

Independent Monitoring Report 13

Crisis Intervention

Compliance Assessments by Paragraph

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

Crisis Intervention: ¶198

98. Certified CIT Officers may satisfy the in-service training requirements, as outlined in Part H, by completing the CIT Refresher Training.

Compliance Progress

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

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|---------------------|--|
| Preliminary: | <i>In Compliance</i> (FIFTH REPORTING PERIOD) |
| Secondary: | <i>In Compliance</i> (TENTH REPORTING PERIOD) |
| Full: | <i>In Compliance</i> (NEW) |

In the thirteenth reporting period, the City and the CPD achieved Full compliance with the requirements of ¶198.

The City and the CPD achieved Preliminary compliance in the fifth reporting period by incorporating the requirements of this paragraph into CPD’s Special Order S11-10-03, *Annual In-Service Training*. Additionally, the CPD has memorialized this paragraph’s requirements into Special Order S05-14, *Crisis Intervention Team (CIT) Program*, which was finalized during the eighth reporting period.

The City and the CPD achieved Secondary compliance in the tenth reporting period by demonstrating that the requisite number of Certified CIT Officers had completed the *Annual In-Service Training*.

The City and the CPD have achieved Full compliance by demonstrating the implementation of the relevant policies and delivery of relevant trainings. To sustain Full compliance, the City and the CPD must reliably produce complete training evaluations, which the IMT has yet to receive. The IMT looks forward to receiving complete training evaluations for the *Annual In-Service Training*.

Paragraph 98 Compliance Progress History

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

COMPLIANCE PROGRESS:
Not Applicable

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

COMPLIANCE PROGRESS:
Not Applicable

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

COMPLIANCE PROGRESS:
Not Applicable

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

COMPLIANCE PROGRESS:
Not Applicable

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

COMPLIANCE PROGRESS:
Preliminary

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

COMPLIANCE PROGRESS:
Preliminary

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

COMPLIANCE PROGRESS:
Preliminary

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

COMPLIANCE PROGRESS:
Preliminary

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

COMPLIANCE PROGRESS:
Preliminary

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

COMPLIANCE PROGRESS:
Secondary

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

COMPLIANCE PROGRESS:
Secondary

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

COMPLIANCE PROGRESS:
Secondary

THIRTEENTH REPORTING PERIOD
JULY 1, 2025 – DECEMBER 31, 2025

COMPLIANCE PROGRESS:
Full

Crisis Intervention: ¶100

100. All Certified CIT Officers who completed the Basic CIT Training before the development of the CIT Refresher Training must complete their first CIT Refresher Training within four years of the date that the CIT Refresher Training is developed. All Certified CIT Officers who complete Basic CIT Training on or after the date that the CIT Refresher Training is developed must complete their first CIT Refresher Training within three years of receiving the Basic CIT Training.

Compliance Progress

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

Preliminary: *In Compliance (FIFTH REPORTING PERIOD)*
Secondary: *Under Assessment*
Full: *Not in Compliance*

In the thirteenth reporting period, the City and the CPD are under assessment for Secondary compliance with the requirements of ¶100.

During this reporting period, the CPD made significant progress toward achieving Secondary compliance by revising its *CIT Refresher* training curriculum. Throughout 2025, the CPD worked in collaboration with subject matter experts who co-lead the course, including mental health professionals, substance use disorder professionals, people with lived experiences of behavioral or mental health crises, and experts in child and adolescent services, to better tailor the 16-hour course to refresh pertinent topics in the 40-hour *Basic CIT* training, including active listening and de-escalation strategies, and tactical considerations. The prior iteration of the *CIT Refresher* training did not sufficiently reinforce key concepts, and many Certified CIT Officers had not received refresher training for several years, some as long ago as 2009, making these updates crucial.

The IMT reviewed revised *CIT Refresher* training during this reporting period and issued a no-objection notice. The IMT has requested that the CPD produce the number/percent of current CIT Certified officers who received the *Basic CIT* training prior to the Consent Decree approved training with a goal of prioritizing their enrollment in the newly revised *CIT Refresher* training. Because these officers attended a 40-hour training years ago, prioritizing these officers for the newly revised refresher training is important to refresh skills. The IMT also reviewed training records, course materials, instructor evaluations, and logs demonstrating CPD's notification process regarding training requirements and certification status. The CPD has been producing training records and course and instructor evaluations the last two reporting periods. The CPD has also been demonstrating a functional system that provides effective and timely notification of (a) when the CPD's officers are due for training, and (b) notification to the OEMC regarding officers whose certifications may have expired.

Looking forward, to achieve Secondary compliance with ¶100, the CPD must finalize and implement delivery of the revised *CIT Refresher* Training. The CPD has indicated it does not plan to deliver the revised *CIT Refresher* training until the first quarter of 2026, at which time the IMT will observe the training delivery and review the instructor evaluations and training records to assess compliance in the fourteenth reporting period. The CPD has noted its intent to seek feedback on the revised *CIT Refresher* from the Chicago Council on Mental Health Equity (CCMHE). See ¶99.

Full compliance will require demonstration that all Certified CIT Officers who received the *Basic CIT Training* before the 2021 Consent Decree-approved training have received the 2025 revised *CIT Refresher Training*, along with evidence of sufficient staffing to maintain training requirements and ongoing course and instructor evaluations.

Paragraph 100 Compliance Progress History

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

Crisis Intervention: ¶102

102. All newly assigned Field Training Officers (“FTOs”) and promoted Sergeants and Lieutenants will continue to receive the Basic CIT Training. To be considered Certified CIT Officers, FTOs, Sergeants, and Lieutenants must meet the eligibility criteria and training requirements established by the CIT Program and this Agreement.

Compliance Progress

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

Preliminary: *In Compliance (FIFTH REPORTING PERIOD)*

Secondary: *In Compliance (NEW)*

Full: *Not in Compliance*

In the thirteenth reporting period, the City and the CPD achieved Secondary Compliance with the requirements of ¶102.

During this reporting period, to assess Secondary compliance, the IMT reviewed the CPD’s training dashboard and the *CIT Coordinator Report*. This documentation demonstrates that 99.6% of all FTOs, Sergeants, and Lieutenants promoted since 2019 (the onset of the Consent Decree) have completed Consent Decree–approved *Basic CIT* or *CIT Refresher* training since 2021.

When considering all CPD FTOs, Sergeants, and Lieutenants department-wide (not limited to those promoted since the onset of the Consent Decree), the data show that 93% have received CIT training since 2021; and 84% have received CIT training in the last three years.

The IMT also reviewed eligibility data related to the CIT Program. In the thirteenth reporting period, the Strategic Initiatives Division (SID) reported that 96% of FTOs, 99% of Sergeants, and 98% of Lieutenants who have completed the required CIT training have passed CPD’s eligibility requirements, which include disciplinary standards outlined in Special Order S05-14, *Crisis Intervention Team (CIT) Program*. The CPD has been diligent in tracking eligibility determinations and ensuring that supervisors who fail to meet eligibility criteria are not prioritized to respond as Certified CIT Officers, thereby not counting toward required response ratios. With these efforts, the CPD achieved Secondary compliance.

The IMT appreciates that the CPD prioritized supervisory participation in Consent Decree–approved *Basic CIT* and *CIT Refresher* training and for its efforts to ensure that all supervisors, including command staff, receive this critical training.

The IMT also appreciates the CPD’s efforts in recent reporting periods in identifying, validating, and reporting Consent Decree–required data, which can be complex.

Moving forward, to maintain Secondary compliance, the City and the CPD must continue to demonstrate the ability to track whether newly assigned Field Training Officers (FTOs) and promoted Sergeants and Lieutenants complete the requisite Crisis Intervention Team (CIT) training and meet the CIT Program’s eligibility requirements. Additionally, the CPD must continue to demonstrate that at least 95% of all FTOs, Sergeants, and Lieutenants have completed Consent Decree–approved *Basic CIT* or *CIT Refresher* training every three years (as required by ¶101) and that FTOs, Sergeants, and Lieutenants who do not meet eligibility requirements are not being counted toward required specialized response ratios.

For Full compliance, the IMT will look for continued demonstration of a reliable system to track eligibility criteria; continued evidence demonstrating that 95% of all FTOs, Sergeants, and Lieutenants have been trained in a timely manner from the point of notification of promotion to completion of the *Basic CIT* and *CIT Refresher* every three years; evidence demonstrating that all FTOs, Sergeants, and Lieutenants that are up for promotion are able to pass the Certified CIT eligibility criteria prior to promotion; and demonstration that all FTOs, Sergeants, and Lieutenants who have failed the eligibility criteria are not being identified as a Certified CIT officer, and are not counted toward required response ratios.

Paragraph 102 Compliance Progress History

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

Crisis Intervention: ¶103

103. *The CIT Program staff responsible for the CIT training curriculum will, where it would add to the quality or effectiveness of the training and when feasible and appropriate, encourage and seek the participation of professionals and advocates who work with individuals in crisis, and persons with lived experiences of behavioral or mental health crisis, including those with involvement in the criminal justice system, in developing and delivering CPD CIT trainings.*

Compliance Progress

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

Preliminary: *In Compliance (SIXTH REPORTING PERIOD)*
Secondary: *In Compliance (TWELFTH REPORTING PERIOD)*
Full: *Under Assessment*

In the thirteenth reporting period, the City and the CPD are under assessment for Full compliance with the requirements of ¶103.

The City and the CPD achieved Preliminary compliance in the sixth reporting period by incorporating the requirements of the paragraph into CPD’s Special Order S05-14, *Crisis Intervention Team (CIT) Program*.

During the twelfth reporting period, the CPD achieved Secondary compliance by demonstrating that the CIT training facilitators, including “professionals and advocates who work with individuals in crisis, and people with lived experiences of behavioral or mental health crisis” reviewed and, where appropriate, revised the *Basic CIT* and *CIT Refresher* trainings and assisted with training delivery.

The *CIT Refresher* training is broken into nine modules with five additional hours of scenario-based training. Some of the modules are taught by community-based subject matter experts and advocates, including a module on Mental Health Signs and Symptoms, which is taught by the National Alliance on Mental Illness (NAMI) and includes a person with lived experience sharing her journey living with a mental health condition. Additionally, community-based subject matter experts teach modules on topics including Child and Adolescent Mental Health; Psychotropic Medications and Medical Conditions; and People living with Mental Health and Substance Use conditions. Presenters developed full PowerPoint presentations and lesson plan updates to reflect best practices. These trainings are taught nearly every week of the year. Additionally, the CPD reliably produced training records for the *Basic CIT* and *CIT Refresher* courses and sought input from the Training Community Advisory Committee (TCAC) on the revised *CIT Refresher* training.

During the thirteenth reporting period, the CPD provided evidence of Crisis Intervention Unit (CIU) staff, community-based subject matter experts, and people with lived experiences of behavioral or mental health crises finalizing the review and revision of the *CIT Refresher* training curricula, along with evidence of feedback

from the TCAC. The IMT recommends that these trainings go through a robust review process at least every three years. During this reporting period, the CPD also presented CIT-related updates and solicited feedback during quarterly CCMHE meetings throughout 2025, including discussion on policy and training. To strengthen the feedback process, the CPD has engaged smaller CCMHE subgroups to help facilitate more meaningful dialogue. Over the last two reporting periods, the CPD has completed full reviews and revised both the *Basic CIT* and *CIT Refresher* trainings with robust input from subject matter experts teaching specific modules of the trainings and has begun to develop the *Advanced CIT* training.

This paragraph remains under assessment for Full compliance while the IMT waits to review evidence of CCMHE feedback on the revised *CIT Refresher* training, which received a no-objection notice from the IMT and OAG this reporting period. The CPD has worked in small groups this reporting period to obtain CCMHE feedback and intends to produce evidence of it in the next reporting period. The IMT will also need to review evidence of the participation of people with involvement in the criminal justice system in developing and delivering training, per the requirements of this paragraph.

Paragraph 87 further requires development and delivery of the *Advanced CIT* training, which provides another mechanism to assess sustained compliance through continued engagement of professionals and advocates who work with people in crisis, and people with lived experiences of behavioral or mental health crisis. Between *Recruit* training, *Annual In-Service* training, and specialized CIT training, there are numerous training opportunities for professionals and advocates who work with people in crisis and people with lived experiences to observe and provide feedback. The IMT encourages the CPD to expand opportunities for in-person and remote observation of trainings and to consider implementation of a short community evaluation tool to gather structured feedback following observed training sessions.

Paragraph 103 Compliance Progress History

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

Crisis Intervention: ¶107

107. Within 180 days of the Effective Date, and quarterly thereafter, CPD will collect and analyze the number of calls for service identified as involving individuals in crisis for every watch in each district to evaluate the number of Certified CIT Officers needed to timely respond. The number of Certified CIT Officers on each watch in every district will be driven by the demand for crisis intervention services for the particular watch and district.

Compliance Progress

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

Preliminary: *In Compliance (NEW)*
Secondary: *Not in Compliance*
Full: *Not in Compliance*

In the thirteenth reporting period, the City and the CPD achieved Preliminary compliance with the requirements of ¶107.

Several Consent Decree paragraphs, including ¶¶107, 108, and 111, require that when a Certified CIT Officer responds to a mental-health-related call, the response must be timely. During this reporting period, the CPD took significant steps to operationalize this requirement by developing a written, measurable definition of “timely response” and applying that definition to existing response time data. This work enables the CPD, for the first time, to establish baseline measurements and accountability mechanisms tied to timeliness for CIT responses.

The CPD, through its Strategic Initiatives Division (SID), defined “timely” using a comparative, district-specific framework that evaluates whether CIT response times perform at least as well as non-CIT response times within the same district, watch, and quarter. Rather than relying on a universal response-time benchmark, the methodology accounts for operational realities such as geography, staffing, call volume, and infrastructure differences across districts. Under this approach, CIT responses are considered timely when average response times are similar to or faster than non-CIT responses for comparable Priority 1 calls in the same operational environment.

From a methodological standpoint, the CPD limited the analysis to Priority 1 calls, which represent approximately 92 percent of CIT-related incidents and constitute the most urgent and operationally comparable subset of calls. Priority 1 CIT calls with certified responses were compared to Priority 1 non-CIT calls within the same district and watch. To address non-normal response time distributions, the CPD applied log transformations and evaluated differences using ratios of mean response times, supplemented by one-tailed statistical tests. The CPD defined “operational significance” as differences exceeding approximately 25% (roughly two to five minutes), with findings intended to identify systematic patterns rather than assess individual officer performance.

The CPD was transparent in documenting data limitations that affect the precision of this analysis. These include incomplete on-scene timestamps for approximately 40 percent of calls, distortions associated with multi-unit responses where the earliest arriving unit may not be a CIT officer, and dispatch or data entry inconsistencies that can artificially inflate or deflate response times. The CPD also acknowledged unavoidable seasonal and staffing-related variability. Despite these limitations, SID determined that the available data were sufficiently robust and representative to support trend analysis and comparative evaluation.

The IMT also reviewed the CPD's *Timely Response Ratio Report*, the *Timely Response Memorandum*, and the *Certified CIT Officer Implementation Plan* produced during this reporting period. Our review indicates that the CPD included its working definition of "timely response" in its *Officer Implementation Plan* and will work to integrate that definition into its broader CIT implementation and evaluation framework. This represents a critical milestone in moving from conceptual compliance toward measurable accountability.

In addition to defining timeliness, the CPD made notable progress toward improving overall CIT response coverage. During this reporting period, the CPD increased the proportion of mental and behavioral health crisis calls receiving a Certified CIT response from approximately 44% to 63% citywide. Twelve district/watch combinations exceeded a 75% response ratio, while a majority of remaining districts demonstrated measurable improvement. While these response ratios do not, on their own, measure timeliness, they provide important contextual data that will be combined with the newly established timeliness standard in future reporting periods.

Looking forward, to achieve Secondary compliance and advance toward Full compliance with ¶107, the CPD must demonstrate that it has adequate personnel to fulfill the requirements of this paragraph and must demonstrate the requisite data collection, tracking, analysis, and management relevant to this paragraph, including regarding on-scene and other time indicators. The IMT will look for training records, including training for all officers in crisis intervention response and completing the CIT Report, as well as continued quarterly reporting that applies the timeliness standard consistently across districts and watches, incorporates baseline measurements, and demonstrates ongoing improvement. The IMT will also assess how CPD uses timeliness findings to inform deployment decisions, staffing models, and the number of Certified CIT Officers assigned to each district and watch based on demonstrated demand. Continued refinement of data quality and integration of timeliness metrics with existing response ratio targets will be necessary to support further compliance determinations.

Paragraph 107 Compliance Progress History

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

Crisis Intervention: ¶108

108. Within 180 days of the Effective Date, CPD will develop an implementation plan (“CIT Officer Implementation Plan”) based on, at a minimum, its analysis of the demand for crisis intervention services for each watch in each district. The CIT Officer Implementation Plan will identify the number of Certified CIT Officers necessary, absent extraordinary circumstances, to meet the following response ratio targets: a. a sufficient number of Certified CIT Officers to ensure that Certified CIT Officers are available on every watch in each district to timely respond to at least 50% of the calls for service identified as involving individuals in crisis, absent extraordinary circumstances (“initial response ratio target”); and b. a sufficient number of Certified CIT Officers to ensure that Certified CIT Officers are available on every watch in each district to timely respond to at least 75% of the calls for service identified as involving individuals in crisis, absent extraordinary circumstances (“second response ratio target”).

Compliance Progress

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

Preliminary: *In Compliance (NEW)*
Secondary: *Not in Compliance*
Full: *Not in Compliance*

In the thirteenth reporting period, the City and the CPD achieved Preliminary compliance and made notable progress toward Secondary compliance with the requirements of ¶108.

During this reporting period, the CPD made substantial progress by formalizing a department-wide definition of “timely” response for Certified Crisis Intervention Team (CIT) officer deployments to mental and behavioral health–related calls for service (see ¶¶107–111). In this reporting period, the CPD established a data-driven framework for defining and measuring timeliness, enabling the CPD to begin collecting baseline data and evaluating performance across districts and watches.

The CPD’s timeliness framework focuses on Priority 1 CIT-related calls, which account for approximately 92% of CIT incidents. The CPD distinguishes between Priority 1 CIT calls with certified responses and Priority 1 non-CIT calls within the same district and watch, allowing for “apples-to-apples” comparisons within comparable operational environments. The CPD further defined “operational significance” as response-time differences exceeding approximately 25% (generally 2–5 minutes), with the intent of identifying systemic patterns rather than evaluating individual officer or call-level performance.

In addition, the CPD completed a draft of its *CIT Officer Implementation Plan* during this reporting period—the first time since the fourth reporting period. The Plan is based on an analysis of crisis intervention demand by district and watch and establishes a structured approach to meeting required response ratios. Defining

“timely” response is essential to informing future compliance determinations and staffing analyses.

The IMT reviewed the CPD’s *CIT Officer Implementation Plan*, Quarter 3 Response Ratio Report, Timely Response Memorandum, and OEMC-certified CIT officer transfer logs to inform its assessment. The CPD’s Strategic Initiatives Division (SID) also conducted enhanced analyses and validated underlying data trends used in the timeliness framework.

The IMT recognizes the CPD’s transparency regarding existing data limitations, including incomplete “on-scene” time entries, multi-unit response distortions, dispatch and data-entry inconsistencies, and unavoidable staffing and seasonal variability. While these limitations persist, the CPD’s methodology to assess the Consent Decree’s “timely” requirements represents a significant improvement in the Department’s ability to identify disparities, guide operational inquiry, and communicate response-time goals to the public.

Looking forward, to progress toward Secondary compliance, the IMT will require quarterly reporting that incorporates baseline timeliness data aligned with the CPD’s new standard, continued improvement in response ratios across districts and watches, and further analysis to determine the number of Certified CIT Officers needed to ensure timely responses citywide. Continued refinement of data quality and documentation of strategies, methods, and actions the CPD will implement to sustain timely response performance will be necessary for future compliance assessments.

Paragraph 108 Compliance Progress History

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

COMPLIANCE PROGRESS:
Not Applicable

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

COMPLIANCE PROGRESS:
None

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

COMPLIANCE PROGRESS:
None

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

COMPLIANCE PROGRESS:
None

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

COMPLIANCE PROGRESS:
None

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

COMPLIANCE PROGRESS:
None

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

COMPLIANCE PROGRESS:
None

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

COMPLIANCE PROGRESS:
None

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

COMPLIANCE PROGRESS:
None

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

COMPLIANCE PROGRESS:
None

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

COMPLIANCE PROGRESS:
None

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

COMPLIANCE PROGRESS:
None

THIRTEENTH REPORTING PERIOD
JULY 1, 2025 – DECEMBER 31, 2025

COMPLIANCE PROGRESS:
Preliminary

Crisis Intervention: ¶109

109. The CIT Officer Implementation Plan will further identify the steps that are necessary to meet and maintain the initial response ratio target by January 1, 2020, and the second response ratio target by January 1, 2022 and the strategies, methods, and actions CPD will implement to make progress to timely achieve and maintain these response ratio targets.

Compliance Progress

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

Preliminary: *In Compliance (NEW)*

Secondary: *Not in Compliance*

Full: *Not in Compliance*

In the thirteenth reporting period, the City and the CPD achieved Preliminary compliance and made notable progress toward Secondary compliance with the requirements of ¶109.

Several Consent Decree paragraphs require that when a Certified CIT Officer responds to a mental or behavioral health–related call, that officer’s response must be “timely.” *See, e.g., ¶¶107–12.* During this reporting period, the CPD took important steps to develop and memorialize a framework defining what constitutes a “timely” CIT response. By establishing this definition, the CPD has created the foundation necessary to collect baseline data, assess accountability, and evaluate compliance with the timeliness requirements of ¶¶107–12.

The CPD’s development of a timeliness standard reflects a complex operational environment and appropriately accounts for factors such as seasonal variation, infrastructure differences, call volume, district size, and staffing levels across the City. The establishment of a standardized definition of “timely” represents a critical milestone and constitutes additional progress toward compliance with ¶¶107–12.

During this reporting period, the CPD also completed a draft of its *CIT Officer Implementation Plan*, which had not been produced since the fourth reporting period. The Plan is based on the CPD’s analysis of the demand for crisis intervention services across watches in each district and establishes a framework for achieving required response ratios. Defining “timely” response is essential to informing future compliance determinations under ¶109. We look forward to continued refinement of the *CIT Officer Implementation Plan* and note that it must be approved by both the OAG and the IMT (per ¶638b) and the final version must be made public (per ¶640).

To assess Preliminary compliance during this reporting period, the IMT reviewed the City’s and the CPD’s:

- ❖ *Certified CIT Officer Implementation Plan*
- ❖ Quarter 3 Response Ratio Report
- ❖ Timely Response Memorandum
- ❖ OEMC Certified CIT Officer transfer logs

The IMT also reviewed analyses prepared by the CPD's Strategic Initiatives Division (SID), which validated the underlying data used to assess response ratios and demand across districts and watches.

The CPD has been transparent regarding data limitations that impact analysis of response timeliness, including:

- ❖ Incomplete "on-scene" time data for approximately 40% of 911 calls, due to officers not activating the "on scene" status;
- ❖ Distortions related to multi-unit responses, where the earliest arrival time may not reflect CIT officer arrival;
- ❖ Dispatch and data entry inconsistencies that may artificially inflate or deflate response times; and
- ❖ Seasonal and staffing fluctuations that introduce unavoidable variability.

Despite these limitations, the CPD's efforts this reporting period provide a data-driven framework for identifying areas where additional operational review may be warranted and for informing community understanding of response-time goals, performance, and disparities.

As the CPD continues to build capacity for more sophisticated analysis, the IMT looks forward to reviewing data reflecting continued improvement in both response ratios and timeliness. Further analysis will be necessary to strategically inform staffing decisions and to ensure that the CPD's CIT data is reliable and includes documented strategies, methods, and actions designed to achieve and maintain required response targets. See ¶109.

In addition to achieving Preliminary compliance through the establishment of the timeliness standard and completion of the *CIT Officer Implementation Plan*, the CPD made significant strides toward Secondary compliance by improving overall response ratios. Department-wide, the rate of CIT officer response to mental and behavioral health crisis calls increased from 44% to 63% between 2024 Q3 and 2025 Q3, noting, however, that the overall rate of CIT calls for service decreased during that same time period.

To achieve Secondary compliance with ¶109, the IMT will require baseline data that integrates the newly established timeliness standard with existing response ratio metrics. This combined analysis will allow the CPD to determine the number of Certified CIT Officers necessary to ensure timely responses across districts and watches.

To achieve Full compliance with ¶109, the CPD must demonstrate that the timeliness standard is fully integrated into operational practice and that the *Certified CIT Officer Implementation Plan* reflects the number of Certified CIT Officers necessary to meet required response ratios on a timely basis.

Paragraph 109 Compliance Progress History

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

Crisis Intervention: ¶110

110. Within 180 days of completing the CIT Officer Implementation Plan, and annually thereafter, CPD will submit a report to the Monitor and the Office of the Attorney General (“OAG”) regarding the progress the Department has made to meet (a) the response ratio targets (“Implementation Plan Goals”) identified within the implementation Plan and (b) the number of Certified CIT Officers identified as necessary to achieve the response ratio targets. The Monitor and the OAG will have 30 days to respond in writing to CPD’s progress report and CPD will publish CPD’s report and the Monitor’s and OAG’s response, if any, within in 45 days of the date CPD submitted the progress report to the Monitor and OAG.

Compliance Progress

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

Preliminary: *In Compliance (NEW)*
Secondary: *Not in Compliance*
Full: *Not in Compliance*

In the thirteenth reporting period, the City and the CPD achieved Preliminary compliance with the requirements of ¶110 by completing a draft of the *CIT Officer Implementation Plan* and providing a working definition of “timely.”

The IMT reviewed the *Plan*, and found it to be comprehensive and data driven, which speaks to the significant progress that has been made in this section of the Consent Decree over the last year. The leadership of the Crisis Intervention Unit (CIU) in collaboration with the Strategic Initiative Division (SID), the members of the CIT Training Division (CITTS), CIT District Operations and Community Support (DOCS) Certified CIT Officers responding to calls for service involving a person in crisis, members of the CCMHE, and others should be commended for their work.

The *Plan* addresses key components of the Crisis Intervention Section required under Consent Decree, establishing first ever baseline data in critical areas. For example, the *Plan* includes:

- A CIU staffing analysis;
- Preliminary estimates for the number of Certified CIT officers needed by district/watch to meet required response ratios, which, when informed by the new timeliness standard, will be more complete;
- CIT training projections and prioritizations for training;
- CIT call outcomes, including baseline attempts to measure Use of Force, Arrests, and use of alternate response on CIT calls;
- The top five offenses for arrests on mental health calls;

- Baseline data regarding similarities and differences in calls for service for both CIT and non-CIT (*e.g.*, the frequency of calls during weekdays/weekends/time of day, and seasonality); and
- A definition of “timely” response.

The IMT encourages the CPD and the OEMC to consider reviewing how it is categorizing Priority 1 calls for service. At present, its data indicate that 90% of CIT-related calls for service met the criteria for Priority 1. We request a review of the categorization of mental health-related calls per the definition of Priority 1 detailed in CPD policy G03-01-01, *Radio Communications*, which states Priority 1 calls are those involving “an imminent threat to life, bodily injury, or major property damage/loss” and will be immediately dispatched.

Additionally, the *Plan* indicates that OEMC policy directs both Priority 1 and 2 calls to have a 10-minute dispatch limit, meaning the OEMC has ten minutes to dispatch a vehicle. However, this does not account for the time it takes to arrive on scene, nor circumstances when it takes more than ten minutes to dispatch. The IMT looks forward to data trends taking these into consideration as it creates baseline data on its timeliness standard.

The IMT appreciates the consideration given to factors that are likely affecting lower response ratios (*e.g.*, higher numbers of probationary police officers in certain districts/watches who are not yet eligible for CIT training; two Certified CIT officers assigned to one patrol beat car; and multiple officers on scheduled time off). This helps inform strategy.

Finally, the IMT appreciates the City’s commitment to publishing a public-facing CIT Dashboard and looks forward to an update on the anticipated timeline for publishing the CIT Dashboard.

Looking forward, the CPD must complete an accurate CPD report, including supporting analyses and documentation, demonstrating progress toward meeting the required response ratio targets and the number of officers necessary to achieve response ratio targets. The CPD report should also include steps to continue to increase response ratio targets and must adhere to the processes outlined under ¶110.

Paragraph 110 Compliance Progress History

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

COMPLIANCE PROGRESS:
Not Applicable

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

COMPLIANCE PROGRESS:
None

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

COMPLIANCE PROGRESS:
None

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

COMPLIANCE PROGRESS:
None

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

COMPLIANCE PROGRESS:
None

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

COMPLIANCE PROGRESS:
None

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

COMPLIANCE PROGRESS:
None

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

COMPLIANCE PROGRESS:
None

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

COMPLIANCE PROGRESS:
None

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

COMPLIANCE PROGRESS:
None

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

COMPLIANCE PROGRESS:
None

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

COMPLIANCE PROGRESS:
None

THIRTEENTH REPORTING PERIOD
JULY 1, 2025 – DECEMBER 31, 2025

COMPLIANCE PROGRESS:
Preliminary

Crisis Intervention: ¶111

111. *Through the execution of the CIT Officer Implementation Plan, CPD will ensure that it maintains a sufficient number of Certified CIT Officers on duty on every watch of each district to help ensure that a Certified CIT Officer is available to timely respond to each incident identified as involving individuals in crisis, absent extraordinary circumstances.*

Compliance Progress

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

Preliminary: *In Compliance (NEW)*

Secondary: *Not in Compliance*

Full: *Not in Compliance*

In the thirteenth reporting period, the City and the CPD achieved Preliminary compliance with the requirements of ¶111.

During this reporting period, the CPD completed another draft of its *CIT Officer Implementation Plan*; it had not submitted a draft of the *Plan* since the fourth reporting period. The *Plan* is grounded in CPD’s district- and watch-level analysis of demand for crisis intervention services and establishes a structured approach to ensuring that a sufficient number of Certified CIT Officers are available on every watch in each district to respond to incidents involving individuals in crisis, absent extraordinary circumstances. Completion of the *Plan* satisfies a core requirement of ¶111 and represents a significant step toward institutionalizing CIT staffing expectations. We look forward to continued refinement of the *CIT Officer Implementation Plan* and note that it must be approved by both the OAG and the IMT (per ¶638b) and the final version must be made public (per ¶640).

In addition, the CPD developed and formally adopted a department-wide definition of “timely” response for Certified CIT Officer deployment to mental health-related calls. Because multiple Consent Decree provisions, including ¶111, require that CIT responses be timely, establishing this definition provides the necessary framework for baseline data collection, accountability, and future compliance assessment. The definition accounts for operational realities such as district size, call volume, staffing patterns, seasonal fluctuations, and infrastructure differences, allowing for meaningful comparisons across districts and watches. This definition of “timely” and the analysis that follows should be included in the next version of the *Plan*.

This reporting period also reflected enhanced analytical capacity within the CPD’s Strategic Initiatives Division (SID). The CPD expanded its tracking of crisis-related calls by district and watch, validated response ratio data, and improved its ability to assess whether staffing levels align with anticipated demand. While certain data limitations remain, including incomplete “on-scene” time entries and multi-unit response distortions, the CPD has been transparent about these challenges and

has nonetheless established a defensible, data-driven methodology to evaluate CIT response coverage.

Collectively, the completion of the *CIT Officer Implementation Plan*, the formalization of a “timely” response standard, and the improved use of district- and watch-level data demonstrate that the CPD has put in place the foundational systems required to support sufficient CIT staffing across watches. These actions satisfy the threshold requirements for Preliminary compliance with ¶111.

Looking forward, the CPD must demonstrate that it is executing the *CIT Officer Implementation Plan* in practice, including demonstrating sustained availability of Certified CIT Officers on every watch, continued improvement in response ratios, and completion of supervisor training that incorporates required response targets and the definition of timely response.

Paragraph 111 Compliance Progress History

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

Crisis Intervention: ¶112

112. *If the Monitor determines that CPD has not made material progress toward achieving the CIT Officer Implementation Plan Goals during any given reporting period, CPD will review and revise the CIT Officer Implementation Plan as necessary to enable CPD to make material progress to achieve the Implementation Plan Goals.*

Compliance Progress

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

Preliminary: *In Compliance (NEW)*

Secondary: *Not in Compliance*

Full: *Not in Compliance*

In the thirteenth reporting period, the CPD achieved Preliminary compliance with the requirements of ¶112.

During this reporting period, the IMT assessed the CPD’s progress toward achieving the goals of the *CIT Officer Implementation Plan*, with particular focus on whether the CPD has established the foundational framework necessary to support material progress. To assess compliance, the IMT reviewed the CPD’s latest draft of its *CIT Officer Implementation Plan*; materials reflecting the CPD’s ongoing implementation of S05-14, *Crisis Intervention Team (CIT) Program*; and documentation demonstrating the CPD’s development of a framework for defining “timely” response, as required by ¶¶107–08. The IMT also evaluated whether the CPD has continued implementation efforts in good faith consistent with the Consent Decree’s policy-development requirements. We look forward to continued refinement of the *CIT Officer Implementation Plan* and note that it must be approved by both the OAG and the IMT (per ¶638b) and the final version must be made public (per ¶640).

To achieve Secondary compliance, the CPD must complete the *CIT Officer Implementation Plan* (by receiving approvals from both the OAG and the IMT per ¶638 and make the final version of the *Plan* public per ¶640) and demonstrate that it has sufficient personnel and operational capacity to meet the requirements of ¶112. This will require the CPD to show measurable, data-informed refinement of the *CIT Officer Implementation Plan* and evidence of material progress toward meeting its stated goals. In future reporting periods, the IMT will assess whether the CPD’s implementation efforts are producing sustained progress supported by reliable data and whether the Department’s staffing and deployment practices align with the *Plan*’s objectives.

Paragraph 112 Compliance Progress History

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

COMPLIANCE PROGRESS:
Not Applicable

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

COMPLIANCE PROGRESS:
Not Applicable

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

COMPLIANCE PROGRESS:
None

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

COMPLIANCE PROGRESS:
Not Applicable

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

COMPLIANCE PROGRESS:
Not Applicable

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

COMPLIANCE PROGRESS:
None

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

COMPLIANCE PROGRESS:
None

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

COMPLIANCE PROGRESS:
None

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

COMPLIANCE PROGRESS:
None

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

COMPLIANCE PROGRESS:
None

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

COMPLIANCE PROGRESS:
None

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

COMPLIANCE PROGRESS:
None

THIRTEENTH REPORTING PERIOD
JULY 1, 2025 – DECEMBER 31, 2025

COMPLIANCE PROGRESS:
Preliminary

Crisis Intervention: ¶121

121. CPD will identify and assign a sufficient number of data analysts to collect and analyze data related to the CIT Program and CPD's response to incidents involving individuals in crisis.

Compliance Progress

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

Preliminary: *In Compliance* (FOURTH REPORTING PERIOD)

Secondary: *In Compliance* (TWELFTH REPORTING PERIOD)

Full: *In Compliance* (NEW)

In the thirteenth reporting period, the City and the CPD achieved Full compliance with the requirements of ¶121.

The CPD achieved Preliminary compliance in the fourth reporting period by identifying the number of data analysts that it believed at the time was sufficient to address the CIT Program's data needs (one data analyst), consistent with ¶121's requirements. The CPD memorialized ¶121's requirements into the substantially revised S05-14, *Crisis Intervention Team (CIT) Program*, which was finalized in the sixth reporting period, thereby maintaining Preliminary compliance.

The CPD achieved Secondary compliance in the twelfth reporting period by demonstrating that it allocated sufficient resources to assign a sufficient number of data analysts to the CIT Program and maintained a sufficient number of data analysts. Specifically, the CPD increased the number of its assigned data analysts to three: Principal Operations Analyst, Chief Operations Analyst, and Data Scientist. Additionally, the City and the CPD demonstrated significant progress in the collection and analysis of data related to the CIT Program and the CPD's response to incidents involving individuals in crisis.

The CPD achieved Full compliance in the thirteenth reporting period by continuing to demonstrate that it has a sufficient number of data analysts for the CIT Program to collect and analyze data regarding the CIT Program and the CPD's response to incidents involving individuals in crisis. To sustain Full compliance, the CPD must continue to demonstrate that it has a sufficient number of data analysts to meet the requirements of this paragraph and must continue to conduct ongoing assessments to determine whether more data analysts are necessary to satisfy the requirements of this paragraph. The CPD must also continue to demonstrate the collection and robust analysis of data for responses to incidents involving individuals in crisis to inform trends.

Additionally, while not specifically required by this paragraph, this reporting period the CPD finalized its CIT Dashboard and committed to making it public but did not provide a timeline or plan for making it public. The IMT supports the CPD making the CIT Dashboard public to increase transparency, and requests that the CPD develop a timeline and plan for accomplishing this in the coming reporting periods.

Paragraph 121 Compliance Progress History

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

COMPLIANCE PROGRESS:
Not Applicable

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

COMPLIANCE PROGRESS:
Status Update

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

COMPLIANCE PROGRESS:
Status Update

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

COMPLIANCE PROGRESS:
Preliminary

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

COMPLIANCE PROGRESS:
Preliminary

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

COMPLIANCE PROGRESS:
Preliminary

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

COMPLIANCE PROGRESS:
Preliminary

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

COMPLIANCE PROGRESS:
Preliminary

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

COMPLIANCE PROGRESS:
Preliminary

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

COMPLIANCE PROGRESS:
Preliminary

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

COMPLIANCE PROGRESS:
Preliminary

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

COMPLIANCE PROGRESS:
Preliminary

THIRTEENTH REPORTING PERIOD
JULY 1, 2025 – DECEMBER 31, 2025

COMPLIANCE PROGRESS:
Secondary

Crisis Intervention: ¶122

122. *Within 365 days of the Effective Date, and on an annual basis thereafter, the City will publish a written Crisis Intervention Plan. The development of the Crisis Intervention Plan will be based on the regular review of aggregate data and a sample of incidents conducted by CPD and OEMC. The CIT Coordinator will consider quantitative crisis-intervention data, qualitative data on officers' and community members' perception of the effectiveness of the CIT Program, CPD member feedback regarding crisis intervention-related training, actual incident information, staffing and deployment analysis of available Certified CIT officers, research reflecting the latest in best practices for police responses to individuals in crisis, and any feedback and recommendations from the Advisory Committee. OEMC will consider the response to, identification of, and dispatch of calls for service involving individuals in crisis by OEMC tele-communicators, research reflecting the latest in best practices for tele-communicator responses to individuals in crisis, and any feedback and recommendations from the Advisory Committee.*

Compliance Progress

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

Preliminary: *Not in Compliance*
Secondary: *Not in Compliance*
Full: *Not in Compliance*

In the thirteenth reporting period, the City did not achieve any level of compliance with the requirements of ¶122. While the City has not yet met the requirements for Preliminary compliance, the IMT recognizes the thoughtful work undertaken during this reporting period toward the development of a *Crisis Intervention Plan* Scope of Work.

To assess Preliminary compliance with ¶122, the IMT evaluated whether the City had published a written *Crisis Intervention Plan* supported by documentation and analysis incorporating information and feedback from all stakeholders within the City's crisis response system, including the Chicago Police Department (CPD), the Chicago Council on Mental Health Equity, the Chicago Fire Department, the Office of Emergency Management and Communications (OEMC), and the Chicago Department of Public Health (CDPH).

During this reporting period, the IMT met with the City to review the proposed Scope of Work and examined written summaries of meetings held with key stakeholders, including the Mayor's Office, Department of Law, CPD Crisis Intervention Unit, OEMC, Chicago Fire Department, and CDPH. The Scope of Work outlines a structured, phased approach to the development of the *Crisis Intervention Plan*, including:

1. Formatting methodology and annual project planning (Q4 2025–Q1 2026);
2. Calls for service and staffing analysis (Q4 2025–Q2 2026);
3. Current state analysis (Q4 2025–Q2 2026);
4. Recommendations (Q2 2026–Q3 2026); and
5. Implementation planning (Q2 2026–Q4 2026).

Each phase identifies key activities and deliverables and reflects a sequenced approach to plan development.

Notwithstanding this progress, ¶122 requires the City to publish a *Crisis Intervention Plan* within the first year of the Consent Decree and annually thereafter. The City has not submitted a *Crisis Intervention Plan* since the fourth reporting period, which ended in December 2020. As a result, the City remains out of compliance with this requirement.

Looking forward, the IMT expects the City to continue advancing each phase of the Scope of Work and to provide regular updates during the next reporting period. The IMT also emphasizes the importance of incorporating data and feedback related to OEMC call-taking and dispatch processes, including additional call-taker and dispatch metrics in monthly OEMC reporting, to allow assessment of dispatch delays relative to on-scene arrival times. Further, the *Crisis Intervention Plan* must continue to reflect input from all crisis response stakeholders and account for recent developments, including CDPH’s CARE pilot program, as the City works toward achieving compliance with ¶122. The IMT also notes that the City’s *Crisis Intervention Plan* must be approved by both the OAG and the IMT (per ¶638) and the final version must be made public (per ¶122’s requirements and ¶640).

Paragraph 122 Compliance Progress History

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

COMPLIANCE PROGRESS:
Not Applicable

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

COMPLIANCE PROGRESS:
None

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

COMPLIANCE PROGRESS:
None

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

COMPLIANCE PROGRESS:
None

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

COMPLIANCE PROGRESS:
None

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

COMPLIANCE PROGRESS:
None

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

COMPLIANCE PROGRESS:
None

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

COMPLIANCE PROGRESS:
None

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

COMPLIANCE PROGRESS:
None

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

COMPLIANCE PROGRESS:
None

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

COMPLIANCE PROGRESS:
None

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

COMPLIANCE PROGRESS:
None

THIRTEENTH REPORTING PERIOD
JULY 1, 2025 – DECEMBER 31, 2025

COMPLIANCE PROGRESS:
None

Crisis Intervention: ¶123

123. *The purpose of the Crisis Intervention Plan will be to evaluate the City’s identification of and response to incidents involving individuals in crisis and recommend any changes to staffing and deployment, policy, or training to ensure consistency with CPD and OEMC policy, this Agreement, and best practices. CPD will implement the Crisis Intervention Plan in accordance with the specified timeline for implementation. The Crisis Intervention Plan will: a. report the number, type, and outcome of incidents involving individuals in crisis, the number of Certified CIT Officers available and on duty in each district and on each watch, the percentage of calls for service involving individuals in crisis for which Certified CIT Officers were the first officers to respond to the scene for each watch in every district, and the response times for calls for service involving individuals in crisis for each watch in every district; b. evaluate the CIT Program’s compliance with the objectives and functions identified above; c. identify strategies to ensure that CPD has a sufficient number of Certified CIT Officers to meet its response ratio targets for calls for service involving individuals in crisis; d. describe any additional resources, including program staff or equipment, the CIT Program needs to perform its functions; e. identify safety issues and trends regarding interactions between individuals in crisis and officers; f. identify deficiencies and opportunities for improvement in identifying and dispatching calls for service involving individuals in crisis; g. recognize and highlight CIT Program and Certified CIT Officer successes, including successful individual officer performance; h. develop response strategies for repeat calls for service involving individuals who are frequently in crisis; i. recommend any changes to crisis intervention-related strategies, policies, and procedures; j. recommend any changes to CPD and OEMC trainings related to individuals in crisis, including any case studies and teaching scenarios; and k. include a timeline and plan for implementing recommended changes.*

Compliance Progress

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

Preliminary: *Not in Compliance*
Secondary: *Not in Compliance*
Full: *Not in Compliance*

In the thirteenth reporting period, the City did not achieve any level of compliance with the requirements of ¶123.

During this reporting period, the IMT assessed the City’s progress toward compliance by reviewing documentation related to the development of a *Crisis Intervention Plan* Scope of Work and by meeting with City representatives to discuss the proposed approach. The IMT reviewed a written summary of meetings held with key stakeholders, including the Mayor’s Office, Department of Law, Chicago Police Department Crisis Intervention Unit, Office of Emergency Management and Communications (OEMC), Chicago Fire Department (CFD), and the Chicago Department of Public Health (CDPH).

The Scope of Work outlines a five-phase process for developing the *Crisis Intervention Plan*: (1) Formatting Methodology and Annual Project Plan (Q4 2025–Q1

2026); (2) Calls for Service and Staffing Analysis (Q4 2025–Q2 2026); (3) Current State Analysis (Q4 2025–Q2 2026); (4) Recommendations (Q2 2026–Q3 2026); and (5) Implementation Plan (Q2 2026–Q4 2026). Each phase identifies key activities and deliverables and reflects a thoughtful and sequenced approach to plan development.

While the IMT recognizes the qualitative, quantitative, and collaborative work required to develop a comprehensive *Crisis Intervention Plan* and commends the City for engaging stakeholders and establishing a structured development process, ¶122 requires the City to publish a written *Crisis Intervention Plan* within the first year of the Consent Decree and annually thereafter. The City has not submitted a *Crisis Intervention Plan* since the fourth reporting period, which ended in December 2020. As a result, Preliminary compliance cannot be achieved until the *Crisis Intervention Plan* is formally produced and published.

Looking forward, the IMT looks forward to the City’s continued progress in the next reporting period and expects updates as the City advances through each of the five outlined phases. To move toward Preliminary compliance, the City must complete and publish a written *Crisis Intervention Plan* that incorporates stakeholder input, supporting documentation, and analysis consistent with the requirements of ¶123.

Paragraph 123 Compliance Progress History

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

Crisis Intervention: ¶126

126. Consistent with the requirements set forth in the Training section of this Agreement, all officers will receive in-service training, every three years, regarding responding to individuals in crisis that is adequate in quality, quantity, and scope for officers to demonstrate competence in the subject matter. This in-service training will include, but not be limited to, the following topics: a. a history of the mental health system; b. how to recognize and respond to individuals in crisis, including, but not limited to, identifying types of mental health conditions, signs and symptoms of mental health conditions, common treatments and medications, and common characteristics, behaviors, or conduct associated with individuals in crisis; c. the potential interactions officers may have on a regular basis with individuals in crisis, their families, and service providers, including steps to ensure effective communication and avoid escalating an interaction with an individual in crisis; d. techniques to safely de-escalate a potential crisis situation; e. the circumstances in which a Certified CIT Officer should be dispatched or consulted; and f. local resources that are available to provide treatment, services, or support for individuals in crisis, including available pre- and post-arrest diversion programs, and when and how to draw upon those resources.

Compliance Progress

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

Preliminary: *In Compliance* (FIFTH REPORTING PERIOD)
Secondary: *In Compliance* (EIGHTH REPORTING PERIOD)
Full: *In Compliance* (NEW)

In the thirteenth reporting period, the City and the CPD achieved Full compliance with the requirements of ¶126.

The CPD achieved Preliminary compliance with ¶126 in the fifth reporting period by incorporating the requirements of this paragraph into Special Order S11-10-03, *In-Service Training*.

The CPD achieved Secondary compliance in the eighth reporting period by delivering training that met the requirements of ¶126 and producing evidence that 95% of all officers completed the eight-hour 2022 *Annual In-Service Training*. However, at that time, the CPD did not produce officer or instructor evaluations of the training, nor did it produce outcome metrics necessary under the ADDIE model to assess the effectiveness of the training. In *Independent Monitoring Report 9*, we noted that to maintain Secondary compliance, the CPD would need to produce training evaluations for the eight-hour 2023 *Annual In-Service Training* delivered during the eighth reporting period.

During this reporting period, the CPD developed and delivered a new annual in-service training covering the requirements of ¶126—including subparagraphs a.–f.—titled *Crisis Intervention and Officer Wellness*. While the training is adequate in quality and scope and sufficiently covers the required subject matter, the portion

of the training specifically addressing ¶126 was reduced to one hour, with an additional section dedicated to scenario-based exercises. The IMT reviewed training curricula, lesson plans, attendance records, and related documentation to assess compliance during this reporting period.

Paragraph 126 requires that all officers receive in-service training every three years regarding responding to individuals in crisis that is adequate in quality, quantity, and scope to allow officers to demonstrate competence in the subject matter. Over the last several years, the CPD has increased the overall quantity of crisis-related training. With these efforts, the CPD achieved Full compliance. Moving forward, the IMT will continue to assess whether the reduction in total training hours beginning in 2025 has any adverse effects on officer preparedness or training effectiveness.

To sustain Full compliance, the CPD must produce officer and instructor evaluations for the eight-hour *Crisis Intervention and Officer Wellness* training delivered in 2025, as well as documentation of outcome metrics demonstrating the effectiveness of the training. As required by ¶126, the IMT will assess sustained compliance by reviewing records demonstrating that at least 95% of officers receive training every three years, evaluation data, and outcome measures used to inform training improvements. Additionally, the CPD should consider consulting with the Chicago Council on Mental Health Equity (CCMHE) regarding this training. The IMT recommends that the CCMHE observe the training and, where appropriate, provide community and lived-experience feedback. See ¶130.

Paragraph 126 Compliance Progress History

| | | |
|--|--|---|
| FIRST REPORTING PERIOD MARCH 1, 2019 – AUGUST 31, 2019 COMPLIANCE PROGRESS: Not Applicable | SECOND REPORTING PERIOD SEPTEMBER 1, 2019 – FEBRUARY 29, 2020 COMPLIANCE PROGRESS: Not Applicable | THIRD REPORTING PERIOD MARCH 1, 2020 – DECEMBER 31, 2020 COMPLIANCE PROGRESS: Not Applicable |
| FOURTH REPORTING PERIOD JANUARY 1, 2021 – JUNE 30, 2021 COMPLIANCE PROGRESS: Not Applicable | FIFTH REPORTING PERIOD JULY 1, 2021 – DECEMBER 31, 2021 COMPLIANCE PROGRESS: Preliminary | SIXTH REPORTING PERIOD JANUARY 1, 2022 – JUNE 30, 2022 COMPLIANCE PROGRESS: Preliminary |
| SEVENTH REPORTING PERIOD JULY 1, 2022 – DECEMBER 31, 2022 COMPLIANCE PROGRESS: Preliminary | EIGHTH REPORTING PERIOD JANUARY 1, 2023 – JUNE 30, 2023 COMPLIANCE PROGRESS: Secondary | NINTH REPORTING PERIOD JULY 1, 2023 – DECEMBER 31, 2023 COMPLIANCE PROGRESS: Secondary |
| TENTH REPORTING PERIOD JANUARY 1, 2024 – JUNE 30, 2024 COMPLIANCE PROGRESS: Secondary | ELEVENTH REPORTING PERIOD JULY 1, 2024 – DECEMBER 31, 2024 COMPLIANCE PROGRESS: Secondary | TWELFTH REPORTING PERIOD JANUARY 1, 2025 – JUNE 30, 2025 COMPLIANCE PROGRESS: Secondary |
| THIRTEENTH REPORTING PERIOD JULY 1, 2025 – DECEMBER 31, 2025 COMPLIANCE PROGRESS: Full | | |

Crisis Intervention: ¶127

127. All new recruits will receive training that is adequate in quantity, quality, and scope regarding responding to individuals in crisis. It will include, but not be limited to, training on the subjects identified above.

Compliance Progress

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

| | |
|---------------------|---|
| Preliminary: | <i>In Compliance</i> (FIFTH REPORTING PERIOD) |
| Secondary: | <i>In Compliance</i> (ELEVENTH REPORTING PERIOD) |
| Full: | <i>In Compliance</i> (NEW) |

In the thirteenth reporting period, the City and the CPD achieved Full compliance with the requirements of ¶127.

The CPD achieved Preliminary compliance with ¶127 in the fifth reporting period by developing and finalizing its policy S11-10-01, *Recruit Training*, which incorporates ¶127's requirements. The CPD maintained Preliminary compliance in subsequent reporting periods by reviewing and revising this policy.

The CPD achieved Secondary compliance with ¶127 in the eleventh reporting period based on the IMT's review of three training courses: *CIT Recruit Concepts*, *Mental Health Awareness and Response*, and *Neurobiology of Trauma and PTSD*. The *Mental Health Awareness and Response* training independently covers all topics required by ¶126. This training, in combination with the *CIT Recruit Concepts* training and the *Neurobiology of Trauma and PTSD* training, provides an excellent foundation for all recruits. The CPD Academy also delivers two additional relevant training courses, *Crisis Intervention and Disturbance Calls* and *Interacting with Persons with Disabilities*. All of these trainings are required by the Illinois Law Enforcement Training and Standards Board (ILETSB).

The IMT observed portions of the *Mental Health Awareness and Response* training during the eleventh reporting period. While the training content was excellent, the CPD must evaluate instructor qualifications. Training section paragraphs ¶¶284–85 require subject matter expertise, and given the content of these trainings, it is important to establish that the instructor is well qualified.

Looking ahead, the IMT again recommends that members of the Chicago Council on Mental Health Equity (CCMHE) observe these trainings and, where appropriate, provide community and lived-experience feedback, specifically for the *Mental Health Awareness and Response* training, which covers ¶¶126–27. See also ¶¶103 and 130.

The CPD achieved Full compliance by demonstrating the ongoing delivery of these trainings to new recruits. To sustain Full compliance, the CPD must produce the relevant course evaluations and instructor evaluations. The IMT will also consider

the annual review of the training curricula and, where necessary, any revision of the training courses.

Paragraph 127 Compliance Progress History

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

Crisis Intervention: ¶128

128. The City will have a crisis intervention response advisory committee (“Advisory Committee”) with subject matter expertise and experience that will assist in identifying problems and developing solutions and interventions designed to improve outcomes for individuals in crisis who require City services. The Parties acknowledge that the City has formed the City-wide Mental Health Steering Committee and that the City may draw upon those resources to satisfy the requirements of this Agreement.

Compliance Progress

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

Preliminary: *In Compliance (SECOND REPORTING PERIOD)*
Secondary: *In Compliance (NEW)*
Full: *Not in Compliance*

In the thirteenth reporting period, the City achieved Secondary compliance with the requirements of ¶128.

In prior reporting periods, the City achieved Preliminary compliance by establishing the Chicago Council on Mental Health Equity (CCMHE) as the advisory body responsive to ¶128 and staffing it with members possessing relevant subject matter expertise and experience. However, the City had not previously demonstrated that the CCMHE was sufficiently resourced, consistently operational, or able to perform sustained advisory functions necessary to reach Secondary compliance.

During the thirteenth reporting period, the Independent Monitoring Team (IMT) assessed the City’s progress toward Secondary compliance through a review of CCMHE governance documents, meeting materials, meeting minutes, attendance records, and presentations provided to the CCMHE, as well as discussions with City personnel during site visits.

The City has now demonstrated that it has provided sufficient resources and qualified personnel to support the CCMHE in providing the assistance required by ¶128. Specifically, the City finalized and implemented CCMHE bylaws, formalizing the Committee’s structure, roles, and procedures. The City also demonstrated that CCMHE meetings are occurring on a quarterly basis with documented evidence of quorum, and that meetings are supported by City staff responsible for coordination, materials preparation, and follow-up. Of note, in the thirteenth reporting period, all agenda, meeting materials, meeting minutes, and video recordings were posted for all four meetings in 2025 with two exceptions: there were broken video recording links for the November 10 and February 10 meetings, and the minutes are missing from the November 10 meeting. The IMT will continue to assess improvement moving forward.

The IMT further reviewed evidence that the CCMHE engaged in substantive advisory activity, including reviews and discussions related to crisis response programs, operational practices, and interagency coordination involving the Chicago Police Department, the Office of Emergency Management and Communications, and the Chicago Department of Public Health. Meeting materials reflect that the CCMHE is receiving information necessary to assist in identifying problems and informing solutions and interventions designed to improve outcomes for individuals in crisis who require City services.

Additionally, the City demonstrated improved processes related to transparency and collaboration, including more consistent documentation of meetings, clearer identification of quorum, and increased sharing of materials in advance of meetings. The CCMHE continues to include members with lived experience and community representation, satisfying the requirement that the advisory body reflect diverse perspectives relevant to crisis intervention and response. The improvement in CCMHE functionality allowed the City to achieve Secondary compliance with ¶128.

To achieve Full compliance with ¶128, the City must demonstrate that the CCMHE's advisory functions are not only operational but sustained over time. This includes continued evidence of quorum at quarterly meetings, ongoing provision of sufficient staffing and administrative support, maintenance of the required CCMHE stakeholders under ¶132, regular substantive reviews of data, policies, training, and operational practices, with increased emphasis on data and operational practices to permit the development of the CCMHE "solutions and interventions" required under this paragraph, clear documentation showing how CCMHE input informs City decision-making related to crisis response and improved reliability of meeting materials and video recording, with functional links, are posted on the CCMHE website. The IMT will continue to assess whether the CCMHE maintains the necessary structure and support to provide ongoing assistance as required by this paragraph.

Paragraph 128 Compliance Progress History

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

COMPLIANCE PROGRESS:
Not Applicable

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

COMPLIANCE PROGRESS:
Preliminary

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

COMPLIANCE PROGRESS:
Preliminary

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

COMPLIANCE PROGRESS:
Preliminary

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

COMPLIANCE PROGRESS:
Preliminary

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

COMPLIANCE PROGRESS:
Preliminary

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

COMPLIANCE PROGRESS:
Preliminary

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

COMPLIANCE PROGRESS:
Preliminary

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

COMPLIANCE PROGRESS:
Preliminary

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

COMPLIANCE PROGRESS:
Preliminary

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

COMPLIANCE PROGRESS:
Preliminary

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

COMPLIANCE PROGRESS:
Preliminary

THIRTEENTH REPORTING PERIOD
JULY 1, 2025 – DECEMBER 31, 2025

COMPLIANCE PROGRESS:
Secondary

Crisis Intervention: ¶129

129. The Advisory Committee, at a minimum, will meet quarterly to review and recommend improvements to the City's overall response to individuals in crisis, with consideration to areas such as coordinated crisis response; data collection and evaluation; community engagement and awareness; service outreach and prevention; and the CIT Program.

Compliance Progress

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

Preliminary: *In Compliance (SECOND REPORTING PERIOD)*
Secondary: *In Compliance (NEW)*
Full: *Not in Compliance*

In the thirteenth reporting period, the City achieved Secondary compliance with the requirements of ¶129.

During this reporting period, the IMT assessed whether the Advisory Committee's quarterly meetings included substantive reviews and feedback regarding the City's overall response to individuals in crisis, with consideration to coordinated crisis response; data collection and evaluation; community engagement and awareness; service outreach and prevention; and the Crisis Intervention Team (CIT) Program, as required by ¶129.

To assess Secondary compliance, the IMT reviewed meeting agendas, attendance records, minutes, and publicly posted materials for the Chicago Council on Mental Health Equity (CCMHE), as well as documentation demonstrating compliance with Open Meetings Act requirements, including public notice, ease of public access, and timely posting of materials. The IMT also evaluated whether the CCMHE operated under a finalized set of bylaws and an effective operational structure, whether meetings reliably reached quorum, and whether the substance of the meetings reflected meaningful engagement with policies, programs, and data related to the City's crisis response system.

The evidence reviewed demonstrates that the CCMHE convened meetings during this reporting period with reliable attendance and quorum, operated pursuant to adopted bylaws, and engaged in substantive discussion and feedback on crisis response initiatives, including presentations and discussions related to coordinated crisis response programs, data-informed initiatives, and service delivery models. Meeting agendas, attendance, and minutes were posted in a timely manner, and materials were made available in advance of meetings, allowing members to review and prepare feedback consistent with the requirements of ¶129. It is the continued recommendation of the IMT that all meeting materials are posted for public review minimally 48 hours in advance of the meeting to enhance meaningful input and discussion because bylaws require written public comments to be received within 24 hours of the meeting to be addressed at the meeting.

Looking forward, to achieve Full compliance, the City must demonstrate that the CCMHE has the necessary and sustained support and structure to ensure that meetings continue to occur at least quarterly on an ongoing basis. This includes continued adherence to bylaws and Open Meetings Act requirements, reliable quorum, timely posting of agendas, presentation materials, minutes, and video recordings with consistent provision of resources and staffing support sufficient to sustain the CCMHE’s work over time.

Paragraph 129 Compliance Progress History

| | | |
|--|---|--|
| FIRST REPORTING PERIOD MARCH 1, 2019 – AUGUST 31, 2019 COMPLIANCE PROGRESS: Not Applicable | SECOND REPORTING PERIOD SEPTEMBER 1, 2019 – FEBRUARY 29, 2020 COMPLIANCE PROGRESS: Preliminary | THIRD REPORTING PERIOD MARCH 1, 2020 – DECEMBER 31, 2020 COMPLIANCE PROGRESS: Preliminary |
| FOURTH REPORTING PERIOD JANUARY 1, 2021 – JUNE 30, 2021 COMPLIANCE PROGRESS: Preliminary | FIFTH REPORTING PERIOD JULY 1, 2021 – DECEMBER 31, 2021 COMPLIANCE PROGRESS: Preliminary | SIXTH REPORTING PERIOD JANUARY 1, 2022 – JUNE 30, 2022 COMPLIANCE PROGRESS: Preliminary |
| SEVENTH REPORTING PERIOD JULY 1, 2022 – DECEMBER 31, 2022 COMPLIANCE PROGRESS: Preliminary | EIGHTH REPORTING PERIOD JANUARY 1, 2023 – JUNE 30, 2023 COMPLIANCE PROGRESS: Preliminary | NINTH REPORTING PERIOD JULY 1, 2023 – DECEMBER 31, 2023 COMPLIANCE PROGRESS: Preliminary |
| TENTH REPORTING PERIOD JANUARY 1, 2024 – JUNE 30, 2024 COMPLIANCE PROGRESS: Preliminary | ELEVENTH REPORTING PERIOD JULY 1, 2024 – DECEMBER 31, 2024 COMPLIANCE PROGRESS: Preliminary | TWELFTH REPORTING PERIOD JANUARY 1, 2025 – JUNE 30, 2025 COMPLIANCE PROGRESS: Preliminary |
| THIRTEENTH REPORTING PERIOD JULY 1, 2025 – DECEMBER 31, 2025 COMPLIANCE PROGRESS: Secondary | | |

Crisis Intervention: ¶130

130. *The City will request that the Advisory Committee provide guidance on crisis response-related policies, procedures, and training of City agencies, including CPD and OEMC, and assist the City in developing and expanding current strategies for responding to individuals in crisis, including reducing the need for police-involved responses to individuals in crisis and developing municipal and community resources, such as pre- and post-arrest diversion resources and alternative response options (like drop-off centers, mobile crisis teams, a central nonemergency crisis line). The City will further request that in providing the guidance detailed above the Advisory Committee will consider specific strategies for responding to children and youth when they experience a behavioral or mental health crisis.*

Compliance Progress

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

| | |
|---------------------|---|
| Preliminary: | <i>In Compliance (SECOND REPORTING PERIOD)</i> |
| Secondary: | <i>Under Assessment</i> |
| Full: | <i>Not in Compliance</i> |

In the thirteenth reporting period, the City is under assessment for Secondary compliance with the requirements of ¶130.

To assess Secondary compliance with ¶130, the IMT reviewed a range of Chicago Council on Mental Health Equity (CCMHE) materials and activities to evaluate whether the Advisory Committee is engaging in substantive review and providing guidance on the City’s crisis response policies, training, and strategies. This review included CCMHE meeting agendas and minutes from 2025 quarterly meetings to assess the regularity of meetings, quorum, and the substance of discussions related to crisis response policies, training, and system-level strategies. The IMT also assessed documentation reflecting CCMHE engagement with City agencies, including the CPD and OEMC, as well as public health partners, particularly with respect to crisis response infrastructure, alternative response models, and cross-system coordination.

In addition, the IMT reviewed evidence of CCMHE involvement in policy development, training review, and introductory strategy-level discussions related to crisis response programs, including CIT, non-law-enforcement response options such as 988 and CARE, and community-based diversion resources. The IMT evaluated the CCMHE’s operational structure, including the adoption and implementation of by-laws, meeting organization and transparency practices, and compliance with public access requirements. Finally, the IMT reviewed meeting materials and discussions addressing specialized response considerations for children and youth experiencing behavioral or mental health crises, as well as evidence of increased involvement of individuals with lived experience through meeting participation and public comment. While this documentation reflects ongoing activity and progress,

it does not yet demonstrate the level of sustained, outcome-oriented advisory engagement required to achieve Secondary compliance, and therefore Secondary compliance remains under assessment.

Looking forward, to achieve Secondary compliance and progress toward Full compliance with ¶130, the City should continue to demonstrate that CCMHE guidance is actively considered and meaningfully integrated into policy revisions, training development, and operational practices across the CPD, the OEMC, and other relevant City agencies. Progress toward Full compliance will further depend on the City's ability to demonstrate, through reliable and validated data, that CCMHE-informed strategies are contributing to improved crisis response outcomes, including reduced reliance on police-involved responses, expanded community-based resources, and sustained engagement with individuals with lived experience.

While the City has improved its engagement with the CCMHE related to policy, training and data, to achieve Full compliance, the IMT encourages the parties to focus subsequent efforts with the CCMHE on obtaining documented strategies supporting *“assist[ing] the City in developing and expanding current strategies for responding to individuals in crisis, including reducing the need for police-involved responses to individuals in crisis and developing municipal and community resources, such as pre- and post-arrest diversion resources and alternative response options (like drop-off centers, mobile crisis teams, a central nonemergency crisis line). The City will further request that in providing the guidance detailed above the Advisory Committee will consider specific strategies for responding to children and youth when they experience a behavioral or mental health crisis.”*

There is a fairly significant gap in progress related to this requirement of ¶130 that must be addressed for Full compliance.

Paragraph 130 Compliance Progress History

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

COMPLIANCE PROGRESS:
Not Applicable

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

COMPLIANCE PROGRESS:
Preliminary

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

COMPLIANCE PROGRESS:
Preliminary

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

COMPLIANCE PROGRESS:
Preliminary

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

COMPLIANCE PROGRESS:
Preliminary

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

COMPLIANCE PROGRESS:
Preliminary

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

COMPLIANCE PROGRESS:
Preliminary

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

COMPLIANCE PROGRESS:
Preliminary

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

COMPLIANCE PROGRESS:
Preliminary

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

COMPLIANCE PROGRESS:
Preliminary

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

COMPLIANCE PROGRESS:
Preliminary

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

COMPLIANCE PROGRESS:
Preliminary

THIRTEENTH REPORTING PERIOD
JULY 1, 2025 – DECEMBER 31, 2025

COMPLIANCE PROGRESS:
Preliminary

Crisis Intervention: ¶132

132. The Advisory Committee will be chaired by the Mayor’s Office. The Mayor’s Office will invite individuals who have personally experienced a behavioral or mental health crisis, people with experience working with individuals in crisis, and experts with knowledge in law enforcement responses to individuals in crisis. At a minimum, the Mayor’s Office will invite individuals from the following groups: first responders; the CIT Coordinator; OEMC; county and city hospitals, health care providers, and mental health professionals; the Cook County State’s Attorney’s Office; the Cook County Public Defender’s Office; at least one academic research entity; community behavioral and mental health professionals; advocacy groups for consumers of behavioral and mental health services; behavioral and mental health service providers; homeless service providers; substance abuse service providers; persons with lived experiences of behavioral or mental health crises; and other similar groups.

Compliance Progress

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

Preliminary: *In Compliance (SECOND REPORTING PERIOD)*
Secondary: *In Compliance (NEW)*
Full: *Not in Compliance*

In the thirteenth reporting period, the City and the CPD achieved Secondary compliance with the requirements of ¶132.

During this reporting period, the City produced documentation detailing its efforts to invite individuals from each of the groups identified in ¶132 to participate in the Chicago Council for Mental Health Equity (CCMHE).

To assess Secondary compliance, the IMT reviewed a participant list of CCMHE members and evidence of the City’s outreach to the groups identified in ¶132.

Paragraph 132 requires the Mayor’s office to “invite individuals who have personally experienced a behavioral or mental health crisis, people with experience working with individuals in crisis, and experts with knowledge in law enforcement responses to individuals in crisis.” Additionally, ¶132 requires the Mayor’s office, at a minimum, to invite individuals from the following groups to participate in the CCMHE: “first responders; the CIT Coordinator; OEMC; county and city hospitals, health care providers, and mental health professionals; the Cook County State’s Attorney’s Office; the Cook County Public Defender’s Office; at least one academic research entity; community behavioral and mental health professionals; advocacy groups for consumers of behavioral and mental health services; behavioral and mental health service providers; homeless service providers; substance abuse service providers; persons with lived experiences of behavioral or mental health crises; and other similar groups.”

The City has historically had difficulty identifying a representative from the Cook County Public Defender and the Cook County Hospital sectors. This reporting period, the City demonstrated 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 on the CCMHE with the exception a “county hospital.”

Looking forward, to achieve Full compliance, the City must continue to demonstrate that individuals from the groups identified in ¶132 are represented on the CCMHE and that these individuals are provided opportunities to meaningfully participate on the committee. Additionally, the City should continue to make further efforts to invite a representative from the county hospital sector, including by reaching out to contacts other than the ones they have attempted, so that this group can be adequately represented on the CCMHE.

Paragraph 132 Compliance Progress History

| | | |
|--|---|--|
| FIRST REPORTING PERIOD MARCH 1, 2019 – AUGUST 31, 2019 COMPLIANCE PROGRESS: Not Applicable | SECOND REPORTING PERIOD SEPTEMBER 1, 2019 – FEBRUARY 29, 2020 COMPLIANCE PROGRESS: Preliminary | THIRD REPORTING PERIOD MARCH 1, 2020 – DECEMBER 31, 2020 COMPLIANCE PROGRESS: Secondary |
| FOURTH REPORTING PERIOD JANUARY 1, 2021 – JUNE 30, 2021 COMPLIANCE PROGRESS: Secondary | FIFTH REPORTING PERIOD JULY 1, 2021 – DECEMBER 31, 2021 COMPLIANCE PROGRESS: Secondary | SIXTH REPORTING PERIOD JANUARY 1, 2022 – JUNE 30, 2022 COMPLIANCE PROGRESS: Secondary |
| SEVENTH REPORTING PERIOD JULY 1, 2022 – DECEMBER 31, 2022 COMPLIANCE PROGRESS: Preliminary | EIGHTH REPORTING PERIOD JANUARY 1, 2023 – JUNE 30, 2023 COMPLIANCE PROGRESS: Secondary | NINTH REPORTING PERIOD JULY 1, 2023 – DECEMBER 31, 2023 COMPLIANCE PROGRESS: Preliminary |
| TENTH REPORTING PERIOD JANUARY 1, 2024 – JUNE 30, 2024 COMPLIANCE PROGRESS: Preliminary | ELEVENTH REPORTING PERIOD JULY 1, 2024 – DECEMBER 31, 2024 COMPLIANCE PROGRESS: Preliminary | TWELFTH REPORTING PERIOD JANUARY 1, 2025 – JUNE 30, 2025 COMPLIANCE PROGRESS: Preliminary |
| THIRTEENTH REPORTING PERIOD JULY 1, 2025 – DECEMBER 31, 2025 COMPLIANCE PROGRESS: Secondary | | |

Crisis Intervention: ¶133

133. CPD policy will provide that a crisis intervention response may be necessary even in situations where there has been an apparent violation of law.

Compliance Progress

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

| | |
|---------------------|---|
| Preliminary: | <i>In Compliance</i> (THIRD REPORTING PERIOD) |
| Secondary: | <i>In Compliance</i> (EIGHTH REPORTING PERIOD) |
| Full: | <i>Under Assessment</i> |

In the thirteenth reporting period, the City and the CPD are under assessment for Full compliance with the requirements of ¶133.

The City and the CPD achieved Preliminary compliance with ¶133 in the third reporting period by incorporating its requirements into Special Order S04-20, *Recognizing and Responding to Individuals in Crisis*. This directive establishes that a crisis intervention response may be required even when there is an apparent violation of law and provides guidance for recognizing and responding to individuals experiencing a mental health crisis.

The City and the CPD achieved Secondary compliance with ¶133 in the eighth reporting period by demonstrating at least 95% completion of required Crisis Intervention Team (CIT) training, including *Crisis Intervention Team eLearning*, addressing policy changes applicable to all officers, and the 2021 Crisis Intervention Team In-Service Training. At that time, the IMT noted the absence of sufficient training evaluation data to assess the effectiveness of crisis response training.

During this reporting period, the IMT assessed whether crisis intervention responses are occurring in practice, including in situations involving apparent violations of law, as required for Full compliance. The IMT reviewed CPD Crisis Intervention Reports and associated data documenting officer responses to individuals in crisis, including arrest outcomes, use of force, de-escalation tactics, call dispositions, and referrals to healthcare providers.

The IMT also reviewed the CPD CIT Q3 2025 Response Ratio Report, which provides baseline data relevant to assessing compliance with ¶133 and related paragraphs. The data demonstrates the frequency of crisis-related calls, associated use of force, implementation of CIT techniques, arrest outcomes, and transportation to hospitals. The IMT also reviewed data regarding the presence of weapons during crisis encounters. However, CPD data does not clearly indicate whether crisis intervention responses are occurring consistent with ¶133, including when there is an apparent violation of law.

Looking forward, the IMT anticipates that the revisions underway to the Crisis Intervention Team Report may address the current gaps in data and support Full compliance with ¶133.

Paragraph 133 Compliance Progress History

| | | |
|--|--|--|
| FIRST REPORTING PERIOD MARCH 1, 2019 – AUGUST 31, 2019 COMPLIANCE PROGRESS: Not Applicable | SECOND REPORTING PERIOD SEPTEMBER 1, 2019 – FEBRUARY 29, 2020 COMPLIANCE PROGRESS: Not Applicable | THIRD REPORTING PERIOD MARCH 1, 2020 – DECEMBER 31, 2020 COMPLIANCE PROGRESS: Preliminary |
| FOURTH REPORTING PERIOD JANUARY 1, 2021 – JUNE 30, 2021 COMPLIANCE PROGRESS: Preliminary | FIFTH REPORTING PERIOD JULY 1, 2021 – DECEMBER 31, 2021 COMPLIANCE PROGRESS: Preliminary | SIXTH REPORTING PERIOD JANUARY 1, 2022 – JUNE 30, 2022 COMPLIANCE PROGRESS: Preliminary |
| SEVENTH REPORTING PERIOD JULY 1, 2022 – DECEMBER 31, 2022 COMPLIANCE PROGRESS: Preliminary | EIGHTH REPORTING PERIOD JANUARY 1, 2023 – JUNE 30, 2023 COMPLIANCE PROGRESS: Secondary | NINTH REPORTING PERIOD JULY 1, 2023 – DECEMBER 31, 2023 COMPLIANCE PROGRESS: Secondary |
| TENTH REPORTING PERIOD JANUARY 1, 2024 – JUNE 30, 2024 COMPLIANCE PROGRESS: Secondary | ELEVENTH REPORTING PERIOD JULY 1, 2024 – DECEMBER 31, 2024 COMPLIANCE PROGRESS: Secondary | TWELFTH REPORTING PERIOD JANUARY 1, 2025 – JUNE 30, 2025 COMPLIANCE PROGRESS: Secondary |
| THIRTEENTH REPORTING PERIOD JULY 1, 2025 – DECEMBER 31, 2025 COMPLIANCE PROGRESS: Secondary | | |

Crisis Intervention: ¶134

134. CPD policy will encourage officers to redirect individuals in crisis to the healthcare system, available community resources, and available alternative response options, where feasible and appropriate.

Compliance Progress

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

| | |
|---------------------|---|
| Preliminary: | <i>In Compliance</i> (THIRD REPORTING PERIOD) |
| Secondary: | <i>In Compliance</i> (EIGHTH REPORTING PERIOD) |
| Full: | <i>Under Assessment</i> |

In the thirteenth reporting period, the City and the CPD maintained Preliminary and Secondary compliance with the requirements of ¶134 and is under assessment for Full compliance.

The City and the CPD achieved Preliminary compliance by memorializing the requirements of ¶134 in Special Order S04-20, *Recognizing and Responding to Individuals in Crisis*. The directive provides guidance for identifying individuals in crisis and outlines available healthcare, community resources, and alternative response options.

The City and the CPD achieved Secondary compliance by demonstrating 95% completion of Crisis Intervention Team eLearning and in-service training. The training addressed policy updates and equipped officers with knowledge of community resources and alternative response options.

To assess Full compliance, the IMT reviewed Crisis Intervention training records, Crisis Intervention Reports, the latest draft of the *Certified CIT Officer Implementation Plan*, and the Q3 2025 Response Ratio Report. The IMT also reviewed 988 call diversion data produced by OEMC and revisions to the Mental Health Incident Notice. Data indicates that 2.8% of Crisis Intervention Reports resulted in arrest, most of which were misdemeanors. Additionally, many reports reflected transportation to hospitals, and transfers from 911 to 988 increased over time. The IMT also reviewed information related to the CARE pilot program. The IMT identified limitations in available CARE data and noted gaps due to the absence of a public dashboard and incomplete outcome reporting.

To achieve Full compliance, the IMT will look for ongoing evidence that officers are diverting people to healthcare and community-based resources when “feasible and appropriate.” The IMT will also look for reliable, validated disposition data demonstrating diversion outcomes across CPD, OEMC, and Chicago Department of Public Health (CDPH) systems.

Paragraph 134 Compliance Progress History

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

COMPLIANCE PROGRESS:
Not Applicable

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

COMPLIANCE PROGRESS:
Not Applicable

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

COMPLIANCE PROGRESS:
Preliminary

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

COMPLIANCE PROGRESS:
Preliminary

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

COMPLIANCE PROGRESS:
Preliminary

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

COMPLIANCE PROGRESS:
Preliminary

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

COMPLIANCE PROGRESS:
Preliminary

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

COMPLIANCE PROGRESS:
Secondary

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

COMPLIANCE PROGRESS:
Secondary

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

COMPLIANCE PROGRESS:
Secondary

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

COMPLIANCE PROGRESS:
Secondary

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

COMPLIANCE PROGRESS:
Secondary

THIRTEENTH REPORTING PERIOD
JULY 1, 2025 – DECEMBER 31, 2025

COMPLIANCE PROGRESS:
Secondary

Crisis Intervention: ¶135

135. CPD will ensure that the language used in policies, procedures, forms, databases, and trainings to communicate about incidents involving individuals in crisis is appropriate, respectful, and consistent with industry recognized terminology. CPD will seek input from community stakeholders, including the Advisory Committee, for recommendations to identify appropriate and respectful terminology.

Compliance Progress

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

Preliminary: *In Compliance* (THIRD REPORTING PERIOD)
Secondary: *In Compliance* (EIGHTH REPORTING PERIOD)
Full: *In Compliance* (NEW)

In the thirteenth reporting period, the City and the CPD achieved Full compliance with the requirements of ¶135.

The City and the CPD achieved Preliminary compliance with ¶135 in the third reporting period by establishing Special Order S05-14, *Crisis Intervention Team (CIT) Program*, which requires that language used in policies, procedures, forms, databases, and training materials to communicate about incidents involving individuals in crisis be appropriate, respectful, and consistent with professional terminology.

Additionally, Special Order S04-20, *Recognizing and Responding to Individuals in Crisis*, clearly communicates CPD’s commitment to interacting with individuals in crisis with dignity, respect, and the utmost regard for the preservation of human life and the safety of all people involved. Under the “Procedures” section of the directive, officers are explicitly instructed that they are required to interact with individuals in crisis with dignity and respect.

The City and the CPD achieved Secondary compliance in the eighth reporting period by demonstrating 95% completion of both the Crisis Intervention Team e-learning addressing policy changes affecting all officers and the 2021 Crisis Intervention Team In-Service Training, through which appropriate language was trained department-wide. CPD policies and training materials were reviewed by members of the Chicago Council on Mental Health Equity (CCMHE), satisfying the second component of ¶135. The IMT’s review of policies, procedures, forms, databases, and training materials confirmed the CPD’s commitment to reinforcing respectful dialogue when discussing individuals in crisis.

During the thirteenth reporting period, the IMT reviewed the *CIT Officer Implementation Plan*, the draft revised Crisis Intervention Team Report, the revised *CIT Refresher* training, and updated language incorporated into the CIT Report currently under review. The CPD has taken sufficient steps to ensure that respectful language is used in policies, procedures, databases, forms, and training materials

when communicating about individuals in crisis, thereby achieving Full compliance with ¶135.

To sustain Full compliance, the City and the CPD must develop an industry-recognized event code using respectful language to replace the current “disturbance mental” code (*i.e.*, DISTME) and “Mental Absence.” The IMT has been informed that changes to event codes may only occur once the new Computer Aided Dispatch (CAD) system is implemented. While the City has discussed plans for operationalizing this change for several years, implementation has not yet occurred. The CPD will need to implement alternative event code(s) for mental health-related calls for service and seek input from the CCMHE.

Additionally, during the sustainment period, the IMT will conduct random audits of Body-Worn Camera (BWC) footage from mental health crisis calls and will continue to review policies, procedures, forms, databases, and training materials to ensure that, as best practices evolve, language remains respectful and reflects industry-recognized terminology.

Paragraph 135 Compliance Progress History

| | | |
|---|--|--|
| FIRST REPORTING PERIOD MARCH 1, 2019 – AUGUST 31, 2019 COMPLIANCE PROGRESS: Not Applicable | SECOND REPORTING PERIOD SEPTEMBER 1, 2019 – FEBRUARY 29, 2020 COMPLIANCE PROGRESS: Not Applicable | THIRD REPORTING PERIOD MARCH 1, 2020 – DECEMBER 31, 2020 COMPLIANCE PROGRESS: Preliminary |
| FOURTH REPORTING PERIOD JANUARY 1, 2021 – JUNE 30, 2021 COMPLIANCE PROGRESS: Preliminary | FIFTH REPORTING PERIOD JULY 1, 2021 – DECEMBER 31, 2021 COMPLIANCE PROGRESS: Preliminary | SIXTH REPORTING PERIOD JANUARY 1, 2022 – JUNE 30, 2022 COMPLIANCE PROGRESS: Preliminary |
| SEVENTH REPORTING PERIOD JULY 1, 2022 – DECEMBER 31, 2022 COMPLIANCE PROGRESS: Preliminary | EIGHTH REPORTING PERIOD JANUARY 1, 2023 – JUNE 30, 2023 COMPLIANCE PROGRESS: Secondary | NINTH REPORTING PERIOD JULY 1, 2023 – DECEMBER 31, 2023 COMPLIANCE PROGRESS: Secondary |
| TENTH REPORTING PERIOD JANUARY 1, 2024 – JUNE 30, 2024 COMPLIANCE PROGRESS: Secondary | ELEVENTH REPORTING PERIOD JULY 1, 2024 – DECEMBER 31, 2024 COMPLIANCE PROGRESS: Secondary | TWELFTH REPORTING PERIOD JANUARY 1, 2025 – JUNE 30, 2025 COMPLIANCE PROGRESS: Secondary |
| THIRTEENTH REPORTING PERIOD JULY 1, 2025 – DECEMBER 31, 2025 COMPLIANCE PROGRESS: Full | | |

Crisis Intervention: ¶148

148. OEMC will develop and implement its portion of the Crisis Intervention Plan.

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

Preliminary: *Under Assessment*
Secondary: *Not in Compliance*
Full: *Not in Compliance*

In the thirteenth reporting period, the City and the OEMC are under assessment for Preliminary compliance with the requirements of ¶148.

The OEMC previously achieved Preliminary compliance with ¶148 during the fourth reporting period through revisions to Standard Operating Procedure 21-004, *Crisis Intervention Program*. However, the OEMC subsequently did not maintain Preliminary compliance during the eighth reporting period because it failed to update the policy to fulfill all requirements of ¶148.

During the thirteenth reporting period, the IMT reviewed the City's *Crisis Intervention Plan Scope of Work*. The IMT also met with the City to discuss the Scope of Work and reviewed written summaries of meetings held with key stakeholders, including the Mayor's Office, Department of Law, Chicago Police Department Crisis Intervention Unit, OEMC, Chicago Fire Department, and Chicago Department of Public Health.

The Scope of Work organizes the *Crisis Intervention Plan* into five phases:

1. Formatting Methodology and Annual Project Plan (Q4 2025 – Q1 2026)
2. Calls for Service and Staffing Analysis (Q4 2025 – Q2 2026)
3. Current State Analysis (Q4 2025 – Q2 2026)
4. Recommendations (Q2 2026 – Q3 2026)
5. Implementation Plan (Q2 2026 – Q4 2026)

Each phase identifies key activities and deliverables and represents a reasonable, sequenced approach to completion of the *Crisis Intervention Plan*.

The IMT recognizes the level of qualitative, quantitative, and collaborative agency work required to develop and implement the *Crisis Intervention Plan* and appreciates the steps taken to convene the necessary stakeholders. The IMT supports this process and acknowledges that the development of a comprehensive *Crisis Intervention Plan* is expected to take approximately one year and will require sustained time and resources to produce a quality product.

The IMT notes that community members continue to raise concerns regarding the OEMC's call-taking and dispatching processes, particularly as they relate to Black

and Brown communities who experience disparities in dispatch and response times on priority calls. Paragraph 123 specifically requires the OEMC to consider response time, identification of, and dispatch of calls for service involving individuals in crisis by OEMC telecommunications personnel. Additional call-taking and dispatch data should be analyzed as part of the *Crisis Intervention Plan* to assess potential disparities or trends between dispatch times and arrival on scene.

Additionally, the City's *Crisis Intervention Plan* must continue to incorporate information and feedback from all stakeholders involved in the City's crisis response system, including the Chicago Police Department, the Chicago Council on Mental Health Equity, the Chicago Fire Department, the OEMC, and the Chicago Department of Public Health. The Chicago Department of Public Health has launched its pilot CARE program, which represents an important step toward reducing law-enforcement responses to individuals in crisis and advancing deflection and diversion as core goals of the Consent Decree, including requirements under ¶¶126, 130, 131, and 134. OEMC plays a critical role in triaging these calls, and data analysis related to this function should be a core component of the *Crisis Intervention Plan*.

The IMT appreciates the OEMC's continued collaboration with key stakeholders and its integral role in the City's crisis response system. To achieve Preliminary compliance, the City and the OEMC must receive no-objection notices from the IMT and the OAG for a draft of the relevant policy or policies and continue toward implementation in good faith. The IMT looks forward to continued updates as the City progresses through each phase of the *Crisis Intervention Plan* during the next reporting period.

Paragraph 148 Compliance Progress History

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

COMPLIANCE PROGRESS:
Not Applicable

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

COMPLIANCE PROGRESS:
Not Applicable

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

COMPLIANCE PROGRESS:
Status Update

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

COMPLIANCE PROGRESS:
Preliminary

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

COMPLIANCE PROGRESS:
Preliminary

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

COMPLIANCE PROGRESS:
Preliminary

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

COMPLIANCE PROGRESS:
Secondary

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

COMPLIANCE PROGRESS:
None

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

COMPLIANCE PROGRESS:
None

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

COMPLIANCE PROGRESS:
None

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

COMPLIANCE PROGRESS:
None

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

COMPLIANCE PROGRESS:
None

THIRTEENTH REPORTING PERIOD
JULY 1, 2025 – DECEMBER 31, 2025

COMPLIANCE PROGRESS:
None

Crisis Intervention: ¶150

150. The Parties acknowledge that OEMC currently meets regularly with CPD and the City-wide Mental Health Steering Committee. OEMC will continue to meet regularly with CPD, in addition to appropriate members of the Advisory Committee, including service providers and advocates, to review and assess data and information regarding the identification of, the dispatch of, and response to calls for service involving individuals in crisis by OEMC telecommunicators.

Compliance Progress

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

Preliminary: *In Compliance (FOURTH REPORTING PERIOD)*
Secondary: *Under Assessment*
Full: *Not in Compliance*

In the thirteenth reporting period, the City and the Office of Emergency Management and Communications (OEMC) are under assessment for Secondary compliance with the requirements of ¶150.

In prior reporting periods, the City and the OEMC maintained Preliminary compliance with ¶150 based on initial coordination efforts between OEMC, the Chicago Police Department (CPD), and the Chicago Council on Mental Health Equity (CCMHE). However, those efforts did not yet demonstrate sufficient evidence of meetings occurring, regularized data review practices, or systematic assessment of crisis-related calls required to meet the threshold for Secondary compliance.

During the thirteenth reporting period, the IMT reviewed documentation demonstrating that the OEMC has qualified personnel responsible for reviewing and assessing data and information regarding the identification of, dispatch of, and response to calls for service involving individuals in crisis by OEMC telecommunicators. The evidence further demonstrated that the OEMC is collecting, tracking, analyzing, and managing crisis-related call data consistent with the requirements of ¶150.

The IMT also reviewed evidence of bi-weekly meetings between key stakeholders including the CPD, the OEMC, the CFD, the CDPH, and the Mayor’s Office to collaborate on the development of the City’s *Crisis Intervention Plan* Scope of Work and review interagency policies and data. This collaboration demonstrates significant strides in improved data and information regarding the identification of, the dispatch of, and response to calls for service involving individuals in crisis by OEMC telecommunicators, and law enforcement and non-law enforcement responses to behavioral health calls for service. The IMT also reviewed agendas, meeting materials, and attendance records showing that the OEMC is meeting regularly, at a minimum quarterly, with the CPD and the CCMHE.

To achieve Secondary compliance, the OEMC must continue to demonstrate regular, documented engagement with the CPD, the CCMHE, the Chicago Fire Department, and the Chicago Department of Public Health, and any other pertinent stakeholder, while maintaining evidence that qualified personnel are routinely reviewing and assessing crisis-related call data. Specifically, the IMT will look for further evidence that the OEMC is meeting regularly with the CPD and appropriate members of the CCMHE “to review and assess data and information regarding the identification of, the dispatch of, and response to calls for service involving individuals in crisis by OEMC telecommunicators.”

Full compliance requires demonstration that relevant policies have been fully implemented and that data collection, analysis, and interagency feedback processes are consistently operationalized over time. The operationalization of the City’s *Crisis Intervention Plan* will be an important contributor to these efforts.

Paragraph 150 Compliance Progress History

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