deficits it has faced for years. BIA

¹ Report, p. 10.

continues to fall far short of its budgeted number of positions, including, crucially, investigators – BIA only has approximately 20% of the budgeted investigator positions filled and about two-thirds of the sergeants' positions. These staffing shortfalls continue to result in substantial delays in investigations being completed within 180 days of the initiation of the investigation, as required by the Consent Decree. OAG is also concerned that the staffing shortages and backlog may impact the quality and thoroughness of this critical accountability mechanism.

In the coming monitoring periods, the City and CPD must prioritize maintaining and increasing staffing in these units doing the critical work of reform.

Developing Methodologies for Full Compliance

As CPD has developed policies and training materials in compliance with the Consent Decree, the OAG and the City's focus has turned to the issue of how to measure the compliance of CPD's policing practices. The purpose of the Consent Decree is to establish lasting changes in police practices, and a full compliance determination requires a methodology for measuring and evaluating such practices. In the most recent monitoring period, IMT made findings of full compliance regarding two use of force practices (the use of OC devices and the use of impact weapons). IMT reached these conclusions after assessing the frequency of such uses and the consequences that follow from out-of-policy uses. OAG strongly recommends CPD and IMT continue to identify specific methodologies for assessing whether Department members' uses of force in day-to-day policing complies with the Consent Decree.

Conclusion

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 constitutional policing in Chicago every day.

Respectfully,

s/Mary J. Grieb

Mary J. Grieb

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cc: Jackie Thompson, Allan Slagel, Counsel for the City of Chicago (via email)

Attachment B:
City of Chicago
Comments
(October 9, 2025)



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October 9, 2025

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VIA EMAIL

RE: Independent Monitoring Team's IMR-12 Report

Counsel –

The City of Chicago (City) writes to provide its response and comments to the Independent Monitoring Team's Independent Monitor Report-12 Report. The City's comments fall into the following general categories:

1. ***Needs Clarification / Compliance Assessment:*** The City's position is that additional compliance is warranted based upon the evidentiary record. This includes materials produced for the IMT that reflect work done in the reporting period. This also includes paragraphs where the City produced materials to achieve new levels of compliance and the IMT's draft is silent on the paragraph and/or fails to address why the identified deliverable failed to achieve new compliance. The City 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 in its voluminous commentary.
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.

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

IMPARTIAL POLICING

The City and CPD welcome the IMT's determination of Secondary Compliance with paragraph 65. To maintain this status, the City and CPD will adopt the IMT's recommended methodology, which includes hosting quarterly meetings focused on advancing language access. CPD will document and share meeting notes, outcomes, and compliance initiatives with the IMT. Additionally, CPD will continue to facilitate coordination between Language Access Coordinators and prepare a comprehensive compliance report detailing overall efforts. CPD believes this approach offers a clear path toward achieving operational compliance and looks forward to receiving feedback from IMT.

CRISIS INTERVENTION

The City and CPD welcome the recognition of new levels of compliance for paragraphs 92, 93, 95, 96, 101, 103, 104, 105, 117, 121, 136 and 141.

The City and CPD seek clarification on the methodology to raise the compliance level for paragraph 89 of the Consent Decree. Paragraph 89 requires the CIT Coordinator to conduct an annual review of policies and training, however, a new requirement to "establish [an] annual review cadence that addresses public feedback regarding relevant mental health related policies" has appeared. The understood expectation is that the Chicago Council on Mental Health Equity (CCMHE) conduct annual reviews of CIT policies. The City and CPD previously relayed to the IMT and the Office of the Attorney General (OAG) that its' review process with CCMHE aligns with existing procedures under paragraph 636, which establishes a two-year cycle for community engagement. This process was developed collaboratively with CCMHE members to ensure Crisis Intervention Unit (CIU's) engagement efforts reflect departmental practices, adhere to CCMHE bylaws, and accommodate CCMHE's voluntary member's reasonable availability—which does not support annual reviews of all CIT policies and trainings. CCMHE members have repeatedly indicated they lacked sufficient time to review all CPD's policies on an annual basis. Furthermore, the submitted deliverables clarify CPD's position that soliciting public feedback on policies annually does not conflict with state law.

The City and CPD disagree with the IMT's assessment not to advance paragraphs 107-112 to Preliminary Compliance. CPD submitted an existing policy that addresses paragraph requirements, specifically through the issuance of S05-14 (MONITOR2621). S05-14 was modified to include a section on the crisis intervention implementation plan clearly outlining the requirements of these paragraphs and received no objection. CPD also submitted the framework for the crisis implementation plan which includes the establishment of outcome metrics for

assessment of additional levels of compliance. This approach is consistent with the methodology applied to several other paragraphs throughout the Consent Decree, particularly those that include terms such as “timely” and establish defined metrics related to achieving compliance. In those cases, additional compliance levels were recognized as part of the policy’s progression toward full implementation.

The City and the CPD request clarification regarding the IMT’s methodology for assessing Secondary Compliance under Paragraph 115. According to the IMT, further compliance hinges on demonstrating “adequate staffing, training, and community engagement.” However, we note that the language of Paragraph 115 tasks the CIT Coordinator with enhancing the effectiveness of the CIT Program, improving responses to individuals in crisis, and facilitating engagement with relevant stakeholders. It does not prescribe a specific staffing level for the CIT Coordinator. Only Paragraph 90 explicitly addresses staffing, requiring the City and CPD to ensure the CIU is staffed sufficiently to fulfill the objectives and functions of the CIT Program. Staffing levels, however, are influenced by external factors beyond the Department’s control—such as promotions, inter-unit transfers, medical leave, and the City’s budget process. These variables should not impede CIU’s ability to meet compliance through substantive deliverables aligned with the paragraph’s intent. Therefore, staffing levels should not be a determining factor in assessing compliance with Paragraph 115. As detailed in the IMR-12 Coordinator Summary Report, CPD and CIU implemented significant program enhancements, including comprehensive updates to training curricula, improvements to data analytics processes, and engagement with a broad range of crisis intervention stakeholders. The report also references the Officer Implementation Plan Framework’s staffing analysis, which likely will address the IMT’s “adequate staffing” criterion. Taken together, these efforts fulfill the objectives outlined in Paragraph 115 and support a finding of Full Compliance. The City and CPD acknowledge the IMT’s concerns regarding staffing levels for crisis intervention personnel. However, it is premature to establish specific staffing ratios or workloads at this stage. The forthcoming Work Force Allocation (WFA) study will provide critical data and analysis to inform these decisions in alignment with the requirements of the Consent Decree.

The City and CPD seek clarification on the IMT’s methodology for assessing Secondary Compliance under Paragraph 120. The IMT has indicated that “insufficient evidence for a new level of compliance” was provided, citing the need for additional documentation such as the CIT Officer Implementation Plan, data analysis, staffing and deployment information, CIT Reports, and trends at both the district and department levels. We note that Paragraph 120 does not reference the Officer Implementation Plan. While future iterations of this Plan are intended to support Operational Compliance, the Department emphasizes that the Response Ratio Report already demonstrates substantial efforts to collect, analyze, and report data on incidents involving individuals in crisis. These documented efforts reflect meaningful progress toward the objectives outlined in Paragraph 120 and, in the Department’s view, satisfy the requirements for achieving Secondary Compliance.

The City and the OEMC respectfully disagree with the IMT’s methodology for assessing compliance under Paragraph 140. OEMC Standard Operating Procedure 23-004, Section V, clearly states that CIT-designated calls are not to be held in dispatch. The IMT’s decision to withhold Full Compliance based on “awaiting analysis of data regarding length of time to dispatch CIT officers” should be reconsidered. OEMC’s data confirms that CIT calls are dispatched immediately upon receipt and are not subject to delay. The evidence provided demonstrates

consistent adherence to dispatch protocols for CIT calls, satisfying the requirements of paragraph 140.

USE OF FORCE

The City and CPD welcome the recognition of new levels of compliance for paragraphs 153, 156, 158, 160, 168, 171, 189, 207, 213, 217, and 231. Throughout this reporting period, the Department has prioritized the development and implementation of policies, training, and operational practices to meet these benchmarks.

The City and CPD respectfully seek clarification regarding the IMT's methodology for assessing Full Compliance under paragraph 162 of the Consent Decree. We maintain that we have satisfied the requirements of this paragraph and should be recognized as fully compliant. The Department's Annual Use of Force Report, published each June, provides substantial evidence that officers consistently offer individuals the opportunity to comply voluntarily when it is safe and feasible. This report includes detailed data on contributing actions by individuals and outlines the force mitigation strategies employed by officers. The 2024 Annual Use of Force Report [MONITOR2682, pages 83 and 90] contains the most recent and relevant data supporting these practices.

The City and CPD also respectfully disagree with the methodology reflected in the IMT's spreadsheet, which suggests that Full Compliance under Paragraph 162 is contingent upon additional data from an upcoming audit on verbal warnings. CPD asserts that this requirement is misplaced, as verbal warnings are not addressed in Paragraph 162. Instead, they are explicitly covered in Paragraphs 183, 200, 209, and 214. Therefore, CPD urges the IMT to reconsider its current assessment and recognize that the Department's documented efforts fulfill the specific obligations outlined in paragraph 162.

The City and CPD seek clarification regarding the IMT methodology for assessing Full Compliance under Paragraph 198. CPD maintains that it has met the requirements of this paragraph and should be recognized as fully compliant. Paragraph 198 requires that officers receive training on the potential injuries associated with Taser deployment and the importance of considering the subject's offense prior to use. These elements are incorporated into CPD's Taser training curriculum, most recently submitted as part of the 2024 Taser 10/ABLE training, which achieved a 95% compliance rate [MONITOR2350]. In addition to training, CPD has implemented robust oversight mechanisms. The Tactical Review and Evaluation Division (TRED) reviews all Level 2 Taser discharge incidents, while the Force Review Board (FRB)—or the Civilian Office of Police Accountability (COPA), when applicable—review all Level 3 discharges. The 2024 TRED Year-End Report [MONITOR2681, pages 60–62] includes detailed debriefing points related to Taser discharges and confirms that no officers required debriefing for failure to meet the standards outlined in Paragraph 198. Further supporting data is included in the 2024 Annual Use of Force Report [MONITOR2682, pages 97–99, 111], which provides additional insights into Taser-related incidents and officer conduct. Taken together, these efforts demonstrate CPD's adherence to the requirements of paragraph 198 and support the finding of Full Compliance.

The City and CPD posit there may be a scrivener's error associated with Paragraph 199 and respectfully request clarification from the IMT regarding the current level of compliance. CPD

seeks to ensure that the assessment accurately reflects the Department's adherence to the requirements outlined in this paragraph.

The City and CPD seek clarification regarding the IMT's methodology for assessing Full Compliance under paragraph 228. CPD maintains that it has met the requirements for both Secondary and Full Compliance. Secondary Compliance has been consistently demonstrated through training documentation that confirms supervisors are being trained on their responsibilities. Supporting evidence includes the 2025 Annual In-Service Supervisor Training [MONITOR2475] and the 2024 Supervisor Training Compliance Report [MONITOR2357]. While the IMT has previously expressed concerns about the perceived limited role of supervisors in field and district-level operations, CPD highlights that the TRED reports show supervisors actively reviewing incidents, identifying issues, and making recommendations. These actions reflect meaningful engagement in front-line supervision and reinforce accountability within units. The most recent data supporting Full Compliance is detailed in the 2024 TRED Year-End Report [MONITOR2681, pages 54–56, 58], which further illustrates supervisors' involvement in oversight and operational effectiveness.

The City and CPD seek clarification regarding the IMT's methodology for assessing Full Compliance under paragraph 234. Full Compliance is supported by recent data presented in the 2024 TRED Year-End Report [MONITOR2681, pg. 58], which documents recommendations made by TRED for investigating supervisors. These findings and recommendations reflect CPD's commitment to accountability and supervisory engagement in use of force incidents. Additional supporting data is provided in the 2024 Annual Use of Force Report [MONITOR2682, pages 45, 51–53, 109–111], which further documents CPD's review processes and oversight mechanisms. This demonstrates that CPD has established mechanisms for accountability and oversight, ensuring that supervisory responsibilities are actively monitored and enforced. CPD respectfully requests clarification on the IMT's assessment criteria and affirms that the Department's documented practices fulfill the obligations outlined in paragraph 234.

TRAINING

The City and CPD welcome the recognition of new levels of compliance for paragraphs 277, 294, 298, 299, 305, 306, 307, 313, 315, 316, 317, 318, and 324.

The City and the CPD seek clarification regarding the IMT's methodology for assessing Secondary Compliance under Paragraph 286. According to the IMR-12 Report, achieving Secondary Compliance requires CPD to receive approval from both the IMT and the OAG, followed by finalization and implementation of the Department Notice. CPD submitted the relevant materials on June 12, 2025, to both the IMT and OAG, and has on file a Notice of No Objection (NOL) from the IMT. While the IMT commentary outlines its approach to assessing Secondary Compliance, Paragraph 286 is currently marked as under assessment for Preliminary Compliance. Given that the policy has received the IMT's NOL and considering the time elapsed since submission, CPD respectfully asserts that the Department has met the necessary conditions and should be granted Preliminary Compliance for this paragraph. (MONITOR2616)

The City and the CPD respectfully seek clarification of IMT's methodology for assessing Secondary Compliance under Paragraph 291. Specifically, the Audit Division notes that its' Audit of 2024 In-Service Training Records—an audit that has been conducted annually—was not

referenced in the draft report. To ensure alignment with compliance expectations, the Audit Division would appreciate clarification on whether this audit remains a necessary component for continued compliance with Paragraph 291.

SUPERVISION

The City and CPD would like to address several inaccuracies and points of clarification regarding the IMT's executive summary on Supervision. First, the summary on page 9 does not accurately reflect all districts participating in CPD's Unity of Command and Span of Control Pilot Program. CPD confirms that the program is active in districts 008, 014, 015, 016, 017, 020, and 024. Second, the data referenced in footnote 29 of the executive summary omits information from periods 2, 4, and 6. CPD provided data for periods 2 and 4 in the April 2025 monthly report, and data for period 6 was submitted in June. Additionally, CPD submitted quarterly screenshots of metrics for all pilot districts via DST, covering all relevant periods. Third, footnote 30 of the executive summary incorrectly states CPD's target goal for the Unity of Command and Span of Control initiative as 80%, when the correct target is 70%. Finally, CPD submitted documentation for 2025 In-Service Supervisors through Monitor2475, but IMR 12, page 47, inaccurately reports that these materials were not provided.

OFFICER WELLNESS AND SUPPORT

The City and CPD welcome the recognition of new levels of compliance for paragraphs 381, 383, 384, 388, 389, 391, 393, 394, 395, 398, 402, 404, 406, 407, 408, 409, 410, 411, 412, 413, and 415.

The City and CPD seek clarification on the IMT's methodology for Full Compliance for paragraph 385. CPD has exceeded the requirements of Paragraph 385 through the development, implementation, and sustainment of a comprehensive Communication Strategy in both 2023 and 2025 [MONITOR2608]. These strategic plans have resulted in meaningful outreach and engagement efforts that effectively inform department members about the mental health and wellness resources, services, and support available through CPD. They also address stigma, misinformation, and other barriers to accessing services, while emphasizing officer wellness as a core component of departmental operations. The 2025 Annual Report to the Superintendent includes data on wellness roll calls, training, and outreach activities, demonstrating that the Professional Counseling Division (PCD) consistently provides information on available wellness resources and support. The 2025 Communication Strategy outlines CPD's long-term plan to sustain wellness-related outreach and engagement, including protocols for data collection, evaluation, and reporting—further reinforcing CPD's commitment to meeting the evolving wellness needs of its members. Additionally, in 2025, Officer Wellness Liaisons (OWLs) within the Wellness Section began conducting in-person district roll calls to regularly disseminate information on CPD's wellness offerings. Data related to these outreach efforts, including OWL-led roll calls, will continue to be documented in the Annual Report to the Superintendent [MONITOR2550] and discussed during monthly IMT/OAG Wellness calls. These ongoing efforts highlight CPD's dedication to implementing, sustaining, and enhancing its Communication Strategy and its associated wellness objectives.

The City and CPD are seeking clarification regarding the status of paragraph 418. This paragraph was included in the first draft of IMR-12 but is absent from the second draft. CPD seeks to understand why it was omitted and to confirm the current compliance designation.

ACCOUNTABILITY

The City and CPD seek clarification on the IMT's assessment of paragraphs 488-491. The City and CPD maintain that the requirements outlined in these paragraphs have been met and warrant recognition at the level of Preliminary Compliance. The issuance of General Order G06-03 "Firearm Discharge and Officer Involved Death Incident Response and Investigation" fully addresses the requirements in paragraphs 488-491. The directive completed the 627 process and was published on April 15, 2021. It has also undergone two 636 reviews alongside the full suite of use of force policies. Furthermore, training has been delivered and observed by IMT, OAG, and the Judge during IMR 12. Additionally, the IMT attends the Force Review Board where Officer-involved Shootings and Deaths are fully examined. Consequently, the City and CPD assert it should be in Preliminary Compliance with paragraphs 488-491.

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

The City and CPD welcome the recognition of new levels of compliance for paragraphs 834 and 858.

The City and CPD seek clarification on the IMT's methodology for Full Compliance for paragraph 827. As part of its commitment to responsive and data-driven training development, CPD produced the 2025 Training Needs Assessment on May 15, 2025 [MONITOR2546]. This assessment effectively identified the need for additional training related to investigatory stops, protective pat downs, and enforcement of Loitering Ordinances. Importantly, the assessment incorporated both community input and feedback from the 4ASRU feedback loops, ensuring that training priorities reflect the concerns and expectations of both internal and external stakeholders. The City and CPD respectfully request that this comprehensive and collaborative approach be recognized as meeting the criteria for Full Compliance under this paragraph.

The City and CPD seek clarification on the IMT's methodology for Preliminary Compliance for paragraph 836. Paragraph 836 requires that CPD submit a plan to address areas of need to the Monitor and OAG for the review and approval process. CPD submitted this plan "¶861 Plan" on 15MAY25 (MONITOR2547). The paragraph does not require that the plan, or any aspect of the plan, is fully implemented, as "codifying in department policy the Universal Stop Application" would suggest. Implementation requirements are monitored by other paragraphs.

The City and CPD seek clarification on the IMT's methodology for Full Compliance for paragraph 838. While the new Stop Application will provide for more comprehensive data collection and reduce errors, CPD's ability to maintain and preserve electronic versions of ISRs, Stop Reports, and LDRs is existent in the currently deployed systems (i.e. CLEARNet). CPD continues to actively maintain and preserve electronic records, which constitutes Full Compliance. See 2024 TRED Mid-Year Report (23JAN25 MONITOR2515).

The City and CPD seek clarification on the IMT's methodology for Full Compliance for paragraph 839. CPD has demonstrated its feedback loop from supervisors to CPD members. See extensive discussion on this loop in the 2024 TRED Mid-Year Report (23JAN25 MONITOR2390: pg. 77).

The City and CPD seek clarification on the IMT's methodology for Full compliance for paragraph 852. CPD provided a Notice of Job Opportunity (NOJO) package (06 June 2024 MONITOR2059) showing CPD continues to maintain and staff 4ASRU as the designated unit to conduct Department-level reviews of representative ISRs and Stop Reports.

The City and CPD seek clarification on the IMT's methodology for Secondary Compliance for paragraph 859. As demonstrated in the 2024 TRED Mid-Year Report, pg. 78 (23JAN25, MONITOR2390), which discusses CPD's implementation of the "five times deficient" rule and data. Accordingly, CPD asserts it has achieved Secondary Compliance.

The City and CPD seek clarification on the IMT's methodology for Preliminary compliance for paragraph 861. This paragraph requires that CPD develops and consults on a timeline for implementation of the recommendations provided for in ¶860(f). CPD submitted this timeline "¶861 Plan" on 15MAY25 (MONITOR2547). The paragraph does not require that the timeline, or any aspect of the timeline, is fully implemented, as "codify[ing] in department policy the Universal Stop Application" would suggest. Implementation requirements are monitored by other paragraphs.

The City and CPD are seeking clarification for Secondary Compliance for paragraphs 862, 863, and 864. CPD has provided a plan for community engagement on investigatory stops, protective pat-downs, and enforcement of the loitering ordinances. CPD provided DD22-08 "Community Engagement Policies" (05 December 2024 MONITOR2295) which demonstrates that the department is making strides in establishing a process to continue to meaningfully engage the community in the development of CPD policy and training to promote trust between CPD and the communities that it serves.

The City and CPD seek clarification on the IMT's methodology for Preliminary Compliance for paragraph 872. Compliance level should be "Non-Assessable IMR-12" not "None." This paragraph should not be assessable until IMR-13, as it stipulates that CPD is to conduct an assessment two years after 27 June 2023, when the stipulation was filed.

Sincerely,

/s/ Jackie L. Thompson, Jr.
Deputy Corporation Counsel
City of Chicago Department of Law
Public Safety Reform Division

cc: Allan Slagel
Scott Spears
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Anthony-Ray Sepulveda
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Attachment B:
City of Chicago
Comments
(October 9, 2025)
