

Independent Monitoring Report 13

Accountability and Transparency

Compliance Assessments by Paragraph

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

Accountability and Transparency: ¶447

447. The City and CPD will require that all COPA and BIA personnel and Accountability Sergeants communicate with complainants and involved CPD members in a professional and respectful manner.

Compliance Progress		(Reporting Period: July 1, 2025, through December 31, 2025)
Preliminary:		<i>In Compliance (FIFTH REPORTING PERIOD)</i> ¹
	CPD	<i>In Compliance (FIFTH REPORTING PERIOD)</i>
	COPA	<i>In Compliance (FOURTH REPORTING PERIOD)</i>
Secondary:		<i>In Compliance (NINTH REPORTING PERIOD)</i>
	CPD	<i>In Compliance (NINTH REPORTING PERIOD)</i>
	COPA	<i>In Compliance (FIFTH REPORTING PERIOD)</i>
Full:		<i>In Compliance (NEW)</i>
	CPD	<i>In Compliance (NEW)</i>
	COPA	<i>In Compliance (NINTH REPORTING PERIOD)</i>

In the thirteenth reporting period, the City and the CPD achieved Full compliance, and COPA maintained Full compliance with the requirements of ¶447.

Prior to the thirteenth reporting period, COPA achieved Preliminary compliance in the fourth reporting period by finalizing its *Intake* policy. COPA achieved Secondary compliance in the fifth reporting period by finalizing and delivering its *COPA Intake Unit: Overview of Policies and Procedures: In-Service 2021* training. Additionally, COPA achieved Full compliance in the ninth reporting period by providing transcripts of interviews of complainants and officers demonstrating that COPA personnel communicate in a professional and respectful manner.

Prior to the thirteenth reporting period, the CPD achieved Preliminary compliance in the fifth reporting period by finalizing S08-01, *Complaint and Disciplinary Investigators and Investigations*. The CPD achieved Secondary compliance in the ninth reporting period by finalizing and delivering its BIA In-Service Training Module 7, *Procedural Justice, Implicit Bias, and Conflicts of Interest*. To maintain Secondary compliance, the CPD provided its *BIA In-Service Training eLearning Module: Procedural Justice, Implicit Bias, and Conflicts of Interest* and its *BIA Onboard Training: Evidence Collection and Non-Department Interviews* for review.

¹ The Consent Decree requires actions by various City entities, including the CPD, COPA, the Police Board, and the Office of the Inspector General. Ultimately, the City is responsible for ensuring compliance. As a result, if a Consent Decree paragraph requires actions by multiple City entities, we will not find that the City has met Preliminary, Secondary, or Full compliance until all those entities have met the corresponding level of compliance. Nonetheless, for some paragraphs, we will clarify compliance assessments for each entity to demonstrate which benchmarks have been met.

In the twelfth reporting period, the IMT reviewed a random sample of audio recordings involving complainants and participants from 2024 log number investigations conducted by BIA. These recordings demonstrated BIA investigators’ communications with CPD members and complainants in a professional and respectful manner. However, the sample audio recordings provided did not include examples of audio recordings of investigations conducted by Accountability Sergeants.

To assess Full compliance, the IMT reviewed additional audio recordings from log number investigations conducted by Accountability Sergeants. These recordings demonstrated Accountability Sergeants’ communications with CPD members and complainants in a professional and respectful manner. These recordings, along with the BIA recordings provided and assessed during the twelfth reporting period, demonstrate that BIA investigators and Accountability Sergeants communicate with complainants and involved CPD members in a professional and respectful manner.

Moving forward, for the CPD, we expect to receive evidence of continued compliance each reporting period and for the CPD to periodically review and revise, if necessary, its S08-01, *Complaint and Disciplinary Investigators and Investigations*, policy to maintain Full compliance. For COPA, we expect to receive evidence of continued compliance pursuant to the CPD, IMT, and OAG agreed-upon staggered production schedule and for COPA to periodically review and revise, if necessary, its *Intake* policy to maintain Full compliance.

Paragraph 447 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: 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		

Accountability and Transparency: ¶475

475. The City and CPD will undertake best efforts to ensure that the identities of complainants are not revealed to the involved CPD member prior to the CPD member's interrogation.

Compliance Progress		(Reporting Period: July 1, 2025, through December 31, 2025)
Preliminary:		<i>In Compliance</i> (FIFTH REPORTING PERIOD) ²
	CPD	<i>In Compliance</i> (FIFTH REPORTING PERIOD)
	COPA	<i>In Compliance</i> (FIFTH REPORTING PERIOD)
Secondary:		<i>In Compliance</i> (ELEVENTH REPORTING PERIOD)
	CPD	<i>In Compliance</i> (ELEVENTH REPORTING PERIOD)
	COPA	<i>In Compliance</i> (SEVENTH REPORTING PERIOD)
Full:		<i>Under Assessment</i>
	CPD	<i>Under Assessment</i>
	COPA	<i>In Compliance</i> (NINTH REPORTING PERIOD)

In the thirteenth reporting period, the CPD is under assessment, and COPA maintained Full compliance with the requirements of ¶475.

Prior to the thirteenth reporting period, the CPD achieved Preliminary compliance in the fifth reporting period by finalizing its Special Order S08-01, *Complaint and Disciplinary Investigators and Investigations*. The CPD achieved Secondary compliance in the eleventh reporting period by providing documentation that at least 95% of CPD members completed the *BIA Accountability Supplemental eLearning*, which addressed the requirements of this paragraph. The CPD also provided documentation that at least 95% of BIA members and Accountability Sergeants completed the *2024 BIA In-Service Training*. The in-service training included instruction on Module 9, *Interviewing Department Members*, which also addressed the requirements of this paragraph.

To assess Full compliance, the IMT reviewed investigation notification logs, acknowledgements, and interview records for a random sample of 37 investigations in which a CPD member had been notified to appear for an interview. This data demonstrated that BIA investigators provided accused Department members with a notice that includes the identity of the complainant an average of 13 days prior to the accused Department member's interview. Nine of the investigation

² As referenced above, the Consent Decree requires actions by various City entities, including the CPD, COPA, the Police Board, and the Office of the Inspector General. Ultimately, the City is responsible for ensuring compliance. As a result, if a Consent Decree paragraph requires actions by multiple City entities, we will not find that the City has met Preliminary, Secondary, or Full compliance until all those entities have met the corresponding level of compliance. Nonetheless, for some paragraphs, we will clarify compliance assessments for each entity to demonstrate which benchmarks have been met.

examples reflected a delay of more than 2 weeks between this notice and the accused Department member’s interview, while six showed a delay of more than 30 days.

Prior to the thirteenth reporting period, COPA achieved Preliminary compliance in the fifth reporting period by providing its *COPA Interviews-Chicago Police Department Members* policy. COPA achieved Secondary compliance in the seventh reporting period by providing its *Officer Interviews In-Service* training and documentation demonstrating that this training was provided to more than 95% of COPA’s staff. COPA achieved Full compliance in the ninth reporting period by providing documentation ensuring that the identities of complainants are not revealed to the involved CPD member prior to the CPD member’s interrogation.

Moving forward, for the CPD, the IMT will look for documentation that the CPD is operating in accordance with ¶1475’s mandates, and for it to periodically review and revise, if necessary, its S08-01, *Complaint and Disciplinary Investigators and Investigations*, policy to maintain Full compliance. For COPA, we expect to receive evidence of continued compliance pursuant to the CPD, IMT, and OAG agreed-upon staggered production schedule and for COPA to periodically review and revise, if necessary, its *COPA Interviews-Chicago Police Department Members* policy to maintain Full compliance.

Paragraph 475 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: 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: 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		

Accountability and Transparency: ¶483

483. *The City and CPD will ensure there are regularly conducted satisfaction surveys relating to the complaint intake and investigation processes. The City and CPD will evaluate trends and training opportunities identified as a result of information received from such quality control surveys.*

Compliance Progress

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

Preliminary: *In Compliance (FIFTH REPORTING PERIOD)*
Secondary: *In Compliance (ELEVENTH REPORTING PERIOD)*
Full: *Under Assessment*

In the thirteenth reporting period, the CPD is under assessment for Full compliance with the requirements of ¶483.

Prior to the thirteenth reporting period, the CPD achieved Preliminary compliance in the fifth reporting period by finalizing its Special Order S08-01, *Post-Investigation Log Number Procedures*. The CPD achieved Secondary compliance in the eleventh reporting period by providing documentation that at least 95% of CPD members completed the *BIA Accountability Supplemental eLearning*, which addressed the requirements of this paragraph. The CPD also provided its *BIA Satisfaction Survey Status Report* for review, which appropriately addressed the requirements of this paragraph.

To maintain Secondary compliance, the CPD provided the BIA's *In-Service Training eLearning Module: Sexual Misconduct and Criminal & Bias Organization* for review.

To assess Full compliance, the IMT reviewed the *BIA Satisfaction Survey Analysis*, which includes key survey data and the CPD's response. This documentation demonstrates that the CPD has determined whether satisfaction surveys are regularly conducted and additional training needs are identified to continually improve the complaint intake and investigation processes. However, the documentation does not adequately identify additional or modified trainings to address the findings or other results of the satisfaction surveys.

Moving forward, for the CPD, the IMT will look for documentation that the CPD is operating in accordance with ¶483's mandates, and for it to periodically review and revise, if necessary, its S08-01, *Post-Investigation Log Number Procedures*, policy to maintain Full compliance. The IMT also encourages the CPD to focus on increasing the survey response rates, show meaningful evaluation of survey results and implement related training opportunities.

Paragraph 483 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:
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:
Secondary

Accountability and Transparency: ¶512

512. *The City will ensure that within 365 days of the Effective Date, COPA and BIA have developed parallel policies regarding the mediation of misconduct complaints by non-CPD members. The policies will govern mediation of misconduct complaints involving non-CPD member complainants. The policies will specify, at a minimum, (a) the criteria for determining incidents eligible for resolution through mediation; (b) the goals of mediation, including efficiency, transparency, procedural justice, restorative justice, and strengthening public trust; (c) the steps in the mediation process; and (d) methods of communication with complainants regarding the mediation process and the opportunity to participate. Items (a) through (d) above will be consistent between the CPD and COPA mediation policies.*

Compliance Progress

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

Preliminary:	CPD	<i>Not in Compliance</i> ³
	COPA	<i>In Compliance (SEVENTH REPORTING PERIOD)</i>
Secondary:	CPD	<i>Not in Compliance</i>
	COPA	<i>In Compliance (NEW)</i>
Full:	CPD	<i>Not Yet Assessed</i>
	COPA	<i>Not Yet Assessed</i>

In the thirteenth reporting period, COPA achieved Secondary compliance with the requirements of ¶512, and the City and the CPD have not yet achieved Preliminary compliance. Because all relevant City entities must reach levels of compliance to bring the City, as a whole, into compliance, the City has not yet reached Preliminary compliance.

For the CPD, to assess Preliminary compliance, the IMT reviewed the CPD’s D22-04, *Community-Police Mediation Program*. The IMT provided comments on January 16, 2026. The draft policy, as written, does not fully address the requirements of ¶512 because it does not address the goals of mediation. Additionally, ¶512 requires that the CPD and COPA have parallel policies. The draft D22-04, as written, is inconsistent with COPA’s Guidance, *Referral for Mediation*. Therefore, the CPD has not yet achieved Preliminary compliance with ¶512.

³ As referenced above, the Consent Decree requires actions by various City entities, including the CPD, COPA, the Police Board, and the Office of the Inspector General. Ultimately, the City is responsible for ensuring compliance. As a result, if a Consent Decree paragraph requires actions by multiple City entities, we will not find that the City has met Preliminary, Secondary, or Full compliance until all those entities have met the corresponding level of compliance. Nonetheless, for some paragraphs, we will clarify compliance assessments for each entity to demonstrate which benchmarks have been met.

To assess Secondary Compliance, the IMT reviewed COPA’s *Mediation Training*, which addressed the requirements of this paragraph, and received documentation that at least 95% of the required personnel received the training. The training includes appropriate content that identifies the goals and objectives of the mediation program, the governing policy, the Consent Decree, and Illinois law. Additionally, it emphasizes that resolution of a complaint through the mediation process will result in no further investigation, which will enhance the efficiency and effectiveness of the complaint investigation process.

Moving forward, for the CPD, we expect to receive a revised D22-04, *Community-Police Mediation Program*, which addresses the requirements of ¶512 as outlined above. For COPA, we will look for documentation that COPA is acting in accordance with ¶512’s mandates.

Paragraph 512 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		

Accountability and Transparency: ¶518

518. CPD will provide the required notice regarding disciplinary matters to the Illinois Law Enforcement Training and Standards Board, including when an officer resigns while a misconduct investigation or disciplinary charges are pending.

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

Preliminary: *In Compliance (FIFTH REPORTING PERIOD)*
Secondary: *In Compliance (ELEVENTH REPORTING PERIOD)*
Full: *Under Assessment*

In the thirteenth reporting period, the CPD maintained Secondary compliance and is under assessment for Full compliance with ¶518.

To assess Full compliance, the IMT reviewed documentation consisting of examples of paperwork submitted to the Illinois Law Enforcement Training and Standards Board (ILETSB). This documentation provided evidence of compliance with the requirements of ¶518. However, the sample provided did not include sufficient information for the IMT to assess whether the CPD has implemented its policies such that required notice is provided as outlined in this paragraph.

Moving forward, the IMT will review documentation that the CPD is operating in accordance with ¶518’s mandates, and for it to periodically review and revise, if necessary, its S08-01-04, *Post-Investigation Log Number Procedures*.

Paragraph 518 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: Not Applicable</p>	<p>THIRD REPORTING PERIOD MARCH 1, 2020 – DECEMBER 31, 2020 COMPLIANCE PROGRESS: Not Applicable</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: Preliminary</p>	<p>SIXTH REPORTING PERIOD JANUARY 1, 2022 – JUNE 30, 2022 COMPLIANCE PROGRESS: Preliminary</p>
<p>SEVENTH REPORTING PERIOD JULY 1, 2022 – DECEMBER 31, 2022 COMPLIANCE PROGRESS: Preliminary</p>	<p>EIGHTH REPORTING PERIOD JANUARY 1, 2023 – JUNE 30, 2023 COMPLIANCE PROGRESS: Preliminary</p>	<p>NINTH REPORTING PERIOD JULY 1, 2023 – DECEMBER 31, 2023 COMPLIANCE PROGRESS: Preliminary</p>
<p>TENTH REPORTING PERIOD JANUARY 1, 2024 – JUNE 30, 2024 COMPLIANCE PROGRESS: Preliminary</p>	<p>ELEVENTH REPORTING PERIOD JULY 1, 2024 – DECEMBER 31, 2024 COMPLIANCE PROGRESS: Secondary</p>	<p>TWELFTH REPORTING PERIOD JANUARY 1, 2025 – JUNE 30, 2025 COMPLIANCE PROGRESS: Secondary</p>
<p>THIRTEENTH REPORTING PERIOD JULY 1, 2025 – DECEMBER 31, 2025 COMPLIANCE PROGRESS: Secondary</p>		

Accountability and Transparency: ¶526

526. Within 180 days of being assigned to BIA or being hired by COPA, all new BIA personnel and COPA employees will receive initial on-boarding training that is adequate in quality, quantity, scope, and type. Within 120 days of the Effective Date, COPA and BIA will verify that all existing personnel received training that is consistent with this Agreement.

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

Preliminary:		<i>In Compliance (NINTH REPORTING PERIOD)</i> ⁴
	CPD	<i>In Compliance (NINTH REPORTING PERIOD)</i>
	COPA	<i>In Compliance (THIRD REPORTING PERIOD)</i>
Secondary:		<i>In Compliance (NEW)</i>
	CPD	<i>In Compliance (NEW)</i>
	COPA	<i>In Compliance (FOURTH REPORTING PERIOD)</i>
Full:		<i>In Compliance (NEW)</i>
	CPD	<i>In Compliance (NEW)</i>
	COPA	<i>In Compliance (FIFTH REPORTING PERIOD)</i>

In the thirteenth reporting period, the City and the CPD achieved Secondary and Full compliance and COPA maintained Full compliance with ¶526.

Prior to the thirteenth reporting period, the CPD achieved Preliminary compliance in the ninth reporting period by finalizing its S08-01, *Complaint and Disciplinary Investigators and Investigations*, as well as BIA’s *Onboard Training Plan* for 2024. Since the ninth reporting period, the CPD has continued to develop training materials related to BIA’s *Onboard Training Plan*, as well as a new training plan each year.

To assess Secondary compliance this reporting period, the IMT continued to review BIA’s modules developed around topics required by ¶528 for its *Onboard Training* over the last few reporting periods, receiving no-objection notices from the IMT and the OAG. Additionally, the IMT reviewed BIA’s *2026 Onboard Training Plan*, to which we provided a no-objection notice with feedback related to improvements regarding selection of instructors, adult learning modalities, and references to policy.

⁴ As referenced above, the Consent Decree requires actions by various City entities, including the CPD, COPA, the Police Board, and the Office of the Inspector General. Ultimately, the City is responsible for ensuring compliance. As a result, if a Consent Decree paragraph requires actions by multiple City entities, we will not find that the City has met Preliminary, Secondary, or Full compliance until all those entities have met the corresponding level of compliance. Nonetheless, for some paragraphs, we will clarify compliance assessments for each entity to demonstrate which benchmarks have been met.

To assess Full compliance this reporting period, the IMT reviewed BIA's *Onboard Training* records to determine whether the CPD has appropriate training and systems in place to ensure all new personnel and employees receive adequate onboarding training within 180 days of assignment. In the materials provided for review, the CPD recognized only one instance where an Accountability Sergeant was not trained within 180 days of assignment, but the Accountability Sergeant did not participate in investigations until after they completed the training required by ¶526. The training records and supporting documentation summarizing the analysis BIA conducted to evaluate its training records show that the CPD has systems in place to ensure that its employees are receiving the required onboard training within 180 days of assignment as required by ¶526.

Prior to the thirteenth reporting period, COPA achieved Preliminary compliance in the third reporting period by finalizing its *Training Plan*, which fully addressed the requirements of ¶526. COPA achieved Secondary compliance in the fourth reporting period by providing training academy attendance records for *New Hire Onboarding Orientations*, which included training on a variety of topics such as implicit bias and procedural justice. Additionally, COPA achieved Full compliance by providing records that tracked the provision and completion of training to and by COPA employees. COPA demonstrated that it had the necessary systems in place to meet the requirements of ¶526 and follow its own training plan. Since COPA achieved Full compliance in the fifth reporting period, it has continued to provide training records of *COPA Academy Training*. Additionally, COPA continues to provide opportunities to the IMT and the OAG for training observations.

To maintain Full compliance, the IMT reviewed COPA's *Onboard Training* records for onboard training delivered to its employees in the twelfth and thirteenth reporting periods, as well as a history of the onboard training dates for all current BIA investigators and Accountability Sergeants. The training records continued to show that its employees are receiving the required onboard training as required by ¶526.

For the CPD, we will look for evidence of maintenance of Full compliance with ¶526's mandates in each future reporting period. For COPA, we expect to receive evidence of continued compliance pursuant to the CPD, IMT, and OAG agreed upon staggered production schedule.

Paragraph 526 Compliance Progress History

FIRST REPORTING PERIOD MARCH 1, 2019 – AUGUST 31, 2019 COMPLIANCE PROGRESS: None	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: 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: Full		

Accountability and Transparency: ¶527

527. Within 180 days of the Effective Date, COPA and BIA will begin providing all investigation staff members with at least eight hours of annual, comprehensive, in-service training.

Compliance Progress		(Reporting Period: July 1, 2025, through December 31, 2025)
Preliminary:		<i>In Compliance</i> (NINTH REPORTING PERIOD) ⁵
	CPD	<i>In Compliance</i> (NINTH REPORTING PERIOD)
	COPA	<i>In Compliance</i> (THIRD REPORTING PERIOD)
Secondary:		<i>In Compliance</i> (ELEVENTH REPORTING PERIOD)
	CPD	<i>In Compliance</i> (ELEVENTH REPORTING PERIOD)
	COPA	<i>In Compliance</i> (FIFTH REPORTING PERIOD)
Full:		<i>Under Assessment</i>
	CPD	<i>Under Assessment</i>
	COPA	<i>In Compliance</i> (FIFTH REPORTING PERIOD)

In the thirteenth reporting period, the City and the CPD maintained Secondary compliance and are under assessment for Full compliance, and COPA maintained Full compliance with ¶527. Because all relevant City entities must reach levels of compliance to bring the City, as a whole, into compliance, the City has not yet reached Full compliance.

Prior to the thirteenth reporting period, the CPD achieved Preliminary compliance in the ninth reporting period by finalizing its S08-01, *Complaint and Disciplinary Investigators and Investigations*, as well as BIA's *In-Service Training Plan* for 2024. Since the ninth reporting period, the CPD has continued to develop training materials related to BIA's *In-Service Training Plan*, as well as a new training plan each year that addresses the topics required by ¶528. The CPD achieved Secondary compliance in the eleventh reporting period by developing and delivering eight hours of comprehensive in-service training.

To assess Full compliance this reporting period, the IMT reviewed BIA's *2026 In-Service Training Plan* and BIA's *In-Service Training* records to determine whether the CPD has appropriate training and systems in place to ensure all investigative staff members receive at least eight hours of annual, comprehensive, in-service training. However, the training records provided did not include any in-service training that was conducted in 2025. Therefore, the CPD is under assessment for

⁵ As referenced above, the Consent Decree requires actions by various City entities, including the CPD, COPA, the Police Board, and the Office of the Inspector General. Ultimately, the City is responsible for ensuring compliance. As a result, if a Consent Decree paragraph requires actions by multiple City entities, we will not find that the City has met Preliminary, Secondary, or Full compliance until all those entities have met the corresponding level of compliance. Nonetheless, for some paragraphs, we will clarify compliance assessments for each entity to demonstrate which benchmarks have been met.

Full compliance until the IMT can review the 2025 in-service training records and evaluations.

Prior to the thirteenth reporting period, COPA achieved Preliminary compliance in the third reporting period by finalizing its *Training Plan*. COPA achieved Secondary compliance in the fifth reporting period by providing in-service training attendance records. Additionally, COPA achieved Full compliance by providing records that tracked the provision and completion of in-service training to and by COPA employees. COPA demonstrated that it had the necessary systems in place to meet the requirements of ¶527 by developing and delivering annual, comprehensive in-service training, while maintaining detailed and clear records to keep track of personnel training history. Since COPA achieved Full compliance in the fifth reporting period, COPA has continued to provide training records of COPA in-service trainings. Additionally, COPA continues to provide opportunities to the IMT and the OAG for training observations.

To maintain Full compliance, the IMT reviewed COPA's *In-Service Training* records and evaluations for numerous trainings delivered to its employees in the twelfth and thirteenth reporting periods. The training records continued to show that its employees are receiving the required eight hours of annual, comprehensive, in-service training as required by ¶527.

For the CPD, we will look for the 2025 in-service training records and evaluations to assess Full compliance. For COPA, we expect to receive evidence of continued compliance pursuant to the CPD, IMT, and OAG agreed upon staggered production schedule.

Paragraph 527 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:
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:
Secondary

Accountability and Transparency: ¶528

528. The initial and annual in-service training for COPA and BIA investigators will include instruction in: a. how to properly handle complaint intake, and the consequences for failing to take complaints; b. best practices in procedural justice, including techniques for communicating with complainants and members of the public; c. the collection of objective verifiable evidence; d. the process for seeking an override affidavit in the absence of a signed complainant affidavit; e. for COPA investigators, techniques for conducting impartial investigations of domestic violence and sexual misconduct; f. for BIA investigators, techniques for conducting impartial investigations of sexual misconduct; g. investigative skills, including proper interrogation and interview techniques, gathering and objectively analyzing evidence, and data and case management; h. the challenges of law enforcement administrative investigations, including identifying alleged misconduct that is not clearly stated in the complaint or that becomes apparent during the investigation; i. properly weighing the credibility of witnesses against CPD members; j. using objective evidence to identify and resolve inconsistent statements; k. implicit bias; l. the proper application of the relevant standards of proof; m. relevant COPA and CPD rules, policies, and protocols including the requirements of this Agreement; n. relevant state and federal law; o. relevant CPD Rules of Conduct, including Rules 14, 21, and 22; p. the CMS; q. the applicable collective bargaining agreements; and r. how to access and use the PRS or information available on the PRS.

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

Preliminary:		<i>In Compliance (TENTH REPORTING PERIOD)</i> ⁶
	CPD	<i>In Compliance (TENTH REPORTING PERIOD)</i>
	COPA	<i>In Compliance (SECOND REPORTING PERIOD)</i>
Secondary:		<i>In Compliance (ELEVENTH REPORTING PERIOD)</i>
	CPD	<i>In Compliance (ELEVENTH REPORTING PERIOD)</i>
	COPA	<i>In Compliance (NINTH REPORTING PERIOD)</i>
Full:		<i>Under Assessment</i>
	CPD	<i>Under Assessment</i>
	COPA	<i>In Compliance (TENTH REPORTING PERIOD)</i>

In the thirteenth reporting period, the City and the CPD maintained Secondary compliance and are under assessment for Full compliance, and COPA maintained Full compliance with ¶528. Because all relevant City entities must reach levels of

⁶ As referenced above, the Consent Decree requires actions by various City entities, including the CPD, COPA, the Police Board, and the Office of the Inspector General. Ultimately, the City is responsible for ensuring compliance. As a result, if a Consent Decree paragraph requires actions by multiple City entities, we will not find that the City has met Preliminary, Secondary, or Full compliance until all those entities have met the corresponding level of compliance. Nonetheless, for some paragraphs, we will clarify compliance assessments for each entity to demonstrate which benchmarks have been met.

compliance to bring the City, as a whole, into compliance, the City has not yet reached Full compliance.

Prior to the thirteenth reporting period, the CPD achieved Preliminary compliance in the tenth reporting period by finalizing its S08-01, *Complaint and Disciplinary Investigators and Investigations*, as well as developing and receiving approval for modules of instruction for each subparagraph of ¶528 (see below chart). The CPD achieved Secondary compliance in the eleventh reporting period by providing documentation that at least 95% of BIA members and Accountability Sergeants completed the 2024 *BIA In-Service Training*. By completing the 2024 *BIA In-Service Training*, the CPD has now trained on each relevant subparagraph of ¶528.

The CPD has continued to revise and provide for review modules of instruction for both in-service and onboard training. This reporting period, the CPD provided various drafts of modules for review, to which the IMT provided no-objection notices, including:

- *BIA In-Service Training eLearning Module: Consent Decree and Law Review*
- *BIA In-Service Training eLearning Module: Complete Investigatory Files and Case Management System*
- *BIA In-Service Training eLearning Module: Objective Verifiable Evidence*
- *BIA In-Service Training eLearning Module: Interviewing Department Members*
- *BIA In-Service Training eLearning Module: Sexual Misconduct and Criminal & Bias Organization*
- *BIA In-Service Training eLearning Module: Optimizing Resources and Computer Functions*
- *BIA In-Service Training eLearning Module: Mistakes and Updates*

To assess Full compliance, the IMT previously reviewed and approved BIA's *In-Service Training Plan* and its *Onboard Training Plan*. The IMT and OAG have also been provided opportunities in prior reporting periods to observe multiple CPD trainings related to its in-service and on-boarding trainings, relevant to ¶528. The IMT also reviewed onboard training and in-service training records. However, the training records provided did not include in-service training that was conducted in 2025. The CPD must have systems in place to deliver onboard training for all new BIA personnel within 180 days (see ¶526), but the CPD has not yet demonstrated that it has such systems in place to deliver eight hours of annual, comprehensive, in-service training to all investigation staff members (see ¶527).

Additionally, the CPD did not provide instructor and course evaluation materials for review. To assess the effectiveness of the trainings and to improve the quality of future instruction and curriculum (see ¶287), the CPD must provide for review

its curriculum evaluation materials related to BIA's *Onboard Training and In-Service Training*. Therefore, the City and CPD are under assessment for Full compliance with ¶528 until the CPD provides its evaluation materials for review.

Prior to the thirteenth reporting period, COPA achieved Preliminary compliance in the second reporting period by finalizing its *Training and Professional Development Plan*. COPA achieved Secondary compliance in the ninth reporting period by developing and receiving approval for training curriculum relevant to each subparagraph of ¶528. COPA achieved Full compliance in the tenth reporting period by continuing to update and provide training to its members on each subparagraph of ¶528, as well as providing course and instructor evaluation records. The IMT provided feedback in the tenth and eleventh reporting periods to COPA's training personnel regarding COPA's evaluation process and requested improvements. Since then, COPA has developed a stronger evaluation process by providing different avenues for employees to fill out the evaluation materials. Additionally, COPA has developed an Instructor Academy, which aims to help improve instruction and course curriculums. Through COPA's new *Faculty Development Framework*, COPA provides professional development opportunities for improving the skills of its subject matter experts.

To maintain Full compliance this reporting period, the IMT reviewed COPA's in-service and onboard training records, ensuring that at least 95% of the required personnel received the training required by ¶¶526–27 and the subparagraphs of ¶528. In addition to COPA's *New Hire Orientation* and its *Onboard Training*, COPA also provided the required in-service training to its investigation staff in 2025 on the following topics:

- Sexual Misconduct
- Intake
- Case Management System
- Implicit Bias
- Procedural Justice
- Timeliness Benchmarks
- Mediation

Additionally, the IMT and OAG have been provided ample opportunities to observe COPA training sessions for multiple years now. Lastly, COPA revised two of its in-service training curriculums to ensure they were relevant with CPD directives, state, and federal law, the relevant CPD collective bargaining agreements, and Consent Decree requirements. The IMT provided no-objection notices to COPA's revised *4th Amendment Training* and its *Collective Bargaining Agreements Training*.

The below chart indicates which CPD and COPA trainings have been approved for each subparagraph, along with the status of delivery for each training.

¶528 Topic	Relevant CPD Training(s)	Relevant COPA Training(s)
<p>a. how to properly handle complaint intake, and the consequences for failing to take complaints</p>	<p>Module 2, <i>Complaint Initiation and Affidavit Overrides</i> (delivered in IMR9)</p> <p><i>BIA Onboard Training: Initiation and Sworn Affidavits</i> (yet to be delivered)</p>	<p><i>COPA Intake Unit: Overview of Policies and Procedures</i> (delivered in IMR5)</p>
<p>b. best practices in procedural justice, including techniques for communicating with complainants and members of the public</p>	<p>Module 4, <i>Sexual Misconduct Initiation</i> (delivered in IMR9)</p> <p>Module 7, <i>Procedural Justice, Implicit Bias, and Conflicts of Interest</i> (delivered in IMR9)</p> <p><i>Collection of Evidence and Interviews with Non-Department Members</i> (delivered in IMR11)</p> <p><i>BIA Onboard Training: Procedural Justice, Implicit Bias, and Conflicts of Interest</i> (yet to be delivered)</p> <p><i>BIA Onboard Training: Sexual Misconduct Intake and TIRSA Review</i> (yet to be delivered)</p> <p><i>BIA Onboard Training: Evidence and Non-Department Member Interviews</i> (yet to be delivered)</p> <p><i>BIA In-Service Training eLearning Module: Sexual Misconduct and Criminal & Bias Organization</i> (yet to be delivered)</p> <p><i>BIA In-Service Training eLearning Module: Procedural Justice, Implicit Bias, and Conflicts of Interest</i> (yet to be delivered)</p>	<p><i>COPA Intake Unit: Overview of Policies and Procedures</i> (delivered in IMR5)</p> <p><i>Procedural Justice Training</i> (delivered in IMR4)</p>
<p>c. the collection of objective verifiable evidence</p>	<p><i>Collection of Evidence and Interviews with Non-Department Members</i> (delivered in IMR11)</p>	<p><i>Fact Gathering-Evidence Collection Training</i> (delivered in IMR7)</p>

	<i>BIA Onboard Training: Evidence and Non-Department Member Interviews</i> (yet to be delivered)	
d. the process for seeking an override affidavit in the absence of a signed complainant affidavit	<p>Module 2, <i>Complaint Initiation and Affidavit Overrides</i> (delivered in IMR9)</p> <p><i>BIA Onboard Training: Initiation and Sworn Affidavits</i> (yet to be delivered)</p> <p><i>BIA In-Service Training eLearning Module: Complaint Initiation and Affidavit Overrides</i> (yet to be delivered)</p>	<i>Complaint Register Training</i> (delivered in IMR8)
e. for COPA investigators, techniques for conducting impartial investigations of domestic violence and sexual misconduct	Not Applicable	<p><i>Forensic Experiential Trauma Interviews (FETI) Training</i> (delivered in IMR6)</p> <p><i>Sexual Misconduct and Domestic Violence Training</i> (delivered in IMR9)</p>
f. for BIA investigators, techniques for conducting impartial investigations of sexual misconduct	<p>Module 4, <i>Sexual Misconduct Initiation</i> (delivered in IMR9)</p> <p><i>BIA Onboard Training: Sexual Misconduct Intake and TIRSA Review</i> (yet to be delivered)</p> <p><i>BIA In-Service Training eLearning Module: Sexual Misconduct and Criminal & Bias Organization</i> (yet to be delivered)</p>	Not Applicable
g. investigative skills, including proper interrogation and interview techniques, gathering, and objectively analyzing evidence, and data and case management	<p>Module 9, <i>Interviewing Department Members</i> (delivered in IMR11)</p> <p><i>BIA Onboard Training: Department Members Interviews</i> (yet to be delivered)</p> <p><i>BIA In-Service Training eLearning Module: Interviewing Department Members</i> (yet to be delivered)</p>	<p><i>COPA Intake Unit: Overview of Policies and Procedures</i> (delivered in IMR5)</p> <p><i>COPA Officer Interviews Training</i> (delivered in IMR7)</p> <p><i>Fact Gathering-Evidence Collection Training</i> (delivered in IMR7)</p>

<p>h. the challenges of law enforcement administrative investigations, including identifying alleged misconduct that is not clearly stated in the complaint or that becomes apparent during the investigation</p>	<p>Module 10, <i>Mistakes and Updates</i> (delivered in IMR11)</p> <p><i>BIA Onboard Training: Evidence and Non-Department Member Interviews</i> (yet to be delivered)</p> <p><i>BIA Onboard Training: Department Members Interviews</i> (yet to be delivered)</p> <p><i>BIA In-Service Training eLearning Module: Mistakes and Updates</i> (yet to be delivered)</p>	<p><i>Fact Gathering-Evidence Collection Training</i> (delivered in IMR7)</p>
<p>i. properly weighing the credibility of witnesses against CPD members</p>	<p>Module 3, <i>Credibility, Standards of Proof, and Disciplinary Decision Making</i> (delivered in IMR11)</p> <p><i>BIA Onboard Training: Credibility, Standards of Proof, and Disciplinary Decision Making</i> (yet to be delivered)</p>	<p><i>Fact Gathering-Evidence Collection Training</i> (delivered in IMR7)</p> <p><i>Witness Reliability Training</i> (delivered in IMR4)</p>
<p>j. using objective evidence to identify and resolve inconsistent statements</p>	<p>Module 3, <i>Credibility, Standards of Proof, and Disciplinary Decision Making</i> (delivered in IMR11)</p> <p><i>BIA Onboard Training: Credibility, Standards of Proof, and Disciplinary Decision Making</i> (yet to be delivered)</p>	<p><i>COPA Officer Interviews Training</i> (delivered in IMR7)</p> <p><i>Fact Gathering-Evidence Collection Training</i> (delivered in IMR7)</p> <p><i>CPD Rules and Directives</i> (delivered in IMR4)</p>
<p>k. implicit bias</p>	<p>Module 3, <i>Credibility, Standards of Proof, and Disciplinary Decision Making</i> (delivered in IMR11)</p> <p>Module 7, <i>Procedural Justice, Implicit Bias, and Conflicts of Interest</i> (delivered in IMR9)</p> <p><i>BIA Onboard Training: Procedural Justice, Implicit Bias, and Conflicts of Interest</i> (yet to be delivered)</p> <p><i>BIA Onboard Training: Credibility, Standards of Proof, and</i></p>	<p><i>Implicit Bias Training</i> (delivered in IMR4)</p>

	<p><i>Disciplinary Decision Making</i> (yet to be delivered)</p> <p><i>BIA In-Service Training eLearning Module: Procedural Justice, Implicit Bias, and Conflicts of Interest</i> (yet to be delivered)</p>	
l. the proper application of the relevant standards of proof	<p>Module 3, <i>Credibility, Standards of Proof, and Disciplinary Decision Making</i> (delivered in IMR11)</p> <p><i>BIA Onboard Training: Credibility, Standards of Proof, and Disciplinary Decision Making</i> (yet to be delivered)</p>	<i>Final Summary Reports Training</i> (delivered in IMR7)
m. relevant COPA and CPD rules, policies, and protocols including the requirements of this Agreement	<p>Module 7, <i>Procedural Justice, Implicit Bias, and Conflicts of Interest</i> (delivered in IMR9)</p> <p>Module 10, <i>Mistakes and Updates</i> (delivered in IMR11)</p> <p><i>Investigation Assignment and Timelines</i> (delivered in IMR11)</p> <p><i>BIA Onboard Training: Rules and Regulations</i> (yet to be delivered)</p> <p><i>BIA Onboard Training: Initiation and Sworn Affidavits</i> (yet to be delivered)</p> <p><i>BIA Onboard Training: Procedural Justice, Implicit Bias, and Conflicts of Interest</i> (yet to be delivered)</p> <p><i>BIA Onboard Training: Consent Decree and Law Review</i> (yet to be delivered)</p> <p><i>BIA Onboard Training: Credibility, Standards of Proof, and Disciplinary Decision Making</i> (yet to be delivered)</p>	<p><i>Consent Decree Overview</i> (delivered in IMR3)</p> <p><i>CPD Rules and Directives</i> (delivered in IMR4)</p>

	<p><i>BIA Onboard Training: Sexual Misconduct Intake and TIRSA Review (yet to be delivered)</i></p> <p><i>BIA Onboard Training: Introduction to BIA and the Complaint Management System (CMS) (yet to be delivered)</i></p> <p><i>BIA In-Service Training eLearning Module: Procedural Justice, Implicit Bias, and Conflicts of Interest (yet to be delivered)</i></p> <p><i>BIA In-Service Training eLearning Module: Mistakes and Updates (yet to be delivered)</i></p>	
n. relevant state and federal law	<p><i>Module 4, Sexual Misconduct Initiation (delivered in IMR9)</i></p> <p><i>Module 5, Consent Decree and Law Review (delivered in IMR9)</i></p> <p><i>Module 10, Mistakes and Updates (delivered in IMR11)</i></p> <p><i>BIA Onboard Training: Consent Decree and Law Review (yet to be delivered)</i></p> <p><i>BIA Onboard Training: Sexual Misconduct Intake and TIRSA Review (yet to be delivered)</i></p> <p><i>BIA In-Service Training eLearning Module: Sexual Misconduct and Criminal & Bias Organization (yet to be delivered)</i></p> <p><i>BIA In-Service Training eLearning Module: Consent Decree and Law Review (yet to be delivered)</i></p> <p><i>BIA In-Service Training eLearning Module: Mistakes</i></p>	<p><i>Fourth Amendment Training (delivered in IMR9)</i></p> <p><i>Compelled Statements Training (delivered in IMR9)</i></p>

	<i>and Updates (yet to be delivered)</i>	
o. relevant CPD Rules of Conduct, including Rules 14, 21, and 22	<p>Module 2, <i>Complaint Initiation and Affidavit Overrides</i> (delivered in IMR9)</p> <p>Module 3, <i>Credibility, Standards of Proof, and Disciplinary Decision Making</i> (delivered in IMR11)</p> <p><i>BIA Onboard Training: Rules and Regulations</i> (yet to be delivered)</p> <p><i>BIA Onboard Training: Initiation and Sworn Affidavits</i> (yet to be delivered)</p> <p><i>BIA Onboard Training: Credibility, Standards of Proof, and Disciplinary Decision Making</i> (yet to be delivered)</p> <p><i>BIA In-Service Training eLearning Module: Complaint Initiation and Affidavit Overrides</i> (yet to be delivered)</p>	<i>CPD Rules and Directives</i> (delivered in IMR4)
p. the CMS	<p>Module 1, <i>Complaint Management System and Complete Investigatory Files</i> (delivered in IMR9)</p> <p><i>BIA Onboard Training: Introduction to BIA and the Complaint Management System (CMS)</i> (yet to be delivered)</p>	<i>Case Management System: Overview of Policy and Procedures</i> (delivered in IMR6)
q. the applicable collective bargaining agreements	<p>Module 8, <i>Audio Recording Interview Guidelines</i> (delivered in IMR11)</p> <p><i>BIA Onboard Training: Department Members Interviews</i> (yet to be delivered)</p>	<i>Collective Bargaining Agreement Training</i> (delivered in IMR3)
r. how to access and use the PRS or information available on the PRS	Module 6, <i>SharePoint, SPARS & Performance Recognition System</i> (delivered in IMR9)	Not Applicable

	<i>BIA Onboard Training: Optimizing Computer Functions</i> (delivered in IMR13)	
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Moving forward, for the CPD, we will look for BIA’s 2025 *In-Service Training* records, evaluation materials related to BIA’s *Onboard Training* and *In-Service Training*, and evidence demonstrating that the CPD has systems in place to ensure every BIA member and Accountability Sergeant receives adequate onboard training within 180 days of assignment, as well as eight hours of annual, comprehensive, in-service training. For COPA, we expect to receive evidence of continued compliance pursuant to the CPD, IMT, and OAG agreed upon staggered production schedule.

Paragraph 528 Compliance Progress History

<p>FIRST REPORTING PERIOD MARCH 1, 2019 – AUGUST 31, 2019</p> <p>COMPLIANCE PROGRESS: None</p>	<p>SECOND REPORTING PERIOD SEPTEMBER 1, 2019 – FEBRUARY 29, 2020</p> <p>COMPLIANCE PROGRESS: None</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: None</p>	<p>FIFTH REPORTING PERIOD JULY 1, 2021 – DECEMBER 31, 2021</p> <p>COMPLIANCE PROGRESS: None</p>	<p>SIXTH REPORTING PERIOD JANUARY 1, 2022 – JUNE 30, 2022</p> <p>COMPLIANCE PROGRESS: None</p>
<p>SEVENTH REPORTING PERIOD JULY 1, 2022 – DECEMBER 31, 2022</p> <p>COMPLIANCE PROGRESS: None</p>	<p>EIGHTH REPORTING PERIOD JANUARY 1, 2023 – JUNE 30, 2023</p> <p>COMPLIANCE PROGRESS: None</p>	<p>NINTH REPORTING PERIOD JULY 1, 2023 – DECEMBER 31, 2023</p> <p>COMPLIANCE PROGRESS: None</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: Secondary</p>	<p>TWELFTH REPORTING PERIOD JANUARY 1, 2025 – JUNE 30, 2025</p> <p>COMPLIANCE PROGRESS: Secondary</p>
<p>THIRTEENTH REPORTING PERIOD JULY 1, 2025 – DECEMBER 31, 2025</p> <p>COMPLIANCE PROGRESS: Secondary</p>		

Accountability and Transparency: ¶1530

530. Within 90 days of the Effective Date, COPA and BIA will create separate initial and in-service training plans.

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

Preliminary:	<i>In Compliance (NINTH REPORTING PERIOD)</i> ⁷
CPD	<i>In Compliance (NINTH REPORTING PERIOD)</i>
COPA	<i>In Compliance (THIRD REPORTING PERIOD)</i>
Secondary:	<i>In Compliance (ELEVENTH REPORTING PERIOD)</i>
CPD	<i>In Compliance (ELEVENTH REPORTING PERIOD)</i>
COPA	<i>In Compliance (THIRD REPORTING PERIOD)</i>
Full:	<i>Under Assessment</i>
CPD	<i>Under Assessment</i>
COPA	<i>In Compliance (TWELFTH REPORTING PERIOD)</i>

In the thirteenth reporting period, the City and the CPD remained under assessment for Full compliance with ¶1530, with COPA maintaining Full compliance. Because all relevant City entities must reach levels of compliance to bring the City, as a whole, into compliance, the City has not yet reached Full compliance.

Prior to the thirteenth reporting period, the CPD achieved Preliminary compliance in the ninth reporting period by finalizing S08-01, *Complaint and Disciplinary Investigators and Investigations*, and by providing BIA’s 2024 *In-Service Training Plan* and BIA’s 2024 *Onboard Training Plan*. The CPD achieved Secondary compliance in the eleventh reporting period by providing and receiving approval for BIA’s 2025 *In-Service Training Plan* and BIA’s 2025 *Onboard Training Plan*.

To assess Full compliance this reporting period, the IMT reviewed BIA’s 2026 *In-Service Training Plan* and BIA’s 2026 *Onboard Training Plan*. Following review, the IMT provided a no-objection notice to the training plans. Although the CPD has systems in place to ensure the development of separate annual initial and in-service training plans, the CPD did not provide for review instructor and course evaluation materials. To assess the effectiveness of the training and to improve the quality of future instruction and curriculum (see ¶1287), the CPD must provide for review its curriculum evaluation materials related to the modules outlined each year in BIA’s *Onboard Training Plan* and *In-Service Training Plan*. Therefore, the

⁷ As referenced above, the Consent Decree requires actions by various City entities, including the CPD, COPA, the Police Board, and the Office of the Inspector General. Ultimately, the City is responsible for ensuring compliance. As a result, if a Consent Decree paragraph requires actions by multiple City entities, we will not find that the City has met Preliminary, Secondary, or Full compliance until all those entities have met the corresponding level of compliance. Nonetheless, for some paragraphs, we will clarify compliance assessments for each entity to demonstrate which benchmarks have been met.

City and CPD are under assessment for Full compliance with ¶530 until the CPD provides its evaluation materials for review.

Prior to the thirteenth reporting period, COPA achieved Preliminary and Secondary compliance in the third reporting period by providing and revising its *Training and Professional Development Department Training Plan* and developing initial and in-service training courses in accordance with the plan. COPA achieved Full compliance in the twelfth reporting period by providing its *2025-2026 Training Plan*, training records, and training evaluation records. Additionally, COPA provided its *Faculty Development Framework*, which expands and supplements prior documentation that explains how training and lesson plans are developed, how training instructors are selected and developed, and the process for evaluation of training courses and instructors.

To maintain Full compliance this reporting period, the IMT reviewed and approved COPA's *2026 Training Plan*. The training plan includes the expected timeline for delivery of each in-service training and the required onboard training, as well as the subject matter experts identified as the instructors. Through COPA's new *Faculty Development Framework*, COPA provides professional development opportunities for improving the skills of their subject matter experts.

Moving forward, for the CPD, we will look for BIA's 2025 *In-Service Training* records and evaluation materials related to the modules outlined each year in BIA's *Onboard Training Plan* and *In-Service Training Plan*, as well as documentation maintaining that CPD and its employees continue to implement ¶530's mandates. For COPA, we expect to receive evidence of continued compliance pursuant to the CPD, IMT, and OAG agreed upon staggered production schedule.

Paragraph 530 Compliance Progress History

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

COMPLIANCE PROGRESS:
None

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

COMPLIANCE PROGRESS:
None

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

COMPLIANCE PROGRESS:
Preliminary

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

COMPLIANCE PROGRESS:
Preliminary

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

COMPLIANCE PROGRESS:
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:
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:
Secondary

Accountability and Transparency: ¶540

540. Within 180 days of the Effective Date, Police Board members and hearing officers will receive initial and annual training that is adequate in quality, quantity, scope, and type and will cover, at minimum, the following topics: a. constitutional and other relevant law on police-community encounters, including law on the use of force and stops, searches, and arrests; b. police tactics; c. investigations of police conduct; d. impartial policing; e. policing individuals in crisis; f. CPD policies, procedures, and disciplinary rules; g. procedural justice; and h. community outreach.

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 Police Board achieved Secondary compliance with the requirements of ¶540.

Prior to the thirteenth reporting period, the Police Board achieved Preliminary compliance in the fifth reporting period by providing a *Training Agenda* that detailed the training the Police Board hoped to accomplish. The proposed trainings outlined the topics required by ¶540. In the eleventh reporting period, the Police Board maintained Preliminary compliance by providing its *Policy Regarding Training of Police Board Members and Hearing Officers*. The policy provides that each Police Board member and hearing officer will receive initial training within six months of taking their position and shall receive annual training each calendar year thereafter.

Also prior to the thirteenth reporting period, the Police Board provided documentation demonstrating that at least 95% of its personnel received initial training on topics outlined in ¶540(a) (“constitutional and other relevant law on police-community encounters, including law on the use of force and stops, searches, and arrests”), ¶540(b) (“police tactics”), ¶540(d) (“impartial policing”), ¶540(e) (“policing individuals in crisis”), ¶540(f) (“CPD policies, procedures, and disciplinary rules”) and ¶540(g) (“procedural justice”).

To assess Secondary compliance this reporting period, the IMT reviewed the Police Board’s *Training Plan*, which identified a plan for annual training for Police Board members and hearing officers that covers the topics required by ¶540. Additionally, the Police Board provided documentation demonstrating that at least 95% of its personnel received initial training on topics outlined in ¶540(c) (“investigations of police misconduct”) and ¶540(h) (“community outreach”).

Moving forward, we will look for documentation demonstrating that Police Board members and hearing officers receive initial and annual training on the topics outlined in this paragraph and in the Police Board’s *Training Plan*.

Paragraph 540 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: 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		

Accountability and Transparency: ¶541

541. The trainings [referenced in ¶540] will be provided by sources both inside and outside of CPD, as needed, to provide high quality training on investigative techniques, and CPD policies, procedures, and disciplinary rules.

Compliance Progress

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

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

In the thirteenth reporting period, the City and the Police Board achieved Secondary compliance with the requirements of ¶541.

Prior to the thirteenth reporting period, the Police Board achieved Preliminary compliance in the fifth reporting period by providing a *Training Agenda* that detailed the training the Police Board hoped to accomplish. The Police Board also provided members and hearing officers a one-hour training regarding responding to calls with a mental health component. NAMI Chicago presented this training. The Police Board also provided trainings beyond that required in ¶540 and ¶541. Although some trainings were beyond those mentioned in ¶540 (and referenced in ¶541), the Police Board leadership believed that providing such blocks of instruction were essential for the work they perform and would provide greater meaning and context to the trainings required by ¶540 and ¶541. Additionally, the Police Board provided some trainings in accordance with its *Training Agenda* and demonstrated its willingness and ability to seek out and engage appropriate individuals to provide its trainings.

Also prior to the thirteenth reporting period, the Police Board provided documentation demonstrating that at least 95% of its personnel received initial training on topics outlined in ¶540(a) (“constitutional and other relevant law on police-community encounters, including law on the use of force and stops, searches, and arrests”), ¶540(b) (“police tactics”), ¶540(d) (“impartial policing”), ¶540(e) (“policing individuals in crisis”), ¶540(f) (“CPD policies, procedures, and disciplinary rules”) and ¶540(g) (“procedural justice”). COPA, BIA, and NAMI Chicago provided these training sessions.

To assess Secondary compliance this reporting period, the IMT reviewed documentation that shows that at least 95% of its personnel received initial training on topics outlined in ¶540(c) (“investigations of police misconduct”) and ¶540(h) (“community outreach”), which were provided by COPA and BIA. The IMT also reviewed the Police Board’s *Training Plan*, which provides that the executive director is responsible for ensuring high quality training and determining the need for review from outside sources, as required by ¶541.

Moving forward, we will look for the Police Board to demonstrate that it has sufficiently implemented its policies and training to ensure that the trainings on topics listed in ¶540 are delivered by sources both inside and outside of the CPD, as needed, to provide high-quality training on investigative techniques and CPD policies, procedures, and disciplinary rules, as required by ¶541.

Paragraph 541 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: 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		

Accountability and Transparency: ¶1542

542. Within 90 days of the Effective Date, the City will create a training policy for Police Board members and hearing officers.

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

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

In the thirteenth reporting period, the City and the Police Board achieved Secondary compliance with the requirements of ¶1542.

Prior to the thirteenth reporting period, the Police Board achieved Preliminary compliance in the fifth reporting period by providing a *Training Agenda* that detailed the training the Police Board hoped to accomplish. In the eleventh reporting period, the Police Board maintained Preliminary compliance by providing its *Policy Regarding Training of Police Board Members and Hearing Officers*. The policy provides that each Police Board member and hearing officer will receive initial training within six months of taking their position and shall receive annual training each calendar year thereafter.

To assess Secondary compliance this reporting period, the IMT reviewed the Police Board's *Training Plan*, which identified a plan for annual training for Police Board members and hearing officers that covers the topics required by ¶1540. Additionally, the Police Board provided documentation demonstrating that at least 95% of its personnel received initial training that is adequate in quality, quantity, scope, and type and covers the training topics required by ¶1540.

Moving forward, we will look for the Police Board to demonstrate that it has sufficiently implemented its policies and training such that the Police Board has a system in place to ensure continued training will be provided annually.

Paragraph 542 Compliance Progress History

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

COMPLIANCE PROGRESS:
None

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:
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

Accountability and Transparency: ¶1544

544. The City, CPD, and COPA recognize the importance of transparency to improving CPD-community relations, and the City, CPD, and COPA have taken important steps to increase transparency about their operations, including how they conduct investigations into CPD member misconduct. The City, CPD, and COPA will continue to take steps to increase transparency, including the implementation of the requirements set forth below.

Compliance Progress	(Reporting Period: July 1, 2025, through December 31, 2025)
Preliminary:	<i>In Compliance (NINTH REPORTING PERIOD)</i> ⁸
CPD	<i>In Compliance (NINTH REPORTING PERIOD)</i>
COPA	<i>In Compliance (FIFTH REPORTING PERIOD)</i>
Secondary:	<i>In Compliance (NEW)</i>
CPD	<i>In Compliance (NEW)</i>
COPA	<i>In Compliance (FIFTH REPORTING PERIOD)</i>
Full:	<i>Not in Compliance</i>
CPD	<i>Not in Compliance</i>
COPA	<i>In Compliance (EIGHTH REPORTING PERIOD)</i>

In the thirteenth reporting period, the City and the CPD achieved Secondary compliance with the requirements of ¶1544, and COPA maintained Full compliance. Because all relevant City entities must reach levels of compliance to bring the City, as a whole, into compliance, the City has not yet reached Full compliance.

To assess Secondary Compliance for the CPD, the IMT reviewed links to webpages on the BIA Webpage,⁹ which contains information regarding log number investigation procedures, a link to the Know Your Rights campaign, and Department Directives. The IMT also reviewed links to the BIA Accountability 2 dashboard,¹⁰ which provides access to all published BIA annual and quarterly reports. The BIA annual and quarterly reports contain information regarding community engagement and log number investigation procedures. This documentation appropriately addresses the requirements of ¶1544.

Moving forward, for the CPD, we expect to receive evidence that the CPD has continued to prioritize and take steps toward increasing transparency in accordance

⁸ As referenced above, the Consent Decree requires actions by various City entities, including the CPD, COPA, the Police Board, and the Office of the Inspector General. Ultimately, the City is responsible for ensuring compliance. As a result, if a Consent Decree paragraph requires actions by multiple City entities, we will not find that the City has met Preliminary, Secondary, or Full compliance until all those entities have met the corresponding level of compliance. Nonetheless, for some paragraphs, we will clarify compliance assessments for each entity to demonstrate which benchmarks have been met.

⁹ See BIA Webpage, [Bureau of Internal Affairs – Chicago Police Department](#)

¹⁰ See BIA Accountability 2 dashboard, [Accountability Dashboard 2 – Chicago Police Department](#)

with ¶544’s mandate and for the CPD to continue to periodically review and revise, if necessary, G08-01, *Complaint and Disciplinary System*. For COPA, we expect to receive evidence of continued compliance pursuant to the CPD, IMT, and OAG agreed upon staggered production schedule.

Paragraph 544 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: 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: 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		

Accountability and Transparency: ¶1546

546. Within 180 days following the expiration of each calendar year of the term of this Agreement, the City will produce and publish an annual report describing CPD activity during the previous calendar year (“CPD Annual Report”). The purpose of the CPD Annual Report will be to inform the public of the City’s law enforcement achievements and challenges, as well as new programs and steps taken to address challenges and build on successes. The CPD Annual Report will further provide information regarding the City’s implementation and status of this Agreement. The CPD Annual Report will not include any specific information or data by law that may not be disclosed. Subject to applicable law, the CPD Annual Report will provide data and program updates analyzing: a. community engagement and problem-solving policing efforts, identifying successes, challenges, and recommendations for future improvement; b. stop, search, and arrest data and any analysis of that data that was undertaken; c. use-of-force data and associated analyses; d. CPD responses to requests for service from individuals in crisis; e. initiatives that CPD has implemented for officer assistance and support; f. recruitment efforts, challenges, and successes; and g. in-service and supplemental recruit training.

Compliance Progress

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

Recurring Schedule: Annually **Met** **Missed**

Preliminary: *In Compliance (NEW)*

Secondary: *In Compliance (NEW)*

Full: *Under Assessment*

In the thirteenth reporting period, the City and the CPD achieved Preliminary and Secondary compliance with the requirements of ¶1546 and are under assessment for Full compliance.

On the last day of the twelfth reporting period, the CPD informally provided its published *2024 Annual Report*, which met the requirement of ¶1546 that the report be produced and published within 180 days following the expiration of the calendar year. The report appropriately addresses the requirements of this paragraph. With respect to ¶1546(c), the CPD’s *2024 Annual Report* incorporates by reference the CPD’s *2024 Annual Use of Force Report*, which was also published on the last day of the twelfth reporting period and informally provided to the IMT and the OAG. The CPD did not achieve any level of compliance in the twelfth reporting period, however, because the CPD had yet to develop and implement a policy addressing the requirements of ¶1546.

To assess Preliminary compliance, the IMT reviewed the CPD’s Special Order S09-05-02, *Department Publication*, which addresses the requirements of ¶1546. The IMT and OAG provided no-objection notices. The policy outlines requirements for the CPD’s annual report, including use of force trends as required by ¶1547. Additionally, the policy requires the publication of the annual report and sets out the

contents that must be included in the annual report in accordance with the requirements of the Consent Decree.

To assess Secondary and Full compliance, the IMT reconsidered the CPD’s *2024 Annual Report* and *2024 Annual Use of Force Report*. The CPD demonstrated that it has allocated sufficient resources to submit an annual report, which meets the requirements of this paragraph, for Secondary compliance. For Full compliance, the CPD must demonstrate that the annual report sufficiently captures annual achievements, challenges, new programs, and steps taken to address challenges and build on success.

Moving forward, we will look for the CPD to continue to finalize and publish detailed and timely annual reports that address the requirements of ¶546, to ensure that the annual report sufficiently captures the required information, and to periodically review and revise, if necessary, its S09-05-02, *Department Publication*.

Paragraph 546 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: 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: Secondary		

Accountability and Transparency: ¶547

547. CPD will regularly analyze the information it collects regarding reportable uses of force to identify significant trends. CPD will include information about any such trends in the CPD Annual Report.

Compliance Progress

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

Recurring Schedule: Annually **Met** **Missed**

Preliminary: *In Compliance (NEW)*

Secondary: *In Compliance (NEW)*

Full: *Not Yet Assessed*

In the thirteenth reporting period, the City and the CPD achieved Preliminary and Secondary compliance with the requirements of ¶547.

On the last day of the twelfth reporting period, the CPD informally provided its published *2024 Annual Report*, which incorporates by reference the CPD's *2024 Annual Use of Force Report*. The CPD's *2024 Annual Use of Force Report* was also published on the last day of the twelfth reporting period and informally provided to the IMT and the OAG. The *2024 Annual Use of Force Report* discusses significant use of force patterns and trends, but the report does not include sufficient information about the collection and analysis of use of force data. The CPD did not achieve any level of compliance in the twelfth reporting period because the CPD had yet to develop and implement a policy addressing the requirements of ¶547.

To assess Preliminary compliance, the IMT reviewed the CPD's Special Order S09-05-02, *Department Publication*, which addresses the requirements of ¶547. The IMT and OAG provided no-objection notices. The policy outlines requirements for the CPD's annual report, including use of force trends as required by ¶547.

To assess Secondary compliance, the IMT reconsidered the CPD's *2024 Annual Report* and *2024 Annual Use of Force Report*. The CPD demonstrated that it has allocated sufficient resources to regularly analyze the information it collects regarding reportable uses of force to identify significant trends and that the CPD reports on such trends in its annual report.

Moving forward, to achieve Full compliance, the CPD must demonstrate that it regularly analyzes the information it collects regarding reportable uses of force to identify significant trends and reports on such trends in its annual report. To demonstrate this, the CPD must provide sufficient information about how it collects and analyzes the use of force data. We will also look for the CPD to periodically review and revise, if necessary, its S09-05-02, *Department Publication*.

Paragraph 547 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:
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:
Secondary