

**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 13

The Independent Monitor Margaret A. Hickey and the Independent Monitoring Team submit the attached *Independent Monitoring Report 13*.

Dated April 14, 2026

/s/Margaret A. Hickey

Margaret A. Hickey
ArentFox Schiff LLP
233 S. Wacker Drive, Suite 7100
Chicago, IL 60606
Telephone: (312) 258-5500
Facsimile: (312) 258-5600
maggie.hickey@afslaw.com

CERTIFICATE OF SERVICE

The undersigned attorney hereby certifies that, on April 14, 2026, she caused a true and correct copy of the foregoing ***Independent Monitoring Report 13*** 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

Margaret A. Hickey
ArentFox Schiff LLP
233 S. Wacker Drive, Suite 7100
Chicago, IL 60606
Telephone: (312) 258-5500
Facsimile: (312) 258-5600
maggie.hickey@afslaw.com



INDEPENDENT MONITORING REPORT 13

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

Report Date: April 14, 2026

Independent Monitoring Team

Chicago Police
Department
Consent Decree



Monitor Maggie Hickey

This report, *Independent Monitoring Report 13*, provides our compliance assessments for efforts from the second half of 2025: July 1 through December 31, 2025. As detailed in this report, the City of Chicago (City) and the Chicago Police Department (CPD) continue to prioritize and make significant progress with the Consent Decree.

Overall, the City has now achieved at least Preliminary compliance with about 97% of the original monitorable paragraphs (or 536 paragraphs), at least Secondary compliance with about 72% of paragraphs (or 395 paragraphs), and Full compliance with about 26% (or 146 paragraphs). In addition to paragraphs where the City and the CPD maintained compliance, the City gained additional levels of compliance with about 60 of these paragraphs—or about 11% of the original monitorable paragraphs—including 13 paragraphs that moved into Preliminary compliance, 29 paragraphs that moved into Secondary compliance, and 18 paragraphs that moved into Full compliance.

As reflected above, most of the City and the CPD's compliance gains were made toward Secondary compliance. These compliance gains are consistent with the City's and the CPD's dedicated efforts to develop, provide, evaluate, and improve training. For example, the CPD Training Division has demonstrated increasingly institutionalized efforts to incorporate community perspectives into the development and delivery of training. During this reporting period, the CPD expanded its engagement with community stakeholders, advocacy organizations, and subject-matter experts to ensure that training content reflects the lived experiences, concerns, and expectations of Chicago residents. These efforts are evident in key programs, such as the *Constitutional Policing Foundations course*, which was developed with external legal and community-informed perspectives, and the *Crisis Intervention and Wellness training*, which equips officers to respond to individuals in behavioral health crises using approaches grounded in community and public health input.

The CPD Training Division also integrated community collaboration into the *Active Bystandership for Law Enforcement (ABLE)* and policy training modules. This included partnerships with organizations such as the Center on Halsted to inform LGBTQ+ interactions, as well as broader engagement through the Training Community Advisory Committee (TCAC), which provides structured community input into curriculum design, review, and continuous improvement. In addition, the CPD has expanded opportunities for *Training Community Observation Days*, which allow community members to directly observe training delivery, interact with instructors, and provide feedback on instructional methods and course



Chief Rodney Monroe, Ret.



Dr. Theron Bowman

content. In fact, the CPD hosted community members and the Independent Monitoring Team (IMT) for the latest “Community Training Observation Day” just this past Saturday, April 11, 2026. These observation opportunities represent an important transparency mechanism and reinforce public confidence in the CPD’s training reforms.

Further, the CPD’s community survey and outreach efforts engaged more than 1,700 residents, youth participants, and community organizations, demonstrating a robust and data-informed approach to identifying training priorities. The inclusion of diverse voices through surveys, advisory committees, and direct observation reflects a comprehensive strategy to embed community input across the training lifecycle. Collectively, these initiatives represent a significant and commendable advancement toward a more transparent, accountable, and community-centered training framework.

One critical independent measure of community trust is the IMT’s surveys of “a broad cross section of members of the Chicago community regarding the CPD” (Consent Decree ¶1645). Following the Consent Decree, we have conducted our survey every two years and reported publicly on the results. Our most recent survey in 2024, for example, found that the levels of community trust of the CPD had risen nearly back to the level of trust found before March 2020 (35% in 2024, 20% in 2022, 37% in 2020). We are currently at work on our fourth citywide survey and will share our results later this year.

Separately, after the reporting period, the City and the CPD completed a long-awaited workforce allocation study.¹ This study has the potential to fundamentally shift the way the CPD approaches resource allocation and potentially expedite Consent Decree compliance. We look forward to monitoring and reporting on these efforts.

In the last reporting period, we noted that the City, the CPD, and the Office of the Illinois Attorney General (OAG) were seeking to address elements of the IMT’s *Comprehensive Assessment*, which included, among other things, strategies for accelerating full and effective compliance. (Consent Decree ¶¶657–59). Likewise, the City and the OAG continue to consider whether to request the Court to approve modifications to the Consent Decree “to achieve or sustain intended results.” (Consent Decree ¶659.) This continues to include potentially adding traffic stop requirements to the Consent Decree.

Finally, we would like to acknowledge the invaluable contributions of Associate Monitor for the Community Policing section of the Consent Decree, Steve Rickman, who passed away in November 2025. As a key contributor to policing reform across the country—and an integral member of the IMT and our Community Engagement Team since the inception of the Consent Decree—Steve Rickman significantly shaped our monitoring efforts, including this report. We continue this work in his honor.

¹ *Report on Workforce Allocation Study*, MATRIX CONSULTING GROUP (March 27, 2026), <https://www.chicagopolice.org/stories/cpd-wfa-cpa/>.

Table of Contents

Executive Summary	3
I. Community Policing	18
II. Impartial Policing.....	22
III. Crisis Intervention	25
IV. Use of Force.....	36
V. Recruitment, Hiring & Promotion	43
VI. Training	47
VII. Supervision	51
VIII. Officer Wellness and Support.....	59
IX. Accountability and Transparency.....	63
X. Data Collection, Analysis & Management	71
XI. Investigatory Stops, Protective Pat-Downs, and Enforcement of Loitering Ordinances.....	75
Conclusion, Looking Ahead to <i>Independent Monitoring Report 14</i>	81

Attachment A: Office of the Illinois Attorney General Comments (April 8, 2026)	86
Attachment B: City of Chicago Comments (April 9, 2026)	90

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, 2019.² 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.³

² 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.

³ As a party to the Consent Decree, the City is ultimately responsible for compliance. See ¶1720. Unless otherwise specified, references to the City include its relevant entities. See ¶1736.

This is *Independent Monitoring Report 13*. As in previous monitoring reports, this is an update to the Court and the public on compliance efforts during the thirteenth reporting period: from July 1, 2025, through December 31, 2025.⁴ 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 13*, 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.⁵

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

⁴ 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 13th 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>.

⁵ This report represents a six-month assessment of the City’s compliance efforts from July 1, 2025, through December 31, 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 December 31, 2025, and before the date we submit this report. Importantly, we have not assessed efforts made after December 31, 2025, in this report. We will do so in the monitoring report for the fourteenth reporting period (January 1, 2026, through June 30, 2026). 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/>.

efforts toward complying with a requirement—which in some cases it has—the City still has the additional burden of providing sufficient proof of its efforts with sufficient time for the IMT and the OAG to review the information.

We assess compliance at three levels: (1) Preliminary, (2) Secondary, and (3) Full. These compliance levels allow us to share our assessments of the City’s progress throughout the duration of the Consent Decree. Typically, these levels correspond with whether the City or its relevant entities have (1) created a compliant policy, (2) adequately trained personnel on that policy, and (3) successfully implemented the reform in practice.⁶ 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.⁷



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* ¶¶714–15.⁸ 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.

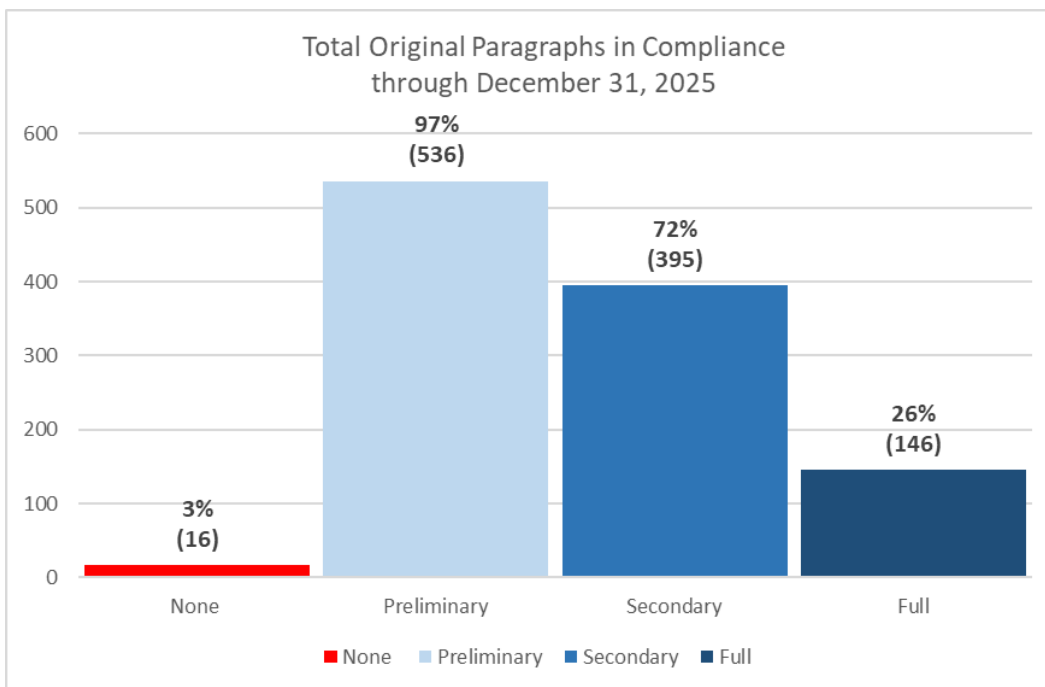
⁶ There are, however, many paragraphs that do not include policy or training elements. In those circumstances, the three levels may follow a different trajectory, such as (1) whether the City or its relevant entities have established the framework and resources to achieve the reform, (2) whether the 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.

⁷ 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.

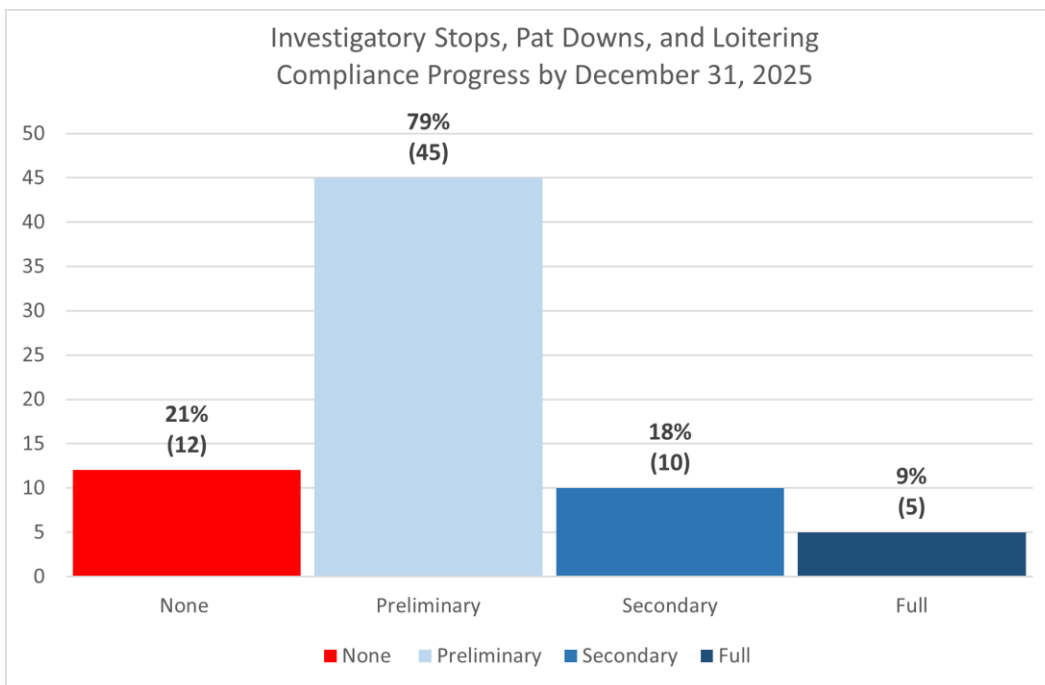
⁸ *See Stipulation Regarding Search Warrants, Consent Decree Timelines, and the Procedure for “Full and Effective Compliance,” Illinois v. Chicago*, Case No. 17-cv-6260 (March 25, 2022), <https://cpdmonitoringteam.com/wp-content/uploads/2024/03/2022.03.25-Stipulation-Regarding-Search-Warrants-Consent-Decree-Timeline.pdf>.

For the original monitorable paragraphs (552), the City has achieved at least Preliminary compliance with 536 paragraphs (or about 97%), at least Secondary compliance with 395 paragraphs (or about 72%), and Full compliance with about 146 paragraphs (or about 26%). More specifically, at the end of the thirteenth reporting period, and by December 31, 2025, the City remained in Preliminary compliance with 141 paragraphs, remained in Secondary compliance with 249 paragraphs, and achieved or maintained Full compliance with 146 paragraphs—leaving 16 paragraphs with no levels of compliance (or about 3%).

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.

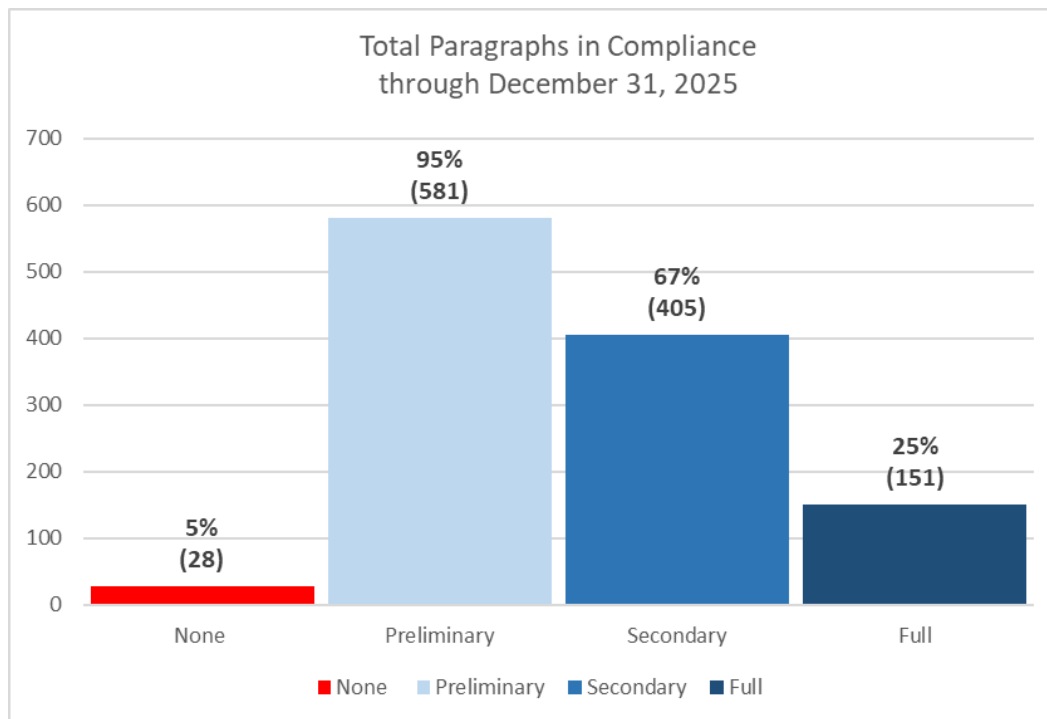


In the thirteenth reporting period, the IMT continued to assess monitorable paragraphs in the more recently added Investigatory Stops, Protective Pat-Downs, and Enforcement of Loitering Ordinances section of the Consent Decree. As reflected below, the IMT assessed the City’s compliance with 57 of these paragraphs in the thirteenth reporting period, and by December 31, 2025, the City received at least Preliminary compliance with 45 paragraphs (or about 79%), at least Secondary compliance with 10 paragraphs (or about 18%), and Full compliance with five paragraphs (or about 9%). More specifically, the City and the CPD remained in Preliminary compliance with 35 paragraphs, Secondary compliance with five paragraphs, and Full compliance with five paragraphs. As a result, the City does not have compliance with the remaining twelve paragraphs under review to date. In the coming reporting periods, the IMT will continue to assess additional paragraphs.⁹



⁹ See [ISR Stipulation Figure 1](#) for additional information about which paragraphs will be monitored in future reporting periods.

As a result, including all monitorable paragraphs in the thirteenth reporting period (609 paragraphs), the City has achieved Preliminary compliance with 581 paragraphs (about 95%), Secondary compliance with 405 paragraphs (about 67%), and Full compliance with 151 paragraphs (about 25%)—leaving 28 paragraphs with no levels of compliance.¹⁰



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.

¹⁰ Conclusion Figure 3 reflects the current compliance status of all monitorable paragraphs to date.

Executive Summary Figure 1. Sample of Principal Achievements & Challenges

Section	Sample of Principal Achievements	Sample of Principal Challenges
Community Policing	<ul style="list-style-type: none"> The CPD finalized and deployed its Digital Resource Guides to officer mobile devices, moving community-based partnerships and services from administrative lists to functional field tools. This searchable, up-to-date directory of social services removes previous logistical barriers to connecting the public with services thereby achieving new compliance with ¶19. While Secondary compliance is still under assessment for ¶37, the CPD achieved a strategic victory by formalizing a sustainable training model providing a comprehensive curriculum matrix that maps specific community policing requirements to its broader annual in-service training. The CPD is moving beyond treating the District Strategic Plans (DSPs) as static documents and has successfully operationalized both quarterly and annual reviews demonstrating that District Commanders are not just filing reports but are actively using these tools to identify problem-solving opportunities for ¶45. The CPD assigned critical positions that aid in advancing levels of compliance in this section, including a Chief to oversee the efforts of the Office of Community Policing, as well as a Director and Deputy Director in the Office. The CPD also created a Victim Services Team with 10 new Victim Advocates. 	<ul style="list-style-type: none"> One of the most significant administrative challenges the CPD has faced over several reporting periods is the shift from an annual standalone training curriculum for community policing to an integrated matrix approach to meeting the requirements of ¶37. Instead of creating a separate "Community Policing" course, they opted to map these concepts across the general annual training curriculum. While the CPD has demonstrated that the broader curriculum is equivalent to a standalone module, they were not able to achieve the 95% completion rate by the end of 2025. With the finalization of the <i>Interactions with Youth</i> (G02-05) policy, the CPD has now pivoted to training the workforce and implementing deflection strategies in the field meeting the requirements of ¶32. However, the CPD is still working through the cultural and operational challenges of moving officers from a traditional enforcement mindset to a "deflection-first" approach for eligible youth to meet the requirements of ¶33. While the CPD established the mechanisms for community engagement (i.e., the district strategic planning process, and Beat and DAC meeting templates) demonstrating a process for incorporating feedback from a diverse cross-section of the community, additional documentation is needed to show how specific community suggestions directly resulted in changes to district problem-solving strategies for ¶¶45 and 46.

Section	Sample of Principal Achievements	Sample of Principal Challenges
Impartial Policing	<ul style="list-style-type: none"> • Finalized key policies governing interactions with persons with disabilities. The CPD completed and submitted the S02-07 policy suite on Interactions with Persons with Disabilities, formally establishing department-wide protocols for engaging with individuals with physical, mental, and developmental disabilities. • Advanced implementation of core Impartial Policing policies. The CPD finalized or substantially advanced several policies identified in its Equity Action Plan, including G02-06, <i>Gender-Based Violence Incidents</i>; G08-06, <i>Prohibition of Sexual Misconduct</i>; S02-08, <i>Community Engagement in Policy and Training Development</i>; and S02-07-03, <i>Interactions with Persons Who Are Deaf, Deafblind, or Hard of Hearing</i>. • Strengthened transparency and strategic planning related to equity and bias-free policing. The CPD published its <i>2024 Annual Hate Crimes Report</i> and submitted the final version of its <i>Equity Action Plan</i>, outlining departmental priorities for advancing impartial policing and improving community trust. • Implemented department-wide training on interactions with TIGN individuals. The City and CPD finalized and launched the Interactions with Transgender, Intersex, and Gender Nonconforming (TIGN) Individuals eLearning module, which was reviewed and approved by the IMT and the OAG. The training reinforces policy requirements related to respectful address, search procedures, and transportation protocols. The CPD records indicate that over 95% of active-duty personnel completed the training during the reporting period. • Operationalized the Prohibition of Sexual Misconduct policy through department-wide training. The CPD launched the <i>Prohibition of Sexual Misconduct eLearning</i> module, achieving over 95 percent completion among personnel, thereby reinforcing policy requirements and promoting department-wide awareness and compliance. 	<ul style="list-style-type: none"> • Demonstrating sustained compliance through data and reporting systems. As additional paragraphs reach Secondary Compliance, the CPD and its Office of Equity and Engagement must strengthen their data collection, analysis, and reporting systems to effectively demonstrate sustained implementation and progress toward Full compliance. • Ensuring consistent implementation of new policies through training and supervision. While the CPD has finalized several core policies related to impartial policing, the Department must continue ensuring that officers and supervisors consistently apply these policies in practice through ongoing training, supervision, and accountability mechanisms. • Institutionalizing community engagement in policy and training development. The CPD has taken steps to re-engage community stakeholders in reviewing policies and training materials. Sustaining these partnerships and ensuring that community feedback continues to inform departmental policies and practices remains an ongoing priority.

Section	Sample of Principal Achievements	Sample of Principal Challenges
Crisis Intervention	<ul style="list-style-type: none"> The CPD developed a working definition of “timely” enabling the City and CPD to achieve Preliminary compliance with ¶¶107–112 and begin establishing baseline data and accountability for its response times. The CPD developed a draft of its comprehensive <i>Crisis Intervention Officer Implementation Plan</i>. The City developed a <i>Crisis Intervention Plan Scope of Work</i>, which provides a roadmap for completing the <i>Crisis Intervention Plan</i> required by ¶¶122–23 within the next year. The OEMC delivered its revised <i>Crisis Intervention and Mental Health Awareness 2-hour refresher training</i> required for telecommunicators. See ¶144, 146. 	<ul style="list-style-type: none"> The CPD’s Crisis Intervention Unit (CIU) continues to face challenges related to staffing. The CPD is not meeting the required response ratios by Certified CIT Officers for calls for service involving individuals in crisis. See ¶108. The OEMC must finalize its policy revisions, incorporating feedback from the IMT, OAG, and CCMHE, to maintain and/or achieve additional levels of compliance with several paragraphs. See, e.g., ¶¶138–40, 146, 148–49, 151. Although the City and the CPD committed to making the CPD’s CIT Dashboard public to increase transparency, by the end of the reporting period it was still not public facing.
Use of Force	<ul style="list-style-type: none"> The Firearm Pointing Pilot Program continues to advance, with additional district captains receiving training on Incident Debriefing Reviews (IDRs) that involve a firearm pointing incident. This reporting period, the CPD expanded this program into more districts. In 2026, Area Deputy Chiefs and District Commanders will have additional oversight responsibilities. Lieutenants will also be trained to review firearm pointing incidents. The City and the CPD achieved Preliminary compliance (and Secondary compliance) with the final three paragraphs in this Section that had not yet achieved any level of compliance, due to the finalization of S03-14, <i>Body Worn Cameras</i>, following the Court’s November 21, 2025 Order regarding public safety briefings.¹¹ 	<ul style="list-style-type: none"> TRED has not eliminated the backlog of IDRs for review, despite the creation of the firearm pointing pilot program, which moved IDRs involving firearm pointing incidents to the district-level. Body-worn camera policy violations remain a top debriefing point for CPD officers.¹² TRED will be revising its five-tiered body-worn camera progression matrix to three tiers. We look forward to continued improvements in policy compliance.

¹¹ See Memorandum Order, *Illinois v. Chicago*, Case No. 1:17-cv-06260 (Nov. 21, 2025), <http://cpdmonitoringteam.com/wp-content/uploads/2026/01/2025.11.21-Order-re-CPD-BWC-Policy.pdf>.

¹² TRED’s *2025 Mid-Year Report*, Chicago Police Department (December 30, 2025), at 8, <https://www.chicagopolice.org/wp-content/uploads/2025-TRED-MIDYEAR-REPORT-FINAL.pdf>.

Section	Sample of Principal Achievements	Sample of Principal Challenges
Recruitment, Hiring & Promotion	<ul style="list-style-type: none"> The City and the CPD developed and implemented strategic plans to improve internal communications among the CPD officers to increase transparency and officer awareness about the promotions process for the Commander rank. 	<ul style="list-style-type: none"> The lack of integration of disciplinary history into the promotions process is a material compliance issue, with implications for supervisory accountability, leadership legitimacy, and public trust under the Consent Decree. The City and the CPD struggled with the continuity of recruitment and hiring practices updates within the larger recruitment, hiring, and promotions framework.
	Training	<ul style="list-style-type: none"> The City and the CPD made significant progress towards enhancing the CPD’s instructor evaluation process, including the development of an electronic Performance Evaluation System (PES) including specialized role evaluations. The Field Training Evaluation Section continued progress towards compliance, demonstrating systematic management, evaluation, and improvements for the Field Training Program.
Supervision	<ul style="list-style-type: none"> CPD updated and finalized E05-01, <i>Performance Evaluations of All Sworn and Civilian Department Members Below the Rank of Superintendent</i> to include all sworn and civilian members. CPD improved its staffing dashboard tools and provided the IMT direct access to the Watch Sheet Application and the Unity of Command/Span of Control Tableau dashboard. The CPD announced plans to expand the Unity of Command and Span of Control Pilot Program to the 15th, 16th, 17th, 20th, and 24th districts. 	<ul style="list-style-type: none"> The CPD continued to face staffing instability in “Tier 1” districts, due in part to long term medical leaves, details to other assignments, and transfers out of districts. CPD supervisors have continued to express that staffing shortages and high workloads are hindering their ability to perform all supervisory duties such as responding to scenes, mentoring supervisees, and conducting timely performance evaluations. The CPD must continue to expand the Unity of Command and Span of Control Pilot Program to all 22 districts.
Officer Wellness & Support	<ul style="list-style-type: none"> The CPD continued to implement its <i>Officer Wellness Communications Strategy</i> by distributing palm cards and magnets featuring phone numbers to access employee assistance services, and by attending roll-calls to describe the wellness and support services available. 	<ul style="list-style-type: none"> The CPD continues to struggle to produce data tracking the provision of its Professional Counseling Division services, which are required to be provided on specific timelines (e.g., ¶¶407 and 408).

Section	Sample of Principal Achievements	Sample of Principal Challenges
Accountability & Transparency	<ul style="list-style-type: none"> The CPD developed and provided additional onboard and in-service training modules for BIA and Accountability Sergeants. The City and COPA implemented a new policy and plan for Phase 3 of the Community-Police Mediation Pilot Program, as well as developed training on the policy. The CCPSA continued its search for a new COPA Chief Administrator and continued related community outreach. 	<ul style="list-style-type: none"> Many Accountability Sergeants continue to have other responsibilities that significantly compete with their Accountability Sergeant duties (i.e., completing investigations within required timeframes), which is required 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	<ul style="list-style-type: none"> The City and the CPD revised its draft Data Systems Plan required by ¶1607, which will help guide the CPD’s technology evolution well into the future. 	<ul style="list-style-type: none"> We remain concerned about TRED staffing levels, which continue to fluctuate, as does its backlog of use-of-force cases requiring review.
Investigatory Stop Reports, Protective Pat Downs, & Enforcement of Loitering Ordinances	<ul style="list-style-type: none"> The CPD revised policy suites G03-08 <i>Street Stops and the Fourth Amendment</i> and S10-02 <i>Gang and Narcotics-Related Loitering</i>. The CPD developed the Temporary Detention Application and provided training to officers. The CPD consulted with the Training Community Advisory Committee (TCAC) to receive and incorporate feedback from community advisory board members for ISR-related training. 	<ul style="list-style-type: none"> The CPD needs to demonstrate additional community engagement on policies and training, in addition to community engagement on investigatory stops, generally. The CPD needs to make its revised investigatory stop and gang and narcotics loitering policies, G03-08 <i>Street Stops and the Fourth Amendment</i> and S10-02 <i>Gang and Narcotics-Related Loitering</i>, effective to achieve greater levels of compliance with multiple paragraphs.

Update on the Status of Implementation Plans and Training Materials

The Consent Decree outlines the plan review process in ¶¶638-640. As the City and the CPD develop and revise the plans through the Consent Decree process, they must consult with the IMT and OAG throughout the development and revision process. The City and the CPD must then provide the IMT and OAG with the final draft of the plan at least 30 days before the plan is proposed to be implemented (¶¶639–40). The IMT and the OAG then have 30 days to comment unless the IMT and/or OAG state in writing that additional time is necessary for an adequate review. The City, the CPD, the OAG, and the IMT then have at least 30 days to resolve comments. If we are unable to come to a timely agreement, an entity

may submit a formal objection, which triggers a “workout period” (¶1630). The entities then have an additional 30 days to resolve the issue before one of the Parties brings the issue to the Court to resolve (¶1630). On the other hand, when the IMT and the OAG approve, the City and the CPD can finalize the plan, which must be made public (¶1638–40).

As the City has worked to develop the plans and training materials over the last thirteen reporting periods, the City and the CPD have recently made significant progress providing drafts or final versions to the IMT and OAG for review and approval. Below we summarize in a table the progress the City has made for all plans required by ¶1638, with additional supporting context provided in the below subsections that include our summaries of compliance assessments within each section of the Consent Decree.

Plans that require Monitor and OAG approval per ¶1638	Draft(s) Provided to the IMT and the OAG	City / CPD Finalized	Final Versions Made Public
Crisis Intervention Plan (¶1122) <i>“Within 365 days of the Effective Date and on an annual basis thereafter”</i>	✓	✗	Not yet applicable
CIT Officer Implementation Plan (¶1108) <i>“Within 180 days of the Effective Date, CPD will develop an implementation plan”</i>	✓	✗	Not yet applicable
Training Plan (¶1272) <i>“Within one year of the Effective Date, and on an annual basis thereafter”</i>	✓	✓	✗
Span of Control and Unity of Command Plan (¶1360) <i>“By January 1, 2020, CPD will develop a staffing model to achieve the principles of unity of command and span of control”</i>	✓	✓	✗
Recruitment, Hiring, and Promotion Plans (¶¶1258–60) <i>“By December 31, 2020 and at least every three years thereafter”</i>	✓	✓	✗
Officer Support Systems Plan (¶¶1383–84) <i>“Within 60 days of the completion of the needs assessment, CPD will develop a plan”</i>	✓	✓	✗
Equipment and Technology Audit Response Plan (¶¶1415–16) <i>“Within 90 days of the completion of the initial audit, CPD will develop a plan, including a timeline for implementation”</i>	✗	✗	Not yet applicable
Training plans for COPA, Deputy PSIG, and BIA (¶1530) <i>“Within 90 days of the Effective Date”</i>	COPA: ✓ Deputy PSIG: ✓ BIA: ✓	COPA: ✓ Deputy PSIG: ✓ BIA: ✓	✗
Data Systems Plan (¶1607) <i>“Within 365 days of the Effective Date”</i>	✓	✗	Not yet applicable

The IMT’s Community Engagement Activities

The IMT continues its efforts to hear community voices and listen to the issues that matter most to Chicago’s communities with regard to policing and police reform. The IMT’s Community Engagement Team (CET) continues to host periodic community listening sessions and has also been visiting Community Commission for Public Safety and Accountability’s (CCPSA) District Councils throughout the city.

The IMT’s CET performs two key tasks regarding the Consent Decree monitoring process: (1) gathering input from Chicagoans about their concerns regarding CPD policies and practices, and (2) providing information to the Chicago community about the IMT’s activities and findings.

We sought to hear sentiments from a broad range of Chicagoans during the thirteenth reporting period. For example, Judge Rebecca Pallmeyer held a virtual public hearing on September 9, 2025. The judge heard from Chicagoans who voiced their concerns, observations, and ideas about Chicago Police Department reform. We also held a Listening Session in December 2025 in partnership with the University of Illinois Chicago’s Lawndale Neighborhood Center. Chicagoans shared their thoughts and concerns about policing with Independent Monitor Maggie Hickey, Associate Monitor for Data and Officer Wellness Dr. Laura Kunard, and members of the IMT’s Community Engagement Team.

Executive Summary Figure 2.

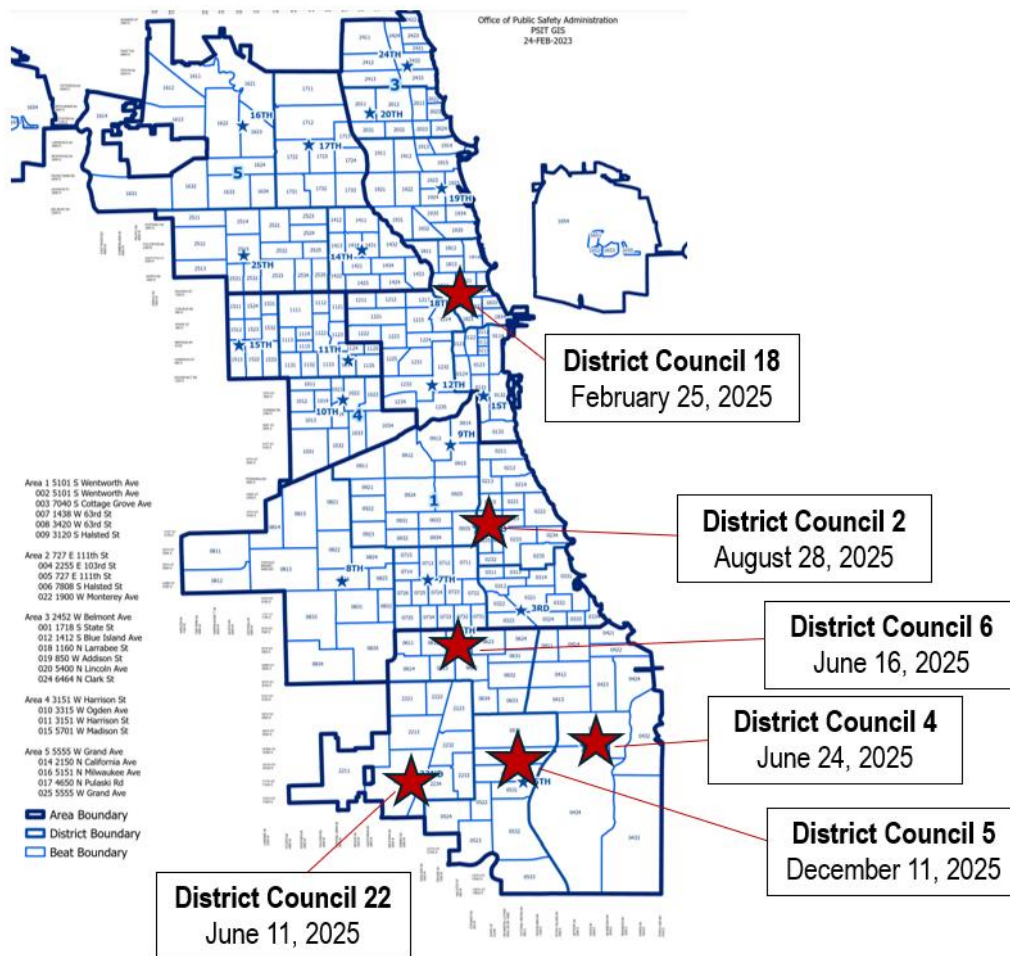
IMT Community Listening Session Flyer (December 4, 2025)



Combined with our visits to CCPSA District Council meetings in 2024, we have visited 14 of the 22 councils and plan to continue our visits in 2026. During our visits,

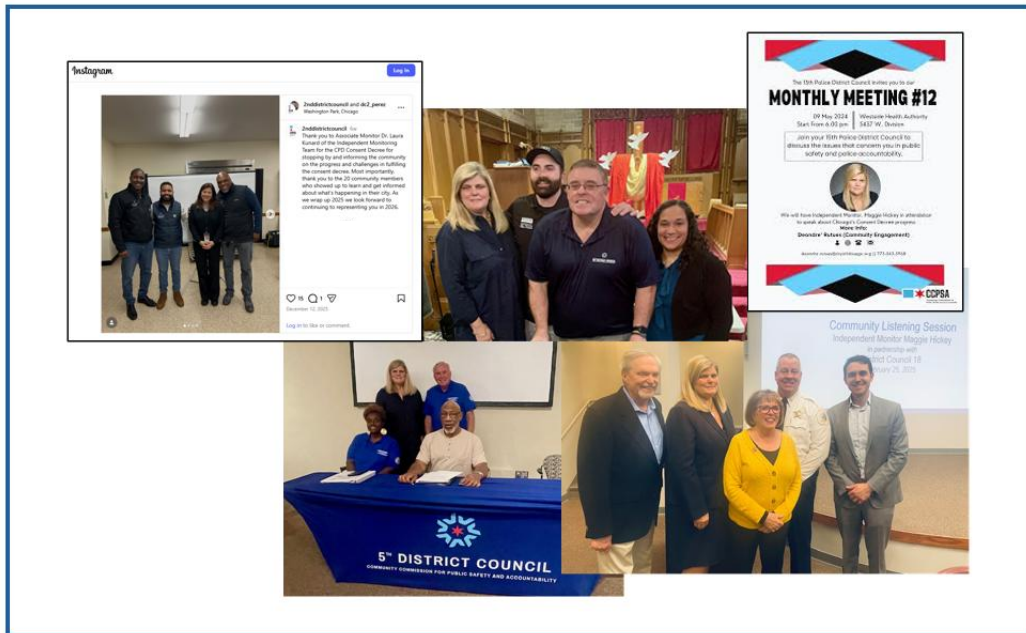
we provide some brief Consent Decree progress updates and listen to community members tell us about policing in their neighborhoods. The map below highlights our visits during the twelfth and thirteenth reporting periods (January 1, 2025, through December 31, 2025).

Executive Summary Figure 3.
IMT visits to CCPSA District Council locations in 2025



We also issued periodic newsletters, emails, and press releases to update community stakeholders on our monitoring activities throughout this reporting period; we continue to encourage community members to contact us anytime through our website www.cpdmonitoringteam.com.

Executive Summary Figure 4.
IMT and CET members visiting CCPSA District Councils in 2025



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 Pat Downs, and Enforcement of Loitering Ordinances

I. Community Policing

In the thirteenth 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 CPD continued to move toward advancing compliance levels for its community policing requirements in the thirteenth reporting period. Most notably, the City and the CPD demonstrated significant progress toward achieving Full compliance with ¶45 by building on the tracking infrastructure established in previous reporting periods. The CPD demonstrated that District Commanders are successfully conducting annual reviews of community policing strategies, that these reviews now explicitly incorporate input from a diverse cross-section of the community, and that District Strategic Plans (DSPs) are actively monitored and used to improve problem-solving strategies for reducing crime.

Additional progress toward Full compliance is noted for three paragraphs (¶¶14, 16, and 25) where the CPD focused efforts to achieve advanced levels of compliance. More specifically, the CPD moved toward Full compliance with ¶14 by demonstrating that the OCP is actively fulfilling its codified duties to oversee and support community policing strategies across the Department. For ¶16, the CPD provided evidence demonstrating that Area Deputy Chiefs and District Commanders are now regularly and substantively reviewing district strategies as required. For ¶25, the CPD demonstrated that standardized tracking templates, training guidance, and oversight processes are institutionalized and consistently used across districts to ensure Beat and DAC meetings and are occurring as scheduled and functioning as intended problem-solving forums. While these efforts did not ultimately advance the compliance level for any of these paragraphs during this reporting period, they set the City and the CPD up well for increased compliance in the periods to come.

During this reporting period, the City and the CPD moved toward Secondary compliance with ¶37 and achieved Secondary compliance with ¶¶19 and 32. The CPD achieved Secondary compliance with ¶¶19, and 32 by:

- ❖ Completing the requisite training to deploy the Digital Resource Guides (DRGs) department wide and thereby achieving Secondary compliance with ¶19. This

tool is now accessible to officers via the department’s intranet and mobile devices, allowing for immediate referrals to community services.

- ❖ Following the long-awaited finalization of the *Interactions with Youth Policy* (G02-05), the CPD achieved Secondary compliance with ¶32 by successfully developing and delivering the *Interactions with Youth eLearning* to the workforce, ensuring officers are trained on developmentally appropriate responses.

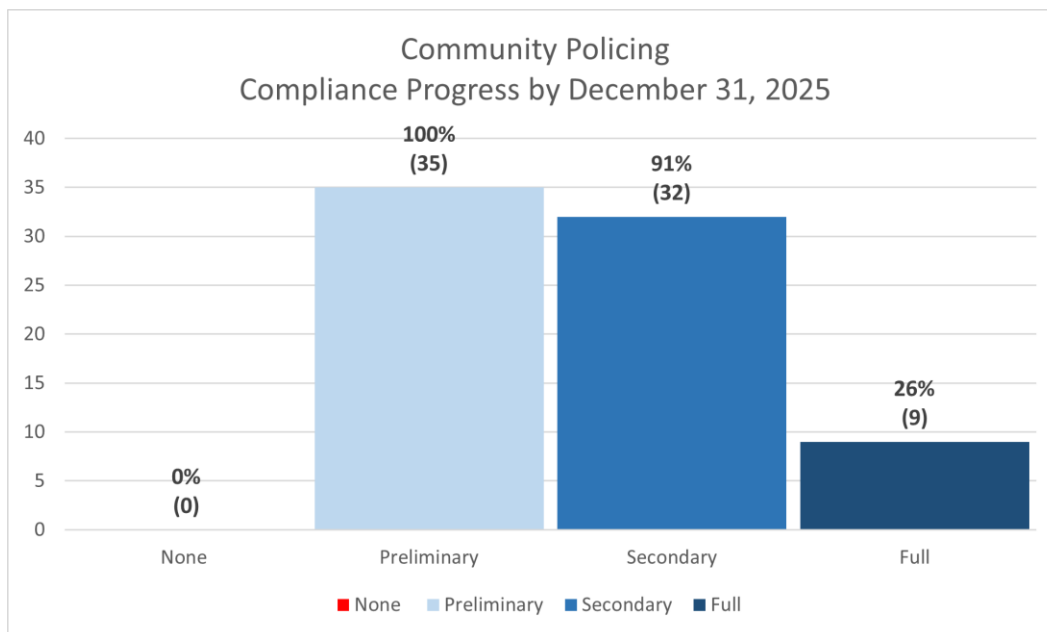
The CPD moved significantly closer to Secondary compliance with ¶37 by pivoting to an integrated training model, submitting a comprehensive matrix for the first time that identifies where specific community policing concepts—such as problem-solving techniques and adolescent development—are embedded within the broader annual in-service curriculum. By correlating this content mapping with training records demonstrating over 95% workforce completion, the CPD has established a potential pathway to meet the annual training requirement without a standalone course, pending the IMT’s validation that the mapped content sufficiently covers the required topics.

The thirteenth reporting period was defined by a critical transition from policy formulation to operationalization by demonstrating the institutionalization of workflows required for Full compliance. The CPD provided evidence that community policing structures have evolved from theoretical concepts into functioning parts of daily operations, specifically through the deployment of digitized resource directories (¶19), and the use of annual reviews to address resource gaps based on diverse community input (¶45).

Community Policing Progress through Thirteen Reporting Periods

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

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 Fourteenth Reporting Period

As noted above, the City and the CPD have made progress during the current reporting period. Looking ahead to the fourteenth reporting period, the IMT's assessment strategy will shift from verifying policy and training completion to auditing the operational impact and sustainability of these reforms. For paragraphs that recently advanced in compliance, the CPD must demonstrate that training is translating into field behavior and provide evidence that community policing concepts are being applied in daily interactions.

The IMT will also be looking to assess whether community inputs are meaningful and influential, specifically tracking whether Youth and District Advisory Committees are actively shaping Department-wide strategies (¶¶15 and 46) and whether public awareness campaigns continue to incorporate participatory feedback (¶28). Finally, to support a finding of durability requisite for the sustainment period, the CPD must demonstrate that compliance responsibilities are successfully managed by appropriate personnel over time (¶15), while maintaining consistent metrics for arrestee phone access (¶31) and demonstrating supervisory leadership in rewarding community-oriented policing (¶48). Consequently, the CPD should prioritize the preparation of outcome-based audits—rather than relying solely on output-based records like meeting minutes and training records.

Success in the fourteenth reporting period will therefore be defined not by what the CPD has built, but by how effectively those systems are functioning to serve the community.

Specific compliance assessments, by paragraph, for the Community Policing section are available here: <https://cpdmonitoringteam.com/wp-content/uploads/2026/04/1-IMR13-Community-Policing.pdf>. 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.¹³

¹³ 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 thirteenth reporting period, the City's and the CPD's progress toward compliance with the important requirements in the Impartial Policing section increased from the previous reporting period. The City and the CPD provided various policies for IMT and OAG review, receiving no-objection notices and advancing compliance for several paragraphs, as detailed below. These included the following CPD policies: G02-06 *Gender-Based Violence Incidents*, G08-06 *Prohibitions of Sexual Misconduct*, S02-08 *Community Engagement in Policy and Training Development*, and S02-07-03 *Interactions with Persons Who Are Deaf, Deafblind, or Hard of Hearing*. The CPD also produced its *2024 Annual Hate Crimes Report* and submitted the final version of its *Equity Action Plan*.

During this reporting period, the CPD also launched the department-wide administration of the *Responsible Use of Social Media and Prohibitions on Criminal and Biased Organizations eLearning* course. The City and the CPD also finalized – but did not deliver – its *Religious Interactions eLearning* consistent with G02-01-05, *Religious Interactions*, including requirements related to the search of individuals with religious garments and religious accommodations. See ¶60.

Similarly, finalization and implementation of the *Prohibition of Sexual Misconduct eLearning* helped the CPD achieve Secondary compliance with ¶63.

The CPD also achieved Preliminary compliance with the requirements of ¶¶53 and 68 after finalizing the related policy suite, which included S02-07, *Interactions with Persons with Disabilities*; S02-07-01, *Interactions with Persons with Physical Disabilities*; and S02-07-02, *Interactions with Persons with Non-Visible Disabilities*, after considering and incorporating feedback from the IMT, the OAG, and Chicago's communities. The CPD also achieved preliminary compliance with ¶¶79 and 80 by developing a rigorous statistical methodology to assess misdemeanor arrests specifically 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.

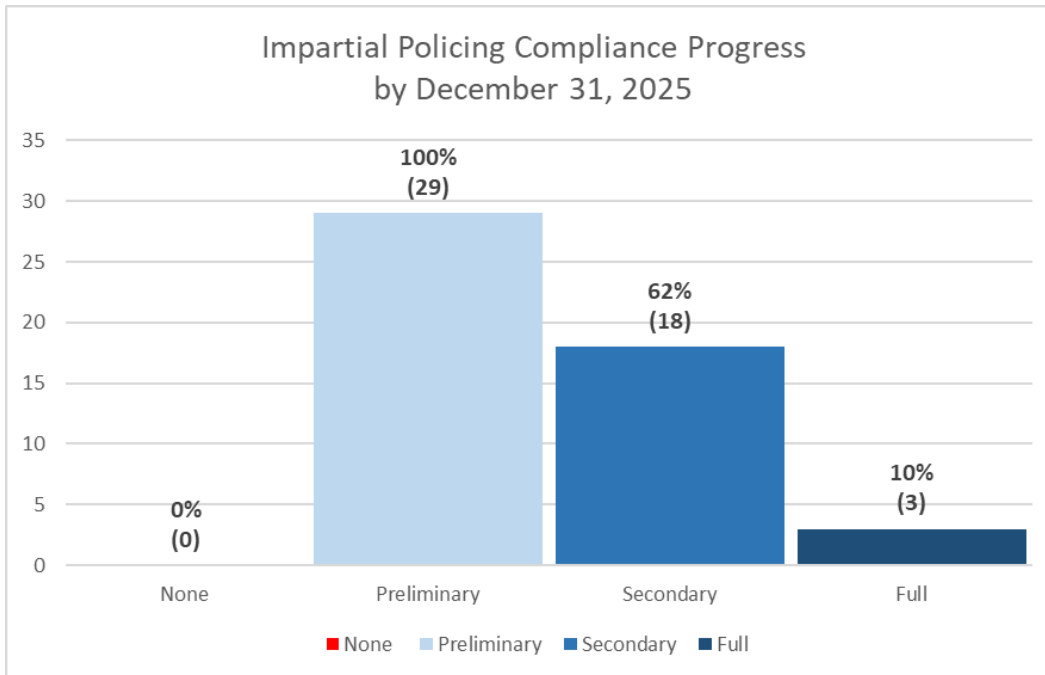
Impartial Policing Progress through Thirteen Reporting Periods

In the thirteenth 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).¹⁴ The City maintained Preliminary compliance for 7 paragraphs (¶¶57, 60, 62, 64, 66, 70, and 72), achieved

¹⁴ Paragraph 82 does not contain a substantive requirement for the City. Likewise, ¶81 contains conditional requirements that may never apply and, at the time of this report, do not apply.

Preliminary compliance for four paragraphs (§§68–69, and 79–80), maintained Secondary compliance for eleven paragraphs (§§54–56, 58–59, 65, 71, 74–75, and 76–77), achieved Secondary compliance for four paragraphs (§§52–53, 61, and 63), and maintained Full compliance for three paragraphs (§§67, 73, and 78).

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 Fourteenth Reporting Period

As noted above, the City and the CPD have made progress during the current reporting period. We hope that this progress continues into the fourteenth reporting period, and we look forward to furthering discussions on measuring the practical application of the paragraph requirements to assess Full compliance.

Specific compliance assessments, by paragraph, for the Impartial Policing section are available here: <https://cpdmonitoringteam.com/wp-content/uploads/2026/04/2-IMR13-Impartial-Policing.pdf>. 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.¹⁵

¹⁵ 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 thirteenth reporting period, the City of Chicago (City), the Chicago Police Department (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 City and the CPD made important progress this reporting period. For example, the City produced a scope of work for the required *Crisis Intervention Plan* after meaningful collaboration with other stakeholders including the Chicago Fire Department, the OEMC, the CPD, the Mayor's Office, and the Chicago Department of Public Health. This was a notable achievement and will provide a roadmap for completing the *Crisis Intervention Plan* required by ¶¶122–23 within the next year.

The CPD also completed a draft of its *Crisis Intervention Officer Implementation Plan*, building on its framework that was produced in the twelfth reporting period. The Consent Decree requires the CPD to complete the *Plan*, obtain approval from both the IMT and the OAG (see ¶638), make a final version of the *Plan* public (see ¶640) and produce an annual progress report (see ¶110), but it had previously not been produced since 2021.

The CPD also worked to define “timely” response in connection with Certified CIT Officers’ responses to incidents identified as involving people in mental health crisis, which was required to begin to assess compliance with ¶¶107–112 and had not yet been completed since the start of the Consent Decree.¹⁶ A working definition of “timely” will allow the CPD to establish baseline data and accountability for this “timely” standard, will help inform the community of the City’s goals for response times to 911 calls, and will provide data on what these response times presently are, and whether there are any disparities which need attention.¹⁷ This

¹⁶ This is a complicated but crucially important endeavor that must factor among other things seasonal changes, infrastructure differences, the size of districts, and staffing across Chicago.

¹⁷ The IMT encourages the Superintendent and CPD leadership to cast a public facing vision for City-wide goals for response times to various priority level calls. For example, the Houston Police Department has public facing data showing current response times and response time goals for priority 1 and 2 calls. See, e.g., *City of Houston Enterprise Assessment Report* (Dec. 2024), p. 29 (showing an average of 6.1 minutes for priority 1 calls and 11.4 minutes for priority two goals), <https://www.houstontx.gov/efficiencystudy/COH-Efficiency-Study-Final-Report.pdf>; *Strategic Plan FY 2021-2026*, HOUSTON POLICE DEPARTMENT, p. 7 (showing average response times for priorities 1–5 calls), https://www.houstontx.gov/police/departments-reports/strategic_plan/StrategicPlan2021-26.pdf; see also *Inside HPD's race against time to respond to calls amid staffing, traffic, and vehicle challenges*, CLICK2HOUSTON (July 24, 2025), <https://www.click2houston.com/news/investigates/2025/07/24/breaking-down-hpd-response-times-beat-by-beat/>.

work, taken together, enabled the CPD to achieve Preliminary compliance with ¶¶108–112.

The OEMC also made notable progress this reporting period, launching its *Crisis Intervention and Mental Health Awareness* training in the fourth quarter of 2025, and producing 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 CCMHE provided important feedback on CPD and OEMC policies, and the City met its requirement for holding quarterly CCMHE meetings with a quorum present.

In the sections below, we detail the efforts, accomplishments, and challenges of the CPD, the OEMC, and the CCMHE this reporting period. For the CPD, we include subsections regarding staffing, response ratios, policies, training, and plans.

Chicago Police Department

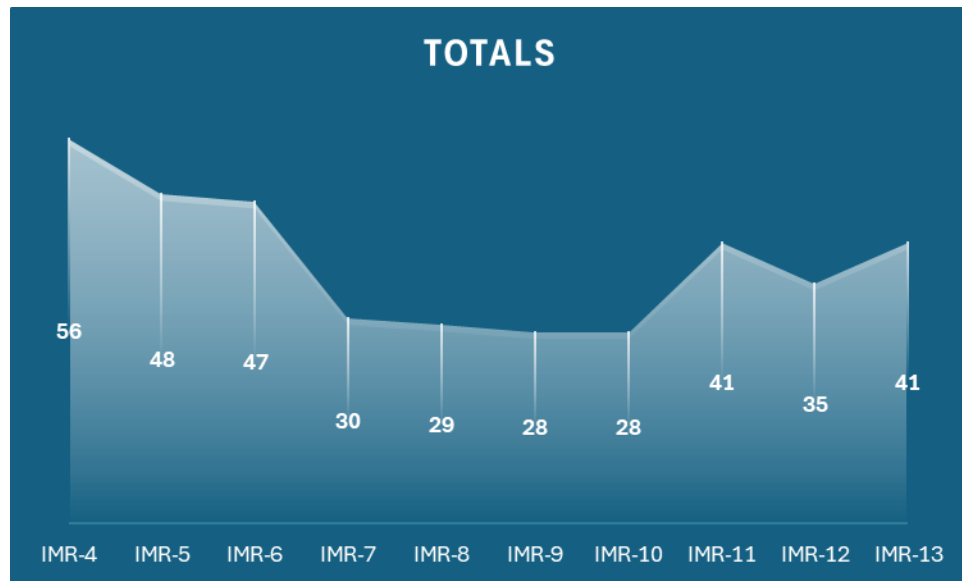
This reporting period, the CPD developed its new CIT DOCS Activity Log. We understand that the CPD has plans to pilot the Log in the next reporting period. This is an important step in tracking field-based work, including community stakeholder engagement, roll call training, follow up with high frequency utilizers of 911 services, and additional efforts informing deflection and diversion from the criminal justice system (See, e.g., ¶¶87, 88, 91, 114, 119).

Chicago Police Department Staffing

The CPD's CIU continues to face staffing challenges. At the end of the thirteenth reporting period, the CPD's CIU was staffed with 41 personnel. Similar to other reporting periods, in the thirteenth reporting period, staffing fluctuated between 35-41 members.

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, district level resources, vehicles, and supplies. To comply with the Consent Decree and align with national best practices, the City and the CPD must ensure that the CIU has adequate staffing and resources.

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



The CIU published an internally conducted staffing needs assessment in the thirteenth reporting period. Based on interviews, workload analysis, and operational requirements, the assessment recommended an increase in CIU personnel to 62 positions (60 sworn, 2 civilian). Given the requirements under the Consent Decree and the size of Chicago, the IMT views this recommendation as the minimum level of staffing required and more reflective of staffing levels at the onset of the Consent Decree.¹⁸ The recommended staffing level of 62 positions is only six more positions than the highest staffing levels previously achieved under Consent Decree, despite the significant increase in work required to meet required outcomes. Ultimately, the outcomes required under the Consent Decree will drive whether there is sufficient staffing in the CPD's CIU and overall CIT program. The IMT looks forward to the completion of the department-wide Workforce Allocation Study, which the City intends to complete in 2026.

At the end of the reporting period, the CIU's CIT Training Division had 10 officers and two sergeants 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, nor the *Advanced CIT Veteran* training since 2009. These training courses are not only

¹⁸ 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.

required but are also an important component of a healthy CIT program that advances the knowledge and skills of Certified CIT Officers.¹⁹ The CIU's internal staffing assessment calls for increasing the training personnel by eleven officers.

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, conducting follow-ups with high frequency utilizers of police services, connecting people with community resources, conducting district roll-call briefings) presently have only one team in each of the five areas (each area is made up of several districts) in the City. The CIU's internal staffing assessment recommends an additional 10 personnel (for a total of 27) which will allow one officer in each district.

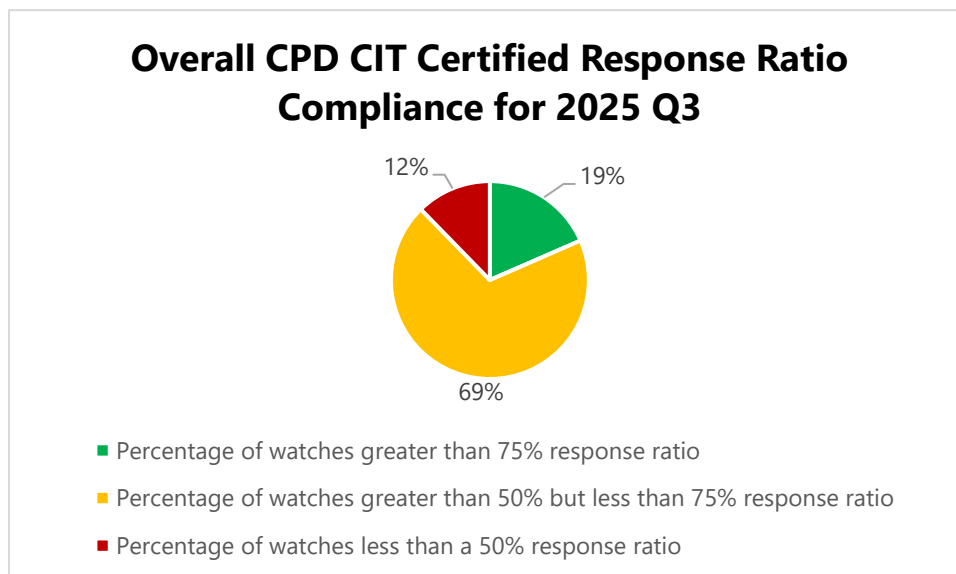
Response Ratios

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, 12 watches have a greater than 75% response ratio; 45 watches have a greater than 50% but less than 75% response ratio; and 8 watches have under a 50% response ratio. This is trending in the right direction, with solid progress since the last reporting period.

The CIT Dashboard contains useful data (and includes no personally identifiable information) that is helpful to the public. This reporting period, the City committed to work toward making the CIT Response Ratio Dashboard public-facing, which will increase transparency.

¹⁹ 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.

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



Chicago Police Department Policies and Training

The CPD continued to demonstrate progress with ¶189, 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.” This reporting period, the CPD completed the review of most, but not all policies as required by this paragraph. The IMT understands that the CPD intends to finish the required policy review in the fourteenth reporting period, which includes S05-14, *Crisis Intervention Team*, the overarching CIT program policy.

The CPD 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. The training will launch in the first quarter of 2026. Additionally, the CPD’s CIU continued to consistently provide the IMT with strong course and instructor evaluations and attendance records for the *Basic CIT* and *CIT Refresher* trainings.

The CPD also delivered its *Crisis Intervention and Officer Wellness* training, which was delivered to 95% of all CPD officers during its *2025 Annual In-Service* training.²⁰ See ¶126. While this training reduced the content related to crisis response

²⁰ In 2024, 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*

from 8 hours to approximately two hours, the CPD has provided annual in-service training to all officers related to crisis intervention over the last several years.

Last, new this reporting period, the CIU has developed and intends to launch its first ever pre-service supervisor training in the first quarter of 2026 covering the goals of the CIT program and supervisor responsibilities in the field.

CPD and City Plans

The City and the CPD made notable progress on the *Crisis Intervention Plan* (¶¶122–23) and the *Crisis Intervention Officer Implementation Plan* (¶¶108–12) this reporting period.

The City provided a scope of work for the *Crisis Intervention Plan*, which included an outline of stages that will allow them to gather the data and information necessary to develop the full *Crisis Intervention Plan* and its associated recommendations. This progress is notable; however, the City cannot achieve Preliminary compliance with ¶¶122–23 until the complete *Crisis Intervention Plan* is developed. The IMT also encourages the City to solicit feedback from the CCMHE on the scope of work for the *Crisis Intervention Plan* (see ¶131).

The CPD provided a draft of its *Crisis Intervention Officer Implementation Plan*, which—along with establishing a framework for defining “timely”—achieved Preliminary compliance with ¶¶108–12. The *Crisis Intervention Officer Implementation Plan* provides key data and strategic priorities, which when operationalized, will meet key requirements of the Consent Decree.

The IMT appreciates the collaborative process that went into developing the *Crisis Intervention Officer Implementation Plan*. The *Plan* does an excellent job establishing key baseline data and establishing the scaffolding for layered data for annual subsequent Plans.²¹

The *Plan* demonstrates how the CPD Data Warehouse and Tableau Dashboards are utilized to analyze data, establishing first ever goals for the number of Certified CIT

Health Awareness and Response trainings, which are delivered to and provide an important foundation for new recruits. See ¶¶103 and 127. In the twelfth reporting period, the CPD developed a new training entitled *Crisis Intervention and Officer Wellness*, which was delivered to 95% of all CPD officers during their *2025 Annual In-Service* training.

²¹ For example, the *Plan* utilizes data to (1) develop a CIU staffing analysis (which projects an increase of 26 CPD officers and 1 non-sworn employee to the CIU unit); (2) establish meaningful CIT training projections and a prioritization system for enrollment in training; (3) establish first ever baseline data on CIT call outcomes including measuring use of force, arrests, and use of alternate response on CIT calls; and (4) detail the average number of mental health related crisis calls across the City.

Officers needed by district and watch to meet the required response ratios required by the Consent Decree. See ¶108 (requiring at least 75% of all crisis calls to receive a Certified CIT Officer response). The *Plan* also identifies strategic areas to influence response ratios²²; outlines the internal policy review process that incorporates input from the CCMHE; and outlines the CPD’s commitment to creating a public-facing version of its CIT Dashboard with crisis intervention incident data, which the IMT strongly encourages to increase transparency.

As discussed above, the *Plan* also includes an informed framework for defining “timely” and a plan for analyzing the number of calls for service involving individuals in crisis for every watch and each district to evaluate the number of Certified CIT Officers needed to timely respond. Now the CPD can establish baseline data and accountability for this “timely” standard.²³

The Office of Emergency Management and Communications (OEMC)

The OEMC launched its thoroughly revised *Crisis Intervention and Mental Health Awareness Refresher* training in the fourth quarter of 2025. See ¶146. The IMT appreciates the OEMC’s work to advance the knowledge and skills of its telecommunicators to assist with responses to crisis calls.

However, we note some areas for improvement in training delivery. When the IMT observed this training, we observed that several of the telecommunicators struggled to stay engaged during the two-hour training. The IMT recognizes that mandatory overtime and staffing shortages create challenges for training scheduling and delivery, but we are concerned about the effectiveness of this required training as is. For additional levels of compliance, the IMT will look for improved training delivery that better facilitates participant engagement. The IMT encourages the OEMC to develop a training delivery schedule in 2026 that supports optimal learning conditions and carefully considers scheduling.

²² For example, the *Plan* proposes collaborating with the Bureau of Patrol (BOP) to identify patrol officers assigned to beat cars where neither officer is CIT Certified but the officers are frequently responding to crisis related calls to encourage the officers to apply to become CIT Certified, and proposes reporting at the weekly COMPSTAT meetings with executive leadership regarding CIT responses by district.

²³ While the CPD’s efforts to define “timely” are not complete, and subject to change as data becomes available, the CPD should be commended for memorializing it in writing and using this definition to complete the *Crisis Intervention Officer Implementation Plan*, which was required within 180 days from the onset of the Consent Decree and annually thereafter. See ¶¶108–112. The development of the *Crisis Intervention Officer Implementation Plan* and the framework for what constitutes a “timely response” is crucial for continued progress. See ¶¶107, 108, 111. One notable deficiency in the data is that presently approximately 40% of 911 calls do not have the “on scene” time established upon response to the scene. This means that the data will be collected and analyzed based on the 60% of calls.

In the last reporting period, the OEMC produced nine of its mental health-related policies to the IMT and OAG, and the IMT and OAG provided feedback.²⁴ This reporting period, we encouraged the OEMC to solicit feedback from the CCMHE on these same policies and incorporate feedback from the IMT, OAG and CCMHE into revisions of these policies. At the end of the reporting period, the OEMC produced revised versions of some but not all of these policies, and it was not clear whether they responded to IMT comments or CCMHE feedback. These policies therefore remain in the review process. We encourage the OEMC to prioritize revising and finalizing these policies early in the next reporting period and clarifying whether and how they are responsive to feedback.

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. See ¶149. We encourage the OEMC to continue to refine this reporting tool, which will be important for operational improvements and sustainment efforts.

The Chicago Council on Mental Health Equity (CCMHE)

This reporting period, the CPD and the OEMC made continued progress in soliciting feedback from the CCMHE on policies and training. For example, during the August 25, 2025, and November 10, 2025 CCMHE meetings, the CPD reviewed the S04-20 Policy Suite. The CCMHE provided important feedback on these policies, which was considered by the CPD. At the next meeting, the CPD reported back to the CCMHE on what revisions were made to the policy based on their feedback. This kind of process builds trust and demonstrates the importance of community input, including from people with lived experiences of behavioral or mental health crises. The OEMC discussed their revised *CIT and Mental Health Awareness* training with the CCMHE and received important feedback, also sharing its response to the feedback with the CCMHE.

The CPD has outlined a review process on crisis response-related policies, procedures, and training per ¶¶89 and 130. The City believes CPD policy, CCMHE bylaws, and the Consent Decree requirements are in alignment with their proposed review process. The IMT supports formalizing a process that all parties understand and follow, and we look forward to confirming this process with the OAG, the City, the CPD, and the CCMHE in the next reporting period.

²⁴ 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)*.

The City met its requirement for quarterly meetings this reporting period (see ¶129), holding meetings with quorum on August 25, 2025, and November 10, 2025. After years of difficulty achieving a quorum at meetings, the City restructured the committee, revising it from over 40 members to 16 voting members plus nine City members, which has been effective. The City also produced documentation detailing its efforts to include representatives from each of the groups identified in ¶132 on the CCMHE.²⁵

The IMT continues to strongly encourage 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, and to improve efforts to solicit community feedback.²⁶

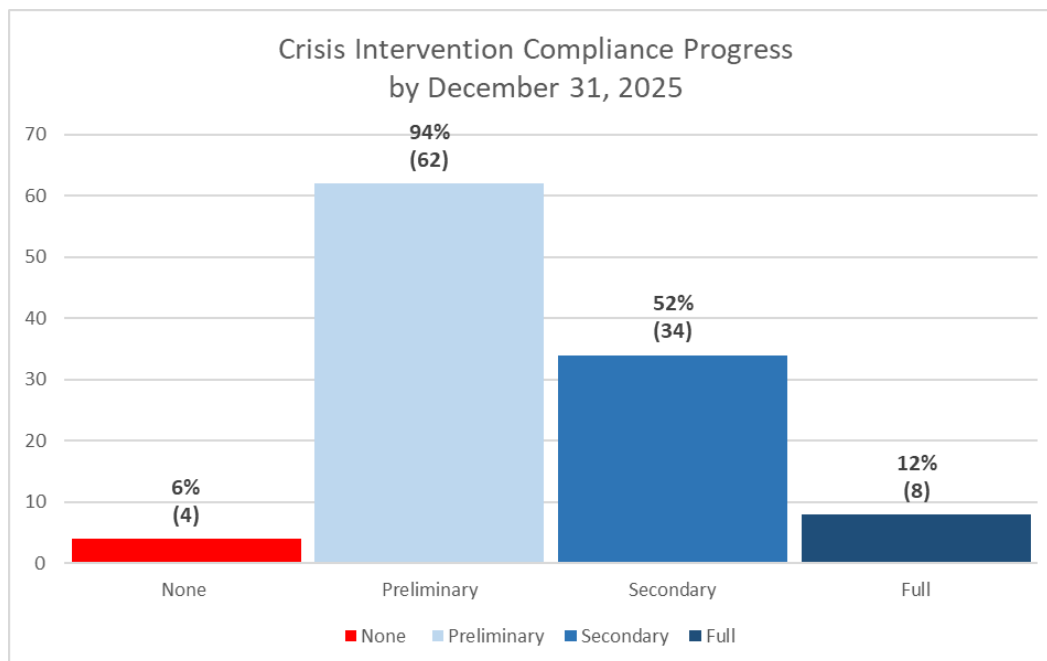
Crisis Intervention Progress through Thirteen Reporting Periods

During this reporting period, the IMT assessed the City's compliance with 66 Crisis Intervention paragraphs: ¶¶87–152. The City maintained Preliminary compliance with 22 paragraphs (¶¶87–91, 94, 100, 114, 119–20, 124–25, 130–31, 137, 142–45, 147, and 150–51), achieved Preliminary compliance with six paragraphs (¶¶107–12), maintained Secondary compliance with 22 paragraphs (¶¶92–93, 95, 97, 99, 101, 103, 105–06, 113, 115, 117–18, 133–34, 136, 138–41, 146, and 152), achieved Secondary compliance with four paragraphs (¶¶102, 128–29, and 132), maintained Full compliance with three paragraphs (¶¶96, 104, and 116), and achieved Full compliance with five paragraphs (¶¶98, 121, 126–27, and 135). At the end of the thirteenth reporting period, the City did not have any level of compliance with four paragraphs (¶¶122–23, and 148–49).

²⁵ Paragraph 132 specifies the community groups that must be invited to participate on the CCMHE. The IMT requested an updated list of which voting individuals represent each of the required categories for the last several reporting periods. The City has historically had difficulty identifying a representative from the Cook County Public Defender and the Cook County Hospital sectors. The City produced multiple emails at the end of this reporting period demonstrating a good faith effort to recruit a representative from the Cook County Hospital sector, but this effort was unsuccessful. However, the Cook County Public Defender is now represented. To that end, all entities named in ¶132 are represented with the exception a "county hospital." With these efforts, the City achieved Secondary compliance with ¶132 this reporting period.

²⁶ The IMT also continues to encourage 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 members of the public to have Facebook login credentials.

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 Fourteenth Reporting Period

In the fourteenth reporting period, the City and the CPD should continue to prioritize efforts to increase staffing of the Crisis Intervention Unit; complete the required *Crisis Intervention Plan* (see ¶¶122–23); gather baseline data on “timely” response (see ¶¶107–12); revise, finalize and make public the *Crisis Intervention Officer Implementation Plan* (see ¶¶638 and 640) and use it, together with the CIT Dashboard, to inform a strategic plan that addresses required response ratios across districts and watches (¶108). The City should identify a timeframe to make the CIT Dashboard public. The CPD should launch its newly revised refresher training (see ¶¶97 and 101).

The OEMC should use its revised refresher training to update the eight-hour training required for all new telecommunicators (see ¶142–44). The OEMC should also further revise its policies, incorporating feedback from the IMT, the OAG, and the CCMHE;²⁷ develop scenario-based exercises to include in the 2026 *Crisis Intervention and Mental Health Awareness* refresher training (see ¶144); produce course

²⁷ Once approved and finalized, we anticipate that these policies will help the OEMC maintain and/or achieve additional levels of compliance with several paragraphs. See, e.g., ¶¶138–40, 146, 148–49, and 151.

and instructor evaluations; assess data variances in the quality assurance materials, and identify a training delivery schedule that supports effective learning.

The CPD should review its last policy, S05-14, with the CCMHE to complete its full Crisis Intervention policy suite review and demonstrate a shared understanding from all parties that the CPD's policy review process is in alignment with CPD policy, CCMHE bylaws, and Consent Decree requirements (*see* ¶189).²⁸ The OEMC should also continue to provide evidence of the OEMC's regular meetings with the CPD and the CCMHE (*see* ¶150).

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 and promote public engagement.

Specific compliance assessments, by paragraph, for the Crisis Intervention section are available here: <https://cpdmonitoringteam.com/wp-content/uploads/2026/04/3-IMR13-Crisis-Intervention.pdf>. 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.²⁹

²⁸ Once the CPD reviews S05-14 with the CCMHE and demonstrates a shared understanding from all parties that the CPD's policy review process is in alignment with CPD policy, CCMHE bylaws, and Consent Decree requirements, the IMT anticipates that the City and CPD will achieve Secondary compliance with ¶189.

²⁹ 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 thirteenth 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 eight 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 training captains in all districts to review firearm pointing incidents. The IMT looks forward to additional progress in the next reporting period, including continued progress in the firearm pointing incident review pilot at the district level, as well as progress towards consistent use of force data, notably for chokeholds and baton use.

Despite certain achievements, use-of-force incidents have risen in the last few years, and we will closely examine the CPD's efforts to address the increase. Similarly, firearm pointing incidents have also risen. The CPD continues to collect and analyze data related to such incidents and to make efforts to understand the rise in TRRs.³⁰ According to the CPD's preliminary evaluation, some of the increase can be attributed to the new levels of force used in the forms, new reporting requirements, and the increase in human activity following the COVID pandemic. The CPD is expected to maintain its efforts to identify and address the different factors influencing the increase.

Similarly, the CPD has noted a backlog with BIA's cases, though the department has committed to address this backlog as well. In this reporting period, discussions have been held regarding strategies to reduce the backlog. We look forward to progress in reducing backlogs in this area, along with some of the IDRs that TRED reviews being able to be referred to BIA.

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 related data and documentation from the City and the CPD. Our discussions were productive and resulted in progress toward compliance. For example, after several discussions, TRED is expected to include new debriefing points on crisis intervention, procedural justice, and impartial policing as captains review firearm pointings and foot pursuits in 2026.

During this reporting period, on November 21, 2025, in response to opposing briefs from the City and the OAG, the Court determined that the CPD does not need to record one-on-one Public Safety Briefings with an involved officer and an

³⁰ There was a 23% increase in TRR incidents from 2023 to 2024. However, the *2024 Annual Report* indicates that 2,532 TRR occurrences (39%) were the result of an assault or battery on a CPD officer, and an additional 615 TRR occurrences (10%) did not have force reported and included emergency handcuffing.

uninvolved supervisor after a shooting or death. However, the Court also ruled that the Consent Decree requires the CPD to record the Street Deputy Walk-Through Questions, which may go beyond immediate safety concerns.

The Public Safety Briefing is an internal, time-sensitive, one-on-one exchange with an uninvolved officer asking a prescribed set of questions—after the officer-involved shooting or death but while public safety is still potentially in question. The Court reasoned that the Public Safety Briefing is different from public-facing police activity. In contrast, the Street Deputy Walk-Through occurs after a scene is safe, is broader and allows discretionary follow-up, is preceded by a *Garrity*-style warning advising officers of their rights and administrative liability. As a result, the Street Deputy Walk-Through qualifies as an “administrative interview” that must be audio-recorded (and where possible video-recorded) under ¶488(f) of the Consent Decree. The Court’s narrow ruling is expressly confined to the two procedures as they are currently constituted and does not create a blanket exemption from recording other activities.

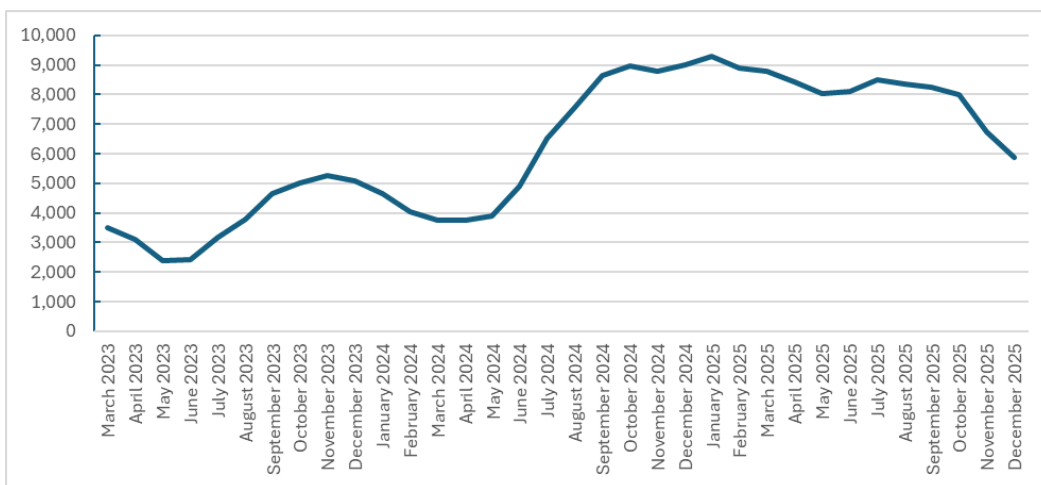
As a result of the Court’s ruling, the CPD has now achieved Secondary compliance with ¶¶236–38, and the City and the CPD have now reached at least Preliminary compliance with all paragraphs in the Use of Force section.

Additionally, this period, the CPD implemented its community engagement policy, S02-08, *Community Engagement in Policy Development*. The IMT continues to believe this newly developed community engagement process will improve the CPD’s use-of-force policies and training. We look forward to reviewing the CPD’s biennial review of its use-of-force policies, which should consist of revisions related to its community engagement.

This reporting period, the City and the CPD remained committed to the implementation of a pilot program that will move the responsibility for reviewing certain firearm pointing incidents from TRED to district captains. This reporting period, the CPD trained all captains across the CPD’s 22 districts to conduct such reviews. We acknowledge the CPD’s efforts in training and implementing review at the district level. During this reporting period, the CPD identified a need to train additional higher ranking district supervisors and place additional oversight responsibilities on area deputy chiefs and district commanders for firearm pointing incidents and foot pursuit reports as well. While training for captains concluded in December, both the CPD and the IMT expect the district-level review program will result in greater accountability and quicker feedback to frontline officers from their immediate supervisors. We look forward to training for high-ranking supervisors during 2026 and the expected result of greater accountability at the district level.

The City and the CPD provided numerous presentations to the IMT and the OAG throughout this reporting period regarding the pilot program, their steps to comply with the requirements of the Consent Decree, the increases in TRRs, and their plan for reducing the current TRED backlog, which as of December 2025, has decreased to an average of 5,890 IDRs.³¹ This reporting period, the CPD conducted a preliminary analysis on the increase in TRRs. They noted that in a comparison between 2023 and 2024, there was a 30% increase in TRR occurrences, a 16% increase in officers being assaulted, a 25% increase in members using low-level control tactics (level 1 uses of force), and a 12% increase in officers not using force. It was also noted that most (80%) of the TRRs completed were done by officers with experience of 10 years or less, which emphasized a training need at the recruit-level, as well as policies for training and tactics used when officers are in the field.

TRED’s IDR Backlog, Average by Month, 2023-2025



Notably, the CPD provided a detailed analysis of the increase of TRRs to the OAG and the IMT. After a drop in use of force incidents from 2019 to 2021, the data show a rise in the use of force between 2021 and 2024, accompanied by a corresponding increase in TRRs.³² In February 2020, the CPD implemented a policy defining the new levels of force and related reporting requirements. The CPD’s preliminary assessment indicates the rise in TRRs is connected to the newly defined levels of force, overall increases as a result of a sharp decline in crime and police interactions during the COVID pandemic, enhancements to Use of Force policies and training, and improved reporting procedures. The policy was later revised in June 2023 to clarify the levels and reporting requirements of a response to active resistance. Since the CPD revised and clarified the TRR forms, they have seen an

³¹ Between July 1, 2025 - December 31, 2025, the IDR backlog went from 8,252 to 5,721. In the same period, the TRED officer headcount increased from 50 to 55. TRED also has 2 tactical review specialists assigned/detailed to the unit.

³² According to the CPD’s analysis, TRR occurrences also decreased during the pandemic between 2020-2022 and then began to increase.

uptick in reporting by officers. Despite the increase, the CPD's analysis suggests that the most recent years show lower levels than the beginning of the 2010s.³³ The IMT understands that the CPD is continuing to evaluate factors beyond the policy updates that may be related to the increase in TRRs. The IMT also hopes these learnings will be used in training and policy development in future reporting periods. The CPD has also indicated a plan for TRED to better address the backlog in 2026. The IMT remains hopeful that the full expansion and completion of training of district captains and lieutenants will begin to show an impact on the backlog.

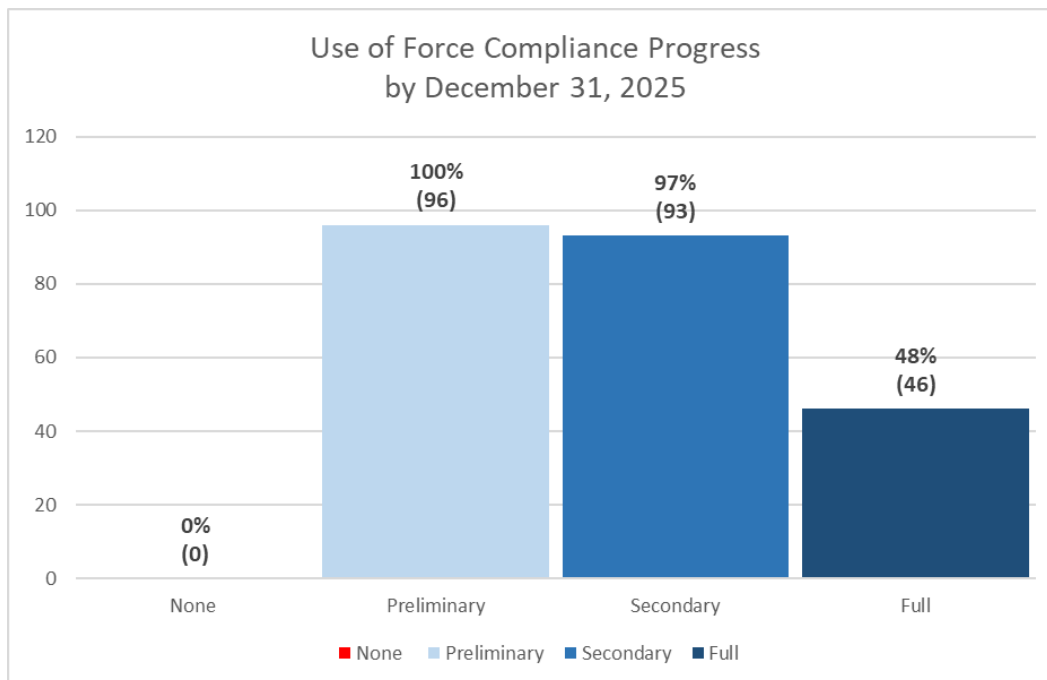
Notably, the CPD has achieved Preliminary compliance with all 96 paragraphs in this section, and nearly half of the paragraphs are in Full compliance. Also, of note this reporting period, as a result of the CPD's low uses of OC spray and even fewer debriefings on verbal warnings prior to, during, and after OC discharge, the CPD has achieved Full compliance. See ¶209. In addition, the CPD demonstrated that it has distributed department-approved OC devices.

Use of Force Progress through Thirteen Reporting Periods

During this reporting period, the IMT assessed the City's compliance with 96 Use of Force paragraphs. At the end of the thirteenth reporting period, the City maintained Preliminary compliance for three paragraphs (¶¶159–60 and 228) and achieved Preliminary compliance with three paragraphs (¶¶236–38). The City maintained Secondary compliance for 43 paragraphs (¶¶153, 155–157, 161–67, 173, 175–78, 182–84, 186–87, 191–93, 198–200, 204, 214, 216–17, 220, 222–24, 226–27, 233–34, 239–41, and 243) and achieved Secondary compliance for four paragraphs (¶¶236–38 and 242). The City maintained Full compliance for 38 paragraphs (¶¶168–72, 174, 179–81, 185, 188–90, 194–97, 201–03, 205–08, 210–11, 213, 215, 218–19, 225, 229–31, 235, 245–46, and 248) and achieved Full compliance with eight paragraphs (¶¶154, 158, 209, 212, 221, 232, 244, and 247).

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.

³³ The CPD's data suggests a sixteen percent decrease in TRRs from 2011 to 2024.



Looking Ahead to the Fourteenth Reporting Period

While the City and the CPD made progress this reporting period, there are also areas for improvement. Specifically, the CPD must continue to make progress in understanding its data to help clarify what is changing related to use of force incidents and why, which will help focus training, supervision, and support. The CPD is in the process of reviewing and revising its department forms to ensure the reporting systems provide clear and meaningful guidance and information for officers and enhance supervisors' abilities to identify issues and respond and report appropriately. Developing transparent analytic frameworks will also demonstrate accountability to the community.

With regard to chokeholds, for instance, the CPD has indicated challenges with accurately capturing data. The CPD's policy G03-02, *De-Escalation, Response to Resistance, and Use of Force*, prohibits chokeholds or any restraint above the shoulders,³⁴ so any movement near a subject's neck area is preemptively categorized as a chokehold and later confirmed. This poses data challenges for incidents that were initially categorized as a chokehold (Level 3 use of force), when that may not be the case. As such, the CPD is concerned that they may be overcounting the

³⁴ See G03-02 Section IV.D.2: "The Chicago Police Department prohibits its members from using chokeholds or other restraints above the shoulders with risk of positional asphyxiation, with the sole exception being as an act of last resort, when necessary to protect against an imminent threat to life."

instances of actual chokeholds. We look forward to additional discussions in the next reporting period about the CPD's plan to address this issue.

In addition, we await data from the CPD and COPA for compliance assessments on a number of paragraphs (see ¶¶162, 178, 199, and 232). We look forward to continued discussions with BIA and COPA on the specifics of these data to determine whether there were improper pretextual reasons for using force against fleeing subjects.

The CPD also continues to make progress addressing the IDR backlog through the district-level reviews conducted by captains. As of December 2025, district captains have reviewed more than 1,000 firearm pointing incident reports. While TRED continues to provide guidance to captains and maintains oversight of TRRs, foot pursuits, and firearm pointings, preliminary results from the district-level pilot indicate that the effort is beginning to alleviate TRED's backlog. This pilot has also increased district-level accountability and encourages more effective supervisory practices and mentorship opportunities for both supervisors and officers. Currently, district captains are able to provide prompt reviews and feedback to officers within 30 days, and we look forward to continued progress in future reporting periods as lieutenants and area chiefs are also trained as part of the pilot.

As we stated last period, the CPD has also yet to produce evidence of its biennial review of its use-of-force policies as required by ¶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 CPD must provide evidence of this biennial review before the IMT can assess for Full compliance with ¶159.

Sustaining Compliance

Furthermore, the CPD has made significant progress in use of force, leading to several discussions this reporting period on sustainment for Full compliance. In particular, the CPD has fulfilled the two-year sustainment requirement for several paragraphs, including ¶¶170, 180–81, 185, 188, 194–95, 197, 245–46, and 248. In some of these paragraphs, the CPD has continued to provide evidence that they are complying with the Consent Decree's requirements. For instance, for ¶194, the CPD continues to track and report whether firearm pointing incidents are erroneously reported, which are incidents where the CPD officer is a SWAT Team Officer

responding to a designated SWAT incident.³⁵ Collecting this data enables the CPD to issue debriefings to officers who are part of SWAT or taskforces, while ensuring that OEMC is notified as required.

Although the CPD achieved Full compliance two years ago with the requirements of ¶¶245, 246, and 248, these paragraphs have not yet achieved all necessary requirements to achieve full and effective compliance. For ¶245, the CPD is planning to deliver its two-year comprehensive review of use-of-force policies in the next reporting period, as required by ¶159. Any assessment of sustainment will depend on this report and responses to it, including the extent of community engagement involved as outlined in ¶160. Similarly, ¶246 has not yet achieved sustainment, despite the CPD addressing the topics outlined in the paragraph. De-escalation remains a core principle of the Consent Decree (¶161), and the IMT continues to monitor and assess the CPD's response to patterns and trends, as well as the department's ability to adapt and refine de-escalation techniques and train officers. Lastly, while the CPD has trained supervisors on the relevant topics as indicated by ¶248 and achieved Full compliance, the IMT has not observed evidence of district supervisors recommending additional training to the extent necessary when compared to TRED (e.g., ¶233). Furthermore, documentation required by policy regarding officers intervening or supporting colleagues who report excessive force has not been provided (see ¶176).

Additionally, the CPD demonstrated that it has made progress toward sustainment for the following paragraphs: ¶¶169, 172, 174, 179, 190, 202–03, 205, 208, 210–11, 215, 218, 219, 225, and 229–30. Moving forward, we look forward to reviewing evidence and having discussions that the CPD is maintaining best practices with the requirements of these paragraphs.

Specific compliance assessments, by paragraph, for the Use of Force section are available here: <https://cpdmonitoringteam.com/wp-content/uploads/2026/04/4-IMR13-Use-of-Force.pdf>. 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.³⁶

³⁵ TRED's *2025 Mid-Year Report*, Chicago Police Department (December 30, 2025), at 43, <https://www.chicagopolice.org/wp-content/uploads/2025-TRED-MIDYEAR-REPORT-FINAL.pdf>; TRED's *2024 Year-End Report*, Chicago Police Department (June 27, 2025), at 41, <https://www.chicagopolice.org/wp-content/uploads/2024-YEAR-END.pdf>

³⁶ A fuller description of the history of compliance efforts, methodologies, compliance determinations for each original monitorable paragraphs in the Use of Force section is available in *Comprehensive Assessment Part I* (which included *Independent Monitoring Report 8*): <https://cpdmonitoringteam.com/imr-8-1/>. For reference, all IMT reports and appendices are available here: <https://cpdmonitoringteam.com/reports-information/>.

V. Recruitment, Hiring & Promotion

In the thirteenth 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 and achieved additional compliance for one paragraph.

During this reporting period, the City and the CPD developed and implemented a new captain promotional process. Last reporting period, we discussed the City and the CPD's focus on improving the processes for each promotional cycle, including enhancing the application preparation materials and creating more transparency around the process. The IMT recognizes the City and the CPD's significant efforts to develop a comprehensive review of each promotional cycle, starting with the 2024 Commanders promotional process, which we expect is forthcoming at the beginning of the fourteenth reporting period. The IMT also acknowledges the City and the CPD's efforts to seek feedback from applicants and to make changes based on such feedback.

Additionally, the City and the CPD achieved Secondary compliance with ¶264 during this reporting period. The City and the CPD provided documentation that demonstrated that they have developed and implemented strategic plans to improve internal communications among the CPD officers to increase transparency and officer awareness about the promotions process for the Commander rank. The IMT looks forward to receiving similar information demonstrating application of this process to the Captain rank promotions.

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 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 reported that they have fully completed implementation of 14 recommendations and six recommendations are in progress. The IMT understands that the City and the CPD also plan to begin working on the implementation of two recommendations in 2026.

Additionally, the CPD experienced challenges with interdepartmental coordination, which resulted in shifting meeting schedules due to emergent needs, lack of

adequate communication between functions, and only one Recruitment and Hiring Committee meeting held at the end of this period.

Finally, since 2020, independent assessments have consistently identified the City's and the CPD's failure to meaningfully consider prior discipline in all merit and rank-order promotion decisions as a high-priority compliance gap. This concern was reiterated in both the 2020 and 2023 DCI Consulting reports. The City and the CPD have acknowledged the validity of the recommendation to incorporate disciplinary history. In 2024, they formally agreed to address this recommendation within an implementation plan with a projected 6 to 24-months timeline. Despite this acknowledgment and stated intent, substantive implementation beyond merit promotions has not yet occurred, and the promotion processes largely continue to exclude prior discipline from consideration, except in limited circumstances.

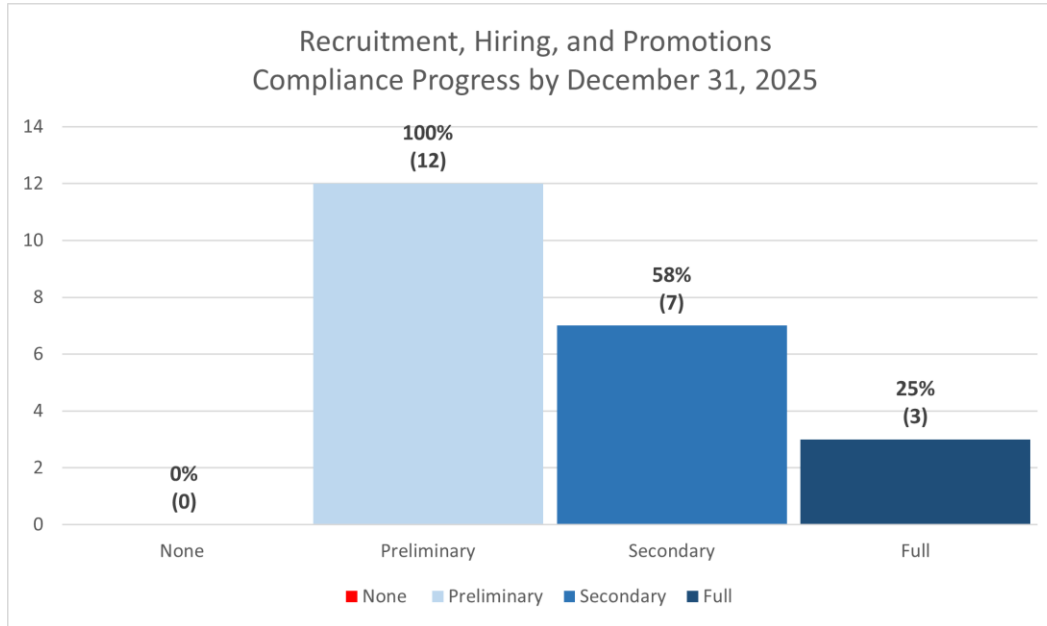
The OAG expressed continued concern this reporting period that progress has stalled, noting that nearly five years have elapsed since the original recommendation was issued. City leadership has cited the complexity of multi-agency coordination and litigation risk as primary reasons for delay, emphasizing the need for any disciplinary-based screening to be legally defensible. CPD leadership, including the Superintendent, publicly affirmed that disciplinary history should be considered, stating that test scores alone are insufficient for selecting leaders responsible for supervising others. The CPD reports that discipline is reviewed during certain background evaluations and has resulted in candidate disqualifications. However, these reviews are not yet embedded in a transparent, standardized promotional framework.

The IMT and OAG have emphasized that the Consent Decree requires not just assessment, but timely implementation, including a formal plan within 60 days of assessment and demonstrable follow-through. Ongoing discussions near the end of the reporting period indicate that the drafting of memos and stakeholder language is underway. These efforts remain preliminary and the City and the CPD have not yet produced operational changes to promotion decisions. The lack of integration of disciplinary history into the promotions process remains a material compliance issue, with implications for supervisory accountability, leadership legitimacy, and public trust under the Consent Decree.

Recruitment, Hiring, and Promotion Progress through Thirteen Reporting Periods

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

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 Fourteenth Reporting Period

Looking ahead to the fourteenth reporting period, the City and the CPD should adopt a more predictable cadence of monthly meetings of stakeholders to work towards meaningful progress towards further levels of compliance. Additionally, the CPD should further outline the coordination and communication expectations 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 publishing the 2024 Commander Report and additional information regarding the promotions process for the Captain rank. The IMT welcomes further discussion with the City and the CPD about the integration of prior disciplinary history and promotion decisions.

Specific compliance assessments, by paragraph, for the Recruitment, Hiring, and Promotion section are available here: <https://cpdmonitoringteam.com/wp-content/uploads/2026/04/5-IMR13-Recruitment-Hiring-and-Promotions-final.pdf>. 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.³⁷

³⁷ 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 thirteenth reporting period, the CPD continued to make progress in many areas of training, as required by the Consent Decree, and increased compliance in one paragraph. Notably, the CPD continued momentum from the previous reporting period by the Bureau of Patrol and the Field Training and Evaluation Section (FTES) to advance compliance for the Field Training and Evaluation Program (FTEP).

Field Training and Evaluation Program

During this reporting period, the CPD continued to advance the FTEP. The CPD successfully maintained a one-to-one ratio for Field Training Officers (FTO) to Probationary Police Officers (PPOs) and solicited anonymous feedback from FTOs and PPOs to inform FTEP training improvements described in the *2026 Annual Training Plan*.

The CPD also fully implemented a new ACADIS software module to track field training progression of PPOs. During the prior reporting period, the FTES 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 (TSG) developed eLearning training, quick guides, tutorial, and user guide to support use of the new system. During this reporting period, FTOs used the ACADIS system to complete Daily Observation Reports (DORs).

Additionally, during this reporting period, the CPD completed a full cycle of *FTO Refresher Training*. This training provided a full 8-hour training day for active FTOs to equip FTOs with knowledge and skills to be successful in working with PPOs, understand changes to the *Basic Law Enforcement* (BLE) curriculum for recruits, and cover procedures and expectations for evaluating recruits in the newly launched DOR application in ACADIS. The FTES sent three FTOs to CPD's Training Support Group to serve as instructors in the *FTO Refresher Training* delivery, a development made in response to feedback from FTOs during prior reporting periods.

Training and Support Group

This reporting period, the CPD concluded the implementation of the *2025 Training Plan*, which included a minimum of 40 hours of In-Service Training based on the previously published *2025 Needs Assessment*. The 2025 In-Service Training courses included courses such as *Crisis Intervention and Wellness*, *Constitutional Policing*, *De-escalation*, *Response to Resistance*, *Use of Force- Unknown/High-Risk*, and

Transitional Vehicle Stops, Active Bystander for Law Enforcement (ABLE), and numerous eLearning courses.

The CPD submitted the *2026 Annual Training Plan*, informed by the comprehensive *Training Needs Assessment* process undertaken by the CPD early in 2025. The *2026 Annual Training Plan* details out the CPD's annual 40-hour *In Service Training* (IST) program, eLearning courses, recruit training, promotional training, and all other training needs, incorporating the training courses and principles required by the Consent Decree (e.g., impartial policing, procedural justice), the requirements of the Illinois Law Enforcement Training and Standards Board (ILETSB), and the Commission on Accreditation for Law Enforcement Agencies (CALEA), among others. The *2026 Annual Training Plan* also clearly distinguished elective courses from mandatory courses. The CPD also began to identify courses to open to civilian employees of the CPD in 2026, such as *Crisis Intervention and Wellness, ABLE, and Leadership* trainings.

The CPD implemented a new pilot program for instructor evaluations within the TSG, as outlined in Department Notice DN25-06, *Training Division Instructor Evaluations – Pilot Program*. The IMT reviewed a sample of these evaluations to examine how the CPD implemented the policy in practice. To further support instructor development and ensure quality training delivery for Department members, the CPD developed a new performance evaluation system during this reporting period for CPD member annual performance reviews. See ¶¶369-376. The CPD will implement this new system in January 2026 and house the ability for tailored evaluations for FTOs and instructors. We commend the CPD on making tangible progress on training evaluation this reporting period.

The CPD has initiated efforts to enhance the training capabilities across the department by cross-training TSG instructors for In-Service Training courses, opening the Instructor's Academy to instructors across CPD bureaus and identifying strategies to increase coordination and support among training personnel across the entire department.

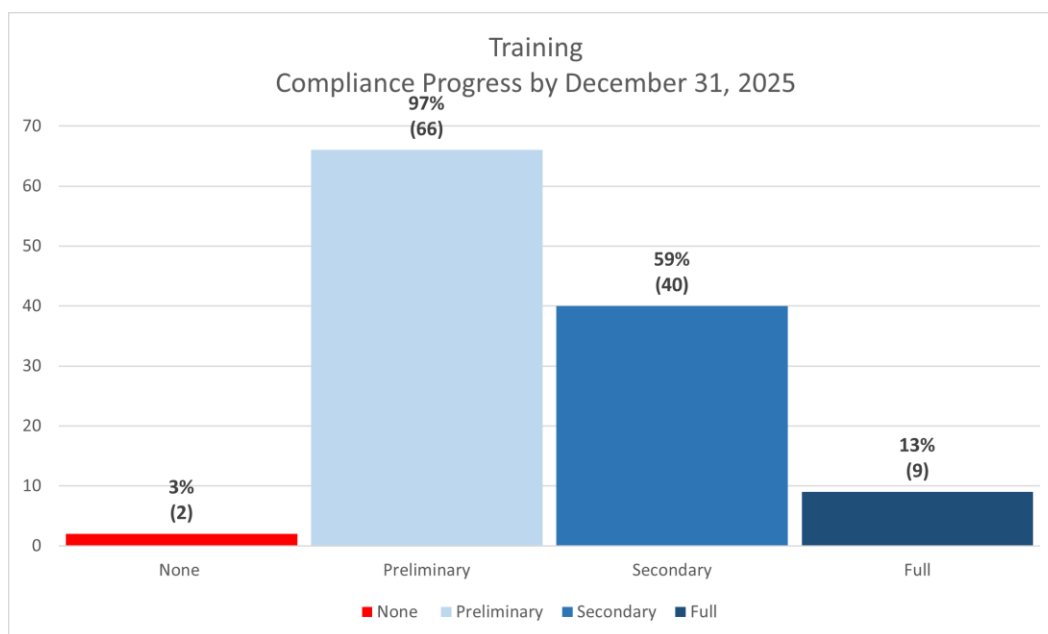
Further, the CPD made steady progress to review and update training modules provided to CPD Sergeants and Lieutenants during Pre-Service Training. During this reporting period, the CPD submitted initial training materials for ten Pre-Service training courses. We look forward to continuing to engage the CPD on the finalization of these trainings and reviewing additional Pre-Service training curricula in the next reporting period.

Training Progress through Thirteen Reporting Periods

In the thirteenth reporting period, we assessed the City's compliance with 68 Training paragraphs. Specifically, in the thirteenth reporting period, the City and

the CPD maintained Preliminary compliance for 24 paragraphs (§§279–82, 284, 289, 291, 296, 303–04, 308–12, 314, 326–29, 331–33, and 338), achieved Preliminary compliance for two paragraphs (§§286 and 288), maintained Secondary compliance with 26 paragraphs (§§272–78, 292, 295, 297–98, 301–02, 307, 313, 315–17, 319, 322, 324, 335–37, and 339–40), achieved Secondary compliance with five paragraphs (§§283, 285, 294, 300, and 334), maintained Full compliance with eight paragraphs (§§270–71, 305–06, 318, 320–21, and 323), and achieved Full compliance for one paragraph (§299). The City and the CPD failed to reach Preliminary compliance for two paragraphs (§§287 and 290).

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 Fourteenth Reporting Period

Looking ahead to the next reporting period, the IMT anticipates further compliance achievement, with particular emphasis on instructor qualifications and evaluations, recruit training, and pre-service training. 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/2026/04/6-IMR13-Training.pdf>. 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.³⁸

³⁸ 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 thirteenth reporting period, the City and the CPD achieved additional levels of compliance with a few paragraphs, including Secondary compliance with ¶354 and Full compliance with ¶¶350 and 368.

The IMT and the CPD maintained regular bi-weekly meetings during the thirteenth reporting period and gathered valuable information to assess compliance with the Consent Decree requirements. Bi-weekly meetings, along with monthly meetings that include the OAG, focused on the Unity of Command and Span of Control pilot program, the development of the updated Performance Evaluation System, access to Supervision tracking mechanisms, and clarifications on the proposed methodologies for the thirteenth 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.

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(e). Span of control limits the number of officers any one sergeant can supervise daily. See ¶358(d). 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 is a staffing model launched to implement these concepts to enable more effective and efficient supervision, mentoring, officer support, and policing. The current model for the program, implemented in the ninth reporting period, is the third iteration and focuses on three tenets: (1) geographic familiarity, (2) high-quality supervision, and (3) resource flexibility.

CPD Districts 4, 6, and 7 currently operate under the Unity of Command and Span of Control staffing model and 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, 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. An agreement with the CPD collective bargaining units³⁹ sets an annual limit of five districts for the expansion of the staffing model. Thus, CPD has selected districts 15, 16, 17, 20, and 24, which are classified as “Tiers 2 and 3” and are more securely staffed. During the thirteenth reporting period, the CPD conducted informal briefings with each of the new districts preparing for their inclusion in the new staffing model. As attendance at these briefings has not been systematically tracked, the CPD has also developed a more formalized training that all officers will be required to complete through the learning management system. The IMT looks forward to the delivery of this training to ensure a fulsome understanding of the staffing model, the concepts of Unity of Command and Span of Control, and the benefits that result from their implementation.

Also during this reporting period, the CPD worked with each new expansion district to adjust day off groups, partner assignments, furlough selections, and other operational measures. We understand that expansion of the Unity of Command and Span of Control staffing model is targeted to occur in January 2026 (the beginning of the fourteenth reporting period).

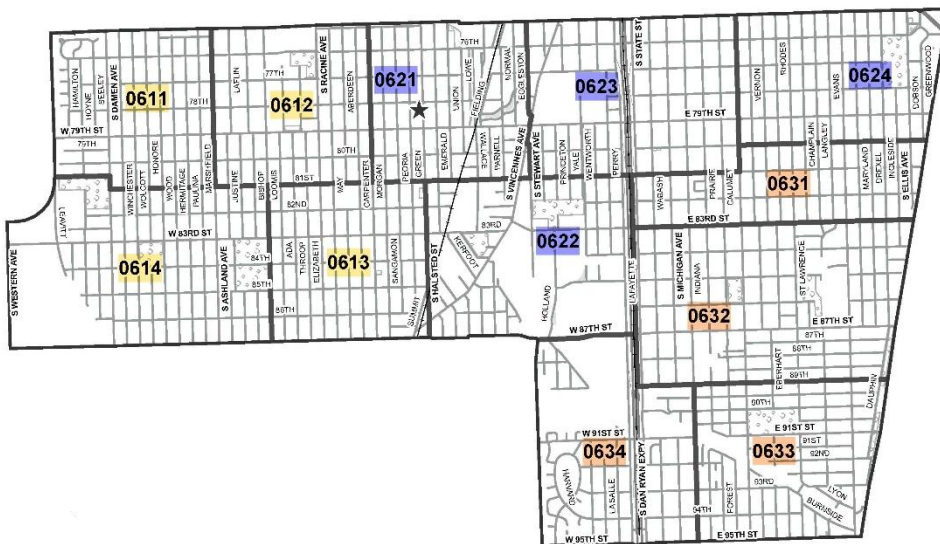
As the CPD strategically staggered implementation, the Unity of Command and Span of Control Pilot Programs are in various stages of completion. [Supervision Table 1](#), below, shows the progress of the pilots in active districts. Districts in the “Implementation Planned” phase are preparing for their 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.

³⁹ A [letter](#) from Superintendent Snelling to Fraternal Order of Police, Lodge #7 President John Cantanzara states that “the Department may only reduce no more than 5 Police Districts per calendar year, with the prerequisite that the 70% manpower is maintained.”

Supervision Table 1.
Progress of Unity of Command/Span of Control Pilot Programs

CPD District (in order of implementation)	Implementation Status
006 – Gresham	Implementation Underway
004 – South Chicago	Implementation Underway
007 – Englewood	Implementation Underway
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)

6TH District
Gresham
7808 S HALSTED ST



Key

Sector	Map Color
10	Yellow
20	Blue
30	Orange

During monthly calls, the City and the CPD shared data about the progress of the pilot program throughout the thirteenth reporting period. 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).⁴⁰ The CPD-determined target goal for the Unity of Command by sector, or the frequency with which a member is working within their assigned sector⁴¹ 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. However, over the last year, the CPD has consistently maintained their target goal for Unity of Command by sector. (see Table 2).

Supervision Figure 1.

6th District Beat Map, Source: Office of Public Safety Administration)

The IMT acknowledges the CPD’s efforts but looks forward to all metrics 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 in the past two reporting periods. We look forward to further discussions with the CPD about their plans to replicate this success in other districts.

Supervision Figure 2.

Compliance with CPD-Determined Target Goals in the Thirteenth 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	62 – 87%	76 – 82%	52 – 61%
004 – South Chicago	65 – 83%	78 – 83%	40 – 48%
007 – Englewood	49 – 72%	78 – 84%	23 – 34%

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. During the thirteenth reporting period, the IMT was provided direct access to both the Watch Sheet Application and the Unity of Command and Span of Control Tableau Dashboard.

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. However, many of the paragraphs within the

⁴⁰ 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%.

⁴¹ Each CPD district is comprised of sectors which are further broken down into beats. The “10 sector” includes beats beginning with the district number and ending in 10-19, the “20 sector” includes beats beginning with the district number and ending in 20-29. And the “30 sector” includes beats beginning with the district number and ending in 30-39. This is further illustrated in Figure 1.

Supervision section require reforms in all 22 districts. Therefore, further levels of compliance cannot be achieved until the pilot continues to expand and be successfully replicated and implemented in all 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.

This reporting period, the CPD progressed significantly with the development of the Performance Evaluation System (PES). The CPD updated and finalized 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. Additionally, the department developed both the *PES All Department Members and Supervisors eLearning Training*. From October to December 2025, the CPD met with the IMT and OAG regularly to discuss and address feedback on these trainings. This collaborative approach to the implementation process helped to streamline efforts and ensure roll out of the new system in January 2026. The IMT acknowledges the CPD's progress on the updated PES and looks forward to receiving feedback about the training and reviewing data from the system, including annual goals, portfolio notes, and performance evaluations.

The CPD has also convened a Unity of Command and Span of Control Pilot Program Evaluation Committee, which is required to meet at least twice a year to discuss implementation progress and share feedback from CPD personnel. This committee is comprised of leadership from the Bureau of Patrol, the Audit Section, the Labor Relations Division, Professional Standards and Compliance Division, the Fraternal Order of Police, and the Policemen's Benevolent & Protective Association. The group has the potential to play an important role in the programs' effective implementation. The IMT hopes this committee will provide informed recommendations on program expansion, staffing considerations, and necessary modifications to ensure a smooth implementation process.⁴² During the thirteenth reporting period, the committee met twice, with the IMT and OAG observing both sessions. The IMT sees these meetings as opportunities to foster meaningful dialogue with the participating district commanders and believes their effectiveness could be further strengthened through enhanced data sharing and structured follow-up on action items.

General Updates: CPD Member Training and the Workforce Allocation Study

While the pilot programs are integral to successfully fulfilling many of the requirements of the supervision section, other actions are necessary too. For example,

⁴² 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.

the City and the CPD must regularly train supervisors on how to perform their duties. During the thirteenth reporting period, the CPD conducted its *2025 In Service Training* for supervisors. This iteration of the training marked the first time that all supervisors (both sworn officers and civilian CPD staff members) were provided the opportunity to attend in-service training together. During past focus groups, civilian supervisors have expressed confusion about their role equivalencies with sworn members, their ability to discipline sworn members, and other facets of their duties.⁴³ The IMT believes this collaborative training approach has the potential to close operational knowledge gaps for civilian supervisors and address in-group/out-group relationship dynamics that are present within CPD's organizational culture.

Additionally, the Workforce Allocation Study (WFA Study) remained in progress at the end of the reporting period and, once finished, should 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 required duties, including adherence to administrative functions that can affect the overall efficiency and effectiveness of the CPD. Insufficient staffing may 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 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 thirteenth reporting period, the WFA vendor developed an organizational profile of the CPD, which serves as a framework for the staffing analysis. The organizational profile provides an overview of the makeup, structure, and size of the CPD while the interim framework report outlines the methodology for the analysis and discusses positions with the potential for civilianization. The IMT recognizes these preliminary documents show progress toward the full analysis. We look forward to the final report which we expect to include further detail and recommendations regarding implications for the previously mentioned pilots and overall supervision. Just as, if not more, important will be the implementation plan

⁴³ 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.

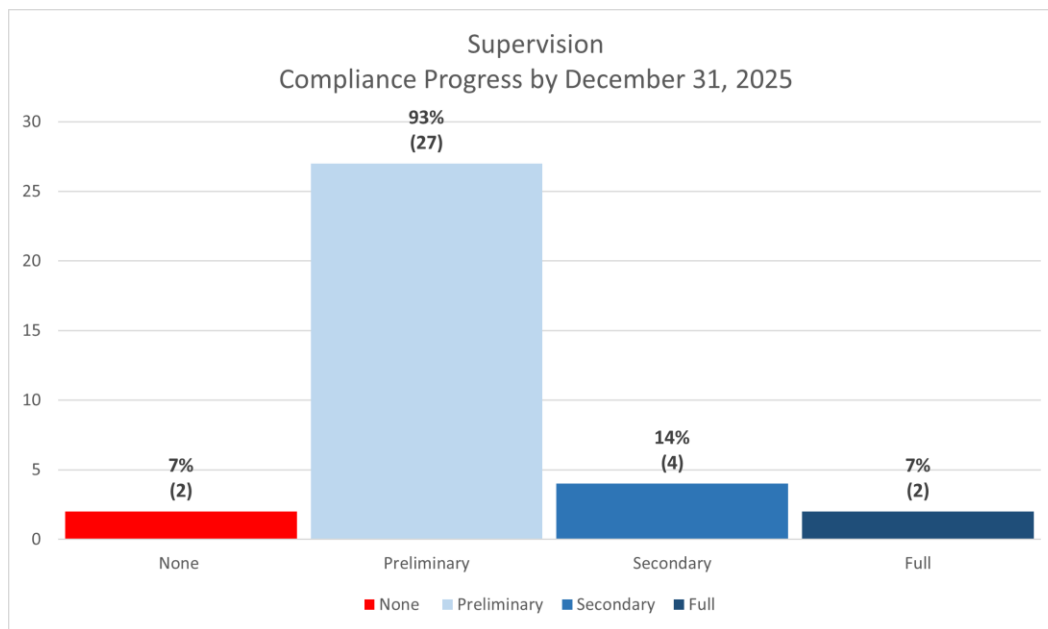
which should clearly outline how the CPD will operationalize the recommendations, indicate responsible stakeholders, and identify potential barriers or complicating factors.

The CPD, the vendor, and the Civic Consulting Alliance hold bi-weekly meetings to discuss the progress of the WFA Study. The City and the CPD recently announced the release of the report.⁴⁴ We look forward to monitoring and reporting on progress throughout 2026.

Supervision Progress through Thirteen Reporting Periods

Overall, we assessed the City’s compliance with 29 Supervision paragraphs during the thirteenth reporting period (¶¶347–57 and 359–76). In the thirteenth reporting period, the City and the CPD maintained Preliminary compliance for 23 paragraphs (¶¶347–48, 351–53, 355–56, 359–64, 366–67, and 369–76), achieved Secondary Compliance for one paragraph (¶354), maintained Secondary compliance for one paragraph (¶349), and achieved Full compliance with two paragraphs (¶¶350 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.



⁴⁴ *Report on Workforce Allocation Study*, MATRIX CONSULTING GROUP (March 27, 2026), <https://www.chicagopolice.org/stories/cpd-wfa-cpa/>.

Looking Ahead to the Fourteenth Reporting Period

In the fourteenth reporting period, the IMT looks forward to the CPD's expansion of Unity of Command and Span of Control Pilot Program into five 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 feedback from the evaluation committee. The IMT also looks forward to CPD identifying additional success metrics to demonstrate the operational effectiveness of the staffing model.

We also 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 cooperation is particularly relevant to 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 feedback about the newly implemented PES, along with data from the system to include annual goals, portfolio notes, and civilian evaluations. We also anticipate receiving further information about the tracking of inputs into the PES and the development of a Tableau dashboard to support that tracking. Further, the IMT should be informed as the CPD continues to expand other supervisory components of the Benchmark system, such as the Employee Intervention and Support System.

The IMT will conduct further interviews and focus groups with officers 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. 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/2026/04/7-IMR13-Supervision.pdf>. 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.⁴⁵

⁴⁵ 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

In the thirteenth reporting period, the City and the CPD maintained compliance levels with the many requirements of the Officer Wellness And Support section of the Consent Decree. As noted 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 thirteenth 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.

This reporting period, the CPD made progress implementing facets of its *Officer Support Systems Plan* and its *Officer Wellness Communications Strategy*. This included distributing “palm cards” and magnets that include a 24/7 phone number to access employee assistance services, phone numbers for the chaplains’ unit, and emphasize that PCD services are confidential, and conducting visiting to roll-calls to inform CPD officers about counseling and wellness services. Other aspects of these plans and strategies, however, are still in development. For example, the Strategy states that “Intranet Posting,” a portion of the strategy aimed at enhancing wellness initiatives through enhanced communications, will “begin in the first quarter of 2026 and continue [every quarter] throughout the year.”

Importantly, the City and the CPD achieved additional levels of compliance with some of its staffing requirements for providing clinical counseling services to CPD members (¶¶390 and 399). The IMT looks forward to reviewing the findings of CPD’s Workforce Allocation Study and the changes the CPD will implement in future monitoring periods.

While the City and the CPD made some compliance progress in the thirteenth reporting period, data and “process mapping” challenges prevented the City and the CPD from making additional compliance progress in the thirteenth reporting period.

With data, for example, the IMT continues to await the production of data from the CPD’s Column Case data management system, which captures Professional Counseling Division (PCD) service data. This data includes appointments, referrals, and whether appointments and referrals are made in a timely manner consistent with CPD policy and the Consent Decree. For example, the Column Case data management system should contain relevant data regarding ¶381’s requirement for “readily accessible confidential counseling service,” ¶389’s requirement for “how long it takes CPD members requesting counseling services to receive them,” and

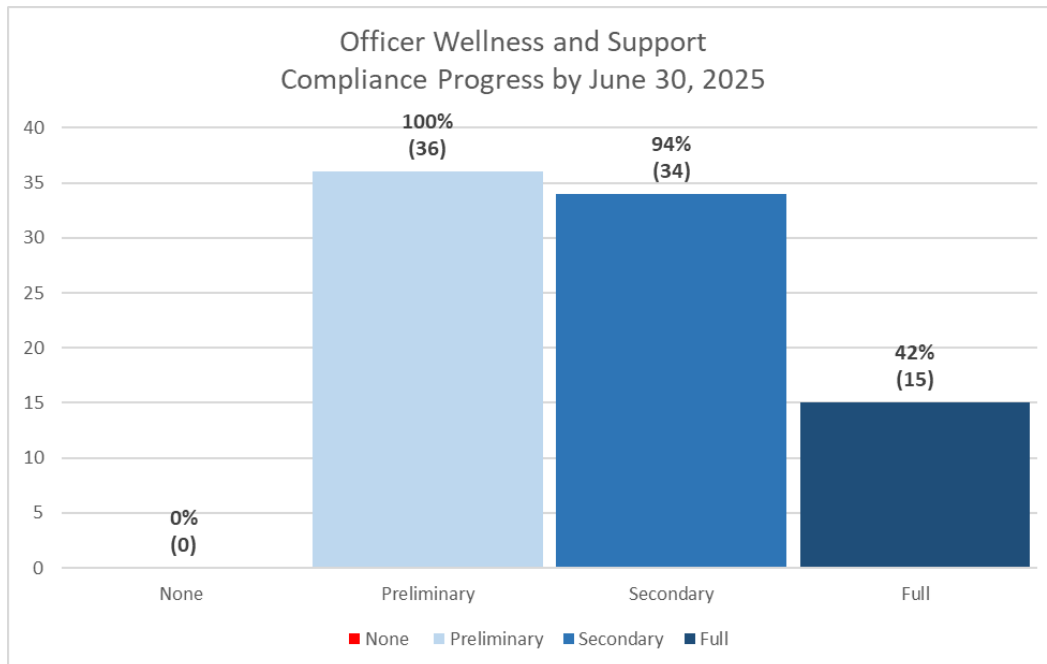
¶395’s requirement for members to have access to “non-emergency generalized counseling sessions with CPD’s licensed mental health professionals within two weeks of a member’s request.” The CPD indicated that it would send Column Case Management data to the IMT for review in the third quarter of 2025, but we have yet to receive the data. We hope to review Column Case data early in the next reporting period.

We also continue to encourage the CPD to engage in “process-mapping” to clarify its processes and procedures around some key issues, including when officers experience traumatic incidents. The CPD’s Traumatic Incident Stress Management Program (TISMP) has received recommendations from its required yearly audits conducted by the CPD’s Audit Division and is still in the process of implementing those recommendations. We believe, however, that engaging in a process mapping exercise would help the CPD to identify gaps in its processes so that officers required to participate in the TISMP are timely identified and do not fall through the cracks. An effective process for identifying officers necessitates the participation of the Patrol Bureau. The IMT encourages the CPD to work across Bureaus and Divisions to clarify these important processes, which are crucial to moving toward compliance with ¶¶409–11.

Officer Wellness and Support Progress through Thirteen Reporting Periods

Overall, the IMT assessed the City’s compliance with 36 Officer Wellness and Support paragraphs in the thirteenth reporting period (¶¶381–402, 404, and 406–18). The City and the CPD maintained Preliminary compliance for two paragraphs (¶¶416–17), achieved Secondary compliance with one paragraph (¶399), maintained Secondary compliance for 18 paragraphs (¶¶384–86, 388–89, 393, 395, 397, 407–15, and 418), achieved Full compliance with one paragraph (¶390), and maintained Full compliance with 14 paragraphs (¶¶381–83, 387, 391–92, 394, 396, 398, 400–02, 404, and 406).

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 Fourteenth Reporting Period

As noted above, the City and the CPD have made some progress during the current reporting period in implementing their *Officer Support Systems Plan* and *Officer Wellness Communications Strategy*. We look forward to further implementation progress in the next reporting period. We also look forward to further implementation of the CPD's *Officer Suicide Prevention Strategy* (§1388).

Further, we expect to see data from the Column Case management system, as well as the results of the City and the CPD's workforce allocation study, which will shed additional light on the CPD's staffing decisions, particularly regarding the PCD. We also look forward to reviewing documentation of the PCD supervisor training.

In addition to the data described above, we will also be looking for the City and the CPD to engage in process mapping for its identification of officers involved in traumatic incidents and whether those officers complete the required TISMP (§1409–11) and receive related follow-up (§1408).

Finally, we look forward to not only reviewing the findings of the CPD's workforce allocation study but also reviewing any changes to staffing regarding employee wellness that may result.

Specific compliance assessments, by paragraph, for the Officer Wellness and Support section are available here: <https://cpdmonitoringteam.com/wp-content/uploads/2026/04/8-IMR13-Officer-Wellness.pdf>. 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.⁴⁶

⁴⁶ 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.⁴⁷ Some requirements previously assigned to other entities have now been assumed by the Community Commission for Public Safety and Accountability (CCPSA). In addition, some of the requirements of the Accountability and Transparency section call for action by the City. All of these moving parts make up a complex accountability system in the City of Chicago.

The City’s complex accountability system requires consistent communication and collaboration among all entities. As noted in prior reports, there has not always been consistent communication between the CPD and COPA. However, since the tenth reporting period, the entities have appeared to improve their collaborative relationship, and COPA has continued to report improved access to data. We look forward to seeing consistent communications and seamless access to reports and data between the entities.

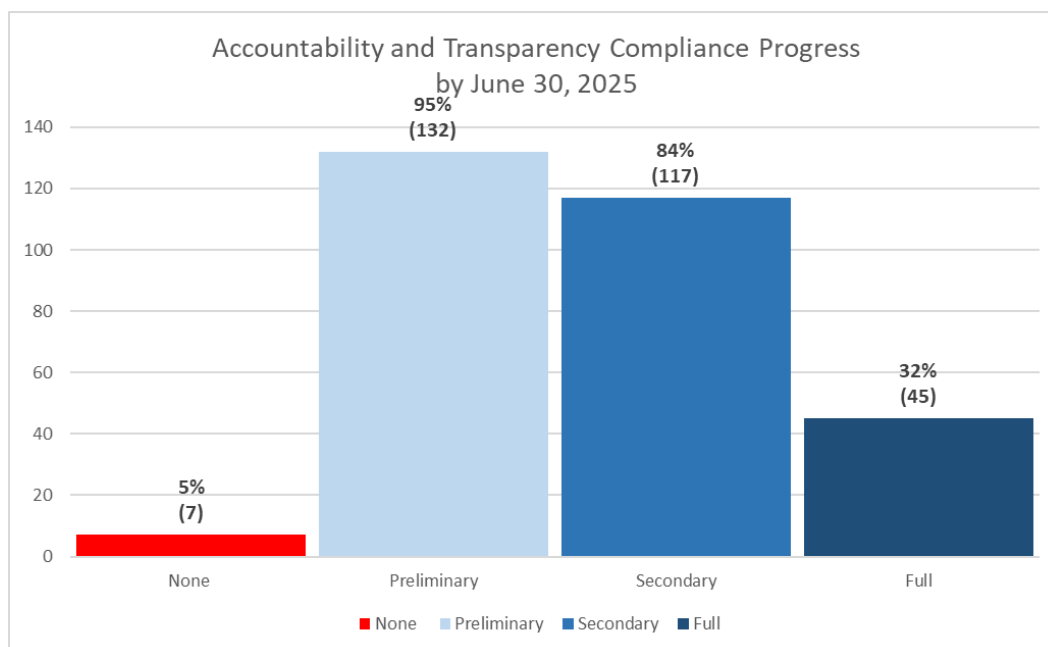
For the past several reporting periods, the CPD, COPA, and the Police Board have conducted regular meetings with the IMT and the OAG. In the eighth reporting period, the CCPSA began conducting monthly meetings as well, but the vast majority of these meetings have been—and continue to be—canceled by the City. In an effort to foster a more collaborative process, in addition to these monthly meetings, the IMT continued to regularly meet individually with the City entities and the OAG. The increased individual meetings and direct communications allowed the IMT to hear challenges and concerns, to explain compliance methodologies, and to provide technical assistance (*see* ¶656). Moving forward, we feel the enhanced, less-rigid communications will further assist the City in achieving and maintaining compliance with the Consent Decree.

⁴⁷ The Deputy PSIG achieved Full compliance with all requirements pertaining to its office in the fourth reporting period (January 2021 – 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.

Accountability and Transparency Progress through Thirteen 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 15 paragraphs (¶¶445, 451, 463, 476, 481–82, 492–93, 495, 501, 521–22, 529, 531, and 549). The City also maintained Secondary compliance with 66 paragraphs (¶¶427–28, 432–35, 440, 443–44, 446, 448–49, 453–57, 459–61, 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, 548, 552, 560, and 564), seven of which are under assessment for Full compliance (¶¶446, 475, 483, 518, 527–28, and 530), and met Secondary compliance with six paragraphs (¶¶540–42, 544, and 546–47), one of which is also under assessment for Full compliance (¶546). The City also maintained Full compliance with 43 paragraphs (¶¶424–26, 429–31, 436–39, 441–42, 450, 452, 462, 467, 470, 473, 485, 499, 502, 511, 533–39, 543, 550–51, 553–59, 561–63, and 565) and met Full compliance with two paragraphs (¶¶447 and 526). The City did not reach any level of compliance with seven paragraphs (¶¶488–91, 494, 512, and 545).

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 thirteenth reporting period, the CPD continued to make progress toward compliance with Accountability and Transparency requirements.⁴⁸ The CPD developed and provided additional onboard and in-service training modules for BIA and Accountability Sergeants. The CPD also provided various data sources to demonstrate compliance with each paragraph's requirements, including, for example, audio recordings of complainants and participants involved in log number investigations, notice of allegation examples, BIA satisfaction surveys, and onboard training records.

During the ninth and tenth reporting periods (July 2023 – June 2024), the CPD developed several BIA in-service training modules based on previous discussions about the format and purpose of the training. During the eleventh reporting period, BIA delivered training on many of the in-service training modules and developed several onboard training modules. During the twelfth and thirteenth reporting periods, the CPD continued to develop BIA onboard training modules and in-service training modules, including eLearning versions of the trainings.

In the twelfth reporting period, the CPD reached Full compliance with several paragraphs (¶¶431, 450, 452, 462, 467, 499, 502, and 553). We note, however, that the CPD did not provide Full compliance submissions for these paragraphs during the thirteenth reporting period.⁴⁹ The IMT expects to receive documentation demonstrating ongoing efforts related to maintaining Full compliance with each paragraph each reporting period. If the CPD fails to do so, the CPD will be at risk of losing Full compliance in the fourteenth reporting period.

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

⁴⁸ 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 officer 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.

⁴⁹ The CPD produced the BIA quarterly reports for Full compliance review with ¶¶431 and 462. However, as we continue to note, the reports alone are insufficient for Full compliance with those paragraphs. To maintain Full compliance with those paragraphs, the CPD must produce the underlying data relevant to those paragraphs rather than a summary of that data.

the thirteenth 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 and the Court's November 21, 2025 Order regarding Public Safety Briefings and Street Deputy Walk Throughs.

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

We continue to note that the Accountability Sergeants' caseload and backlog numbers may not improve until personnel are primarily dedicated to investigating cases in the districts. While the IMT is concerned about the high volume of BIA investigators' and Accountability Sergeants' caseloads and backlog, we are encouraged by the CPD's commitment to address this problem. We are also 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 the CPD and BIA working to address their current backlog of cases.

Civilian Office of Police Accountability

In the thirteenth 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.

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 had already achieved Full compliance prior to the twelfth reporting period. 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 (as 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 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 thirteenth 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, BIA, and NAMI Chicago to provide relevant and thorough training on topics required by the Consent Decree (see ¶¶540–42). In the thirteenth reporting period, the Police Board completed developing and providing initial training to current Police Board members and hearing officers on each of the topics required by ¶540. The Police Board also provided its *Training Plan*, which identifies a plan for annual training for Police Board members and hearing officers that covers ¶540's training topics.

Throughout the thirteenth 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.⁵⁰ That litigation is currently pending appeal, and pursuant to the

⁵⁰ 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.

court's decision, the Police Board only heard cases in which the officer consented to the Police Board's procedures in the thirteenth 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).⁵¹ During the twelfth and thirteenth reporting periods, there were no vacancies on the Police Board.

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 sessions, administering a survey, and releasing educational materials about the role of COPA and the search process. The CCPSA continued its efforts in the thirteenth reporting period. 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.

⁵¹ As noted in our *Comprehensive Assessment Part II*, the IMT recommends incorporating the CCPSA into the Consent Decree to reflect current City entity responsibilities.

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 and thirteenth reporting periods, COPA produced evidence of its community engagement efforts with the public and CPD members over the past five years as well as a *Community-Police Mediation* policy and mediation training materials (see ¶1512). The IMT appreciates the City's and COPA's efforts and looks forward to further updates on the program in the fourteenth reporting period.

Finally, the City continued its efforts to comply with the Police and Community Relations Improvement Act, 50 ILCS 727/1-1 *et seq.* (PCRIA), which sets forth the requirements with regard to the criminal investigation of officer-involved death incidents. Specifically, PCRIA requires, among other things, that "[n]o investigator involved in the investigation may be employed by the law enforcement agency that employs the officer involved in the officer-involved death" 50 ILCS 727/1-10(b).

During the twelfth and thirteenth reporting periods, 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 prior reports, 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.

Looking Ahead to the Fourteenth Reporting Period

In the fourteenth reporting period, for the CPD, the IMT looks forward to reviewing a more comprehensive sample of Illinois Law Enforcement Training and Standards Board (ILETSB) documentation; updated attendance records for BIA's 2025 in-service trainings and corresponding training evaluation materials; the current *CPD Consent Decree eLearning* curriculum; updated information on the CPD's plans to reduce the investigative backlog of cases; updated G03-06 policy series; and Full compliance submissions with ¶¶431, 450, 452, 462, 467, 499, 502, and 553.

In addition, the IMT looks forward to the final versions of the CPD's *Officer-Involved Shooting and Officer-Involved Death Incident* policy series (G03-06, G03-06-01, and G03-06-02), which is one of the most important requirements of the Consent Decree.

For COPA, the IMT looks forward to receiving updates on COPA's plan for productions in the fourteenth and fifteenth reporting periods and updates on the *Community-Police Mediation Pilot Program*. For the Police Board, the IMT looks forward to receiving updates on the Police Board's implementation of annual training for Police Board members and hearing officers. For the CCPSA, the IMT looks forward to receiving updates on the CCPSA's search for a new COPA Chief Administrator.

Specific compliance assessments, by paragraph, for the Accountability and Transparency section are available here: <https://cpdmonitoringteam.com/wp-content/uploads/2026/04/9-IMR13-Accountability-and-Transparency.pdf>. 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.⁵²

⁵² 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 thirteenth 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 ¶607 and Preliminary compliance with ¶605, which represent significant steps forward on two critical fronts.

First, the City and the CPD revised its draft *Data Systems Plan* required by ¶607, which will help guide the CPD's technology evolution well into the future. The *Data Systems Plan* contains detailed information regarding data system implementation, including specified timelines, and outlines the CPD's purpose, mission, and responsibilities for its data systems.

This will be useful in guiding the CPD's implementation activities across the Consent Decree. The *Data Systems Plan*, for example, also includes a detailed Appendix, which includes tabs with areas of opportunity for each ¶606 assessment category; a comprehensive list of data required by the Consent Decree with corresponding paragraph numbers and references to relevant data systems; and a detailed applications list.

The *Data Systems Plan* also features information about the CPD's progress toward identifying and contracting with a vendor to develop and implement a new records management system (RMS) and information about the tasks before other vendors such as Benchmark Analytics and Salesforce, which are developing many tools, platforms, and interfaces to streamline the CPD's data management technologies. It also provides a helpful matrix that depicts the CPD's priorities for system migration.

While we look forward to the CPD moving forward with the *Data Systems Plan*, the CPD must continue to review and revise the plan accordingly. In its current form, we believe that there is room for improvement in future iterations, and we hope that the CPD will increase the level of detail in the *Data Systems Plan* to provide more specific implementation approaches. We also note that a version of the *Data Systems Plan* must become public, per ¶640.

Second, the City and the CPD shared documentation demonstrating "adequate funding" to develop the required early intervention system (EIS). Paragraph 605 requires the City to ensure adequate funding for the CPD to "develop, implement, and maintain" the EIS, and the IMT appreciates documentation of the ongoing development activities performed by Benchmark Analytics. Benchmark Analytics is the vendor selected by the City to create new or enhance existing data systems for a variety of crucial CPD functions and Consent Decree requirements, including for example, the early intervention system ¶¶583-605.



Separately, this reporting period, the City and the CPD did not achieve additional levels of compliance with crucial paragraphs related to the CPD’s Tactical Review and Evaluation Division (TRED) and Force Review Board (FRB): ¶¶575 and 580.

The IMT continued to observe inconsistent execution of FRB meetings, and those which we observed during this monitoring period did not consistently evaluate opportunities 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 Standard Operating Procedure (SOP) 2020-03. To achieve Preliminary compliance with ¶575, the City and the CPD must demonstrate consistent TRED staffing to ensure “sufficient resources to perform” required TRED tasks. To achieve Full compliance with other FRB 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.⁵³

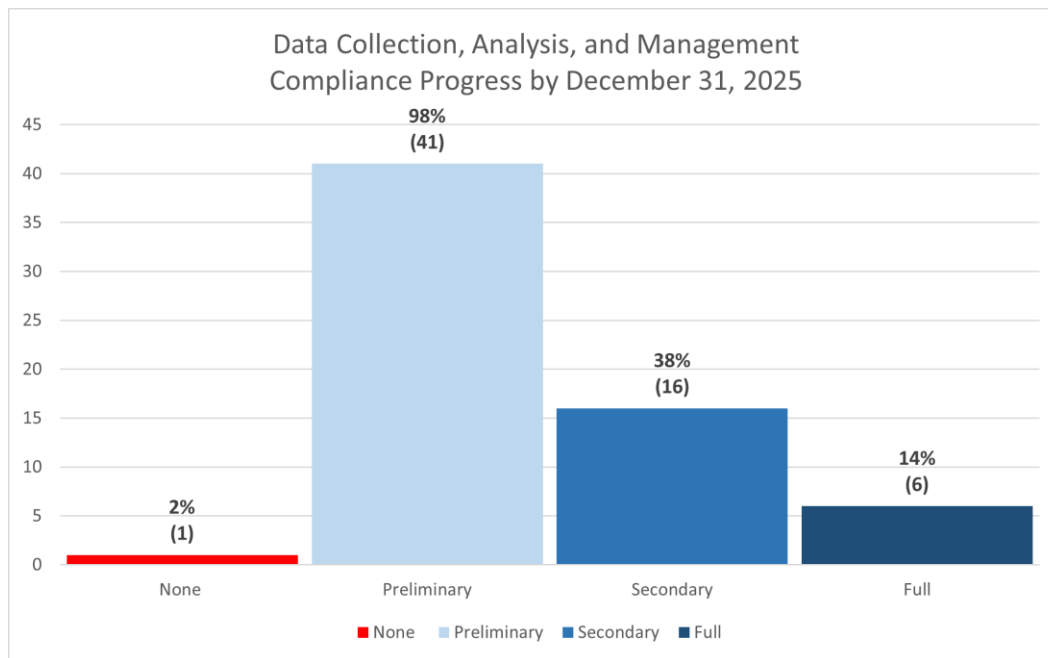
⁵³ The City and CPD have provided the IMT with a PowerPoint template used by TRED during FRBs, which was developed to follow SOP 2020-03. This is a useful tool for consistent reviews, but it is not alone sufficient to demonstrate Full compliance with this paragraph, which requires a critical review of 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](#).)

Finally, we remain concerned about TRED staffing levels. 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 Thirteen Reporting Periods

Overall, the IMT assessed the City’s compliance with 42 Data Collection, Analysis, and Management paragraphs. At the end of the thirteenth reporting period, the City achieved Preliminary compliance with one paragraph (¶605), maintained Preliminary compliance with 24 paragraphs (¶¶572, 574, and 583–604), achieved Secondary compliance with one paragraph (¶607), maintained Secondary compliance with nine paragraphs (¶¶569–70, 573, 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 one paragraph (¶575).

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 Fourteenth Reporting Period

Moving forward, the CPD should continue to work collaboratively to address the Data Collection, Analysis, and Management section of the Consent Decree. We look forward to the below in the next reporting period:

- ❖ the CPD continuing to make progress as it develops its EIS system and accompanying training (see ¶¶583–605);
- ❖ the Information Systems Development Group (ISDG) leading the implementation of the *Data Systems Plan* per ¶¶608;
- ❖ the CPD developing a policy that memorializes COPA’s access to CPD data systems, as this remains a barrier to Full compliance with ¶¶570;
- ❖ the CPD ensuring that all community comments related to its public Use of Force Dashboard are appropriately and timely addressed in accordance with TRED procedures (as this remains a barrier to Full compliance with ¶¶581–82); and
- ❖ the CPD FRB improving its proceedings to comply with the Consent Decree and CPD policies.

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

Specific compliance assessments, by paragraph, for the Data Collection, Analysis & Management section are available here: <https://cpdmonitoringteam.com/wp-content/uploads/2026/04/10-IMR13-Data-Collection-Analysis-and-Management.pdf>. 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.⁵⁴

⁵⁴ 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, 862–64, 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. Beginning in the thirteenth reporting period, five additional paragraphs were monitored (¶¶822–26).⁵⁵ The remaining eight paragraphs (¶¶844–51) will be monitored beginning in the fourteenth reporting period.

In the thirteenth reporting period, the City and the CPD did not achieve any new levels of compliance for paragraphs in the Investigatory Stops, Protective Pat Downs, and Enforcement of Loitering Ordinance section. However, the City and the CPD's lack of compliance advancement does not mean they did not make progress this reporting period. The City and the CPD worked diligently toward implementing the revised policies governing investigatory stops, protective pat-downs, and enforcement of loitering ordinances. For example, the City and the CPD revised the G03-08, *Police Encounters and the Fourth Amendment Policy* suite. Based on discussions with the City and the CPD, the IMT understands the City and the CPD plan to make the G03-08 Policy suite, and the S10-02, *Gang and Narcotics Loitering Policy* suite effective early in the fourteenth reporting period. The City and the CPD also developed and received no-objection notices from the IMT and OAG for an eLearning training on the updated policies. This progress forecasts substantial compliance advancement for numerous paragraphs in the fourteenth reporting period if the City and CPD effectuate the policies, substantially complete training on the policies, and demonstrate community engagement. See ISR Stipulation Figure 2 below.

The City and the CPD also made substantial progress toward implementing the Temporary Detention Application (i.e., Stop Application) this reporting period. The Stop Application will streamline the CPD's reporting by providing one application for multiple types of police encounters. The City and the CPD have provided the

⁵⁵ An Amended Monitoring Plan was put in place during the twelfth reporting period, which established that the IMT will begin to monitor ¶¶822–26 during the thirteenth reporting period (July – December 2025).

OAG and the IMT with demonstrations of the Stop Application and have taken the Parties' feedback on adjustments to the application to improve efficacy of reporting and supervisory review. The City and the CPD have also developed and received no-objection notices from the IMT and OAG on an eLearning for the Stop Application. Therefore, similar to the implementation of the investigatory stop policies, if the City and the CPD are able to train and implement the Stop Application in the next reporting period, they are likely to achieve new levels of compliance with numerous investigatory stop paragraphs in the fourteenth reporting period. See ISR Stipulation Figure 2 below.

While this progress is promising, there are some areas where the City and the CPD have fallen short during the thirteenth reporting period. For example, the IMT received limited evidence of improvements in community engagement on investigatory stop procedures during this reporting period. In the Independent Monitoring Report for the twelfth reporting period, the IMT requested that the City and the CPD ensure specific topics relating to investigatory stops, protective pat downs, and enforcement of the loitering ordinances be addressed in its public awareness campaign. We had additional discussions with the City and the CPD on this topic during a site visit this reporting period.

Towards the end of the reporting period, we received some evidence of community engagement in the development of the *Gang and Narcotics Related Loitering / Police Encounters and the Fourth Amendment* training courses. Specifically, the CPD produced notes of a meeting with the Training Community Advisory Committee (TCAC) indicating that the CPD presented the revised policies to the TCAC and received feedback. Moving forward, we look forward to receiving evidence that the CPD has incorporated community feedback into policy development. Similarly, while some improvements were made with respect to the data analyses required by ¶860, TRED's reports continue to omit some of the paragraph's requirements. For example, while TRED's 2024 year-end report includes data on multiple reporting deficiencies by officers (¶860(d)), the report does not include an analysis of the reasons for report rejections (¶¶860(c) and (e)). The IMT appreciates the re-submission of the CPD's plan to address issues identified during its needs assessment consistent with ¶860(f) but the CPD must address all sub-paragraphs with details regarding roles and responsibilities, implementation steps, timelines, communication and feedback loops, and anticipated outcomes before it will advance in compliance.

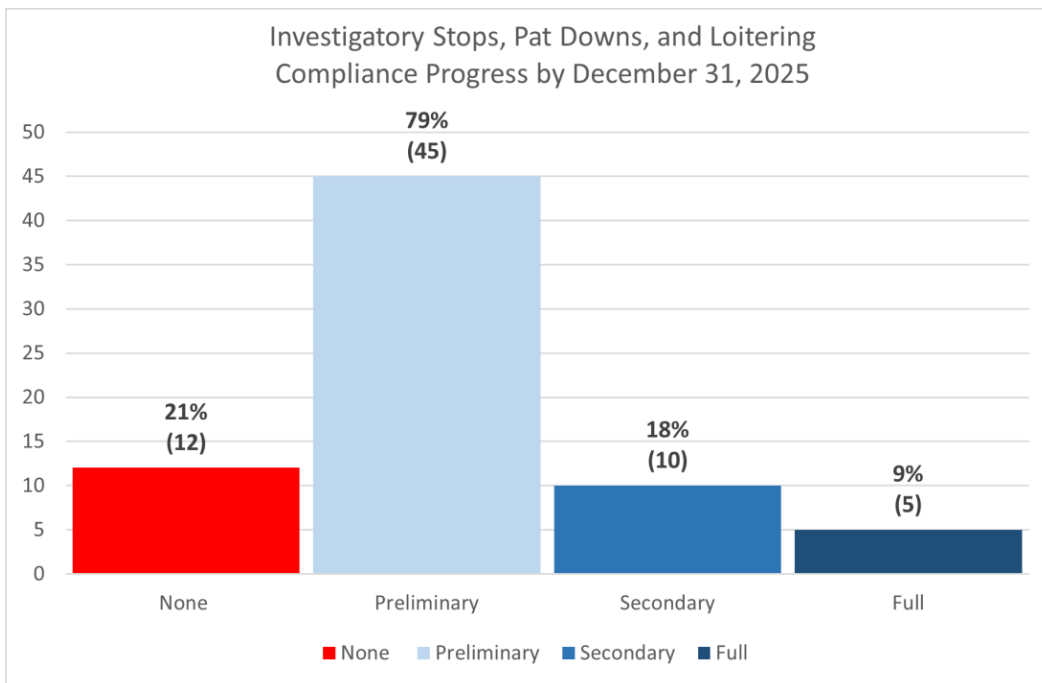
Investigatory Stops, Protective Pat-Downs, and Enforcement of Loitering Ordinances Progress through Thirteen Reporting Periods

During this reporting period, the IMT assessed the City's and the CPD's compliance with 57 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 did not achieve Secondary compliance with any paragraphs but maintained Secondary compliance with five paragraphs (¶¶827, 838–39, 852, and 858). The City and the CPD did not achieve Full compliance with any paragraphs. The City and the CPD maintained Full compliance with five paragraphs (¶¶834–35, 854, 856, and 868). There are twelve paragraphs that are not in compliance (¶¶822–26, 836–37, 840, 861, 869–70, and 872).⁵⁶

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.

⁵⁶ 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 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 below sets out the Amended Monitoring Plan for investigatory stops, protective pat-downs, and enforcement of Loitering Ordinances.

ISR Stipulation Figure 1:
 Investigatory Stops, Protective Pat-Downs, and
 Enforcement of Loitering Ordinances **Amended Monitoring Plan**

Monitoring Period	Paragraphs
Ninth Reporting Period (July 1, 2023–December 31, 2023)	¶¶854, 866, 868 (Total = 3)
Tenth Reporting Period (January 1, 2024–June 30, 2024)	¶¶803–21, 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)

Looking Ahead to the Fourteenth Reporting Period

In the next reporting period, we anticipate that the CPD may advance compliance levels with several investigatory stop paragraphs if they improve their community engagement plans, implement and train officers on the investigatory stop policies, and implement the Stop Application. ISR Stipulation Figure 2 below specifies the

paragraphs that the IMT anticipates may move next reporting period (the fourteenth reporting period) and the requirements for their advancement.

ISR Stipulation Figure 2: Expectations for the Fourteenth Reporting Period

Relevant ¶s	Expectations for the Fourteenth Reporting Period
¶¶803–21, 827–33, 857, 859–60, 862–64, 873	<p>The CPD must complete the six steps below for each of these paragraphs to achieve Secondary compliance:</p> <ol style="list-style-type: none"> 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 of 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 trainings for the revised policies. 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 Committee (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 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.
¶862–64	<ul style="list-style-type: none"> • 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 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 officers 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 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.

Conclusion, Looking Ahead to *Independent Monitoring Report 14*

We have concluded our monitoring efforts for the thirteenth reporting period (July 1, 2025, through December 31, 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 14*, will cover the reporting period from January 1, 2026, through June 30, 2026. 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 fourteenth and fifteenth 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 Court must find that the City and its relevant entities maintained 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 13, Spring 2026)
14th Reporting Period	January 1, 2026 – June 30, 2026 (Independent Monitoring Report 14, 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.

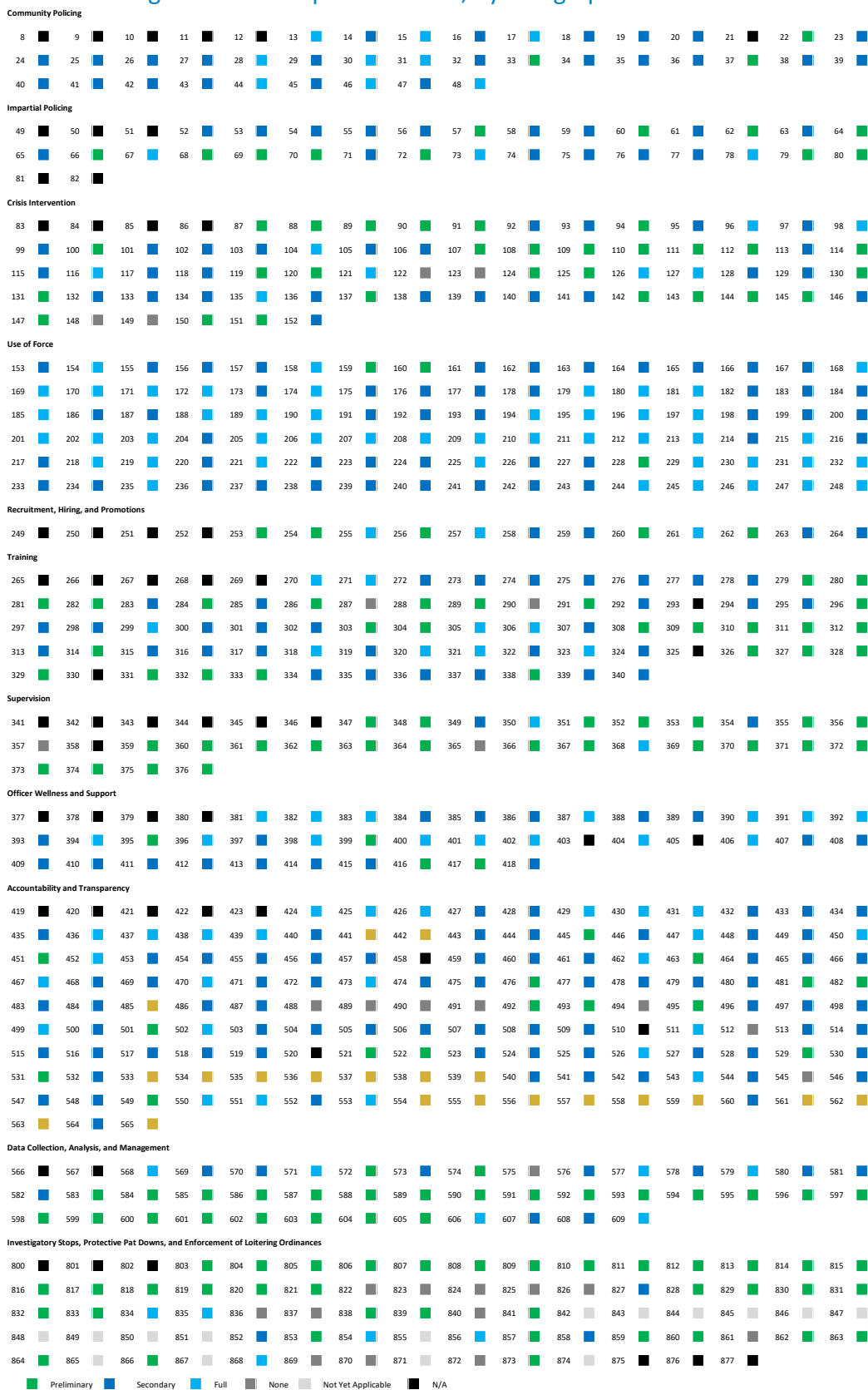
[Conclusion Figure 2](#) on the following page reflects all monitorable paragraphs – including the new Investigatory Stops section – in the Consent Decree, which the IMT will continue to monitor in Year Seven.

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 Seven 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, 861, 862, 863, 864, 865, 866, 868, 869, 870, 872, 873 (Total = 65)
TOTAL	617

Conclusion Figure 3. All Compliance Levels, By Paragraph



Attachment A:
Office of the Illinois Attorney General
Comments
(April 8, 2026)



OFFICE OF THE ATTORNEY GENERAL
STATE OF ILLINOIS

KWAME RAOUL
ATTORNEY GENERAL

April 8, 2026

Margaret A. Hickey
Independent Monitor
ArentFox Schiff LLP
233 S. Wacker Drive, Suite 7100
Chicago, IL 60606
Maggie.Hickey@afslaw.com

**Re: OAG Comments on the Thirteenth 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 Thirteenth Monitoring Report (Report) before the Independent Monitoring Team (IMT) files it with the Court. The Report covers July 1, 2025, through December 31, 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 26% of the original Consent Decree requirements, which is a 3% 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 Created or Revised Nearly All Written Policies to Include Required Reforms, but
Staffing Levels Remain Insufficient**

CPD is in preliminary compliance with 97% 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 two critical policy suites: S02-07, Interaction with Persons with

Disabilities and E05-01, Performance Evaluations of All Sworn and Civilian Department Members. CPD also refined several policies, including G02-05, Interactions with Youth, and G03-09 and S10-02, Investigatory Stops and Gang-Related Loitering, to ensure compliance with the Consent Decree.

Although this progress is noteworthy, the OAG remains concerned that staffing of critical units related to reform and accountability is insufficient. As the IMT reports, the Crisis Intervention Unit (CIU) remains below staffing recommendations and the Bureau of Internal Affairs (BIA) and Tactical Review and Evaluation Division (TRED) still maintain large backlogs of reports. The recently published workforce allocation study¹ provides comprehensive staffing recommendations, including for various reform-related positions. We encourage the City and CPD to implement those recommendations and prioritize staffing of these critical units.

Newly Developed Data Systems Must Be Put to Full Use

To reach further compliance levels, CPD must use newly designed or revamped data and analysis tools to their full potential. The Department must use these disparate tools to ensure it collects meaningful and accurate data to gauge compliance with written policies. Further, having unified data systems will be essential for streamlining on-the-ground compliance. CPD has already deployed some of these technologies, such as the Digital Resources Guides (DRGs), and other technologies are set to go live in the next reporting period and beyond. CPD is currently devising and finalizing a digital performance evaluation system (PES), digital centralized tracking system for training and Field Training (FTO) requirements, centralized online hubs for training that is eLearning-based, and other integrated digital software.

OAG commends CPD for taking steps to integrate and centralize data systems that allow for effective policing and advancing compliance with the Consent Decree. To move towards operational compliance, however, CPD and the City must use these tools to produce actionable data, and study the effectiveness of the Department's practices, policies, and procedures. OAG recognizes the immense work that devising and implementing such tools and programs entails. Moving long-established, siloed processes into new, unified forms requires significant strides in software, hardware, policy, practice, and training. These moves take time to effectively plan and execute, but, seven years after the Consent Decree began, the City and CPD must prioritize rolling out and using these systems now.

The Parties Must Continue to Develop Methodologies for Full Compliance

As the City and CPD have developed many of the policies and training materials to comply with the Consent Decree in recent monitoring periods, the OAG and the City have begun to focus on how to measure CPD's compliance with required reforms in practice. 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 found CPD in full compliance with two *key* use of force

¹ Report on the Workforce Allocation Study, March 27, 2026, available at <https://www.chicagopolice.org/wp-content/uploads/Workforce-Allocation-Study.pdf>.

requirements: Paragraph 154, which requires CPD to maintain best practices in its policies, and Paragraph 158, which requires CPD's use of force policies to promote trust between CPD and the communities it serves. IMT reached these conclusions after assessing efforts at community engagement and CPD's use of public comments in revising policies. OAG strongly recommends that CPD and IMT continue to identify specific methodologies for assessing whether the Department's policies on use of force build community trust and are based on best practices, in compliance 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

Deputy Chief, Civil Rights Bureau

Office of the Illinois Attorney General

115 S. LaSalle St.

Chicago, Illinois 60603

(773) 590-7959

Mary.Grieb@ilag.gov

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

Attachment B:
City of Chicago
Comments
(April 9, 2026)



City of Chicago
Brandon Johnson, Mayor

Department of Law

Mary Richardson - Lowry
Corporation Counsel

121 North LaSalle Street
Suite 600
Chicago, Illinois 60602
(312) 744-0220
(312) 744-5185 fax

www.cityofchicago.org

April 9, 2026

Independent Monitoring Team
c/o Maggie Hickey, Independent Monitor
233 South Wacker Drive, Suite 7100
Chicago, IL 60606
Maggie.Hickey@afslaw.com

Office of the Attorney General of Illinois
c/o Christopher Wells, Chief of Public Interest Division
115 S. LaSalle St.
Chicago, IL 60603
Christopher.Wells@ilag.gov

VIA EMAIL

***RE: Independent Monitoring Team's Second Draft of IMR-13
Report***

Counsel –

The City writes to provide its response and comments to the IMT's Second Draft of IMR-13 Draft 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 to the IMT that reflect work done in the reporting period. This also includes paragraphs where the City and CPD produced materials to achieve new levels of compliance and the IMT's draft is silent on the paragraph and fails to address why the identified deliverable failed to achieve new compliance. The City also through this designation seeks some other clarifications on the comments provided by the IMT.
2. ***Methodology:*** The City disputes the methodology applied, or seeks additional detail regarding the methodology applied, or seeks additional detail for the methodology described for a future level of compliance, or the City has questions or concerns about a future methodology that the IMT has identified or described.
3. ***Factually Inaccurate:*** The City has identified factual corrections or clarifications in the report that the City believes are substantive and/or relevant to the compliance assessment.
4. ***Narrative Corrections or Inconsistencies:*** The City has identified factual corrections or clarifications in the assessment narrative that the City believes are substantive and/or relevant to the compliance assessment.

2 NORTH LASALLE STREET * SUITE 400
CHICAGO, ILLINOIS 60602
312.744.6472 • Matthew.Axelrod@CityofChicago.org

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

COMMUNITY POLICING

1. CITY

The City seeks clarification on the IMT's methodology for Full compliance for paragraph 18. Consent Decree paragraph 18 requires the City to "establish and coordinate regular meetings, **at minimum quarterly**, with representatives from City departments, sister agencies, and CPD to collaborate on developing strategies for leveraging City resources to effectively and comprehensively address issues that impact the community's sense of safety, security, and well-being (emphasis added)." The Mayor's Office of Community Safety Cabinet (MOCS) meetings occur bi-weekly throughout the year. In IMR-8 the IMT stated, "(t)o achieve Full compliance, the City and CPD must demonstrate progress and impact of the coordinated interventions by City departments including CPD." The City has consistently produced evidence in support of Full compliance. For example, in IMR-13 the City produced a compliance summary report demonstrating the progress and impact of the coordinated interventions of the MOCS meetings in 2025. (MONITOR2563: MONITOR00398719-MONITOR00398859; MONITOR2864: MONITOR00424796-MONITOR00424965) The City looks forward to further discussion on this issue with the IMT.

2. CPD

The City and CPD seek clarification on the IMT's methodology for Secondary compliance for paragraph 37. The IMT states that Secondary compliance requires a standalone biennial in-service Community Policing Training. This does not reflect CPD's prior discussions with the IMT. While CPD aims to incorporate a standalone in-service training every three years beginning in 2027, CPD and the IMT discussed using a blended training approach in the intervening years. CPD provided a map of the in-service trainings where those concepts are interwoven as an informal production in IMR-13, and also provided this formal compliance recognition on 15 January 2026 (MONITOR2949). The City and CPD look forward to further discussion on this issue with the IMT.

IMPARTIAL POLICING

The City and OEMC seek clarification on the IMT's methodology for Secondary and Full compliance for paragraph 66. In IMR-8 the IMT stated that OEMC was to update their Limited English Proficiency policy and ensure it was consistent with CPD's S02-01-05, Limited English Proficiency (MONITOR2781: MONITOR00415422-MONITOR00415435; MONITOR2846: MONITOR00424414-MONITOR00424468). In IMR-12, OEMC worked with CPD to ensure its LEP policy was consistent with CPD's S02-01-05 and produced evidence of alignment in IMR-12 (MONITOR2630: MONITOR00403449-MONITOR00403464). The City Language Access Coordinator also reviewed OEMC's policy and provided comments in IMR12. OEMC completed and received no objections to policy and training. The IMT also asked for data demonstrating LEP policy compliance and usage, this data was produced to the IMT in IMR-13 as well. It was the City and OEMC's understanding that paragraph 66 would be in full compliance in IMR-13. The City and OEMC look forward to further discussion on this issue with the IMT.

CRISIS INTERVENTION

1. CPD

The City and CPD disagree with the IMT withholding compliance and seek clarification on the IMT's methodology for Secondary compliance for paragraph 88. The IMT articulated that the path towards compliance on this paragraph requires "an implementation strategy that supports the collecting, tracking, and maintaining of data required under ¶88, including: 1) De-escalation and use of force analysis on mental health calls relative to all calls; 2) Analysis of injury to officers, subjects, and community members relative to all calls; 3) Analysis of disposition data reflecting reduction in criminal justice system involvement; [and] 4) Arrest data on z coded calls (misdemeanor, felony, city ordinance)." CPD's productions during IMR-13 either accomplished these tracking requirements or laid out a clear strategy to attain them. CPD produced an array of deliverables during the last reporting period for ¶88, including the Certified CIT Officer Implementation Plan Framework and its subsequent Plan (MONITOR2931) for ¶88a. and e., the DOCS Activity Log for ¶88e. (MONITOR2930), the CCMHE Review and CIT Coordinator Annual Review Process for ¶88d. and f. (MONITOR2859), as well as records for Crisis Intervention / Wellness In-Service Training for ¶88 b., c., and d. (MONITOR2891). The Department also produced a summary of these intended compliance efforts for this paragraph on 15 January 2026 (MONITOR2944). CPD implemented nearly all of the collection, tracking, and maintenance strategies for the specified data through the above deliverables. In instances where it has not, the Department has clearly laid out a strategy to accomplish these objectives. For example, pages 53-55 of the Certified CIT Officer Implementation Plan conclude by articulating the CPD's intention to "enhance its analysis of CIT call outcomes and conduct deeper review of uses of force in CIT," as well as "enhance the CIT Report to improve both the data entry process and the ability to extract data with greater specificity. This includes capturing detailed information on the de-escalation techniques used during CIT calls, as well as any post-incident follow-up activities, such as referrals to mental health services related incidents." The data contained within these productions, in addition to articulated strategies to refine and utilize these data, warrant Secondary compliance with ¶88. The City and CPD look forward to further discussion on this issue with the IMT.

The City and CPD disagree with the IMT withholding compliance and seek clarification on the IMT's methodology for Secondary compliance for paragraph 89. The IMT correctly noted that the City's proposed review process, as outlined in the CIT Coordinator Summary Report for IMR-12 (MONITOR2636), the Certified CIT Officer Implementation Plan (MONITOR2931), and the CCMHE Review and CIT Coordinator Annual Review Process produced (MONITOR2859), should reflect the City's alignment between CPD policy, CCMHE bylaws, and the Consent Decree requirements. These processes suffice for what the IMT has described in methodologies as its pathway towards Secondary compliance: "evidence of a plan to achieve the requirement of the CIT Coordinator to complete an annual review of policies" and practices of the CIT Program. Through these deliverables, the City and CPD have accomplished another component of the methodology, requiring them to "outline the process by which the CIT Program will consider prior CCMHE feedback when annually reviewing and revising its policies." In the CCMHE Review and CIT Coordinator Annual Review Process produced on 26 November 2025, CPD specifically described the internal process the CIT Coordinator will undergo annually to review its policies and practices to assess if a revision of these materials is warranted. This follows the paragraph's language, which makes clear that the CIT Coordinator will execute an internal process to assess if revisions will occur. CPD

also notes that the IMT has requested the Department codify this requirement in its policy via revision of CCMHE bylaws and of Special Order S05-14 Crisis Intervention Team (CIT) Program. The Department notes that it has codified participation in the CCMHE in the existing version of the policy. CPD also recognizes that the organizational capacity of CCMHE must be concordant with any requested timeframe of the committee's guidance. The process it has established will enable the Department to review its policies, procedures, and trainings, conduct meaningful community engagement, and adhere to state, City, and Consent Decree requirements. This is the rationale for the process articulated on page 6 of the CIT Coordinator Summary Report for IMR-12. The IMT also notes that City and the CPD "should outline the process by which the CIT Program will consider prior CCMHE feedback when annually reviewing and revising its policies." In the CCMHE Review and CIT Coordinator Annual Review Process produced on 26 November 2025, the Department included a summary of the feedback received from CCMHE on a policy suite, and described the overall process undergoes to consider this feedback in its annual review of policies. Finally, the weighting of staffing levels vis-à-vis "qualified personnel" to meet the requirements of this paragraph remains a longstanding topic of discussion with the IMT. Yet the Department feels that the compelling progress made in the Crisis Intervention section while CIU faces these challenges serves to underscore their personnel's qualification to review policies and practices of the CIT Program in a way that is consistent with CPD policy, the Consent Decree, and CCMHE bylaws. The City and CPD look forward to further discussion on this issue with the IMT.

The City and CPD disagree with the IMT withholding compliance and seek clarification on the IMT's methodology for Full compliance for paragraph 92. The IMT's methodology for Full compliance on ¶92 includes, among other criteria, "whether the eligibility review process for Certified CIT officers is reliably occurring.... whether the CPD has implemented its policies and training for CIT officers, and whether the CPD is demonstrating analysis of relevant data. Further, the IMT will assess whether the CIT Refresher Training is being provided every three years." CPD notes that its Training and Response Ratio Dashboards, demonstrated through productions of its Q3 Training Report (MONITOR2817) and Response Ratio Report (MONITOR2816) affirmatively comply with all three of the IMT's criteria. The Department also notes the IMT's methodology includes evidence that "the CPD Crisis Intervention Unit (CIU) and associated units responsible for eligibility review is sufficiently staffed...[and] demonstration that the eligibility review process for Certified CIT Officers is reliably occurring." CPD is unclear how the staffing of CIU fits into assessment of this paragraph, as the Department successfully automated the eligibility review process several IMRs ago. The eligibility review process, as described in several deliverables during IMR-12 and IMR-13, continues to function properly, which itself is evidenced via production of the OEMC transfer logs (the most recent iteration having been produced on 18 September 2025, MONITOR2735). Minimal staff are therefore required to operate it. Other criteria in the methodology are the subject of ongoing dialogue with the IMT, such as there being "enough Certified CIT Officers" in the field to be prioritized to relevant calls. Nonetheless, the Department has satisfied a strong majority of paragraph 92's substantive requirements through its document productions. The City and CPD look forward to further discussion on this issue with the IMT.

The City and CPD disagree with the IMT withholding compliance and seek clarification on the IMT's methodology for Secondary compliance for paragraph 120. The IMT has noted that for Secondary compliance, the IMT "is awaiting the CIT Officer Implementation Plan, analysis of data, staffing, deployment, CIT Reports...and other similar forms of documentation to be used to analyze and identify any district level and department-wide trends." Yet the IMT also acknowledges in its IMR-13 draft report that CPD has produced the Officer Implementation Plan, which includes various data

analyses designed for district level and department-wide review of trends. The Department also produced a Q3 Response Ratio Report during IMR-13 (MONITOR2816), which includes Department-wide and district-level analyses specified in ¶ 120. The City and CPD look forward to further discussion on this issue with the IMT.

The City and CPD disagree with the IMT withholding compliance and seek clarification on the IMT's methodology for Full compliance for paragraph 121. The IMT's methodology for Full compliance on this paragraph requires the demonstration of the analysis, upkeep, and reporting from the CIT Training and Response Ratio Dashboards. It also requires sufficient analysts to do this work, as well as the capability to "analyze response ratios, CIT reports, use of force, diversion, deflection, and integrate data from the unit and district levels...responses to incidents involving individuals in crisis, including use of force on behavioral health calls, data included in the required CIT report, [and] analysis of response ratios across districts/watches based on call volume." Much of the progress made on data-driven deliverables, and their associated quantity and quality, is not possible without CPD's data analysts. The Department integrated all the above requirements with production during IMR-13 of the Q3 Training Report (MONITOR2817) and Response Ratio Report (MONITOR2816), and has also enumerated them to members of the IMT several times during IMR-13. Notably, the IMT itself has lauded the landmark progress made on Crisis Intervention data: The IMR-13 report notes that the Officer Implementation Plan "provides key data and strategic priorities" for the Consent Decree, while doing "an excellent job establishing key baseline data." CPD has also noted that the robust, consolidated efforts of these deliverables and the data allow for an ease of collection that can facilitate enhanced trend analysis over time. Naturally, this work is the by-product of having sufficient staff of data analysts. The City and CPD look forward to further discussion on this issue with the IMT.

The City and CPD disagree with the IMT withholding compliance and seek clarification on the IMT's methodology for Full compliance for paragraphs 101 and 141. The IMT has previously asked for "evidence for a full reporting period of a functioning system that identifies and removes ineligible officers from the list of Certified CIT officers in a timely manner." In response, the Department produced two transfer logs on 18 September 2025 (MONITOR2735) that show the date and time that OEMC receive the Department's list of Certified CIT Officers. These transfer logs demonstrate operation of an automated system that satisfies paragraph 141's requirement for OEMC to have "an updated list of current and active Certified CIT Officers and their assignment at least every week." Moreover, the logs demonstrate that during IMR-12 (01JAN – 30JUN), CPD facilitated the updated list's daily distribution, which identifies and removes ineligible officers (or from the methodologies, "officers who violate the eligibility criteria or who allow their training to lapse") from the list of Certified CIT officers in a timely manner. The IMT also requests evidence "produced each reporting period of the number and percentage of officers who fell out of compliance (including the date of the discipline and/or training violation), and the timeframe it took to notify OEMC to de-prioritize these officers." CPD is committed to integrating this data into future iterations of its quarterly reports. The City and CPD look forward to further discussion on this issue with the IMT.

2. OEMC

The City and OEMC seek clarification on the IMT's methodology for Secondary and Full compliance for paragraphs 138-146. OEMC worked directly with the IMT on the 2-hour refresher for paragraphs 138-146 (MONITOR2775: MONITOR00415129-MONITOR00415253). The refresher materials received a no-objection letter. During IMR-13, OEMC also produced the training records demonstrating completion of the 2-hour refresher. The IMT advised the City and OEMC that review

and completion of the 2-hour refresher would satisfy both the 2-hour refresher and the 8-hour CIT training, because the 2-hour refresher is most of the 8 hours. The 8-hour training is longer because it includes additional scenario-based instruction and additional in-depth conversation concerning mental health. The City and OEMC have also produced call data requested by the IMT. Additionally, the IMR-13 Second draft states on page 32, while describing the IMT's observation of 2-hour refresher the IMT, "while the training played several recorded 911 calls, it did not engage the class in role-play or other scenario-based exercises, which are required by ¶144." This statement is confusing because the IMT provided technical support on the 2-hour refresher and provided a no-objection letter, despite the absence of role-play or other scenario-based exercises. The IMT indicated in small group meetings that the scenarios should be included in the 8-hour initial CIT training. The City and OEMC look forward to further discussion on this issue with the IMT.

The City and OEMC seek clarification on the IMT's methodology for Full compliance for paragraph 149. Paragraph 149 requires that "OEMC supervisors, on an ongoing basis, will audit and provide feedback to call takers and dispatchers regarding their ability to identify, dispatch, and respond appropriately to calls for service involving individuals in crisis." The City and OEMC produced the revised policy, training, training records, excel document with the 2025 Quality Assurance data for OEMC CIT calls, the 2024 Mental Health Audit, and the 2025 Mental Health Audit. The City and OEMC seek clarity as to the IMT's methodology for Full compliance for paragraph 149. The City and OEMC look forward to further discussion on this issue with the IMT (MONITOR2775: MONITOR00415129-MONITOR00415253; MONITOR2430: MONITOR00380130-MONITOR00380135; MONITOR2775: MONITOR00415129-MONITOR00415253; MONITOR2862: MONITOR00424784-MONITOR00424784; MONITOR2909: MONITOR00430123-MONITOR00430127).

3. CITY

The City seeks clarification on the IMT's methodology for Secondary compliance for paragraphs 130 and 131. In IMR-8, the IMT stressed CCMHE member participation, review of policies, meaningful feedback, and member attendance. Specifically, the IMT stated in IMR-8 "(g)oinf forward, further levels of compliance will depend on substantive reviews by the Chicago Council on Mental Health Equity on data, policies, training, community engagement, and operational practices informing recommendations on the overall response to individuals in crisis. A critical component of compliance with ¶130, which the IMT will assess, is the Chicago Council on Mental Health Equity's engagement with the OEMC, the CPD, and other crisis-related policies, procedures, and training." In discussing paragraph 131 in IMR-8 the IMT stated, "further levels of compliance will depend on the Chicago Council on Mental Health Equity's substantive reviews of data, policies, training, community engagement, and operational practices informing recommendations on responses to individuals in crisis. A critical component of compliance with this Paragraph, which the IMT will assess, is the City's facilitation of the Chicago Council on Mental Health Equity's engagement with the OEMC, CPD, and other crisis-related policies, procedures, and training." Since IMR-8, the City restructured the Chicago Council on Mental Health Equity (CCMHE) and reduced the number of member volunteers to a sustainable amount. CCMHE members also voted and chose subcommittee co-chairs for the Consent Decree Sub-Committee and the Behavioral Health Sub-Committee. Per the bylaws, the Consent Decree Co-chairs and members are supposed to meet and review CPD and OEMC polices before the larger meeting, but due to volunteer limitations they have yet to meet. However, despite this challenge CPD and OEMC have met one on one with Consent Decree subcommittee members to review

policies and trainings prior to presentation before the larger group, to illicit more meaningful feedback. The City also hosted several meetings where quorum was met, and where CCMHE volunteers reviewed CPD and OEMC policies and trainings. The City has produced documents demonstrating CCMHE involvement in developing and expanding current strategies for responding to individuals in crisis, including youth, through policy and training review. (most recent examples MONITOR2565: MONITOR00398893-MONITOR00399024; MONITOR2865: MONITOR00424966-MONITOR00425092; MONITOR2859: MONITOR00424692-MONITOR00424742) Further examples can be found in OEMC's and CPD's production of CCMHE members' involvement in their policy and training submissions. In those submissions the CCMHE member comments are documented and incorporated. The CCMHE members' feedback has resulted in direct change in CIT policies and trainings. For example, the updates to strategies related to youth in crisis and the updating resources available to all individuals in crisis. The City looks forward to further discussion on this issue with the IMT.

USE OF FORCE

The City and CPD disagree with the IMT withholding compliance and seek clarification on the IMT's methodology for Full compliance for paragraph 198. This paragraph requires that members be taught of the possible injuries from deploying their Taser and the need to consider the subjects' offense. This subject matter is a part of Taser training, most recently submitted as the 2024 Taser 10/ABLE training 95% compliance [MONITOR2350]. Additionally, TRED reviews all level 2 Taser discharge incidents while the FRB (or COPA when applicable) review all level 3 Taser discharges. Recent data showing this information is included in the 2024 TRED Year-End Report [MONITOR2681, pgs. 60-62] which includes Taser-discharge related debriefing points and indicates no debriefing for officers failing to follow the standards outlined in this paragraph. More Taser data is included in the 2024 Annual Use of Force Report [MONITOR2682, pgs. 97-99, 111]. The City and CPD look forward to further discussion on this issue with the IMT.

The City and CPD seek clarification on the IMT's methodology for Full compliance for paragraph 199. Alternatively, the City and CPD seek clarification that the IMT's Excel spreadsheet detailing compliance – which lists this paragraph at full compliance – is correct. CPD continues to argue that this paragraph should be at full compliance as this paragraph outlines Taser use policy requirements, which is included in G03-02-04 Taser Use and has been included in this policy since the version made effective on 29 February 2020. Some of the submissions demonstrating CPD members have completed training regarding the use of Tasers, include the 2023 Annual Use of Force Training [MONITOR1895] and 2024 Taser 10/ ABLE training 95% compliance [MONITOR2350]. Additionally, TRED reviews all level 2 Taser discharge incidents while the FRB (or COPA when applicable) review all level 3 Taser discharges. Recent data showing this information is included in the 2024 TRED Year-End Report [MONITOR2681, pg. 60] which includes Taser-discharge related debriefing points and indicates NO debriefing for fleeing subject.

The City and CPD seek clarification on the IMT's methodology for Secondary compliance for paragraphs 236, 237, and 238. CPD has submitted proof of BWC 95% eLearning completion (MONITOR2363) which is in line with the S03-14 BWC policy for which CPD obtained preliminary compliance. The City and CPD look forward to further discussion on this issue with the IMT.

The City and CPD seek clarification for the sustainment period for paragraphs 245, 246, and 248. Full compliance was achieved for these paragraphs in IMR-9, and the sustainment period should have concluded in IMR-13. However, the notification of achieved sustainment was not included in the IMR-13 report. The City and CPD look forward to further discussion on this issue with the IMT.

TRAINING

The City and CPD disagree with the IMT withholding compliance and seek clarification on the IMT's methodology for Full compliance for paragraph 277. Paragraph 277 requires that, where it would enhance the quality or effectiveness of the training program, the Education and Training Division seek assistance from outside expertise—when feasible, practical, and appropriate—in the development or review of CPD curricula and lesson plans, or in the review of pilot versions of CPD courses. During IMR-13, CPD submitted the 2026 Training Plan (MONITOR2934), which explicitly documents how outside subject-matter experts are engaged to support curriculum development, review, and pilot implementation when such expertise would add value to the training program. The City and CPD look forward to further discussion on this issue with the IMT.

The City and CPD seek clarification on the IMT's methodology for Full compliance for paragraph 298. CPD disagrees with IMT's determination that Full compliance with ¶298 has not yet been assessed. CPD has implemented a self-sustaining, systematic process to sufficiently staff, supervise, and manage the Field Training and Evaluation Program through S11-02, S11-02-01, and associated FTEP policies, plans, and operational practices. CPD has repeatedly produced documentation demonstrating PPO-FTO assignments, completed FTEP cycles, unit assignments, detail orders, and supervision documented through the ACADIS Daily Observation Report (DOR) system, reflecting active management of field training operations. CPD produced the 110-hour FTO Initial Training Curriculum under MONITOR2509 and received No-Objection letters from the IMT and OAG on 30 April 2025, supporting multiple Consent Decree paragraphs, including ¶298, and demonstrating implemented training supporting effective program management. CPD's ongoing FTO selection, training, assignment, and refresher training processes (MONITOR2590; MONITOR2914), along with reliable PPO cycle data and tracking systems, demonstrate sufficient staffing and supervisory capacity to manage FTEP. Collectively, these materials demonstrate implemented policies, sufficient staffing, reliable data, and a self-sustaining systematic process to staff, supervise, and manage FTEP, to obtain Full compliance with ¶298. The City and CPD look forward to further discussion on this issue with the IMT.

OFFICER WELLNESS AND SUPPORT

The City and CPD disagree with the IMT withholding compliance and seek clarification on the IMT's methodology for Full compliance for paragraph 385. In IMR-12, the City and CPD demonstrated implementation of the required communications strategy. However, the IMR-13 Draft Report notes that some steps had not been implemented. The City and CPD seek clarification on what steps have not yet been implemented. On page 1-2 of the appendix, the IMT notes the Strategy states that "Intranet posting" should "begin in the first quarter of 2026 and continue[] (every quarter) throughout the year." However, wellness roll call presentations highlighting wellness support (e.g., the Cordico Wellness App) began earnestly in January 2025, one year ahead of schedule. In IMR-13, the IMT and OAG attended roll calls in the 006th and 012th districts where the Wellness Section presented on the Cordico Wellness App. To date, the Wellness Section continues to conduct weekly in-person roll calls highlighting wellness resources, services, and support. The Wellness Section began reporting out on

these roll calls in the IMT/OAG Monthly Meetings beginning in July 2025. The Annual Report to the Superintendent and the IMT/OAG Monthly Wellness Meetings will continue to serve as the official reporting on Wellness Section roll calls, outreach, and engagement. The use of Department Intranet Postings (i.e., The Wire) supports Wellness Communications (i.e., wellness services, programs, initiatives and supports). CPD utilized The Wire to increase member awareness around wellness services and support from January 2025 through December 2025. Services and supports highlighted included the Cordico Wellness App, the Officer Wellness Needs Assessment, Financial Fitness Seminars, Quiet Rooms, Suicide Prevention Training and more. In January 2025, the Wellness Sections began collecting, tracking and archiving these postings monthly. Additional reporting (i.e., Monthly IMT/OAG Wellness meetings and the Annual Report to the Superintendent) on Intranet Postings will begin in Q1 2026. The City and CPD look forward to further discussion on this issue with the IMT.

The City and CPD disagree with the IMT withholding compliance and seek clarification on the IMT's methodology for Full compliance for paragraph 386. On page 10 of the IMR-12 Report's Officer Wellness Appendix, the IMT noted that "[t]he effectiveness of the CPD's communication efforts was clearly demonstrated in the 2025 Needs Assessment Summary Report, which highlights member awareness of support services." However, in the IMR-13 Draft report the IMT stated it was difficult to determine the effectiveness of the communications without reliable data from the Needs Assessment. CPD conducted Needs Assessments in 2023 and in 2025 (MONITOR1730 and MONITOR2516). Additionally, on page 3 of the IMR-13 Draft report, the IMT states "... by reviewing both qualitative and quantitative data including interviews of personnel at all ranks to determine awareness and officers' perceived ease of access to information." On page 4, the IMT states "Looking forward, the IMT understands that the CPD plans to develop specific scripts and talking points, expanding the watch operations lieutenants' role in reducing stigma, correcting misinformation, and engaging directly with CPD members. These efforts include distributing palm cards (which began during this reporting period), posting placards, conducting roll-call visits (which also began during this reporting period), and disseminating written announcements to emphasize wellness priorities and strategies." After thorough evaluation of both the 2023 and 2025 Communication Strategy, CPD ascertains that there is no mention of "scripts" or "talking points." Rather, CPD has implemented the following guidance, regarding Administrative Messaging Center (AMC) and supervisor's responsibilities: PCD and Wellness Section are responsible for publishing their respective AMC messages; They are printed daily and placed in the districts' C.O. (Commanding Officer's) books; Supervisors are responsible for reading the AMC messages aloud to Department members at the beginning of their tour of duty during roll call; Supervisors are responsible for ensuring that wellness messaging published on the AMC is included in the C.O. book and relayed to members for a predetermined period, typically 5-7 days, on all watches; Supervisors are responsible for following specific instructions within AMC notices for the Wellness Needs Assessment-Survey, etc. The City and CPD look forward to further discussion on this issue with the IMT.

The City and CPD disagree with the IMT withholding compliance and seek clarification on the IMT's methodology for Full compliance for paragraph 390. At the start of the Consent Decree, CPD only employed 3 licensed mental health professionals. Notably, the Work Force Allocation study recommends a reduction in staffing to the current number employed by CPD. The Department values the importance of having a fully staffed group of licensed mental health professionals. As of the IMR-13 reporting period, CPD employs 24 mental health professionals, consisting of one Director, one Assistant Director, three Clinical Supervisors, and 19 Clinicians. PCD has extended offer letters to 3

additional clinicians with an expected start date in Q1 2026. The City and CPD look forward to further discussion on this issue with the IMT.

The City and CPD disagree with the IMT withholding compliance and seek clarification on the IMT's methodology for Full compliance for paragraph 395. PCD has provided detailed documentation showing that counseling access and timeliness are captured and recorded within the CCM system, which serves as the system of record, and also within paragraph 395(a)'s two-week access requirement (MONITOR2905). CCM records the underlying data and feeds that information into the reporting dashboard used for compliance monitoring. The CCM system automatically generates a prompt requiring documentation when appointments are scheduled outside required timeframes and has been confirmed to function as intended. Current efforts are focused on ensuring the dashboard accurately reflects CCM data for reporting purposes, not because services are delayed or unavailable, but to ensure accurate reporting. These materials, shared through productions, monthly Officer Wellness updates, and site visits, reflect consistent adherence to the requirements of paragraph 395. The City and CPD look forward to further discussion on this issue with the IMT.

The City and CPD seek clarification regarding the status of paragraph 397. This paragraph has been under assessment for full compliance since IMR-11. The separation of functions is codified in policy E06-01 'Professional Counseling Division' and other related policies. To date, CPD has provided ample proof that PCD licensed mental health professionals do not participate in fitness for duty evaluations; which is indicated as such in E06-01 section III, subsection I. The City and CPD look forward to further discussion on this issue with the IMT.

The City and CPD disagree with the IMT withholding compliance and seek clarification on the IMT's methodology for Secondary compliance for paragraph 399. The 2025 Wellness Needs Assessment evaluated department member demand for alcohol and substance use services, including utilization, awareness, and accessibility of counseling and referral resources. Findings demonstrate that CPD maintains both internal alcohol and substance abuse counselors and established external referral pathways that are consistent with identified needs as documented in the 2025 Wellness Needs Assessment. CPD also submitted during IMR-13 column case data. This data can be reviewed in the following productions: Column Case System Walkthrough (MONITOR2711); 2025 Q2 PCD EAP Accomplishments and Activities Month-to-Month Trend Analysis of EAP Service Usage (April 2025 – June 2025) (MONITOR2849); 2025 Q2 – PCD EAP Referrals Overview Month-to-Month Trend Analysis (April 2025 – June 2025) (MONITOR2849); 2025 Q3 – PCD EAP Accomplishments and Activities Month-to-Month Trend Analysis of EAP Service Usage (July 2025 – September 2025) (MONITOR2850). In response to the 2025 Wellness Needs Assessment findings, CPD incorporated Alcohol and Substance use support services into the 2025 Officer Wellness Support Plan (OWSP), which outlines continued staffing, outreach, communication, and referral strategies to ensure service availability remains responsive to member needs. The combined use of staff counselors, external referrals, and ongoing evaluation through the needs assessment show that CPD has aligned staffing levels with documented demand, as outlined in the 2025 OWSP. Additional outreach tools, including a QR code survey administered through Survey Monkey, are used to gather feedback on access, service experience, and utilization. The Wellness Member Services Feedback survey allows members to share input on alcohol and other addiction services, among other services provided by PCD and the Wellness Unit, including awareness and access concerns. While the survey is not a system of record, it provides useful context when reviewed alongside CCM utilization data, the Wellness Needs Assessment, and the Officer Wellness Support Plan. Together, these sources help evaluate whether current staff and referrals to alcohol and substance abuse services are meeting members' needs,

consistent with Paragraph 399. These efforts demonstrate that CPD maintains both internal alcohol and substance abuse counselors, as well as established external referral pathways, that are consistent with needs identified in the 2025 Wellness Needs Assessment. As a result, CPD believes Secondary compliance has been achieved for paragraph 399. The City and CPD look forward to further discussion on this issue with the IMT.

ACCOUNTABILITY AND TRANSPARENCY

The City and CPD disagree with the IMT withholding compliance and seek clarification on the IMT's methodology for Secondary compliance for paragraph 451. The IMT articulated that the path towards Secondary compliance on this paragraph requires CPD to “[d]evelop training relevant to the requirements of this paragraph.” CPD produced a compliance recognition for the BIA 2024 Supplemental eLearning (MONITOR2927) for this paragraph during IMR-13. The training on this paragraph was initially provided to all CPD members in IMR-11, via the BIA Supplemental eLearning. However, preliminary compliance for ¶451 was not granted until IMR-12, via the G04-01 policy. The compliance recognition submission in IMR-13 seeks retroactive Secondary compliance for ¶451, given the advancement to preliminary in IMR-12. CPD believes its compliance recognition (MONITOR2927) is satisfactory to advance ¶451 to Secondary compliance in IMR-13. The City and CPD look forward to further discussion on this issue with the IMT.

The City and CPD disagree with the IMT withholding compliance and seek clarification on the IMT's methodology for Full compliance for paragraph 453. The IMT articulated that the path towards Full compliance on this paragraph requires: “Documentation of reports wherein a criminal and administrative investigation intersect that demonstrates administrative investigations that were ‘initiated and completed’ while a criminal investigation is pending.” CPD produced examples of this documentation (MONITOR2794) during IMR-13. The City and CPD look forward to further discussion on this issue with the IMT.

REQUEST FOR RESPONSE

The City, CPD, and OEMC appreciate the IMT's diligent work in completing the Second Draft of IMR-13. The City, CPD, and OEMC ask that the IMT provide a formal response either in letter form or in the final IMR-13 Report specifically addressing the issues discussed herein.

Sincerely,

/s/ Matthew Axelrod
Assistant Corporation Counsel
City of Chicago Department of Law
Public Safety Reform Division

cc: Allan Slagel
Jackie Thompson
Danielle Clayton
Alexander MacMillan
Scott Spears
Christopher Wells
Mary Grieb
Maggie Hickey

Rodney Monroe
Anthony-Ray Sepulveda
Bridgette Clements

