

Independent Monitoring Report 13

Impartial Policing

Compliance Assessments by Paragraph

Specific compliance assessments, by paragraph, for the Impartial Policing section are available here. This includes paragraphs where the City gained or lost compliance in the thirteenth reporting period, as well as paragraphs with significant developments toward or away from compliance. A fuller description of the history of compliance efforts, methodologies, compliance determinations for each original monitorable paragraph in the Impartial Policing section is available in *Comprehensive Assessment Part I* (which included *Independent Monitoring Report 8*): <https://cpdmonitoringteam.com/imr-8-1/>.

Impartial Policing: ¶52

52. In developing or revising policies and training referenced in this section, CPD will seek input from members of the community and community-based organizations with relevant knowledge and experience through community engagement efforts.

Compliance Progress

(Reporting Period: July 1, 2025, through December 31, 2025)

Preliminary: *In Compliance* (THIRD REPORTING PERIOD)
Secondary: *In Compliance* (NEW)
Full: *Not Yet Assessed*

In the thirteenth reporting period, the City and the CPD achieved Secondary compliance with the requirements of ¶52.

In prior reporting periods, the City and the CPD worked towards Secondary compliance by developing their *Community Engagement Plan* and delivering the *Equity Framework* and *Equity Action Plan*. To evaluate Secondary compliance, the IMT analyzed the CPD's efforts to develop these materials and engage with the community throughout the development of all training materials and policies. In the thirteenth reporting period, the City and the CPD provided its *2026 Community Engagement Plan*,¹ which outlined the policies and trainings for which the CPD will seek community input, as part of the development and revision process.

With this effort, the City and the CPD achieved Secondary compliance for ¶52. To sustain Secondary compliance, the CPD and the Office of Equity and Engagement must provide annual plans and reports, which the IMT will evaluate for continued compliance with the requirements of ¶52. Further, the CPD must develop tracking mechanisms (*i.e.*, intake forms, tracking sheets) to demonstrate its implementation of S02-08, *Community Engagement in Policy Development*.

Looking forward, to assess Full compliance, the IMT will evaluate the outcomes of feedback provided by the community members and community groups on the development of policies and training materials. By analyzing the level to which feedback is taken into consideration and applied, as well as by evaluating feedback from the community and community groups on the practice of community engagement itself, the IMT will determine whether the City and the CPD are abiding by the requirements of ¶52. To this end, comprehensive information on the community feedback loop should be included with the production of all materials covered by ¶52 so that we may review adherence to these requirements.

¹ See the CPD's *2026 Community Engagement Plan*, *Equity Framework*, and *Equity Action Plan* on the CPD's Office of Equity and Engagement webpage: <https://www.chicagopolice.org/equity/>.

Paragraph 52 Compliance Progress History

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

Impartial Policing: ¶53

53. The CPD will, consistent with this Agreement, ensure that its policies and practices prohibit discrimination on the basis of any protected class under federal, state, and local law, including race, color, sex, gender identity, age, religion, disability, national origin, ancestry, sexual orientation, marital status, parental status, military status, source of income, credit history, criminal record, or criminal history. The CPD’s policies and practices will prohibit retaliation consistent with Section 6-101 of the Illinois Human Rights Act (eff. Jan, 1, 2015) and Section 2-160-100 of the Municipal Code of Chicago (amended Oct. 11, 2017).

Compliance Progress

(Reporting Period: July 1, 2025, through December 31, 2025)

Preliminary: *In Compliance (TENTH REPORTING PERIOD)*
Secondary: *In Compliance (NEW)*
Full: *Not Yet Assessed*

In the thirteenth reporting period, the City and the CPD achieved Secondary compliance with the requirements of ¶53.

During previous reporting periods, the City and the CPD worked towards Secondary compliance by developing and delivering the *Equity Framework* and *Equity Action Plan*.² To achieve Secondary compliance, the IMT evaluated the CPD’s ability to finalize the *Equity Action Plan* and complete the revisions and development of the policies identified in the *Framework* and *Plan*. In the thirteenth reporting period, the City and the CPD finalized their *Persons with Disabilities* policy suite³ (S02-07)—including S02-07-03, *Interactions with Persons Who Are Deaf, Deafblind, or Hard of Hearing*—that reflect the requirements of this paragraph. The completion of the S02-07 policy suite marked the completion of all the CPD’s impartial policing policies noted within the *Equity Framework* and *Equity Action Plan*.^{4, 5}

With these efforts, the City and the CPD achieved Secondary compliance with ¶53. To sustain Secondary compliance the CPD must ensure the policies and trainings noted in the Equity Office Action Plan are periodically reviewed to determine if

² See the CPD’s *Equity Framework*, and *Equity Action Plan* on the CPD’s Office of Equity and Engagement webpage: <https://www.chicagopolice.org/equity/>.

³ The policies in the suite include: S02-07, Interactions with People with Disabilities, S02-07-02, Interactions with Persons with Non-Visible Disabilities, S02-07-01, Interactions with Persons with Physical Disabilities, S02-09 Interactions w/ Persons Who are Deaf, Deaf Blind, or Hard of Hearing

⁴ Other policies noted within the *Equity Framework* and *Equity Action Plan* included the foundational policies G02-01 (Protection of Human Rights), G02-04 (Prohibition of Racial Profiling and Other Bias-Based Policing, as well as S02-01-03, G04-06, G02-01-04, G02-01-03, S02-01-05, G08-05, G02-01-05, S06-14-03, and S02-01-07.

⁵ Policies also prohibit retaliation consistent with Section 6-101 of the Illinois Human Rights Act (eff. Jan, 1, 2015) and Section 2-160-100 of the Municipal Code of Chicago (amended Oct. 11, 2017).

they need to be updated and/or revised to meet the needs of the department and the community it serves, as well as provide documentation of such.

Looking forward, to assess Full compliance, the IMT will evaluate the outcomes of the practical application of the concepts outlined in the impartial policing policies by reviewing outcomes from audits, public sentiment surveys, and other community data sources. This information should be included in the annual public Office of Equity and Engagement reports.

Paragraph 53 Compliance Progress History

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

Impartial Policing: ¶61

61. Within 180 days of the Effective Date, CPD will review and, as necessary, revise its policies guiding CPD members' interactions with transgender, intersex, and gender nonconforming individuals, including protocols for arrests, pat downs and searches, transportation, and detention, in order to ensure that, at a minimum: a. terms are properly defined; b. CPD members address individuals, using the names, pronouns, and titles of respect appropriate to the individual's gender identity as expressed or clarified by the individual; c. CPD members refer to individuals in documentation by the name and gender identity as expressed or clarified by the individual, in addition to the information provided on the individual's government-issued identification; d. where same-sex pat downs or searches are required by law or CPD policy, CPD members will respect the gender identity as expressed or clarified by the individual and not rely on proof of the individual's gender identity, such as an identification card, except when a pat down is immediately necessary and waiting for an officer of the same gender would compromise officer or public safety; e. absent exigent circumstances, a transgender, intersex, or gender nonconforming individual is not transported or detained with individuals of a different gender, and that when determining the gender of that individual, CPD members will respect the gender identity as expressed or clarified by the individual and not rely on proof of the individual's gender identity, such as an identification card; and f. CPD members are prohibited from inquiring about intimate details of an individual's anatomy, or medical history, except as necessary to serve a valid law enforcement purpose.

Compliance Progress

(Reporting Period: July 1, 2025, through December 31, 2025)

Preliminary: *In Compliance* (FOURTH REPORTING PERIOD)
Secondary: *In Compliance* (NEW)
Full: *Not Yet Assessed*

In the thirteenth reporting period, the City and the CPD achieved Secondary compliance with the requirements of ¶61.

Following the finalization of the General Orders G02-01-03, *Interactions with Transgender, Intersex, and Gender Nonconforming (TIGN) Individuals* and G06-01-01, *Field Arrest Procedures*, the CPD faced challenges in advancing to Secondary compliance, due to changes in leadership among community stakeholders in the TIGN Working Group, which delayed the development of the associated training curriculum. During this time, the CPD relied on broader courses like *Constitutional Policing* and *Fair and Impartial Policing* to cover some relevant concepts, but a dedicated TIGN training module remained incomplete.

During the thirteenth reporting period the City and the CPD finalized the *Interactions with TIGN Individuals eLearning* module. The IMT and the OAG reviewed and approved the curriculum to ensure it effectively teaches officers the requirements of G02-01-03, *Interactions with Transgender, Intersex, and Gender Nonconforming (TIGN) Individuals*, specifically regarding respectful address, search protocols, and

secure transportation as subparagraphs a.–f. require. The CPD also successfully re-engaged community stakeholders to review the final training materials, closing the feedback loop that had stalled in previous years. By the end of the reporting period, the CPD provided training attendance records demonstrating that over 95% of active-duty personnel had completed the course.

The CPD also established and documented supervisory protocols to ensure the policy is followed in the field, such as reviewing arrest reports to verify that correct names and pronouns are used in documentation, thereby achieving Secondary compliance.

Looking forward, to assess Full compliance the IMT will evaluate complaint data related to this paragraph specific to bias-based, discrimination, and profiling complaints on TIGN status, conduct interviews with community members and organizations representing these communities, and review data and feedback gathered as part of CPD’s community survey. This information should be included in the annual reports prepared by the Office of Equity and Engagement.

Paragraph 61 Compliance Progress History

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

Impartial Policing: ¶63

63. Within 180 days of the Effective Date, CPD will develop and implement a policy that prohibits sexual misconduct by CPD members. The policy will be consistent with best practices and applicable law and will provide definitions of various types of sexual offenses, including those that are not criminal in nature.

Compliance Progress

(Reporting Period: July 1, 2025, through December 31, 2025)

Preliminary: *In Compliance* (EIGHTH REPORTING PERIOD)

Secondary: *In Compliance* (NEW)

Full: *Not Yet Assessed*

In the thirteenth reporting period, the City and the CPD achieved Secondary compliance with the requirements of ¶63.

Following the codification of General Order G08-06, *Prohibition of Sexual Misconduct*, the CPD shifted focus to the development of the required training curriculum. Secondary compliance depended on the quality of training lesson plans, the level of community engagement in their development, and the successful delivery of training to the CPD. By the twelfth reporting period, the CPD was actively developing the *Prohibition of Sexual Misconduct* eLearning. Consistent with the requirements for this sensitive topic, the CPD demonstrated that it had solicited and incorporated input from relevant community stakeholders and victim advocacy groups during the training's development. The IMT and the Office of the Illinois Attorney General (OAG) provided a final review of the curriculum and determined that the course content accurately reflected the prohibitions and reporting requirements of G08-06.

During the thirteenth reporting period, the CPD launched its *Prohibition of Sexual Misconduct* eLearning department-wide and provided attendance records demonstrating that over 95% of active-duty personnel had completed the training. The delivery of this eLearning ensured that the policy was not just written but also understood by the workforce. As a result, the City and the CPD achieved Secondary compliance.

Looking forward, to assess Full compliance the IMT will review complaints regarding sexual misconduct for compliance with the requirements of this paragraph.

Paragraph 63 Compliance Progress History

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

Impartial Policing: ¶68

68. Before January 1, 2020, CPD will review and, to the extent necessary, revise its policies and practices for ensuring effective communication and meaningful access to CPD programs, services, and activities for individuals with physical, mental, or developmental disabilities. These policies will identify specific procedures and responsibilities applicable to circumstances in which CPD officers encounter persons with intellectual or developmental disabilities, autism, dementia, blindness, deafness, hearing loss, and mobility disabilities, including, but not limited to: a. properly defining terms related to individuals with disabilities and the disability community; b. providing reasonable accommodations, to the extent safe and feasible, in order to facilitate CPD officer encounters with individuals with a disability; c. the arrest and transport of individuals with disabilities or who require the assistance of ambulatory devices; and d. using qualified and Department-authorized interpreters, consistent with CPD policy, to communicate with people who are deaf, hard of hearing, or who have a speech impairment, including for the provision of Miranda warnings.

Compliance Progress

(Reporting Period: July 1, 2025, through December 31, 2025)

Preliminary: *In Compliance (NEW)*
Secondary: *Not Yet Assessed*
Full: *Not Yet Assessed*

In the thirteenth reporting period, the City and the CPD achieved Preliminary compliance with the requirements of ¶68.

Early in the thirteenth reporting period, the CPD incorporated the final rounds of feedback on the S02-07, *Interactions with Persons with Disabilities* policy suite from the IMT, the OAG, and community stakeholders, like the Chicago Hearing Society. This ensured the policies adequately addressed critical areas such as the provision of reasonable accommodations and the use of qualified interpreters. During this reporting period, the IMT and the OAG issued no-objection notices for all the policies in the suite. At the end of the reporting period, the CPD published the finalized S02-07 policy suite formally codifying its protocols for interacting with individuals with physical, mental, and developmental disabilities, satisfying the foundational policy requirements of ¶68.

Looking forward, to achieve Secondary compliance, the CPD must finalize training materials pertaining to interactions with people with disabilities in accordance with the requirements of this paragraph.

We will also review the training materials for the engagement with the community per ¶52.

Paragraph 68 Compliance Progress History

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

Impartial Policing: ¶69

69. Before January 1, 2020, CPD will develop a training bulletin that provides CPD members guidance on interactions with people with disabilities, including: a. recognizing and responding to conduct or behavior that is related to an individual's disability, including qualifying medical conditions such as Alzheimer's disease and diabetes; b. providing effective communication and minimizing barriers to communication, including by incorporating sign language and other modes of communication used by people who are deaf, hard of hearing, or who have a speech impairment during police-community interactions; c. attending to the specific needs of individuals with disabilities, such as mobility devices, prosthetics, and service animals; and d. recognizing and responding to identified abuse, neglect, or exploitation of individuals with disabilities, including making any notifications required by CPD policy or the law.

Compliance Progress

(Reporting Period: July 1, 2025, through December 31, 2025)

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

In the thirteenth reporting period, the City and the CPD achieved Preliminary compliance with the requirements of ¶69.

Early in this reporting period, the CPD incorporated the final rounds of feedback on the S02-07, *Interactions with Persons with Disabilities* policy suite from the IMT, and the OAG. This ensured the policies adequately addressed critical areas such as the provision of reasonable accommodations and the use of qualified interpreters. The CPD published the finalized S02-07 policy suite formally codifying its protocols for interacting with individuals with physical, mental, and developmental disabilities, satisfying the foundational policy requirements of ¶69.

Looking forward, to assess Secondary compliance the IMT will evaluate training bulletins pertaining to interactions with people with disabilities for adherence with the requirements of this paragraph, including adequate consideration of cultural competencies. We will also review the training bulletins for engagement with the community per ¶52.

Paragraph 69 Compliance Progress History

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

Impartial Policing: ¶79-80

79. By April 1, 2020, and every year thereafter, CPD will conduct an assessment of the relative frequency of all misdemeanor arrests and administrative notices of violation (“ANOVs”) effectuated by CPD members of persons in specific demographic categories, including race and gender.

80. Prior to conducting this assessment, CPD will share its proposed methodology, including any proposed factors to be considered as part of the assessment, with the Monitor for review and approval. The Monitor will approve CPD’s proposed methodology provided that the Monitor determines that CPD’s methodology comports with published, peer-reviewed methodologies and this Agreement. Upon completion of the assessment, CPD will identify any modifications to CPD’s practices to address the findings in the assessment and develop a timeline for implementation, subject to Monitor review and approval. Upon completion of the assessment, CPD will publish the underlying data, excluding personal identifying information (e.g., name, address, contact information), via a publicly-accessible, web-based data platform.

Compliance Progress

(Reporting Period: July 1, 2025, through December 31, 2025)

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

In the thirteenth reporting period, the CPD achieved Preliminary compliance with the requirements of ¶¶79-80.

Paragraphs 79-80 require the CPD to conduct an annual assessment of the relative frequency of misdemeanor arrests and Administrative Notices of Violation (ANOVs) across demographic categories and the development of related methodologies. Through the twelfth reporting period, the CPD remained Not in Compliance. The primary obstacle was meeting the requirements to satisfy the prerequisite set forth in Paragraph 80: the submission of a revised proposed methodology for the assessment. During this period of stalled progress, the CPD cited a "lack of reliable data" and staffing shortages as the primary barriers to developing an IMT-approved analytical framework.

During the thirteenth reporting period, the CPD overcame these longstanding hurdles to achieve Preliminary Compliance by providing a revised methodology. To reach this milestone and to ensure the assessment framework met the necessary rigor, the CPD engaged external academic partners. This collaboration was initiated to address the "peer-reviewed" standards required by Paragraph 80. Working with these partners, the CPD developed a rigorous statistical methodology to assess misdemeanor arrests. This new framework was designed to account for complex variables that had previously hindered progress, specifically deployment patterns and crime rates, ensuring a more accurate analysis of demographic data.

Further, in working with its internal academic partners, the CPD identified limitations in the ANOV data, specifically the demographic information. As a result, changes to the ANOV citations were made to capture all data necessary to conduct the assessments required by these paragraphs. CPD and its academic partners have also developed and submitted to the IMT an implementation plan outlining the timeline for the revisions to the ANOV citations, the implementation of the new citation books, and subsequent gathering and analysis of data.

The IMT reviewed the revised methodology and implementation plan to confirm it met the standards of the Consent Decree. This approval satisfied the prerequisite for Paragraphs 79–80, and the CPD has achieved Preliminary Compliance. Sustaining compliance will be contingent on CPD’s ability to fulfill the tasks and actions outlined in the implementation plan and methodology.

Looking forward, to assess Secondary compliance the IMT will evaluate CPD’s completion of the analysis and assessments of both misdemeanor arrest data and ANOV citations.

Paragraph 79-80 Compliance Progress History

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