

Appendix 10

Data Collection, Analysis & Management Assessments, by Paragraph

¶1568	¶1579	¶1590	¶1601
¶1569	¶1580	¶1591	¶1602
¶1570	¶1581	¶1592	¶1603
¶1571	¶1582	¶1593	¶1604
¶1572	¶1583	¶1594	¶1605
¶1573	¶1584	¶1595	¶1606
¶1574	¶1585	¶1596	¶1607
¶1575	¶1586	¶1597	¶1608
¶1576	¶1587	¶1598	¶1609
¶1577	¶1588	¶1599	
¶1578	¶1589	¶1600	

Data Collection, Analysis & Management: ¶568

568. CPD will collect and maintain the data and records necessary to accurately evaluate its use of force practices and to facilitate transparency and accountability regarding those practices.

Compliance Progress

(Reporting Period: January 1, 2023, through June 30, 2023)

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

In the eighth reporting period, the City and CPD maintained Preliminary compliance with ¶568.

To assess Preliminary compliance with ¶568, the IMT reviewed the CPD’s relevant policies and documents following the process described in the Consent Decree (¶¶626–41). To assess Secondary compliance with this paragraph, we reviewed the CPD’s training development, implementation, and evaluation (¶286).

Progress before the Eighth Reporting Period

The City and the CPD achieved Preliminary compliance with ¶568 in the sixth reporting period by providing several directives and forms that demonstrated the data collection efforts required by this paragraph.

Progress in the Eighth Reporting Period

The CPD presently possesses the necessary directives and forms to ensure that data and records related to use of force are collected and maintained. The IMT considers this sufficient to act as data collection efforts related to this paragraph, and therefore, the CPD remains in Preliminary compliance.

However, in order to evidence Secondary compliance, we continue to await the most recent training records related to the following: (1) Tactical Response Report (TRR), G03-02-02; (2) Tactical Response Investigation Report (TRR-I), G03-02-08; (3) Tactical Response Report Review (TRR-R), G03-02-08; (4) Arrest Report, G06-01-01 and G03-02-02; (5) Case Incident Report: Field Reporting Manual, S04-13-06, D20-03, and G03-02-02; (6) Investigatory Stop Report, S04-13-09; (7) Administrative Case Files, G08-01; (8) Body-Worn Camera, S03-14; (9) In-Car Camera, S03-05; (10) Third-Party Recordings, G03-02-02; (11) Witness Interviews, G03-02-02; (12) Officer Interviews, G03-02-02. As of June 30, 2023, the IMT has not received the requested training records for modules related to each of the above directives and forms during the reporting period.

Similarly, to assess Full compliance, we continue to await documented protocols for auditing and evaluating the Watch Operations Lieutenants (WOLs) reviews of body-worn camera recordings, as stated in Special Order S03-14, *Body Worn Cameras*. The IMT was not provided with protocols or parameters during the reporting period, and therefore cannot discern how the Audit Division will conduct this oversight. We also have concerns that, in practice, not all data related to use of force is being collected. For instance, during this reporting period, we learned that officers at Midway International Airport were not historically equipped with body-worn cameras. Therefore, any review of use of force at the airport would not have the benefit of body-worn camera footage. We will need to see each of these issues resolved (as well as our recommendations regarding TRED incorporated; see below) to demonstrate Full compliance and to show that all members are collecting data, as necessary.

The City and the CPD maintained Preliminary compliance with ¶568 in the eighth reporting period. Moving forward, we will look for the City and the CPD to provide the requested training records relevant to this paragraph, and to provide documented protocols for auditing and evaluating the Watch Operations Lieutenants' reviews of body worn camera recordings.

Paragraph 568 Compliance Progress History

FIRST REPORTING PERIOD SEPTEMBER 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: 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	

Data Collection, Analysis & Management: ¶569

569. CPD must collect, track, and maintain all available documents related to use of force incidents, including: a. TRRs, or any other similar form of documentation CPD may implement for initial reporting of reportable use of force incidents; b. TRR-Is, or any other similar form of documentation CPD may implement to document supervisory investigation of reportable use of force incidents; c. Tactical Response Reports – Review (“TRR-Rs”), or any other similar form of documentation CPD may implement to document review or auditing of reportable use of force incidents; d. arrest reports, original case incident reports, and investigatory stop reports associated with a reportable use of force incident; e. administrative investigative files, including investigative materials generated, collected, or received by BIA, or COPA, or any similar form of documentation CPD may implement for misconduct allegations or civilian complaints; and f. all reasonably available documentation and materials relating to any reportable use of force, in-custody injury or death, or misconduct allegation, including body-worn, in-car, or known third-party camera recordings, and statements, notes, or recordings from witness and officer interviews.

Compliance Progress

(Reporting Period: January 1, 2023, through June 30, 2023)

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

In the eighth reporting period, the City and CPD maintained Preliminary compliance with ¶569.

To assess Preliminary compliance with ¶569, the IMT reviewed the CPD’s relevant policies and documents following the process described in the Consent Decree (¶¶626–41), and the CPD’s data collection. The IMT also considered whether the CPD’s forms exist in a final format. To assess Secondary compliance with this paragraph, we reviewed the CPD’s training development, implementation, and evaluation (¶286).

Progress before the Eighth Reporting Period

The City and the CPD achieved Preliminary compliance with ¶569 in the fourth reporting period by providing several directives that demonstrated the data collection process required by this paragraph.

Progress in the Eighth Reporting Period

The CPD presently possesses the necessary directives and forms to ensure that data and records related to use of force are collected and maintained. The IMT considers this sufficient to act as data collection efforts related to this paragraph and remain in Preliminary compliance.

However, in order to evidence Secondary compliance, we continue to await the most recent training records related to the following: (1) Tactical Response Report (TRR), G03-02-02; (2) Tactical Response Investigation Report (TRR-I), G03-02-08; (3) Tactical Response Report Review (TRR-R), G03-02-08; (4) Arrest Report, G06-01-01 and G03-02-02; (5) Case Incident Report: Field Reporting Manual, S04-13-06, D20-03, and G03-02-02; (6) Investigatory Stop Report, S04-13-09; (7) Administrative Case Files, G08-01; (8) Body-Worn Camera, S03-14; (9) In-Car Camera, S03-05; (10) Third-Party Recordings, G03-02-02; (11) Witness Interviews, G03-02-02; (12) Officer Interviews, G03-02-02. As of June 30, 2023, the IMT has not received the requested training records for modules related to each of the above directives and forms during the reporting period.

Similarly, to assess Full compliance, we continue to await documented protocols for auditing and evaluating the Watch Operations Lieutenants (WOLs) reviews of body-worn camera recordings, as stated in Special Order S03-14, *Body Worn Cameras*. The IMT was not provided with protocols or parameters during the reporting period, and therefore cannot discern how the Audit Division will conduct this oversight. We also have concerns that, in practice, not all data related to use of force is being collected. For instance, during this reporting period, we learned that officers at Midway International Airport were not historically equipped with body-worn cameras. Therefore, any use of force at the airport would not be captured on body-worn camera footage. We will need to see each of these issues resolved (as well as our recommendations regarding TRED incorporated; see below) to demonstrate Full compliance and to show that all members are collecting data, as necessary.

The City and the CPD maintained Preliminary compliance with ¶569 in the eighth reporting period. Moving forward, we will look for the City and the CPD to provide

the requested training records relevant to this paragraph, and to provide documented protocols for auditing and evaluating the Watch Operations Lieutenants' reviews of body worn camera recordings.

Paragraph 569 Compliance Progress History

FIRST REPORTING PERIOD SEPTEMBER 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: 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	

Data Collection, Analysis & Management: ¶570

570. The City will ensure that reasonably available documents related to reportable uses of force that are or become subject to misconduct complaints or investigations are promptly provided to the appropriate investigative entity (e.g., COPA, BIA). The City will ensure that any reasonably available documents related to reportable uses of force subject to misconduct complaints or investigations, except for open confidential investigations, are accessible in the CMS the City is working to create, or in any similar electronic system, by June 30, 2020. Within seven days of the receipt of a misconduct complaint or the initiation of an administrative investigation, whichever occurs first, the City will identify any available reportable use of force documentation associated with the incident and ensure such documentation is accessible via the CMS or similar system. By June 30, 2020, whenever a reportable use of force incident becomes the subject of a misconduct investigation, COPA will notify CPD via the CMS within three days of the initiation of the investigation.

Compliance Progress

(Reporting Period: January 1, 2023, through June 30, 2023)

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

In the eighth reporting period, the City maintained Preliminary and Secondary compliance with ¶570.

To assess Preliminary compliance with ¶570, the IMT reviewed the policies of the City's entities. To assess Secondary compliance with ¶570, the IMT reviewed records demonstrating that the City's entities have qualified personnel to meet the requirements of this paragraph. To assess Full compliance, the IMT will review the City's entities' data to determine whether the requirements of ¶570 have been operationalized.

Progress before the Eighth Reporting Period

The City achieved Preliminary compliance with ¶570 in the third reporting period by demonstrating operation of CPD's Case Management System (CMS), which allows for tracking of administrative investigations and corresponding documents, videos, and other information, including documents related to use of force. The City achieved Secondary compliance in the sixth reporting period by maintaining

Directive 3.1.6, *CLEAR and COLUMN CMS Systems*, which sufficiently memorialized the operation of the Case Management System (CMS). Relevant to the requirements of this paragraph, we determined that the CMS code continued to allow for COPA to access the CMS for documents and evidence related to administrative investigations of use-of-force events, and reviewed three years of COPA in-service training related to the CMS, which provided sufficient guidance for COPA investigators to navigate the CMS and store investigative material as necessary.

Progress in the Eighth Reporting Period

During the eighth reporting period, COPA maintained its policy, *CLEAR and COLUMN CMS Systems* which sufficiently memorializes the operation of the Case Management System (CMS).¹ Additionally, the CMS code continues to allow for COPA to access the CMS for documents and evidence related to administrative investigations of use-of-force events. Therefore, the City has maintained Preliminary compliance with the requirements of ¶1570.

Furthermore, COPA has previously been in Secondary compliance with the requirements of ¶1570 based on evidence of three years of COPA in-service training related to the CMS. As noted in prior reports, these training materials provided sufficient guidance for COPA investigators to navigate the CMS and store investigative material, as necessary. The City therefore maintained Secondary compliance with the requirements of ¶1570, though in the next reporting period, we will need to see recent evidence demonstrating ongoing compliance.

We note that both CPD's BIA and COPA have Case Management Systems (CMS) which allow access to the "documents related to reportable uses of force subject to misconduct complaints or investigations." However, in our last report, we found that the file contents of several use of force cases did not contain the full range of documents that are typically associated with uses of force (*e.g.*, body-worn camera footage, TRRs). During the eighth reporting period, we repeated our methodology and found additional missing files. We have submitted a Request for Information to the City to determine the reason such documents would be missing and are awaiting a response.

Although we are awaiting a response as to the reasonableness of the missing documents, we continue to hold as a condition of Full compliance that the CPD create a policy memorializing its responsibilities for facilitating a full and complete investigation by COPA, including when COPA's access to CPD's data systems is restricted. Moving forward, we continue to recommend that the CPD develop a companion

¹ This policy was previously numbered 3.1.6.

directive to ensure there are no barriers to COPA’s ability to access and store pertinent documents related to use of force investigations.

The City maintained Preliminary and Secondary compliance with ¶570 in the eighth reporting period. Moving forward, we will look for the CPD to develop a policy memorializing its responsibilities for facilitating a full and complete investigation by COPA, including when COPA’s access to CPD’s data systems is restricted, and will look for evidence that the requirements of this paragraph have been operationalized.

Paragraph 570 Compliance Progress History

FIRST REPORTING PERIOD SEPTEMBER 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: Preliminary	SIXTH REPORTING PERIOD JANUARY 1, 2022 – JUNE 30, 2022 COMPLIANCE PROGRESS: Secondary
SEVENTH REPORTING PERIOD JULY 1, 2022 – DECEMBER 31, 2022 COMPLIANCE PROGRESS: Secondary	EIGHTH REPORTING PERIOD JANUARY 1, 2023 – JUNE 30, 2023 COMPLIANCE PROGRESS: Secondary	

Data Collection, Analysis & Management: ¶571

571. CPD must have an electronic system that accurately and reliably tracks all data derived from reportable use of force incidents, including: a. the response by CPD members during the incident, including the type(s) of force used; b. the date, time, location, and district of the incident; c. whether a foot or vehicle pursuit occurred that is associated with the incident; d. the actual or, if unavailable, perceived race, ethnicity, age, and gender of the subject; e. the name, watch, employee number, and unit and beat of assignment of any CPD member(s) who used force; f. CPD units identified in the incident report as being on the scene of the use of force incident; g. whether the incident occurred during an officer-initiated contact or a call for service; h. the subject's mental health or medical condition, use of drugs or alcohol, ability to understand verbal commands, or disability, as perceived by the CPD member(s) at the time force was used; i. the subject's actions that led to the CPD member's use of force; j. whether the CPD member perceived that the subject possessed a weapon and, if so, what type(s); k. whether the subject possessed a weapon and, if so, what type(s); l. whether reportable force was used against a subject that was handcuffed or otherwise in physical restraints; m. any injuries sustained by CPD members; n. any injuries sustained or alleged by the subject(s) and any medical treatment that was offered or performed on the scene of the incident; o. for each weapon discharged by an officer, including firearms, Tasers, and OC devices, the number of discharges per weapon; and p. whether the subject was charged with an offense and, if so, which offense(s).

Compliance Progress

(Reporting Period: January 1, 2023, through June 30, 2023)

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

In the eighth reporting period, the City and the CPD maintained Preliminary and Secondary compliance with ¶571.

To assess Preliminary compliance with ¶571, the IMT reviewed records demonstrating that the City's entities have qualified personnel to meet the requirements

of this paragraph, and determined whether the database required by this paragraph exists and that all forms and relevant information can be stored within the database. To assess Secondary compliance with this paragraph, we reviewed the CPD's training development, implementation, and evaluation (§286), and determined whether all members are adequately trained in completing each of the forms required by this paragraph. To assess Full compliance, the IMT will review the CPD's data to determine whether the requirements of §571 have been operationalized and to determine whether all forms and data are accessible and accurate.

Progress before the Eighth Reporting Period

The City and the CPD achieved Preliminary compliance with §571 in the fourth reporting period by finalizing enhancements to the Tactical Response Report (TRR) form, which contains the requirements of §571. The City and the CPD achieved Secondary compliance in the sixth reporting period by completing training of officers and supervisors on reporting requirements after a use-of-force event.

Progress in the Eighth Reporting Period

The CPD continues to utilize the Tactical Response Report (TRR) and TRR-Review (TRR-R) forms and both officers and supervisors have received training on completing the documents. The CPD therefore remains in Secondary compliance.

However, Full compliance will continue to rely on audit findings that ensure officers and supervisors are completing the forms accurately. Presently, the Tactical Review and Evaluation Division (TRED) reviews TRRs and TRR-Rs to identify deficiencies in report writing and issues corresponding recommendations or advisements. While TRED has a remedial mechanism in place in the form of advisements and recommendations (as well as a dashboard for supervisors to identify members or groups with higher rates of deficiencies), the high rate of advisements/recommendations (nearly 50% of force events in 2022) indicates that TRRs and TRR-Rs are not consistently complete and/or accurate.

Further related to Full compliance, we are also awaiting some type of audit approach from the Audit Division to determine the reliability of the data. Whereas TRED currently evaluates the validity of the data (*i.e.*, the accuracy of the data), an evaluation of data reliability (*i.e.*, the consistency of the data) should be more broadly conducted by the Audit Division. Although we have consistently requested such an audit in the past, we have not yet received any formal methodology for how the review might be conducted.

The City maintained Preliminary and Secondary compliance with ¶571 in the eighth reporting period. Moving forward, we will look for evidence that officers and supervisors are completing the relevant forms accurately and for an audit approach from the Audit Division to determine the reliability of the data.

Paragraph 571 Compliance Progress History

FIRST REPORTING PERIOD SEPTEMBER 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: 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: Secondary
SEVENTH REPORTING PERIOD JULY 1, 2022 – DECEMBER 31, 2022 COMPLIANCE PROGRESS: Secondary	EIGHTH REPORTING PERIOD JANUARY 1, 2023 – JUNE 30, 2023 COMPLIANCE PROGRESS: Secondary	

Data Collection, Analysis & Management: ¶572

572. CPD will regularly review citywide and district-level data regarding reportable uses of force to: a. assess the relative frequency and type of force used by CPD members against persons in specific demographic categories, including race or ethnicity, gender, age, or perceived or known disability status; and b. identify and address any trends that warrant changes to policy, training, tactics, equipment, or Department practice.

Compliance Progress

(Reporting Period: January 1, 2023, through June 30, 2023)

Recurring Schedule: Ongoing Met Missed

Preliminary: *Not in Compliance*

Secondary: *Not Yet Assessed*

Full: *Not Yet Assessed*

In the eighth reporting period, the City and the CPD did not take any meaningful steps to comply with the requirements of ¶572.

To assess Preliminary compliance with ¶572, the IMT reviewed the CPD’s relevant policies and documents following the process described in the Consent Decree (¶¶626–41).

Progress before the Eighth Reporting Period

The City and the CPD did not take any meaningful steps to comply with the requirements of ¶572 in previous reporting periods.

Progress in the Eighth Reporting Period

The Tactical Review and Evaluation Division (TRED) continues to be responsible for suggesting changes to policy, training, tactics, equipment, or Department practice based on its review of force events. This requirement of ¶572 continues to be memorialized in General Order G03-02-02, *Incidents Requiring the Completion of a Tactical Response Report*. During this reporting period, TRED made hiring efforts to add an additional 20 members.

As for this paragraph’s requirement to “assess the relative frequency and type of force used by CPD members against persons in specific demographic categories, including race or ethnicity, gender, age, or perceived or known disability status,” the CPD continues to ignore its responsibilities under the Consent Decree. For each of the past three monitoring reports, the IMT has emphasized both the importance

of and need for such an assessment. However, for the past three reporting periods, the CPD has not so much as acknowledged this paragraph, let alone taken any steps toward complying with it. The CPD continues to be unwilling to conduct this assessment in violation of the terms of the Consent Decree.

The City and the CPD did not take any meaningful steps to comply with the requirements of ¶572 in the eighth reporting period and, therefore, have not yet reached any level of compliance.

Paragraph 572 Compliance Progress History

FIRST REPORTING PERIOD SEPTEMBER 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: 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	

Data Collection, Analysis & Management: ¶573

573. Prior to conducting the initial assessment required by Paragraph 572, CPD will share its proposed methodology, including any proposed factors to be considered as part of the assessment, with the Monitor for review and approval. The Monitor will approve CPD’s proposed methodology provided that the Monitor determines that CPD’s methodology comports with published, peer-reviewed methodologies and this Agreement.

Compliance Progress (Reporting Period: January 1, 2023, through June 30, 2023)

Recurring Schedule: Ongoing **Met** **Missed**

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

In the eighth reporting period, the City and the CPD have continued to disregard their responsibilities under ¶¶572–73 and have taken no meaningful steps toward compliance.

To assess Preliminary compliance with ¶573, the IMT reviewed the CPD’s relevant policies and documents following the process described in the Consent Decree (¶¶626–41), and the CPD’s proposed methodology per the requirements of this paragraph.

Progress before the Eighth Reporting Period

The City and the CPD did not take any meaningful steps toward compliance with ¶573 in previous reporting periods.

Progress in the Eighth Reporting Period

Consistent with our assessment of ¶572, the CPD has not demonstrated any willingness to provide us with a methodology for conducting this assessment in violation of the terms of the Consent Decree.

The City and the CPD did not take any meaningful steps toward compliance with ¶573 in the eighth reporting period.

Paragraph 573 Compliance Progress History

FIRST REPORTING PERIOD SEPTEMBER 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: 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	

Data Collection, Analysis & Management: ¶574

574. A designated unit at the CPD headquarters level will routinely review and audit documentation and information collected regarding each level 2 reportable use of force incident, a representative sample of level 1 reportable use of force, and incidents involving accidental firearms discharges and animal destructions with no human injuries to ensure: a. CPD members completely and thoroughly reported the reason for the initial stop, arrest, or other enforcement action, the type and amount of force used, the subject's actions or other circumstances necessitating the level of force used, and all efforts to de-escalate the situation; b. the district-level supervisory review, investigation, and policy compliance determinations regarding the incident were thorough, complete, objective, and consistent with CPD policy; c. any tactical, equipment, or policy concerns are identified and, to the extent necessary, addressed; and d. any patterns related to use of force incidents are identified and, to the extent necessary, addressed.

Compliance Progress

(Reporting Period: January 1, 2023, through June 30, 2023)

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

In the eighth reporting period, the City and the CPD maintained Preliminary compliance with ¶574.

To assess Preliminary compliance with ¶574, the IMT reviewed the CPD's relevant policies and documents following the process described in the Consent Decree (¶¶626–41). To assess Secondary compliance with this paragraph, the IMT reviewed records demonstrating that the CPD has qualified personnel to meet the requirements of this paragraph, and reviewed the CPD's training development, implementation, and evaluation (¶286).

Progress before the Eighth Reporting Period

The City and the CPD achieved Preliminary compliance with ¶574 in the third reporting period by finalizing General Order G03-02-08, *Department Review of Use of Force*, and the CPD's Force Review Division's (FRD) Standard Operating Procedure (SOP). The City and the CPD achieved Secondary compliance with this para-

graph in the fourth reporting period by providing a comprehensive SOP which provides clear instruction on how to conduct the FRD's audits and by providing training for FRD members to carry out the tasks in accordance with the SOP. Additionally, FRD personnel received an 8-hour CIT training which included modules related to de-escalation. During the fourth reporting period, the CPD also demonstrated that it provided the FRD with sufficient resources to reduce the backlog of cases pending assignment. However, the City and the CPD lost Secondary compliance in the sixth reporting period due to inadequate staffing.

Progress in the Eighth Reporting Period

During the eighth reporting period, the CPD maintained General Order G03-02-08, *Department Review of Use of Force*, which memorializes the role of the Tactical Review and Evaluation Division (TRED) and the requirements of ¶1574. Additionally, TRED has a comprehensive Standard Operating Procedure (SOP), which provides clear instruction on how to conduct the TRED's audits, including the points of review described in ¶1574(a–d). Furthermore, TRED members continue to receive sufficient training to carry out the tasks in accordance with the SOP, including the department-wide 40-hour in-service training as well as an additional 40 hours of training involving topics such as “use of force, Taser, control tactics, tactical room entry, 4th Amendment, vehicle stops & occupant control, foot pursuits, crisis intervention, and VirTra (simulator) training” (TRED 2022 Year End Report). CPD's SOP and overall training regimen continue to satisfy the first of our criteria for achieving Secondary compliance.

However, in the sixth reporting period, the CPD lost Secondary compliance due to its inability to adequately staff TRED, a second criterion used to assess Secondary compliance for this paragraph. During the eighth reporting period, the CPD took significant steps toward addressing TRED staffing issues, including by temporarily detailing 20 officers to TRED in February of 2023, releasing a job announcement to hire 20 retired officers to serve as permanent TRED reviewers, and posting a Notice of Job Opportunity for staffing the Fourth Amendment Street Stop Review Unit.² These staffing efforts have helped contribute to an approximate 35% decrease in the TRED backlog between the end of March and mid-May.

² Although the Fourth Amendment Street Stop Review Unit will not necessarily review force events as related to this paragraph, the inclusion of street stop reviews into TRED operations will significantly increase the TRED's workload. Therefore, the Notice of Job Opportunity process for this Unit will limit the impact on resources that including the Fourth Amendment Street Stop Review Unit into TRED will undoubtedly create.

Despite these advances, we will need to continue to wait until the TRED review backlog is more manageable. TRED reports reflect that, on average, important advisements and recommendations are not provided to officers and supervisors in a timely manner, which leaves a substantial gap between action and correction (thereby limiting the impact of such correction). We continue to note that this may also impact the available evidence for review, as is the case with pod camera footage being deleted 30 days after an event (*see Independent Monitoring Report 7*).

As with prior reports, we continue to find that the reviews conducted by TRED remain comprehensive and result in substantive recommendations for improvement for CPD. For instance, according to TRED's 2022 Year End Report, TRED issued recommendations and/or advisements in 48% of TRR reviews for "Involved Member 1," 5% of TRR reviews for "Involved Member 2," 12% of TRR reviews for supervisors, and 11% of TRR reviews for approving supervisors. Additionally, TRED has implemented a supervisor dashboard to allow supervisors to identify individuals and groups demonstrating higher deficiency rates, creating a process for identifying problematic members and "closing the loop" by correcting the problem.

Overall, we continue to find that through comprehensive SOPs and well-trained personnel, TRED can provide meaningful feedback for the department and in-fact already does so. However, because, despite commendable progress, the TRED continues to be understaffed and continues to face a sizeable backlog, we find that the CPD has not yet returned to achieving Secondary compliance for this paragraph. To return to Secondary compliance, the CPD will need ensure that TRED has sufficient personnel (and that such personnel have been adequately trained) and that use-of-force events are timely reviewed for deficiencies to be swiftly resolved.

The City and the CPD maintained Preliminary compliance with ¶574 in the eighth reporting period. To regain Secondary compliance, the City and the CPD will need to demonstrate adequate staffing to meet the requirements of this paragraph.

Paragraph 574 Compliance Progress History

FIRST REPORTING PERIOD SEPTEMBER 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: Secondary	FIFTH REPORTING PERIOD JULY 1, 2021 – DECEMBER 31, 2021 COMPLIANCE PROGRESS: Secondary	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	

Data Collection, Analysis & Management: ¶575

575. CPD recently established a Force Review Unit (“FRU”) and tasked the FRU with certain responsibilities described in the preceding paragraph. CPD will ensure that the FRU or any other unit tasked with these responsibilities has sufficient resources to perform them. CPD will ensure that the FRU or any other unit tasked with these responsibilities is staffed with CPD members, whether sworn or civilian, with sufficient experience, rank, knowledge, and expertise to: effectively analyze and assess CPD’s use of force practices and related reporting and review procedures; conduct trend analysis based on use of force data; identify tactical, equipment, training, or policy concerns based on analysis of use of force incidents and data; and develop recommendations regarding modifications to tactics, equipment, training, or policy as necessary to address identified practices or trends relating to the use of force.

Compliance Progress

(Reporting Period: January 1, 2023, through June 30, 2023)

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

In the eighth reporting period, the City and the CPD did not regain any level of compliance with ¶575.

To assess Preliminary compliance with ¶575, the IMT reviewed records demonstrating that the CPD has qualified personnel to meet the requirements of this paragraph.

Progress before the Eighth Reporting Period

The City and the CPD achieved Preliminary and Secondary compliance with ¶575 in the fourth reporting period, but lost compliance in the sixth reporting period due to inadequate staffing.

Progress in the Eighth Reporting Period

As discussed in our assessment of ¶574, the Tactical Review and Evaluation Division (TRED) has taken significant steps to increase staffing, including by temporarily detailing 20 officers to TRED in February of 2023, releasing a job announcement to hire 20 retired officers to serve as permanent TRED reviewers, and posting a

Notice of Job Opportunity for staffing the Fourth Amendment Street Stop Review Unit.

However, the process of ensuring “sufficient resources to perform” the tasks TRED is required to perform is ongoing and we cannot yet say that TRED currently has those resources in place (at least not on a permanent basis). Coupled with the TRED’s current backlog, the need for a stable staffing pool prevents the CPD from achieving Preliminary compliance with this paragraph. To achieve Preliminary compliance, we will need to see a permanent solution implemented and evidence of further reductions in the backlog.

The City and the CPD did not regain any level of compliance with ¶575 in the eighth reporting period. To regain Preliminary compliance, the CPD will need to demonstrate that it has adequate staffing to meet the requirements of this paragraph.

Paragraph 575 Compliance Progress History

FIRST REPORTING PERIOD SEPTEMBER 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: Secondary	FIFTH REPORTING PERIOD JULY 1, 2021 – DECEMBER 31, 2021 COMPLIANCE PROGRESS: Secondary	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	

Data Collection, Analysis & Management: ¶576

576. CPD will conduct random audits of body-worn and in-car camera recordings of incidents that involved civilian interactions to assess whether CPD officers are complying with CPD policy. CPD will take corrective action to address identified instances where CPD officers have not complied with CPD policy as permitted by law, and will identify any trends that warrant changes to policy, training, tactics, equipment, or Department practice.

Compliance Progress

(Reporting Period: January 1, 2023, through June 30, 2023)

Preliminary:	<i>Not in Compliance</i>
Secondary:	<i>Not Yet Assessed</i>
Full:	<i>Not Yet Assessed</i>

In the eighth reporting period, the City and the CPD did not achieve any level of compliance with ¶576.

To assess Preliminary compliance with ¶576, the IMT reviewed the CPD’s relevant policies and documents following the process described in the Consent Decree (¶¶626–41), and the CPD’s data. Additionally, the IMT evaluated whether the CPD has developed an adequate framework that includes valid selection criteria for body-worn and in-car camera recordings per the requirements of this paragraph.

Progress before the Eighth Reporting Period

The City and the CPD made efforts toward but did not achieve any levels of compliance with ¶576 in previous reporting periods. For example, during the seventh reporting period, the CPD provided a further revised version of Special Order S03-14, *Body Worn Cameras*, and the related *Body Worn Camera Review Report*, but these materials were not sufficient to meet the requirements of this paragraph because the *Body Worn Camera Review Report* did not collect data on whether officers’ actions throughout the interaction were consistent with broader CPD policies. Additionally, we expected to receive, but did not receive, the Random Video Review (RVR) protocols and parameters to ensure that the CPD has built in reasonable guidelines for selecting videos, or an updated version of Special Order S03-05, *In-Car Video Systems*, to ensure this directive contains similar processes as the body-worn camera Special Order.

Progress in the Eighth Reporting Period

During the eighth reporting period, the CPD provided a further revised version of Special Order S03-14, *Body Worn Cameras*, as well as an updated *Body Worn Camera Review Report*, which captures key concepts that are to be reviewed by supervisors during the random body-worn camera review. During this reporting period and consistent with prior IMT guidance, the CPD updated the *Body Worn Camera Review Report* to specifically require supervisors to assess for opportunities to de-escalate the situation, determine whether the officer employed principles of force mitigation, and verify that the officer acted in a fair, neutral, and respectful manner throughout the interaction (among other additions). Furthermore, the CPD has revised SO3-14 to be responsive to IMT comments. Additional clarification will be necessary; however, the City has indicated that the CPD “is not seeking preliminary compliance with paragraph 576” at this time. We therefore recommend that when the CPD returns to seeking Preliminary compliance with the Consent Decree, we discuss the necessary additional clarifications.

In addition to SO3-14 and the *Body Worn Camera Review Report*, Preliminary compliance is further dependent on the IMT being able to assess updated Random Video Review (RVR) protocols and parameters to ensure that the CPD has built in reasonable guidelines for selecting videos. However, as the CPD is not seeking Preliminary compliance with this paragraph at this time, it is not clear when we may see the updated RVR protocols. Additionally, ¶576 also requires random audits of in-car camera recordings. We have yet to receive an updated version of Special Order S03-05, *In-Car Video Systems*, to ensure this directive contains similar processes as the body-worn camera Special Order, though again, this is likely because the CPD is not seeking Preliminary compliance with this paragraph at this time. Of particular concern is the fact that deficiencies in the random review of in-car cameras (in addition to the concerns raised by the IMT) were also raised to the City by the Office of Inspector General over two years ago.³ However, we have not seen any updated documents as a result.

To achieve any level of compliance, the CPD will need to ensure that body-worn-camera and in-car-camera hardware is working adequately and that CPD officers are consistently and reliably tagging videos in a way that would facilitate the Watch Operations Lieutenant reviews. The CPD must also train Watch Operations Lieutenants on an updated review protocol, ensuring that each review is of consistent

³ See <https://igchicago.org/2021/06/10/evaluation-of-the-chicago-police-departments-random-reviews-of-body-worn-camera-recordings-follow-up/>.

quality. Full compliance will then depend on Watch Operations Lieutenants conducting their reviews and the IMT conducting audits of reviews to ensure their accuracy and adequacy.

As of the end of this reporting period, the Audit Division was still conducting a body-worn camera Activation Audit and we have not seen the results. The CPD provided its one-page Audit Design Matrix (dated July 22, 2022) on November 3, 2022. We will assess the adequacy of the Audit Division’s efforts once we receive additional information.

The City and the CPD did not achieve any level of compliance with ¶576 in the eighth reporting period. For Preliminary compliance, we will look for the policies and procedures described above to meet the requirements of this paragraph. We will also consider whether the CPD has ensured that body-worn-camera and in-car camera hardware is working adequately.

Paragraph 576 Compliance Progress History

FIRST REPORTING PERIOD SEPTEMBER 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: 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	

Data Collection, Analysis & Management: ¶577

577. CPD will create a Force Review Board (“FRB”) to review, from a Department improvement perspective: (a) any level 3 reportable use of force incident, except for accidental firearms discharges and animal destructions with no human injuries, and (b) any reportable uses of force by a CPD command staff member.

Compliance Progress

(Reporting Period: January 1, 2023, through June 30, 2023)

Preliminary:	<i>In Compliance</i> (THIRD REPORTING PERIOD)
Secondary:	<i>In Compliance</i> (SEVENTH REPORTING PERIOD)
Full:	<i>Not in Compliance</i>

In the eighth reporting period, the City and the CPD maintained Preliminary and Secondary compliance with ¶577.

To assess Preliminary compliance with ¶577, the IMT reviewed the CPD’s relevant policies and documents following the process described in the Consent Decree (¶¶626–41), and the CPD’s data. Additionally, the IMT reviewed records demonstrating that the CPD has qualified personnel to meet the requirements of this paragraph. To assess Secondary compliance, the IMT reviewed the CPD’s training development, implementation, and evaluation (¶286), including the implementation of a decision-point analysis. To assess Full compliance, the IMT considered whether the CPD has sufficiently implemented its policy and training.

Progress before the Eighth Reporting Period

The City and the CPD achieved Preliminary compliance with ¶577 in the third reporting period with the finalization of CPD General Order G03-02-08, *Department Review of Use of Force*, which sufficiently memorialized the role of the Force Review Board (FRB). The City and the CPD achieved Secondary compliance in the seventh reporting period by providing an updated version of Standard Operating Procedure 2020-003, *Force Review Board*, which provides comprehensive guidance for conducting the reviews required by this paragraph.

Progress in the Eighth Reporting Period

During the eighth reporting period, the CPD maintained General Order G03-02-08, *Department Review of Use of Force*, which memorializes the role of the Force Review Board (FRB) in reviewing Level 3 uses of force and reportable uses of force by a CPD command staff member. As the FRB continues to be detailed in policy, the

CPD has remained in Preliminary compliance with ¶577. Additionally, the CPD continues to have Standard Operating Procedure (SOP) 2020-03, *Force Review Board*, which we have previously noted as demonstrating Secondary compliance.

However, the execution of FRBs that the IMT has observed in-person has been disappointing. During this reporting period, the IMT observed FRBs on February 16, 2023, February 28, 2023, and April 19, 2023. During these proceedings, the IMT observed an informative and factual overview of the incidents provided to FRB members. However, the IMT also observed a lack of critical review of the incidents. For instance, in one FRB, the decision-making of an officer to engage in a foot pursuit directly preceding a lethal force event was not critically evaluated – in fact, aside from the factual overview, the foot pursuit itself was not discussed at all. In each of the FRBs we reviewed, the critical review proceedings lasted no more than 30 minutes; hardly enough time to conduct the type of decision-point analysis reflected in SOP 2020-03.

The IMT has pushed for these critical reviews to ensure that the process looks at the incidents closely and engages in decision-point analysis to identify potential areas for organizational improvement. This does not mean the FRB must find a disciplinary action in every incident (and in fact are prohibited from serving as a mechanism for accountability altogether); rather, the proceedings are meant to identify areas for improvement to officers' skills. As these proceedings are designed to be led by the Superintendent (the chief executive of the department), the point is to approach the event from the mindset of "could this have gone differently and, if so, how should we adjust policy and training to reduce the potential for such lethal force events in the future?" However, the IMT is unaware of any organizational changes which have stemmed from the FRBs. Further, we have seen little engagement from the Superintendents presiding over these meetings to date. We look forward to discussing the FRB process with the incoming Superintendent, once selected and approved.

To achieve Full compliance with the requirements of ¶577, the FRB must consistently engage in a critical review of the incidents and make a decision-point analysis that enhances the CPD. The IMT appreciates the invitations to observe the FRB proceedings and will continue to attend.

The City and the CPD maintained Preliminary and Secondary compliance with ¶577 in the eighth reporting period. To achieve Full compliance with the requirements of ¶577, we will look for evidence that the FRB is consistently engaging in a

critical review of the incidents and making a decision-point analysis that enhances the CPD.

Paragraph 577 Compliance Progress History

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

Data Collection, Analysis & Management: ¶578

578. For any reportable use of force incident subject to an ongoing investigation by COPA, COPA will be exclusively responsible for recommending disciplinary action relating to the incident. The purpose of FRB’s review will be to: a. evaluate if actions by CPD members during the incident were tactically sound and consistent with CPD training; and b. if applicable, identify specific modifications to existing policy, training, tactics, or equipment that could minimize the risk of deadly force incidents occurring and the risk of harm to officers and the public.

Compliance Progress

(Reporting Period: January 1, 2023, through June 30, 2023)

Preliminary: *In Compliance (THIRD REPORTING PERIOD)*
Secondary: *In Compliance (SEVENTH REPORTING PERIOD)*
Full: *Not in Compliance*

In the eighth reporting period, the City and the CPD maintained Preliminary and Secondary compliance with ¶578.

To assess Preliminary compliance with ¶578, the IMT reviewed the entities’ relevant policies and documents following the process described in the Consent Decree (¶¶626–41). To assess Secondary compliance, the IMT reviewed the CPD’s training development, implementation, and evaluation (¶286), including the implementation of a decision-point analysis. To assess Full compliance, the IMT reviewed the entities’ data collection and evaluated whether the Force Review Board consistently engaged in a critical review of incidents and made a decision-point analysis per the requirements of this paragraph.

Progress before the Eighth Reporting Period

The City and the CPD achieved Preliminary compliance with ¶578 in the third reporting period with the finalization of CPD General Order G03-02-08, *Department Review of Use of Force*, which sufficiently memorialized the role of the Force Review Board (FRB). The City and the CPD achieved Secondary compliance in the seventh reporting period by providing an updated version of Standard Operating Procedure (SOP) 2020-003, *Force Review Board*, which provides comprehensive guidance for conducting the reviews required by this paragraph.

Progress in the Eighth Reporting Period

During the eighth reporting period, the CPD maintained General Order G03-02-08, *Department Review of Use of Force*, which memorializes the role of the Force Review Board (FRB) in reviewing Level 3 uses of force and reportable uses of force by a CPD command staff member. As the FRB continues to be detailed in policy, the CPD has remained in Preliminary compliance with ¶578. Additionally, the CPD continues to possess Standard Operating Procedure (SOP) 2020-03, *Force Review Board*, which we have previously found to evidence Secondary compliance.

However, the execution of FRBs that the IMT has observed in-person has been disappointing. During this reporting period, the IMT observed FRBs on February 16, 2023, February 28, 2023, and April 19, 2023. During these proceedings, the IMT observed an informative and factual overview of the incidents provided to FRB members. However, IMT also observed a lack of critical review of the incidents. For instance, in one FRB, the decision-making of an officer to engage in a foot pursuit directly preceding a lethal force event was not critically evaluated – in fact, aside from the factual overview, the foot pursuit itself was not discussed at all. In each of the FRBs we reviewed, the critical review proceedings lasted no more than 30 minutes; hardly enough time to conduct the type of decision-point analysis reflected in SOP 2020-03.

The IMT has pushed for these critical reviews to ensure that the process looks at the incidents closely and engages in decision-point analysis to identify potential areas for organizational improvement. This does not mean the FRB must find a disciplinary action in every incident (and in fact are prohibited from serving as a mechanism for accountability altogether); rather, the proceedings are meant to identify areas for improvement to Department members' skills. As these proceedings are designed to be led by the Superintendent (the chief executive of the department), the point is to approach the event from the mindset of "could this have gone different and, if so, how should we adjust policy and training to reduce the potential for such lethal force events in the future?" However, the IMT is unaware of any organizational changes which have stemmed from the FRBs. We look forward to discussing the FRB process with the incoming Superintendent, once selected and approved.

To achieve Full compliance with the requirements of ¶578, the IMT will need to observe the FRB consistently engage in a critical review of the incidents and make a decision-point analysis that enhances the CPD. The IMT appreciates the invitations to observe the FRB proceedings and will continue to attend.

The City and the CPD maintained Preliminary and Secondary compliance with ¶578 in the eighth reporting period. To achieve Full compliance with the requirements of ¶578, we will need to observe the FRB consistently engaging in a critical review of the incidents and making a decision-point analysis that enhances the CPD.

Paragraph 578 Compliance Progress History

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

Data Collection, Analysis & Management: ¶579

579. The FRB will be chaired by the Superintendent, or his or her designee, and will include, at a minimum, the Chief of the Bureau of Patrol, or his or her designee, and CPD members at the rank of Deputy Chief, or above, who are responsible for overseeing policy development, policy implementation, training, and misconduct investigations. CPD's General Counsel, or his or her designee, will also serve on the FRB.

Compliance Progress

(Reporting Period: January 1, 2023, through June 30, 2023)

Preliminary:	<i>In Compliance</i> (THIRD REPORTING PERIOD)
Secondary:	<i>In Compliance</i> (SEVENTH REPORTING PERIOD)
Full:	<i>Not in Compliance</i>

In the eighth reporting period, the City and the CPD maintained Preliminary and Secondary compliance with ¶579.

To assess Preliminary compliance with ¶579, the IMT reviewed the entities' relevant policies and documents following the process described in the Consent Decree (¶¶626–41). To assess Secondary compliance, the IMT reviewed the CPD's training development, implementation, and evaluation (¶286), including the implementation of a decision-point analysis, and reviewed records demonstrating that the CPD has qualified personnel to meet the requirements of this paragraph. To assess Full compliance, the IMT reviewed the entities' data collection.

Progress before the Eighth Reporting Period

The City and the CPD achieved Preliminary compliance with ¶579 in the third reporting period with the finalization of CPD General Order G03-02-08, *Department Review of Use of Force*, which sufficiently memorialized the role of the Force Review Board (FRB). The City and the CPD achieved Secondary compliance in the seventh reporting period by providing an updated version of Standard Operating Procedure (SOP) 2020-003, *Force Review Board*, which provides comprehensive guidance for conducting the reviews required by this paragraph.

Progress in the Eighth Reporting Period

During the eighth reporting period, the CPD maintained General Order G03-02-08, *Department Review of Use of Force*, which memorializes the role of the Force Review Board (FRB) in reviewing Level 3 uses of force and reportable uses of force by a CPD command staff member. As the FRB continues to be detailed in policy, we

find CPD has remained in Preliminary compliance with ¶579. Additionally, the CPD continues to have SOP 2020-03, *Force Review Board*, which is evidence of Secondary compliance.

However, during this reporting period, we were not provided with attendance records from FRBs and are therefore unable to determine whether the membership of the proceedings was consistent with the requirements of ¶579. Moving forward and to achieve Full compliance, we recommend the CPD provide us with attendance records for each proceeding.

The City and the CPD maintained Preliminary and Secondary compliance with ¶579 in the eighth reporting period. Moving forward, we will look for the CPD to provide attendance records from FRBs to the IMT.

Paragraph 579 Compliance Progress History

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

Data Collection, Analysis & Management: ¶580

580. *The FRB will review each incident within its purview promptly, which will in no event be more than 96 hours after the incident occurs. Within 30 days after its review of an incident, the FRB will issue recommendations, if appropriate, to the Superintendent regarding any need for additional training or modifications to policies, tactics, equipment, or Department practices. Upon review and approval by the Superintendent, or his or her designee, the FRB will assign each approved recommendation to a specific CPD command staff member for implementation. CPD will promptly implement each approved recommendation.*

Compliance Progress

(Reporting Period: January 1, 2023, through June 30, 2023)

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

In the eighth reporting period, the City and the CPD maintained Preliminary and Secondary compliance with ¶580.

To assess Preliminary compliance with ¶580, the IMT reviewed the entities' relevant policies and documents following the process described in the Consent Decree (¶¶626–41). To assess Secondary compliance, the IMT reviewed the CPD's training development, implementation, and evaluation (¶286), including the implementation of a decision-point analysis. To assess Full compliance, the IMT reviewed the entities' data collection and evaluated whether the Force Review Board consistently engaged in a critical review of incidents and made a decision-point analysis per the requirements of this paragraph.

Progress before the Eighth Reporting Period

The City and the CPD achieved Preliminary compliance with ¶580 in the third reporting period with the finalization of CPD General Order G03-02-08, *Department Review of Use of Force*, which sufficiently memorialized the role of the Force Review Board (FRB). The City and the CPD achieved Secondary compliance in the seventh reporting period by providing an updated version of Standard Operating Procedure (SOP) 2020-003, *Force Review Board*, which provides comprehensive guidance for conducting the reviews required by this paragraph.

Progress in the Eighth Reporting Period

During the eighth reporting period, the CPD maintained General Order G03-02-08, *Department Review of Use of Force*, which memorializes the role of the Force Review Board (FRB) in reviewing Level 3 uses of force and reportable uses of force by a CPD command staff member. As the FRB continues to be detailed in policy, the CPD has remained in Preliminary compliance with ¶580. Additionally, the CPD continues to possess Standard Operating Procedure (SOP) 2020-03, *Force Review Board* which we have previously found to evidence Secondary compliance.

However, the execution of FRBs that the IMT has observed in-person has been disappointing. During this reporting period, the IMT observed FRBs on February 16, 2023, February 28, 2023, and April 19, 2023. During these proceedings, the IMT observed an informative and factual overview of the incidents provided to FRB members. However, IMT also observed a lack of critical review of the incidents. For instance, in one FRB, the decision-making of an officer to engage in a foot pursuit directly preceding a lethal force event was not critically evaluated – in fact, aside from the factual overview, the foot pursuit itself was not discussed at all. In each of the FRBs we reviewed, the critical review proceedings lasted no more than 30 minutes; hardly enough time to conduct the type of decision-point analysis reflected in SOP 2020-03.

The IMT has pushed for these critical reviews to ensure that the process looks at the incidents closely and engages in decision-point analysis to identify potential areas for organizational improvement. This does not mean the FRB must find a disciplinary action in every incident (and in fact are prohibited from serving as a mechanism for accountability altogether); rather, the proceedings are meant to identify areas for improvement to Department members' skills. As these proceedings are designed to be led by the Superintendent (the chief executive of the department), the point is to approach the event from the mindset of "could this have gone different and, if so, how should we adjust policy and training to reduce the potential for such lethal force events in the future?" However, the IMT is unaware of any organizational changes which have stemmed from the FRBs. We look forward to discussing the FRB process with the incoming Superintendent, once selected and approved.

To achieve Full compliance with the requirements of ¶580, the FRB must consistently engage in a critical review of the incidents and make a decision-point analysis that enhances the CPD. The IMT appreciates the invitations to observe the FRB proceedings and will continue to attend. Additionally related to ¶580, the IMT noted in our prior monitoring report that we had seen evidence of the recommendations coming from the FRB to TRED, particularly, the debriefing point coded

“Other – Policy”. The IMT noted that we needed to observe the second portion of the FRB proceedings to ensure that comprehensive recommendations were being made. As discussed above, we do not believe that recommendations stemming from FRBs have been comprehensive as it relates to the decisions of officers. Similarly, we maintain our recommendation from our prior monitoring report that the CPD implement a follow-up process (similar to the FRB process) after all evidence is received from COPA and all administrative allegations are thoroughly addressed. This is to ensure that policy, training, tactics, and equipment recommendations are made using all the information gathered during the investigative process.

The City and the CPD maintained Preliminary and Secondary compliance with ¶580. To achieve Full compliance with the requirements of ¶580, we will look for evidence that the FRB is consistently engaging in a critical review of the incidents and making a decision-point analysis that enhances the CPD.

Paragraph 580 Compliance Progress History

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

Data Collection, Analysis & Management: ¶581

581. Beginning within 180 days of the Effective Date, CPD will publish on at least a monthly basis aggregated and incident-level data, excluding personal identifying information (e.g., name, address, contact information), regarding reportable use of force incidents via a publicly accessible, web-based data platform.

Compliance Progress

(Reporting Period: January 1, 2023, through June 30, 2023)

Recurring Schedule: Monthly **Met** **Missed**

Preliminary: *Not In Compliance* (NEW: LOST COMPLIANCE)

Secondary: *Not In Compliance* (NEW: LOST COMPLIANCE)

Full: *Not Yet Assessed*

In the eighth reporting period, the City and the CPD lost both Preliminary and Secondary compliance with ¶581.

To assess Preliminary compliance with ¶581, the IMT reviewed the CPD’s relevant policies and documents following the process described in the Consent Decree (¶¶626–41) and reviewed the CPD’s data, including the requisite publicly accessible web-based data platform. To assess Secondary compliance, the IMT reviewed the CPD’s training development, implementation, and evaluation (¶1286), and community engagement, including creating online dashboard tutorials, providing an avenue for community member feedback regarding the dashboard, and responding appropriately to feedback. To assess Full compliance, the IMT evaluated whether the CPD has sufficiently implemented its policy and training with the requisite user-friendly monthly postings based on verified data.

Progress before the Eighth Reporting Period

The City and the CPD achieved Preliminary compliance with ¶581 in the third reporting period by publishing its Use of Force Dashboard. The City and the CPD achieved Secondary compliance in the sixth reporting period by putting into place mechanisms for collecting community feedback and updating the Use of Force Dashboard to provide a user guide for community members. Additionally, the CPD identified the Tactical Review and Evaluation Division (TRED) as the unit responsible for reviewing public comments received through the dashboard’s feedback form.

Progress in the Eighth Reporting Period

During the eighth reporting period, the CPD maintained its use-of-force dashboard, which updates on a monthly basis. The dashboard continues to provide aggregate data on the department's use of force, though there no longer appears to be an option for downloading the underlying incident-level data (a condition of Preliminary compliance).⁴ Additionally, the CPD previously achieved Secondary compliance as a result of the CPD including a community feedback form; however, when we provided a comment through the feedback form, we were not provided any response.⁵ Therefore, while community members may have the ability to submit comments, this is meaningless unless the community members can expect to receive information back.

Presently, the Tactical Review and Evaluation Division (TRED) is responsible for reviewing public comments received through the feedback form. However, during the past two reporting periods, we have not been provided any documentation of public comments and we therefore have been unable to determine whether the CPD has taken responsive steps to address community comments or whether any community comments have been received. As our comment was not addressed or responded to, we must assume that the CPD is not taking responsive steps.

To regain Preliminary compliance with ¶1581, the CPD must reinstate the capability of downloading the incident-level data. To regain Secondary compliance, the CPD will need to retain its comments box, though we will need to discuss with the CPD how it will improve the notification process when comments are submitted. Finally, to reach Full compliance, we maintain our recommendations that the CPD provide evidence that community comments are, when made, being appropriately addressed. Full compliance will also depend on the CPD's ability to demonstrate the reliability of the use of force dashboard data, discussed in greater detail in our assessment of ¶1569.

⁴ In its comments to this report, the City asserts that the data on the use-of-force dashboard was never downloadable. This is, however, contradicted by the IMT's reports, meetings with CPD personnel, City correspondence, and the CPD's own words. For example, the CPD's *Independent Monitoring Period No. 3 Reform Progress Update*: "The latest enhancement [to the public dashboard] incorporated in IMR-3 is the addition of incident level data. On the final tab of the dashboard, 'Data Download,' data can be downloaded by clicking the supplied hyperlink." (December 2020) at 107, <https://home.chicagopolice.org/wp-content/uploads/IMR-3-Status-Report.pdf>.

⁵ Consistent with this paragraph, our comment to the CPD inquired as to how to download the underlying data as it did not appear possible on the dashboard.

The City and the CPD lost both Preliminary and Secondary compliance with ¶581 in the eighth reporting period. To regain Preliminary compliance with ¶581, the CPD must reinstate the capability of downloading the incident-level data. To regain Secondary compliance, the CPD will need to retain its comments box and improve the notification process when comments are submitted.

Paragraph 581 Compliance Progress History

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

Data Collection, Analysis & Management: ¶582

582. The publicly accessible, web-based data platform will enable visitors to: a. identify where reportable uses of force occur through interactive maps depicting incident frequencies at a citywide, district, neighborhood, and ward level; b. identify the frequency, in the aggregate and by type, of reportable uses of force at the citywide, district, neighborhood, and ward level through graphs, charts, and other data visualizations; and c. review aggregate demographic information about the race, ethnicity, age, and gender of persons subjected to reportable uses of force at the citywide, district, neighborhood, and ward level through graphs, charts, and other data visualizations.

Compliance Progress

(Reporting Period: January 1, 2023, through June 30, 2023)

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

In the eighth reporting period, the City and the CPD maintained Preliminary compliance but lost Secondary compliance with ¶582.

To assess Preliminary compliance with ¶582, the IMT reviewed the CPD’s relevant policies and documents following the process described in the Consent Decree (¶¶626–41) and reviewed the CPD’s data, including the requisite publicly accessible web-based data platform. To assess Secondary compliance, the IMT reviewed the CPD’s training development, implementation, and evaluation (¶286), and community engagement, including creating online dashboard tutorials, providing an avenue for community member feedback regarding the dashboard, and responding appropriately to feedback. To assess Full compliance, the IMT evaluated whether the CPD has sufficiently implemented its policy and training with the requisite user-friendly monthly postings based on verified data.

Progress before the Eighth Reporting Period

The City and the CPD achieved Preliminary compliance with ¶582 in the third reporting period by publishing a Use of Force Dashboard that meets the requirements of this paragraph. The City and the CPD achieved Secondary compliance in the sixth reporting period by putting into place mechanisms for collecting community feedback and updating the Use of Force Dashboard to provide a user guide for

community members. Additionally, the CPD identified TRED as the unit responsible for reviewing public comments received through the dashboard's feedback form.

Progress in the Eighth Reporting Period

During the eighth reporting period, the CPD maintained its use-of-force dashboard, which updates on a monthly basis. Although the dashboard's components no longer adhere to the requirements of ¶581 (as discussed above), the elements of ¶582 continue to be incorporated into the aggregate-level data presented through the dashboard's "graphs, charts, and other data visualizations" and therefore the CPD has maintained Preliminary compliance with the requirements of this paragraph.

However, consistent with our assessment of ¶581, the CPD has not maintained Secondary compliance due to a demonstrated failure to receive and respond to comments the IMT made through the comment box. To regain Secondary compliance, the CPD must retain its comments box, though we will need to discuss with the CPD how it will improve the notification process when comments are submitted. To achieve Full compliance, we maintain our recommendation that the CPD provide evidence that community comments are, when made, being appropriately addressed. Full compliance will also depend on the CPD's ability to demonstrate the reliability of the use of force dashboard data, discussed in greater detail in our assessment of ¶569.

The City and the CPD maintained Preliminary compliance but lost Secondary compliance with ¶582 in the eighth reporting period. To regain Secondary compliance, the CPD must retain its comments box and improve the notification process when comments are submitted.

Paragraph 582 Compliance Progress History

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

Data Collection, Analysis & Management: ¶583

583. CPD must collect and provide information to supervisors that enables them to proactively identify at-risk behavior by officers under their command, and to provide individualized interventions and support to address the at-risk behavior. CPD must provide supervisors with an automated electronic system that provides this information and equips supervisors to perform these duties.

Compliance Progress

(Reporting Period: January 1, 2023, through June 30, 2023)

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

In the eighth reporting period, the CPD maintained Preliminary compliance with ¶583.

To assess Preliminary compliance with ¶583, the IMT reviewed the CPD’s relevant policies and documents following the process described in the Consent Decree (¶¶626–41), and reviewed records demonstrating that the CPD has qualified personnel to meet the requirements of this paragraph. To assess Secondary compliance with this paragraph, the IMT reviewed the CPD’s training development, implementation, and evaluation (¶286), and determined whether supervisors are trained on how to use the automated electronic system required by this paragraph. To assess Full compliance, the IMT reviewed data sources and considered whether the CPD is ensuring that supervisors are using the systems and that the systems are beneficial to supervisors.

Progress before the Eighth Reporting Period

The CPD achieved Preliminary compliance with ¶1583 in the fifth reporting period by providing an updated version of Employee Resource E05-02, *Performance Recognition System*, which further reinforces supervisors' responsibilities to proactively engage officers. Additionally, during the fifth reporting period, the CPD continued piloting the Officer Support System (OSS) and provided the IMT with an updated version of Department Notice D20-04, *Officer Support System (OSS) – Pilot Program*, which contains the elements of this paragraph. During the sixth reporting period, the CPD made efforts toward Secondary compliance by providing a supervisor in-service training that provided guidance to supervisors on holding conversations that can be difficult when discussing officers' at-risk behavior, but this training did not discuss how to identify officers with whom to have such conversations.

Progress in the Eighth Reporting Period

The CPD continues to maintain Employee Resource E05-02, *Performance Recognition System*, and Department Notice D20-04, *Officer Support System (OSS) – Pilot Program*⁶, which are sufficient to evidence Preliminary compliance with this paragraph.

However, the utilization of the Performance Recognition System (PRS) and the rollout of the Officer Support System (OSS) continue to suffer from a series of unforced errors which have ignored the IMT's technical assistance or neglected to consult with us altogether. For instance, we continue to note that during the OSS pilot phase, the IMT has not been consulted on crucial elements which inform the operation of the OSS as well as inform potential changes to the OSS when going to

⁶ Several paragraphs within the Consent Decree relate to the Officer Support System (OSS), which is designed to assist supervisors in supporting CPD sworn members in a non-disciplinary manner. The OSS helps supervisors identify members who may benefit from additional support by collecting and maintaining data on each member's reported uses of force, arrests, injuries, vehicle pursuits, misconduct allegations, civil or administrative claims, disciplinary history, body-worn and in-car camera policy violations, awards and commendations, sick leave usage, missed court appearances, training history, and current rank and assignment. It uses advanced models to identify Department members who may be at risk of experiencing an excessive force complaint, suspension, an off-duty complaint, or a domestic abuse/substance abuse complaint. The OSS application provides early intervention and relies on five key elements that include regular reviews, continued communication between supervisors and sworn members, and connecting members with available resources. Additionally, other paragraphs in this section relate to the Performance Recognition System (PRS), a data warehouse where supervisors can cull through similar data as those that feed the OSS. Supervisors are required to regularly check officer metrics to proactively identify officers who demonstrate potential problematic behavior. The interventions available through PRS reviews mirror the interventions available in the OSS.

expand department-wide. In Independent Monitoring Report 7, we reported that the CPD ignored our recommendations for delivering supervisor training, delivering officer training, conducting a comprehensive pilot evaluation, and ensuring a complete dataset consistent with ¶587.

These issues have not been addressed and have continued in the eighth reporting period. As one example, during a June 2023 meeting with CPD representatives, we were informed that a survey was set to be delivered to all officers and supervisors within the pilot 6th District regarding their experiences with and perceptions of the OSS. However, the IMT was not allowed sufficient time to review the survey (and were provided the survey only after requesting a copy) and therefore were only able to provide preliminary comments and recommendations. As this survey is the first evaluation component we have seen regarding the OSS and we have consistently asked for the CPD's plans for evaluating the OSS pilot, it is not clear why the IMT was not consulted earlier and allowed more time to provide more fulsome commentary.

Consistent with our last report, we consider the pilot in the 6th District to serve as an opportunity for the CPD to learn from before expanding to another pilot site (currently scheduled for the 4th District). The CPD currently has a survey to measure officer and supervisor perceptions of OSS (discussed above) and is planning to conduct focus groups with 5th District officers and supervisors. We recommend that the CPD use these data collection methodologies to inform an updated and complete evaluation plan which can then be used for the 4th District pilot. Additionally, prior to beginning in the 4th District, we recommend the CPD provide us the results of its evaluation of the 5th District to inform policy and training improvements. Finally, before beginning in the 4th District, we recommend the CPD provide us with final program documents (*e.g.*, policies, SOPs, trainings, and evaluation material). We will assess Secondary compliance by reviewing these documents. Once the 4th District pilot evaluation has been completed, the CPD will then need to conduct a full evaluation of the pilot and make appropriate changes to policy and training before rolling out the OSS department-wide. This will then set the basis for evaluating Full compliance with the suite of OSS-related paragraphs.

The CPD maintained Preliminary compliance with ¶583 in the eighth reporting period. Moving forward, we request that the CPD provide the survey and evaluation results and final program documents discussed above.

Paragraph 583 Compliance Progress History

FIRST REPORTING PERIOD SEPTEMBER 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	

Data Collection, Analysis & Management: ¶584

584. *The automated electronic system must be: a. data-driven and developed with statistical methods and analytic techniques; b. customizable to CPD; c. adaptive as new information becomes available; d. capable of being audited and evaluated to improve accuracy; and e. able to generate sufficient data that enables assessment of the effects, if any, of support provided and interventions undertaken.*

Compliance Progress

(Reporting Period: January 1, 2023, through June 30, 2023)

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

In the eighth reporting period, the CPD maintained Preliminary compliance with ¶584.

To assess Preliminary compliance with ¶584, the IMT reviewed the CPD’s relevant policies and documents following the process described in the Consent Decree (¶¶626–41). To assess Secondary compliance, the IMT reviewed records demonstrating that the CPD has qualified personnel to meet the requirements of this paragraph, and considered whether the CPD has memorialized a process for ensuring the elements of this paragraph are being followed, such as a training framework for conducting audits and evaluating the system for accuracy.

Progress before the Eighth Reporting Period

The CPD achieved Preliminary compliance with ¶584 in the fifth reporting period by providing an updated version of Department Notice D20-04, *Officer Support System (OSS) – Pilot Program*, which establishes the Officer Support System (OSS) in accordance with this paragraph as well as with other paragraphs within this Section. During the sixth and seventh reporting periods, the CPD made efforts toward but did not reach Secondary compliance with this paragraph, as its evaluation plan did not adequately address the requirements of the Consent Decree, and it struggled with the rollout of the OSS.

Progress in the Eighth Reporting Period

Housed with what will ultimately become the Talent Management System is the Officer Support System (OSS), an automated system which uses underlying statistical models to identify officers and alerts supervisors that a review is required.

During the eighth reporting period, the CPD maintained Department Notice D20-04, *Officer Support System (OSS) – Pilot Program*, which contains the requirements of ¶584.

As part of the OSS, the CPD uses statistical models to predict four extremely rare events: a future sustained excessive force complaint, a future Department suspension, a future off-duty complaint, and a future domestic abuse or substance abuse complaint. Although these models are significant in the statistical sense, the predicted events are infrequent and therefore the models are likely to contain a large number of Type 1 and Type 2 errors (*i.e.*, false-positives and false-negatives). We have recently requested updated models to evaluate this issue and are awaiting a response from the City.

Although the rollout of the OSS continues to suffer from flaws in its implementation, the predictive models used in the current OSS comply with the language of ¶584. Therefore, the CPD maintains Preliminary compliance with this paragraph and the IMT will assess further levels of compliance in accordance with our comments in ¶583 and in our previous monitoring report.

However, as a matter of technical assistance, we suggest the CPD consider supplementing the current OSS to identify officers in need of intervention who otherwise would not be identified through the current statistical models. As noted above, the events being predicted by the OSS are rare in nature. Therefore, they will not consistently identify officers who use force or receive complaints at an extreme rate compared with their peers.⁷ By identifying these outlying officers for possible intervention, the CPD can better manage its personnel and provide data-informed personalized feedback.

The CPD maintained Preliminary compliance with ¶584 in the eighth reporting period. Moving forward, we will look for evidence related to Secondary compliance with this paragraph, including training development, implementation, evaluation, and personnel.

⁷ We include use of force and complaints as only two examples and note that peer-comparison early intervention systems can use any number of metrics to identify officers of concern, including measures of overtime, sick time, or certain types of charges (*e.g.*, resisting arrest), among other comparative metrics.

Paragraph 584 Compliance Progress History

FIRST REPORTING PERIOD SEPTEMBER 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	

Data Collection, Analysis & Management: ¶585

585. *The automated electronic system must perform these primary functions: a. using statistical methods to identify officers who are at elevated risk of engaging in conduct leading to at-risk behavior; b. identifying and facilitating support and interventions that prevent or reduce the occurrence of the identified at-risk behavior; c. providing supervisors with a dashboard of relevant information about members under their direct command to facilitate appropriate supervisory intervention and support; and d. performing peer group analysis with comparative data to account for differences in job assignments, and to identify group- and unit-level patterns of activity.*

Compliance Progress

(Reporting Period: January 1, 2023, through June 30, 2023)

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

In the eighth reporting period, the CPD maintained Preliminary compliance with ¶585.

To assess Preliminary compliance with ¶585, the IMT reviewed the CPD’s relevant policies and documents following the process described in the Consent Decree (¶¶626–41), and determined whether the requisite automated electronic system, via the system code, is capable of performing the tasks required by this paragraph. To assess Secondary compliance, the IMT reviewed the CPD’s training development, implementation, and evaluation (¶286).

Progress before the Eighth Reporting Period

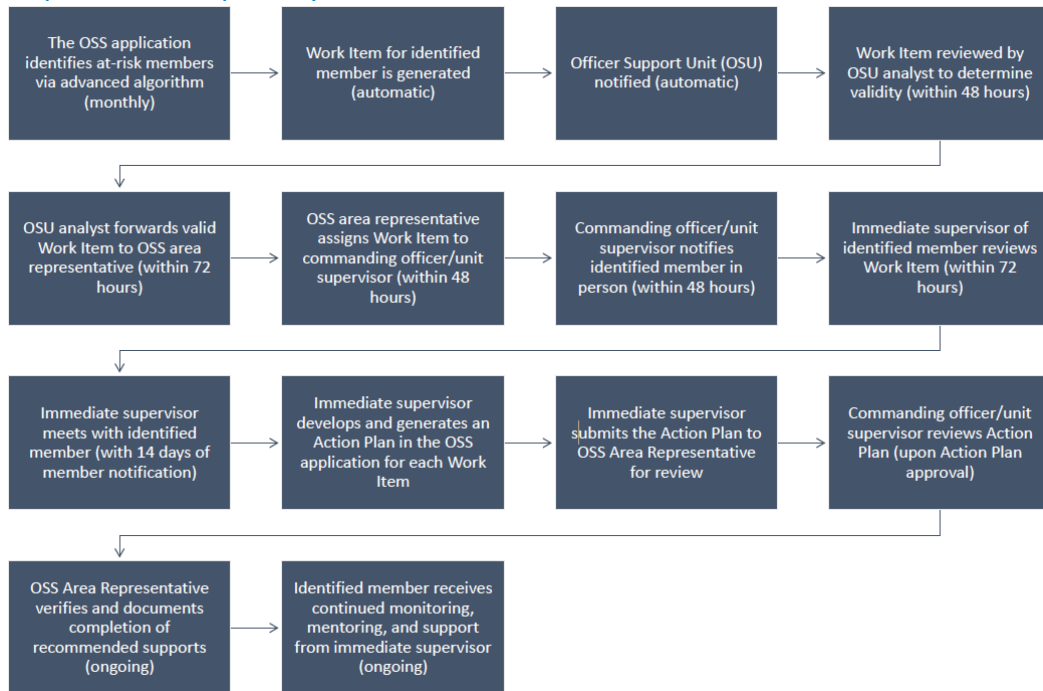
The CPD achieved Preliminary compliance with ¶585 in the fifth reporting period by providing an updated version of Department Notice D20-04, *Officer Support System (OSS) – Pilot Program*, which includes each of the elements required by this paragraph.

Progress in the Eighth Reporting Period

Our review of the Officer Support System (OSS) reveals that it is capable of accomplishing the goals of ¶585. For instance, the OSS uses four specific algorithmic scoring models, as well as an overarching model to identify officers. Additionally, the CPD has provided a list of support and interventions that are available to officers

who have been identified as potentially problematic. Furthermore, the OSS provides supervisors with a dashboard of relevant information in a centralized location, allowing them to implement tailored interventions. Finally, the four scoring models used by the OSS controls for several factors, including assignment, which negates the need for peer-group analysis since peer group factors are already statistically zeroed out. Each of these elements is listed in the updated version of Department Notice D20-04, *Officer Support System (OSS) – Pilot Program*. As a result, the CPD has maintained Preliminary compliance.

Steps to achieve primary functions of OSS



However, as thoroughly discussed in our assessment of ¶1583, the rollout of the Officer Support System (OSS) has suffered from implementation limitations and we will need to see the CPD gather sufficient data from the pilot in the 6th District, use it to inform revisions to policy and training, and conduct a rigorous pilot in the 4th District in order to achieve Secondary compliance. We will then need to see the OSS implemented agency-wide to assess Full compliance.

Additionally, we continue to note that we have not observed or reviewed any training or OSS component specifically related to command staff. Given ¶1585’s requirement to use the OSS to “identify group- and unit-level patterns of activity,” we

maintain that tailored training for command staff will be necessary and should incorporate the findings of Jain, Sinclair, & Papachristos (2022)⁸ as discussed in prior reports.

The CPD maintained Preliminary compliance with ¶585 in the eighth reporting period. Moving forward, we will look for evidence related to Secondary compliance with this paragraph, including training development, implementation, and evaluation.

Paragraph 585 Compliance Progress History

FIRST REPORTING PERIOD SEPTEMBER 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	

⁸ Jain, A., Sinclair, R., & Papachristos, A. V. (2022). Identifying misconduct-committing officer crews in the Chicago police department. *Plos one*, 17(5), e0267217.

Data Collection, Analysis & Management: ¶586

586. A primary goal of the automated electronic system will be to facilitate early identification of officers at elevated risk of being involved in certain types of events so that the officers can receive tailored interventions intended to reduce such risk. The types of events sought to be avoided could include, depending upon the feasibility of identifying these events using statistical methods and analytic techniques, examples such as any instance in which a CPD member is: directly involved in an excessive force incident; subject to a sustained finding in a misconduct investigation; a defendant in a civil lawsuit resulting in an adverse judgment or settlement; suspended more than five days; the subject of a recommendation of employment termination by COPA, BIA, or the Superintendent; a direct participant in an officer-involved shooting or death determined to be unjustified or out of policy by COPA, BIA, the Superintendent, the Police Board, or a court of law; convicted of a crime; or subject to an increased risk of suicide or alcohol and/or substance abuse.

Compliance Progress

(Reporting Period: January 1, 2023, through June 30, 2023)

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

In the eighth reporting period, the CPD maintained Preliminary compliance with ¶586.

To assess Preliminary compliance with ¶586, the IMT reviewed the CPD’s relevant policies and documents following the process described in the Consent Decree (¶¶626–41). To assess Secondary compliance, the IMT reviewed the CPD’s training development, implementation, and evaluation (¶286).

Progress before the Eighth Reporting Period

The CPD achieved Preliminary compliance with ¶586 in the fifth reporting period by providing an updated version of Department Notice D20-04, *Officer Support System (OSS) – Pilot Program*, which includes each of the elements required by this paragraph.

Progress in the Eighth Reporting Period

During the eighth reporting period, the CPD maintained Department Notice D20-04, *Officer Support System (OSS) – Pilot Program*, which identifies the four specific algorithmic scoring models to identify officers potentially in need of an intervention. These four models seek to identify officers who will experience:

- (1) a complaint involving a domestic or substance use event,
- (2) a complaint involving an off-duty event with the exception of domestic or substance use event,
- (3) a sustained excessive force complaint, and
- (4) a suspension.

However, as thoroughly discussed in our assessment of ¶583, the rollout of the Officer Support System has suffered from implementation limitations and we will need to see the CPD gather sufficient data from the pilot in the 6th District, use it to inform revisions to policy and training, and conduct a rigorous pilot in the 4th District in order to achieve Secondary compliance. We will then need to see the OSS implemented agency-wide to assess Full compliance.

The CPD maintained Preliminary compliance with ¶586 in the eighth reporting period. Moving forward, we will look for evidence related to Secondary compliance with this paragraph, including training development, implementation, and evaluation.

Paragraph 586 Compliance Progress History

FIRST REPORTING PERIOD SEPTEMBER 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	

Data Collection, Analysis & Management: ¶587

587. *The automated electronic system must include a computerized relational database that will be used to collect, maintain, integrate, analyze, visualize, and retrieve data for each CPD officer. The information collected and maintained must include but is not limited to: a. all reportable uses of force; b. all arrests by CPD personnel; c. all injuries to and deaths of persons in CPD custody; d. all injuries and deaths resulting from conduct by CPD personnel; e. all vehicle pursuits and traffic collisions involving CPD equipment or personnel; f. all misconduct complaints and investigations involving CPD officers, including the disposition of each allegation; g. all civil or administrative claims initiated against the City or CPD, or CPD officers for Jobs-related conduct; h. all criminal proceedings initiated against a CPD officer, which CPD will require officers to report; i. all instances in which CPD is notified that a court has made a negative credibility determination regarding a CPD officer; j. instances in which CPD learns through the Cook County State's Attorney's Office that an affirmative finding was made during the course of a criminal proceeding that a CPD member was untruthful, including any findings made at suppression hearings; k. all instances in which CPD learns through the Cook County State's Attorney Office, the United States Attorney's Office for the Northern District of Illinois, or other prosecutorial authority that prosecution was declined based in whole or in part on concerns about a CPD officer's credibility; l. judicial proceedings where an officer is the subject of a restraining or protective order, which CPD will require officers to report; m. disciplinary history for all CPD members; n. all non-disciplinary corrective action retained electronically; o. all violations of CPD's body-worn and in-car camera policies; p. all awards and commendations received by CPD officers; q. officer sick leave usage; r. missed court appearances; s. training history; and t. rank, assignment, and transfer history.*

Compliance Progress

(Reporting Period: January 1, 2023, through June 30, 2023)

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

In the eighth reporting period, the CPD maintained Preliminary compliance with ¶587.

To assess Preliminary compliance with ¶587, the IMT reviewed the CPD’s relevant policies and documents following the process described in the Consent Decree (¶¶626–41). To assess Secondary compliance, the IMT reviewed data sources and data reliability related to the requirements of this paragraph.

Progress before the Eighth Reporting Period

The CPD achieved Preliminary compliance with ¶587 in the fifth reporting period by providing updated versions of Department Notice D20-04, *Officer Support System (OSS) – Pilot Program*, which lists the exact data points required by this paragraph, and Employee Resource E05-02, *Performance Recognition System*, which was revised to note that the Performance Recognition System (PRS) provides “a compilation of data from other Department reporting applications.” During the sixth and seventh reporting periods, the CPD made efforts toward but did not reach Secondary compliance, as the CPD was still developing relevant training and struggled with the rollout of the Officer Support System.

Progress in the Eighth Reporting Period

During the eighth reporting period, the CPD maintained Department Notice D20-04, *Officer Support System (OSS) – Pilot Program*, and Employee Resource E05-02, *Performance Recognition System*, which identify the system-data required by ¶587. As a result, the CPD maintained Preliminary compliance.

However, as thoroughly discussed in our assessment of ¶583, the rollout of the Officer Support System has suffered from implementation limitations and we will need to see the CPD gather sufficient data from the pilot in the 6th District, use it to inform revisions to policy and training, and conduct a rigorous pilot in the 4th District in order to achieve Secondary compliance. We will then need to see the OSS implemented agency-wide to assess Full compliance.

Furthermore, we have not yet been provided with evidence that the data identified in ¶587 is actually being collected. As noted in Independent Monitoring Report 6 (see our assessment of this paragraph as well as ¶606), an independent assessment found that the CPD did not collect all data required by ¶587. This must also be resolved before the CPD can achieve Full compliance.

The CPD maintained Preliminary compliance with ¶587 in the eighth reporting period. Moving forward, we will look for evidence related to Secondary compliance with this paragraph, including data sources and data reliability, and training development, implementation, and evaluation.

Paragraph 587 Compliance Progress History

FIRST REPORTING PERIOD SEPTEMBER 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	

Data Collection, Analysis & Management: ¶588

588. CPD will collect and maintain all information reasonably necessary to identify patterns of behavior that are indicative of a future instance of at-risk behavior. The automated electronic system must employ specific criteria to identify officers who will be subject to an intervention or targeted support. The criteria may be based on a single indicator, such as the number of misconduct complaints against an officer, a combination of multiple indicators, or an algorithmic scoring model. CPD will adjust the criteria as necessary based on data and experience to ensure interventions and support are optimally targeted.

Compliance Progress

(Reporting Period: January 1, 2023, through June 30, 2023)

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

In the eighth reporting period, the CPD maintained Preliminary compliance with ¶588.

To assess Preliminary compliance with ¶588, the IMT reviewed the CPD’s relevant policies and documents following the process described in the Consent Decree (¶¶626–41). To assess Secondary compliance, the IMT reviewed data sources and data reliability related to the requirements of this paragraph.

Progress before the Eighth Reporting Period

The CPD achieved Preliminary compliance with ¶588 in the fifth reporting period by providing an updated version of Department Notice D20-04, *Officer Support System (OSS) – Pilot Program*, which memorializes the early intervention system contemplated by this paragraph.

Progress in the Eighth Reporting Period

During the eighth reporting period, the CPD maintained Department Notice D20-04, *Officer Support System (OSS) – Pilot Program*, and Employee Resource E05-02, *Performance Recognition System*, which memorialize the early intervention program contemplated by ¶588. The policy specifies that the Officer Support System (OSS) uses CPD data as part of a predictive algorithm involving four separate scoring models to identify officers who are at a heightened risk for adverse events.

However, as thoroughly discussed in our assessment of ¶583, the rollout of the Officer Support System (OSS) has suffered from implementation limitations and we will need to see the CPD gather sufficient data from the pilot in the 6th District, use it to inform revisions to policy and training, and conduct a rigorous pilot in the 4th District in order to achieve Secondary compliance. We will then need to see the OSS implemented agency-wide to assess Full compliance.

Additionally, consistent with our assessment of ¶584, we suggest the CPD consider supplementing the current OSS to identify officers in need of intervention who otherwise would not be identified through the current statistical models. Although ¶588 allows for the statistical model currently being employed by the CPD, the language of this paragraph also allows the CPD to “adjust the criteria as necessary based on data and experience to ensure interventions and support are optimally targeted.” We will need to see the pilot test in the 4th District conclude and recommend the CPD use the evaluation of the pilot to determine whether “interventions and support [have been] optimally targeted” using the current predictive models.

The CPD maintained Preliminary compliance with ¶588 in the eighth reporting period. Moving forward, we will look for evidence related to Secondary compliance with this paragraph, including data sources and data reliability, and training development, implementation, and evaluation.

Paragraph 588 Compliance Progress History

FIRST REPORTING PERIOD SEPTEMBER 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	

Data Collection, Analysis & Management: ¶589

589. CPD will ensure that all required information is entered into the automated electronic system in a timely, accurate, and complete manner. All information captured within the automated electronic system will be accessible in an organized manner that facilitates identification of at-risk officer conduct.

Compliance Progress

(Reporting Period: January 1, 2023, through June 30, 2023)

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

In the eighth reporting period, the CPD maintained Preliminary compliance with ¶589.

To assess Preliminary compliance with ¶589, the IMT reviewed the CPD’s relevant policies and documents following the process described in the Consent Decree (¶¶626–41). To assess Secondary compliance, the IMT reviewed records demonstrating that the CPD has qualified personnel to meet the requirements of this paragraph; reviewed data sources and data reliability; and reviewed the CPD’s training development, implementation, and evaluation (¶286), including to determine whether all members have been trained in how to complete the required information that will be entered into the automated electronic system per the requirements of this paragraph.

Progress before the Eighth Reporting Period

The CPD achieved Preliminary compliance with ¶589 in the fifth reporting period by providing updated versions of Department Notice D20-04, *Officer Support System (OSS) – Pilot Program*, and Employee Resource E05-02, *Performance Recognition System*, both of which include provisions related to supervisors accessing the respective data system to review members and identify at-risk conduct.

Progress in the Eighth Reporting Period

During the eighth reporting period, the CPD maintained Department Notice D20-04, *Officer Support System (OSS) – Pilot Program*, and Employee Resource E05-02, *Performance Recognition System*, which include provisions related to supervisors accessing the respective data system to review members and identify at-risk conduct. As such, these policies are sufficient for the CPD to maintain Preliminary compliance.

However, as thoroughly discussed in our assessment of ¶583, the rollout of the Officer Support System (OSS) has suffered from implementation limitations and we will need to see the CPD gather sufficient data from the pilot in the 6th District, use it to inform revisions to policy and training, and conduct a rigorous pilot in the 4th District in order to achieve Secondary compliance. We will then need to see the OSS implemented agency-wide to assess Full compliance.

The CPD maintained Preliminary compliance with ¶589 in the eighth reporting period. Moving forward, we will look for evidence related to Secondary compliance with this paragraph, including data sources and data reliability, personnel, and training development, implementation, and evaluation.

Paragraph 589 Compliance Progress History

FIRST REPORTING PERIOD SEPTEMBER 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	

Data Collection, Analysis & Management: ¶590

590. CPD will require unit commanding officers to review the automated electronic system data regarding all officers who are transferred to their command within 14 days of the transfer. CPD will require supervisors to conduct monthly reviews of the automated electronic system data regarding officers under their direct command. The purpose of these reviews will be for supervisors to identify and address patterns of behavior by officers under their direct command that are indicative of a future instance of at-risk behavior. CPD will also require supervisors to review the automated electronic system data together with officers under their direct command during the annual performance evaluation process.

Compliance Progress

(Reporting Period: January 1, 2023, through June 30, 2023)

Recurring Schedule: Monthly



Met



Missed

Preliminary: *In Compliance (FIFTH REPORTING PERIOD)*

Secondary: *Not Yet Assessed*

Full: *Not Yet Assessed*

In the eighth reporting period, the CPD maintained Preliminary compliance with ¶590.

To assess Preliminary compliance with ¶590, the IMT reviewed the CPD’s relevant policies and documents following the process described in the Consent Decree (¶¶626–41). To assess Secondary compliance, the IMT reviewed the CPD’s training development, implementation, and evaluation (¶286).

Progress before the Eighth Reporting Period

The CPD achieved Preliminary compliance with ¶590 in the fifth reporting period by providing an updated version of Employee Resource E05-02, *Performance Recognition System*, which contained the requirements of this paragraph.

Progress in the Eighth Reporting Period

During the eighth reporting period, the CPD maintained Department Notice D20-04, *Officer Support System (OSS) – Pilot Program*, and Employee Resource E05-02, *Performance Recognition System*, which contain the requirements of ¶590. As such, the CPD in Preliminary maintained compliance with this paragraph.

However, as thoroughly discussed in our assessment of ¶583, the rollout of the Officer Support System (OSS) has suffered from implementation limitations and we will need to see CPD gather sufficient data from the pilot in the 6th District, use it to inform revisions to policy and training, and conduct a rigorous pilot in the 4th District in order to achieve Secondary compliance. We will then need to see the OSS implemented agency-wide to assess Full compliance.

The CPD maintained Preliminary compliance with ¶590 in the eighth reporting period. Moving forward, we will look for evidence related to Secondary compliance with this paragraph, including training development, implementation, and evaluation.

Paragraph 590 Compliance Progress History

FIRST REPORTING PERIOD SEPTEMBER 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	

Data Collection, Analysis & Management: ¶591

591. The automated electronic system will employ push notifications and similar mechanisms to alert supervisors when patterns of conduct indicative of a future instance of at risk behavior are identified. CPD will provide appropriate interventions and support in a timely manner.

Compliance Progress

(Reporting Period: January 1, 2023, through June 30, 2023)

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

In the eighth reporting period, the CPD maintained Preliminary compliance with ¶591.

To assess Preliminary compliance with ¶591, the IMT reviewed the CPD’s relevant policies and documents following the process described in the Consent Decree (¶¶626–41). To assess Secondary compliance, the IMT reviewed the CPD’s training development, implementation, and evaluation (¶286).

Progress before the Eighth Reporting Period

The CPD achieved Preliminary compliance with ¶591 in the fifth reporting period by providing an updated version of Department Notice D20-04, *Officer Support System Pilot Program*, which includes the elements of this paragraph.

Progress in the Eighth Reporting Period

During the eighth reporting period, the CPD maintained Department Notice D20-04, *Officer Support System Pilot Program*, which includes the elements of ¶591. For instance, the CPD uses OSS push notifications and CPD email to notify supervisors that an alert has been generated. Additionally, D20-04 includes specific timelines for completing tasks as part of the process, facilitating the timely provision of interventions and support. As a result, the CPD maintained Preliminary compliance with this paragraph.

However, as thoroughly discussed in our assessment of ¶583, the rollout of the Officer Support System (OSS) has suffered from implementation limitations and we will need to see the CPD gather sufficient data from the pilot in the 6th District, use it to inform revisions to policy and training, and conduct a rigorous pilot in the 4th District in order to achieve Secondary compliance. We will then need to see the OSS implemented agency-wide to assess Full compliance.

The CPD maintained Preliminary compliance with ¶591 in the eighth reporting period. Moving forward, we will look for evidence related to Secondary compliance with this paragraph, including training development, implementation, and evaluation.

Paragraph 591 Compliance Progress History

FIRST REPORTING PERIOD SEPTEMBER 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	

Data Collection, Analysis & Management: ¶592

592. CPD will ensure that any CPD member required to receive counseling after being identified through the automated electronic system has the opportunity to participate in an initial counseling session within 14 days of the member being notified of the requirement.

Compliance Progress

(Reporting Period: January 1, 2023, through June 30, 2023)

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

In the eighth reporting period, the CPD maintained Preliminary compliance with ¶592.

To assess Preliminary compliance with ¶592, the IMT reviewed the CPD’s relevant policies and documents following the process described in the Consent Decree (¶¶626–41). To assess Secondary compliance, the IMT reviewed records demonstrating that the CPD has qualified personnel to meet the requirements of this paragraph; reviewed whether there are adequate resources to meet the requisite 14-day timeline; and reviewed the development of electronic data collection tools.

Progress before the Eighth Reporting Period

The CPD achieved Preliminary compliance with ¶592 in the fifth reporting period by providing an updated version of Department Notice D20-04, *Officer Support System Pilot Program*, which contains ¶592’s requirements.

Progress in the Eighth Reporting Period

During the eighth reporting period, the CPD maintained Department Notice D20-04, *Officer Support System Pilot Program*, which contains ¶592’s requirements that officers receive an initial counseling session within 14 days of the agreed upon intervention. As a result, the CPD continues to be in Preliminary compliance with this paragraph.

However, as thoroughly discussed in our assessment of ¶583, the rollout of the Officer Support System (OSS) has suffered from implementation limitations and we will need to see the CPD gather sufficient data from the pilot in the 6th District, use it to inform revisions to policy and training, and conduct a rigorous pilot in the 4th District in order to achieve Secondary compliance. We will then need to see the OSS implemented agency-wide to assess Full compliance.

Furthermore, as noted in our prior reports, the CPD does not currently possess the data processes to reliably track and document whether officers received an initial counseling session within 14 days, as required by ¶1592. During the eighth reporting period, the CPD offered an alternative to capturing data which is further discussed in our assessments of ¶1389. To achieve Full compliance, the CPD must capture data to demonstrate adherence with the 14-day timeline, ideally through an established a data-driven program.

The CPD maintained Preliminary compliance with ¶1592 in the eighth reporting period. Moving forward, we will look for evidence related to Secondary compliance with this paragraph, including training development, implementation, and evaluation, personnel, the development of data collection tools, and resources sufficient to meet the paragraph’s required timelines.

Paragraph 592 Compliance Progress History

FIRST REPORTING PERIOD SEPTEMBER 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	

Data Collection, Analysis & Management: ¶593

593. CPD will ensure that command staff regularly use the automated electronic system data to effectively manage CPD officers and supervisors across all ranks, watches, beats, and districts.

Compliance Progress

(Reporting Period: January 1, 2023, through June 30, 2023)

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

In the eighth reporting period, the CPD maintained Preliminary compliance with ¶593.

To assess Preliminary compliance with ¶593, the IMT reviewed the CPD’s relevant policies and documents following the process described in the Consent Decree (¶¶626–41). To assess Secondary compliance, the IMT reviewed the CPD’s training development, implementation, and evaluation (¶286), including the delivery of comprehensive pilot training.

Progress before the Eighth Reporting Period

The CPD achieved Preliminary compliance with ¶593 in the fifth reporting period by providing updated versions of Department Notice D20-04, *Officer Support System (OSS) – Pilot Program*, and Employee Resource E05-02, *Performance Recognition System*, both of which meet the requirements of this paragraph.

Progress in the Eighth Reporting Period

During the seventh reporting period, the CPD maintained Department Notice D20-04, *Officer Support System Pilot Program*, which includes regular command staff review of the OSS as a key element of the system. As a result, the CPD has maintained Preliminary compliance.

However, as thoroughly discussed in our assessment of ¶583, the rollout of the Officer Support System (OSS) has suffered from implementation limitations and we will need to see the CPD gather sufficient data from the pilot in the 6th District, use it to inform revisions to policy and training, and conduct a rigorous pilot in the 4th District in order to achieve Secondary compliance. We will then need to see the OSS implemented agency-wide to assess Full compliance.

Additionally, we continue to note that we have not observed or reviewed any training or OSS component specifically related to command staff. Given ¶1593’s requirement to use the OSS to “effectively manage CPD officers and supervisors across *all ranks, watches, beats, and districts*” (emphasis added), we maintain that tailored training for command staff will be necessary and should incorporate the findings of Jain, Sinclair, & Papachristos (2022) as discussed in prior reports.⁹

The CPD maintained Preliminary compliance with ¶1593 in the eighth reporting period. Moving forward, we will look for evidence related to Secondary compliance with this paragraph, including training development, implementation, and evaluation.

Paragraph 593 Compliance Progress History

FIRST REPORTING PERIOD SEPTEMBER 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	

⁹ Jain, A., Sinclair, R., & Papachristos, A. V. (2022). Identifying misconduct-committing officer crews in the Chicago police department. *Plos one*, 17(5), e0267217.

Data Collection, Analysis & Management: ¶594

594. CPD will provide training to all officers, supervisors, and command staff regarding the automated electronic system to ensure proper understanding and use of the system.

Compliance Progress

(Reporting Period: January 1, 2023, through June 30, 2023)

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

In the eighth reporting period, the CPD maintained Preliminary compliance with ¶594.

To assess Preliminary compliance with ¶594, the IMT reviewed the CPD’s relevant policies and documents following the process described in the Consent Decree (¶¶626–41). To assess Secondary compliance, the IMT reviewed records demonstrating that the CPD has qualified personnel to meet the requirements of this paragraph, including trainers proficient with the requisite automated electronic system, and reviewed the CPD’s training development, implementation, and evaluation (¶286).

Progress before the Eighth Reporting Period

The CPD achieved Preliminary compliance with ¶594 in the fifth reporting period by providing an updated version of Department Notice D20-04, *Officer Support System Pilot Program*, which contains the requirements of this paragraph.

Progress in the Eighth Reporting Period

During the eighth reporting period, the CPD maintained Department Notice D20-04, *Officer Support System (OSS) – Pilot Program*, which contains the training requirements found in ¶594. The Directive identifies training requirements for the pilot districts and accounts for situations where members transfer into a pilot district. The Directive also discusses training requirements for officers, supervisors, and command staff. As a result, the CPD has maintained Preliminary compliance with this paragraph.

However, as thoroughly discussed in our assessment of ¶583, the rollout of the Officer Support System (OSS) has suffered from implementation limitations and we will need to see the CPD gather sufficient data from the pilot in the 6th District, use it to inform revisions to policy and training, and conduct a rigorous pilot in the

4th District in order to achieve Secondary compliance. We will then need to see the OSS implemented agency-wide to assess Full compliance.

The CPD maintained Preliminary compliance with ¶594 in the eighth reporting period. Moving forward, we will look for evidence related to Secondary compliance with this paragraph, including training development, implementation, and evaluation, and personnel.

Paragraph 594 Compliance Progress History

FIRST REPORTING PERIOD SEPTEMBER 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	

Data Collection, Analysis & Management: ¶595

595. CPD will train all supervisors to use the automated electronic system as designed, to interpret the outputs, to perform appropriate interventions and support, to address underlying stressors to promote officer well-being, and to improve the performance of officers under their direct command.

Compliance Progress

(Reporting Period: January 1, 2023, through June 30, 2023)

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

In the eighth reporting period, the CPD maintained Preliminary compliance with ¶595.

To assess Preliminary compliance with ¶595, the IMT reviewed the CPD’s relevant policies and documents following the process described in the Consent Decree (¶¶626–41). To assess Secondary compliance, the IMT reviewed records demonstrating that the CPD has qualified personnel to meet the requirements of this paragraph, including trainers proficient with the requisite automated electronic system, and reviewed the CPD’s training development, implementation, and evaluation (¶286).

Progress before the Eighth Reporting Period

The CPD achieved Preliminary compliance with ¶595 in the fifth reporting period by providing an updated version of Department Notice D20-04, *Officer Support System Pilot Program*, which contains the requirements of this paragraph.

Progress in the Eighth Reporting Period

During the eighth reporting period, the CPD maintained Department Notice D20-04, *Officer Support System (OSS) – Pilot Program*, which contains the requirement for all supervisors to be trained on the Officer Support System (OSS) in accordance with ¶595. As a result, the CPD has maintained Preliminary compliance with this paragraph.

However, as thoroughly discussed in our assessment of ¶583, the rollout of the Officer Support System (OSS) has suffered from implementation limitations and we will need to see the CPD gather sufficient data from the pilot in the 6th District, use it to inform revisions to policy and training, and conduct a rigorous pilot in the

4th District in order to achieve Secondary compliance. We will then need to see the OSS implemented agency-wide to assess Full compliance.

The CPD maintained Preliminary compliance with ¶595 in the eighth reporting period. Moving forward, we will look for evidence related to Secondary compliance with this paragraph, including training development, implementation, and evaluation, and personnel.

Paragraph 595 Compliance Progress History

FIRST REPORTING PERIOD SEPTEMBER 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	

Data Collection, Analysis & Management: ¶596

596. CPD will conduct annual audits of the automated electronic system. The audits will: a. assess the overall effectiveness of the automated electronic system and the support and interventions prompted by the system; b. assess whether and to what extent supervisors are completing monthly reviews of the automated electronic system information regarding officers under their direct command; c. assess whether and to what extent CPD is providing interventions and support in a timely manner; d. assess whether the interventions and support provided are appropriate and effective; and e. identify any recommended changes to improve the effectiveness of the automated electronic system.

Compliance Progress

(Reporting Period: January 1, 2023, through June 30, 2023)

Recurring Schedule: Annually Met Missed

Preliminary: *In Compliance (FIFTH REPORTING PERIOD)*

Secondary: *Not Yet Assessed*

Full: *Not Yet Assessed*

In the eighth reporting period, the CPD maintained Preliminary compliance with ¶596.

To assess Preliminary compliance with ¶596, the IMT reviewed the CPD’s relevant policies and documents following the process described in the Consent Decree (¶¶626–41). To assess Secondary compliance, the IMT reviewed records demonstrating that the CPD has qualified personnel to meet the requirements of this paragraph, and reviewed the CPD’s training development, implementation, and evaluation (¶286).

Progress before the Eighth Reporting Period

The CPD achieved Preliminary compliance with ¶596 in the fifth reporting period by providing updated versions of Department Notice D20-04, *Officer Support System (OSS) – Pilot Program*, and Employee Resource E05-02, *Performance Recognition System*, both of which meet the requirements of this paragraph.

Progress in the Eighth Reporting Period

During the eighth reporting period, the CPD maintained Department Notice D20-04, *Officer Support System (OSS) – Pilot Program*, and Employee Resource E05-02,

Performance Recognition System, both of which contain the audit requirements of ¶596. As a result, the CPD maintains Preliminary compliance.

However, as thoroughly discussed in our assessment of ¶583, the rollout of the Officer Support System (OSS) has suffered from implementation limitations and we will need to see the CPD gather sufficient data from the pilot in the 6th District, use it to inform revisions to policy and training, and conduct a rigorous pilot in the 4th District in order to achieve Secondary compliance. We will then need to see the OSS implemented agency-wide to assess Full compliance.

The CPD maintained Preliminary compliance with ¶596 in the eighth reporting period. Moving forward, we will look for evidence related to Secondary compliance with this paragraph, including training development, implementation, and evaluation, and personnel.

Paragraph 596 Compliance Progress History

FIRST REPORTING PERIOD SEPTEMBER 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	

Data Collection, Analysis & Management: ¶597

597. CPD will provide timely and appropriate interventions and support to officers identified through the automated electronic system. Interventions and support will be designed to assist officers in avoiding and correcting at-risk behavior. All interventions and support will be documented in the automated electronic system. CPD will review, evaluate, and document in the automated electronic system the progress and effectiveness of the intervention or support strategy for each officer.

Compliance Progress

(Reporting Period: January 1, 2023, through June 30, 2023)

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

In the eighth reporting period, the CPD maintained Preliminary compliance with ¶597.

To assess Preliminary compliance with ¶597, the IMT reviewed the CPD’s relevant policies and documents following the process described in the Consent Decree (¶¶626–41). To assess Secondary compliance, the IMT reviewed the CPD’s training development, implementation, and evaluation (¶286).

Progress before the Eighth Reporting Period

The CPD achieved Preliminary compliance with ¶597 in the sixth reporting period by maintaining Department Notice D20-04, *Officer Support System (OSS) - Pilot Program*, which contains the requirements of this paragraph.

Progress in the Eighth Reporting Period

During this reporting period, the CPD maintained Department Notice D20-04, *Officer Support System (OSS) – Pilot Program*, which includes the process for determining, documenting, and tracking interventions stemming from the Officer Support System (OSS). As a result, the CPD maintained Preliminary compliance with this paragraph.

However, as thoroughly discussed in our assessment of ¶583, the rollout of the Officer Support System (OSS) has suffered from implementation limitations and we will need to see the CPD gather sufficient data from the pilot in the 6th District, use it to inform revisions to policy and training, and conduct a rigorous pilot in the

4th District in order to achieve Secondary compliance. We will then need to see the OSS implemented agency-wide to assess Full compliance.

Furthermore, as discussed in our assessment of ¶1592, the CPD does not currently possess the data processes to reliably track and document wellness-based interventions (*e.g.*, counseling). To achieve Full compliance, the CPD will need to resolve the wellness unit’s data shortcomings to allow the department to review the progress of the intervention.

The CPD maintained Preliminary compliance with ¶1597 in the eighth reporting period. Moving forward, we will look for evidence related to Secondary compliance with this paragraph, including training development, implementation, and evaluation.

Paragraph 597 Compliance Progress History

FIRST REPORTING PERIOD SEPTEMBER 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: 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	

Data Collection, Analysis & Management: ¶598

598. In seeking to provide improved support and wellness to its officers, CPD will seek to identify which supports and interventions are most helpful to officers and develop support and training based on CPD feedback and best practices. The types of support services offered to CPD officers may include, but not be limited to: counseling; training; coaching and mentoring; and additional supervision or monitoring.

Compliance Progress

(Reporting Period: January 1, 2023, through June 30, 2023)

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

In the eighth reporting period, the CPD maintained Preliminary compliance with ¶598.

To assess Preliminary compliance with ¶598, the IMT reviewed the CPD’s relevant policies and documents following the process described in the Consent Decree (¶¶626–41). To assess Secondary compliance, the IMT reviewed records demonstrating that the CPD has qualified personnel to meet the requirements of this paragraph, and reviewed the CPD’s training development, implementation, and evaluation (¶286).

Progress before the Eighth Reporting Period

The CPD achieved Preliminary compliance with ¶598 in the fifth reporting period by providing an updated version of Department Notice D20-04, *Officer Support System (OSS) - Pilot Program*, which contains the requirements of this paragraph.

Progress in the Eighth Reporting Period

In the eighth reporting period, the CPD provided us with updated versions of Department Notice D20-04, *Officer Support System (OSS) – Pilot Program*, which contains the requirements of ¶598. As a result, the CPD maintained Preliminary compliance with this paragraph.

However, as thoroughly discussed in our assessment of ¶583, the rollout of the Officer Support System (OSS) has suffered from implementation limitations and we will need to see CPD gather sufficient data from the pilot in the 6th District, use it to inform revisions to policy and training, and conduct a rigorous pilot in

the 4th District in order to achieve Secondary compliance. We will then need to see the OSS implemented agency-wide to assess Full compliance.

The CPD maintained Preliminary compliance with ¶598 in the eighth reporting period. Moving forward, we will look for evidence related to Secondary compliance with this paragraph, including training development, implementation, and evaluation, and personnel.

Paragraph 598 Compliance Progress History

FIRST REPORTING PERIOD SEPTEMBER 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	

Data Collection, Analysis & Management: ¶599 & 600¹⁰

599. CPD currently maintains a PRS, which is modeled on first-generation attempts by other large departments to develop early intervention systems to identify and address at-risk conduct by officers. CPD has partnered with the University of Chicago’s Crime Lab (“Crime. Lab”) to develop a next-generation EIS that will improve on early intervention systems implemented in other jurisdictions.

600. CPD will maintain its partnership with the Crime Lab or another similarly qualified service provider until such time as an EIS consistent with the requirements of this Agreement has been implemented department-wide, and CPD has developed sufficient technical competency to maintain and improve the EIS as necessary.

Compliance Progress		(Reporting Period: January 1, 2023, through June 30, 2023)
	¶599	¶600
Preliminary:	<i>In Compliance</i> (SIXTH REPORTING PERIOD)	<i>In Compliance</i> (SIXTH REPORTING PERIOD)
Secondary:	<i>Not in Compliance</i>	<i>Not in Compliance</i>
Full:	<i>Not in Compliance</i>	<i>Not in Compliance</i>

In the eighth reporting period, the CPD maintained Preliminary compliance with ¶599 and ¶600.

To assess Preliminary compliance with ¶599, the IMT reviewed the CPD’s relevant policies and documents following the process described in the Consent Decree (¶¶626–41). To assess Secondary compliance, the IMT reviewed the CPD’s training development, implementation, and evaluation (¶286), including adequate training on maintaining the PRS as long as appropriate.

To assess Preliminary compliance with ¶600, the IMT reviewed documentation identifying the range and scope of data that is available to Crime Labs as part of the partnership required by this paragraph. To assess Secondary compliance, the IMT reviewed records demonstrating that the CPD has qualified personnel to meet the requirements of this paragraph, and reviewed the CPD’s training development, implementation, and evaluation (¶286).

¹⁰ We monitor ¶¶599 and 600 together because the two paragraphs’ requirements are interconnected.

Progress before the Eighth Reporting Period

The CPD achieved Preliminary compliance with ¶1599 and ¶1600 in the sixth reporting period by partnering with the University of Chicago Urban Labs to meet the requirements of these paragraphs.

Progress in the Eighth Reporting Period

In the sixth reporting period, we reported that CPD had provided us with a Non-Disclosure Agreement (NDA) which identified the range and scope of data that is available to the University of Chicago Crime Lab as part of the partnership. We cited this as evidence that an ongoing relationship exists and, since the NDA remains in effect, the CPD maintains Preliminary compliance.

We further noted in our prior monitoring report that subsequent levels of compliance would depend on, in large part, the point at which the CPD has “developed sufficient technical competency to maintain and improve the [OSS] as necessary.” During this reporting period, the CPD relaunched the Officer Support System (OSS) pilot in the 6th district.

However, as discussed in prior paragraphs, the implementation of OSS has suffered from critical setbacks and the CPD has not yet demonstrated the competency to maintain or improve the OSS independently. Furthermore, other than the NDA, we have not been provided any evidence that the CPD is still in active partnership with the Crime Lab to *develop* the OSS as required by these paragraphs. As the development of the system is far from complete, and given that an evaluation of the pilot is still to come, we expect the City and the CPD to provide additional records of ongoing collaboration with the Crime Lab moving forward.

In our prior report, we also stated our expectation that the CPD would post Notice of Job Opportunities and develop staff who have the skills to maintain and independently oversee the OSS. During this reporting period, members of the IMT met with the OSS Area Reps during a site visit. The OSS Area Reps demonstrated knowledge regarding the OSS, conceptually and operationally. However, there will need to be additional staff to maintain the OSS to launch it department-wide. We will continue to assess the rollout of the OSS moving forward, though, as it relates to this paragraph, we recommend the CPD provide us with evidence of ongoing partnership with the Crime Lab until such a point where the CPD demonstrates sufficient competency.

The CPD maintained Preliminary compliance with ¶599 and ¶600 in the eighth reporting period. Moving forward, we will look for evidence related to Secondary compliance with this paragraph, including training development, implementation, and evaluation, and additional evidence of ongoing collaboration with the University of Chicago Crime Lab.

Paragraph 599 Compliance Progress History

FIRST REPORTING PERIOD SEPTEMBER 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: 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	

Paragraph 600 Compliance Progress History

FIRST REPORTING PERIOD SEPTEMBER 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: 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	

Data Collection, Analysis & Management: ¶601

601. CPD will continue to solicit input and feedback from representatives of its collective bargaining units during the development and implementation of the EIS.

Compliance Progress

(Reporting Period: January 1, 2023, through June 30, 2023)

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

In the eighth reporting period, the CPD maintained Preliminary compliance with ¶601.

To assess Preliminary compliance with ¶601, the IMT reviewed the CPD’s relevant policies and documents following the process described in the Consent Decree (¶¶626–41). To assess Secondary compliance, the IMT reviewed whether the CPD reengaged with collective bargaining units after sufficient pilot data has been collected to inform the department-wide implementation of the EIS.

Progress before the Eighth Reporting Period

The CPD achieved Preliminary compliance with ¶601 in the third reporting period by providing documentation demonstrating the CPD’s communications soliciting input and feedback from collective bargaining units during the development and implementation of the Officer Support System (OSS). In subsequent reporting periods, the CPD did not reengage with the collective bargaining units. We noted in the fifth reporting period that “ongoing engagement will be an important part of the overall OSS process.” In the sixth reporting period, the CPD attempted to meaningfully engage with the collective bargaining units, but the CPD had not yet expanded the Officer Support System pilot or performed a comprehensive evaluation of the pilot. In the seventh reporting period, the CPD met with the collective bargaining units and maintained ongoing collaboration with collective bargaining unit representatives.

Progress in the Eighth Reporting Period

Previously, the CPD achieved Preliminary compliance with this paragraph based on an initial meeting with collective bargaining units regarding various pilot projects involving the Officer Support System (OSS), unity of command/span of control, the Performance Evaluation System, and a Watch application. However, in Independent Monitoring Report 7, we stated that subsequent levels of compliance with

¶1601 would require the CPD to reengage with collective bargaining units after sufficient pilot data has been collected to inform the department-wide rollout, consistent with the recommendations throughout this report regarding the OSS.

The consistency with which the CPD has engaged with the collective bargaining units about the OSS is presently unclear. In a June 2023 meeting with CPD representatives, we were informed that a representative from the Sergeants' union was included in a meeting of the evaluation committee pertaining to OSS. Additionally, we were informed during an April 2023 site visit that OSS representatives discussed the system with both the Sergeant's union and the Fraternal Order of Police (FOP) in the beginning of the year. However, in March of 2023, we held a meeting with representatives from CPD's Captains and Lieutenants collective bargaining units and were informed that no follow-up with these collective bargaining units had occurred since the initial policy meeting. In speaking with these representatives, we heard an overall sentiment of disappointment that such engagement had not more regularly occurred. Additionally, we heard frustration that questions raised during the initial meeting about these pilots have not yet been answered. As one representative noted, "we are the ones that are going to get questions from officers, and we want to be able to explain to everyone why they are in the program."

Because no evaluation of the 5th District pilot occurred, the CPD does not have any data from the pilot to share with the collective bargaining units with respect to the success or failure of the current OSS efforts. However, this should not prevent the CPD from ensuring that all collective bargaining units have a fulsome understanding of the current OSS operation. Given the fact that the OSS utilizes sophisticated statistical models in identifying potentially problematic officers, it is important that these models are understood and that the system is perceived to be a legitimate tool for improving operations. As the Consent Decree recognizes and we have stressed to the CPD in the past, a critical component to garnering buy-in for the OSS is through ongoing and regular engagement with collective bargaining units as representatives of the members who will be implicated by the system. For the success of the overall program, we recommend the CPD reengage with all collective bargaining units regarding the rollout of the program in the 5th District as well as solicit their input when developing the pilot evaluation to inform future iterations of the OSS.

The CPD maintained Preliminary compliance with ¶1601 in the eighth reporting period. Moving forward, we will look for evidence of reengagement with the collective bargaining units.

Paragraph 601 Compliance Progress History

FIRST REPORTING PERIOD SEPTEMBER 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: Preliminary	

Data Collection, Analysis & Management: ¶602

602. *Prior to beginning the phased implementation of the EIS, CPD will develop and implement new or revised policies and procedures for using the EIS and, if applicable, the updated PRS and information obtained from them. The policies and procedures will address data storage, data retrieval, data analysis, reporting, pattern identification, supervisory use, intervention and support options and procedures, documentation and audits, access to the system, and confidentiality of personally identifiable information.*

Compliance Progress

(Reporting Period: January 1, 2023, through June 30, 2023)

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

In the eighth reporting period, the CPD maintained Preliminary compliance with ¶602.

To assess Preliminary compliance with ¶602, the IMT reviewed the CPD’s relevant policies and documents following the process described in the Consent Decree (¶¶626–41), and reviewed data sources relevant to this paragraph. To assess Secondary compliance, the IMT reviewed the CPD’s training development, implementation, and evaluation (¶1286).

Progress before the Eighth Reporting Period

The CPD achieved Preliminary compliance with ¶602 in the fifth reporting period by providing updated versions of Department Notice D20-04, *Officer Support System (OSS) – Pilot Program*, and Employee Resource E05-02, *Performance Recognition System*, both of which contain the requirements of this paragraph.

Progress in the Eighth Reporting Period

In the eighth reporting period, the CPD maintained Department Notice D20-04, *Officer Support System (OSS) – Pilot Program*, which contains each of the requirements listed in ¶602. Furthermore, in accordance with ¶602, the CPD maintained Employee Resource E05-02, *Performance Recognition System*, which contains the requirements of ¶602 as well as requirements found in other paragraphs within this Section. As a result of having both of these policies, the CPD continues to be in Preliminary compliance with this paragraph.

However, as thoroughly discussed in our assessment of ¶583, the rollout of the Officer Support System (OSS) has suffered from implementation limitations and we will need to see the CPD gather sufficient data from the pilot in the 6th District, use it to inform revisions to policy and training, and conduct a rigorous pilot in the 4th District in order to achieve Secondary compliance. We will then need to see the OSS implemented agency-wide to assess Full compliance.

The CPD maintained Preliminary compliance with ¶602 in the eighth reporting period. Moving forward, we will look for evidence related to Secondary compliance with this paragraph, including training development, implementation, and evaluation.

Paragraph 602 Compliance Progress History

FIRST REPORTING PERIOD SEPTEMBER 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	

Data Collection, Analysis & Management: ¶603

603. *After the completion of the development of the EIS, CPD will implement the EIS through a phased rollout that incorporates pilot testing to identify and address any technical or design issues. CPD will begin phased implementation of the EIS within 18 months of the Effective Date, and will complete full implementation of the EIS by no later than 24 months after the Effective Date.*

Compliance Progress

(Reporting Period: January 1, 2023, through June 30, 2023)

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

In the eighth reporting period, the CPD maintained Preliminary compliance with ¶603.

To assess Preliminary compliance with ¶603, the IMT reviewed the CPD’s relevant policies and documents following the process described in the Consent Decree (¶¶626–41). To assess Secondary compliance, the IMT reviewed records demonstrating that the CPD has qualified personnel to meet the requirements of this paragraph, including to perform pilot test evaluations, and reviewed the CPD’s training development, implementation, and evaluation (¶1286).

Progress before the Eighth Reporting Period

The CPD achieved Preliminary compliance with ¶603 in the fifth reporting period by providing an updated Department Notice D20-04, *Officer Support System (OSS) – Pilot Program*.

Progress in the Eighth Reporting Period

During the eighth reporting period, the CPD maintained Department Notice D20-04, *Officer Support System (OSS) – Pilot Program*, which continues to evidence Preliminary compliance with this paragraph.

However, as thoroughly discussed in our assessment of ¶583, the rollout of the Officer Support System (OSS) has suffered from implementation limitations and we will need to see the CPD gather sufficient data from the pilot in the 6th District, use it to inform revisions to policy and training, and conduct a rigorous pilot in the 4th District in order to achieve Secondary compliance. We will then need to see the OSS implemented agency-wide to assess Full compliance.

The CPD maintained Preliminary compliance with ¶603 in the eighth reporting period. Moving forward, we will look for evidence related to Secondary compliance with this paragraph, including training development, implementation, and evaluation, and personnel to meet the requirements of this paragraph.

Paragraph 603 Compliance Progress History

FIRST REPORTING PERIOD SEPTEMBER 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	

Data Collection, Analysis & Management: ¶604

604. *Prior to full implementation of the EIS, CPD will continue to use the PRS as well as other existing tools and resources to identify patterns of conduct by officers that warrant support and intervention. Following the development and implementation of the EIS, the functions required of the automated electronic system described above may be performed by a combination of the EIS and the PRS as long as all required functions are performed and supervisors are using the system(s) as required by CPD policy. To the extent CPD continues utilizing PRS to perform any of the functions required by this Agreement, CPD will update the PRS to enhance the system’s effectiveness, usability, and accuracy by no later than January 1, 2020.*

Compliance Progress

(Reporting Period: January 1, 2023, through June 30, 2022)

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

In the eighth reporting period, the CPD regained Preliminary compliance with ¶604.

To assess Preliminary compliance with ¶604, the IMT reviewed the CPD’s relevant policies and documents following the process described in the Consent Decree (¶¶626–41), and reviewed data relevant to this paragraph, including an assessment of the CPD’s ability to update the Performance Recognition System (PRS) to meet the requirements of the Consent Decree before launching the Early Intervention System (EIS). To assess Secondary compliance, the IMT reviewed the CPD’s training development, implementation, and evaluation (¶1286), and data relevant to this paragraph, including an assessment of the CPD’s use of the PRS and/or EIS to meet the requirements of the Consent Decree before launching the EIS.

Progress before the Eighth Reporting Period

The CPD achieved Preliminary compliance with ¶604 in the fifth reporting period by providing an updated version of Employee Resource E05-02, *Performance Recognition System*, which included sections related to identifying patterns of conduct by officers that warrant support and intervention. During the sixth reporting period, the CPD made efforts toward Secondary compliance by providing a supervisor in-service training that provided guidance to supervisors on holding conversations that can be difficult when discussing officers’ at-risk behavior, but this

training did not discuss how to identify officers with whom to have such conversations. The CPD lost Preliminary compliance with ¶1604 in the seventh reporting period because the IMT learned that the Officer Support System (OSS) was no longer operating in the 5th District, and that supervisors in the 5th District were not conducting any responsibilities under E05-02. Since the CPD had a district with no enforced policy regarding regular supervisory review of officers, we found that the CPD was no longer in any level of compliance with this paragraph. We recommended that the CPD revise D20-04 to remove District 5 from the list of pilot sites to ensure that E05-02 was properly followed.

Progress in the Eighth Reporting Period

During this reporting period, the CPD launched the Performance Evaluation System (PES) Pilot Program in the 6th district to replace the legacy Performance Recognition System (PRS). In conjunction with the PES launch, the CPD launched the Officer Support System (OSS) in the same district as a pilot.

However, during a site visit to the 6th District this reporting period, members of the IMT heard from some patrol officers and sergeants that they felt ill-equipped to establish the relationships needed to engage in a successful supervisory review process. Some sergeants did share that even though they felt prepared to complete supervisory reviews, they were constrained by available time.

As the CPD has re-implemented the pilot program in the 6th district and demonstrated efforts to perform regular supervisory reviews through the PES, the CPD has returned to Preliminary compliance with this paragraph.

The CPD regained Preliminary compliance with ¶1604 in the eighth reporting period. Moving forward, we will look for evidence related to Secondary compliance with this paragraph, including training development, implementation, and evaluation, data relevant to this paragraph, and an assessment of the CPD's use of the PES.

Paragraph 604 Compliance Progress History

FIRST REPORTING PERIOD SEPTEMBER 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: None	EIGHTH REPORTING PERIOD JANUARY 1, 2023 – JUNE 30, 2023 COMPLIANCE PROGRESS: Preliminary	

Data Collection, Analysis & Management: ¶605

605. The City will ensure CPD has adequate funding to develop, implement, and maintain the EIS and, if necessary, the updated PRS, including ongoing hardware and support requirements and officer support services.

Compliance Progress

(Reporting Period: January 1, 2023, through June 30, 2023)

Preliminary:	<i>Not in Compliance</i>
Secondary:	<i>Not Yet Assessed</i>
Full:	<i>Not Yet Assessed</i>

During the eighth reporting period, the CPD did not reach any level of compliance with the requirements of ¶605.

To assess Preliminary compliance with ¶605, the IMT reviewed documentation demonstrating that the City conducted a needs assessment to determine that it has ensured “adequate funding to develop, implement, and maintain the EIS” as required by this paragraph. To assess Secondary compliance, the IMT considered whether the City has demonstrated that it has provided the funding necessary to develop, implement, and maintain the EIS based on its assessment.

Progress before the Eighth Reporting Period

The CPD did not reach any level of compliance with ¶605 in prior reporting periods.

Progress in the Eighth Reporting Period

As discussed in prior paragraphs, the Officer Support System (OSS) program is currently being relaunched. Thus, we have not yet been provided any evidence that demonstrates the City has ensured “adequate funding to develop implement and maintain the [OSS].” Quite the contrary, available evidence indicates that the CPD does not have adequate funding. For instance, the pilot test of OSS in the 5th District failed in part due to insufficient funding to train supervisors and evaluate alerts. Furthermore, the CPD has not issued all necessary Notice of Job Opportunities to “implement and maintain the EIS” independently (*see* ¶600).

The IMT awaits a revised evaluation plan for the pilot in the 6th District and we will assess whether measures of OSS funding sufficiency are included. As stated in our last report, the measures should span the entirety of the program, particularly looking at funding for officer support services. The CPD and the City will also need to ensure a process is developed for ongoing assessment of funding adequacy and,

where the assessment identifies additional funding is necessary, work together to provide the appropriate resources.

The CPD did not reach any level of compliance with the requirements of ¶605 in the eighth reporting period. Moving forward, we will look for evidence related to Secondary compliance with this paragraph, including a revised evaluation plan.

Paragraph 605 Compliance Progress History

FIRST REPORTING PERIOD SEPTEMBER 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	

Data Collection, Analysis & Management: ¶606

606. *Within 365 days of the Effective Date, CPD will conduct an assessment of CPD’s current information collection mechanisms and data management technology to identify: a. what data CPD currently collects and what additional data is required to be collected to comply with this Agreement; b. the manner of collection (e.g., electronic or paper); c. the frequency with which each type of data is updated; d. the quality control mechanisms in place, or the need for such mechanisms, to ensure the accuracy of data collected; e. what software applications or data systems CPD currently has and the extent to which they are used or accessed by CPD members; f. redundancies or inefficiencies among the applications and systems currently in use; and g. the extent to which the applications and systems currently in use interact with one another effectively.*

Compliance Progress

(Reporting Period: January 1, 2023, through June 30, 2023)

Preliminary: *In Compliance (SIXTH REPORTING PERIOD)*
Secondary: *In Compliance (SEVENTH REPORTING PERIOD)*
Full: *Not in Compliance*

In the eighth reporting period, the City and the CPD maintained Secondary compliance with ¶606.

To assess Preliminary compliance with ¶606, the IMT reviewed documentation to determine whether the CPD has allocated sufficient resources to conduct the required needs assessment; reviewed relevant policies and documents; and reviewed relevant data sources. To assess Secondary compliance, the IMT evaluated whether the CPD has demonstrated significant progress in completing the assessment required by this paragraph.

Progress before the Eighth Reporting Period

The City and the CPD achieved Preliminary compliance with ¶606 in the sixth reporting period by providing the IMT with an example of its approach and methodology for conducting the assessment required by this paragraph. The City and the CPD achieved Secondary compliance with ¶606 in the seventh reporting period by continuing their efforts to fully map and explore their current data collection systems and processes and providing documents related to the core elements of the CPD’s *Roadmap to Operational Compliance* which clearly identified the data CPD needs to inform and evaluate the successful implementation of this roadmap.

Progress in the Eighth Reporting Period

In the eighth reporting period, the CPD continued its efforts to fully map and explore its current data collection systems and processes. During this reporting period, the CPD provided each Associate Monitor with a list of the data CPD believes is necessary to comply with each respective section. In early July 2023, after this reporting period ended, the IMT sent the CPD comments from each Associate Monitor. While each Associate Monitor appreciated the sincere effort of the CPD to summarize such data, many identified additional data points (including qualitative and quantitative data) that the CPD either does not collect or does not meaningfully collect. That CPD engaged each Associate Monitor adheres to prior suggestions from the IMT and satisfies one of our criteria for achieving Full compliance with ¶606. To satisfy other requirements for Full compliance, the CPD must incorporate the comments of the Associate Monitors into a final assessment report that will inform the *Data Systems Plan* (see ¶607). As noted in our prior compliance assessment, the final assessment report must also include commentary on ¶606 subsection (f) (“redundancies or inefficiencies among the applications and systems currently in use”) and subsection (g) (“the extent to which the applications and systems currently in use interact with one another effectively”), as these have not been addressed in the documents we have received to-date. Upon incorporating the input of the entire IMT and developing a final assessment report to inform the *Data Systems Plan*, the CPD will achieve Full compliance with this paragraph.

The City and the CPD maintained Secondary compliance with ¶606 in the eighth reporting period. Moving forward, we will look for the CPD to incorporate the input of the entire IMT and develop a final assessment report to inform the *Data Systems Plan*.

Paragraph 606 Compliance Progress History

FIRST REPORTING PERIOD SEPTEMBER 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: Under Assessment	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	

Data Collection, Analysis & Management: ¶607

607. Within 90 days of completion of the assessment described in the preceding paragraph, CPD will develop a plan, including a timeline for implementation, to prioritize and address the needs identified to enhance CPD’s information collection mechanisms and data management technology (“Data Systems Plan”). CPD will implement the Data Systems Plan in accordance with the specified timeline for implementation.

Compliance Progress

(Reporting Period: January 1, 2023, through June 30, 2023)

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

In the eighth reporting period, the City and the CPD did not achieve any level of compliance with ¶607.

To assess Preliminary compliance with ¶607, the IMT reviewed records demonstrating that the CPD has qualified personnel to meet the requirements of this paragraph, and reviewed the Data Systems Plan to reflect the assessment performed in accordance with ¶606, as required by this paragraph.

Progress before the Eighth Reporting Period

The CPD made efforts towards the assessment related to ¶606 and ¶607 in previous reporting periods but did not reach any level of compliance.

Progress in the Eighth Reporting Period

As discussed above, the CPD has taken significant steps towards the assessment related to ¶606 and, ultimately, ¶607. However, as the ¶606 assessment has not yet been fully completed, the CPD cannot yet reach any level of compliance with ¶607.

To achieve Preliminary compliance with ¶607, the City and the CPD will first need to create a *Data Systems Plan* which reflects the assessment done in accordance with ¶606.

Because the ¶606 assessment has not yet been fully completed, the City and the CPD did not achieve any level of compliance with ¶607. Moving forward, we will

look for the City and the CPD to create a *Data Systems Plan* which reflects the assessment done in accordance with ¶606.

Paragraph 607 Compliance Progress History

FIRST REPORTING PERIOD SEPTEMBER 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: 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	

Data Collection, Analysis & Management: ¶608

608. CPD will continue to maintain an Information Systems Development Group (“ISDG”). The ISDG will continue to be chaired by the Chief of the Bureau of Technical Services or other high-ranking member of CPD’s command staff. The ISDG will also include, in some capacity, personnel from various units of the Department that are responsible for overseeing patrol field operations; conducting criminal investigation and processing juvenile offenders; initiating and conducting investigations of organized crime; overseeing the administrative aspects of CPD; managing data, technology, and information systems; coordinating and exercising supervision over disciplinary matters; administering training; providing legal advice; developing and publishing department policies and procedures; and overseeing and coordinating CPD’s budget and fiscal responsibilities. The ISDG will be responsible for: a. ensuring implementation of the Data Systems Plan; b. ensuring CPD’s information collection mechanisms and data management technologies are in the best long-term interests of the Department for improving operations and management consistent with the terms of this Agreement; and c. recommending strategies to promote the development, sharing, and reporting of relevant information to the Superintendent, the public, the FRB, COPA, BIA, and OIG.

Compliance Progress

(Reporting Period: January 1, 2023, through June 30, 2023)

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

During the eighth reporting period, the CPD maintained Secondary compliance with the requirements of ¶608.

To assess Preliminary compliance with ¶608, the IMT reviewed records demonstrating that the CPD has qualified personnel to meet the requirements of this paragraph. To assess Secondary compliance, the IMT reviewed the CPD’s training development, implementation, and evaluation (¶286), including the framework for how the Information Systems Development Group (ISDG) required by this paragraph will fulfill its responsibilities. To assess Full compliance, the IMT reviewed

relevant data sources and evaluated whether the CPD has demonstrated the ability to provide sound guidance on data system integrity as well as assisting in the implementation of recommendations from the assessment required by ¶1606.

Progress before the Eighth Reporting Period

The City and the CPD achieved Preliminary compliance with ¶1608 in the fourth reporting period by revising Special Order S09-01-01, *Information Systems Development Group*, which contains the requirements of this paragraph. The City and the CPD achieved Secondary compliance in the fifth reporting period by continuing to maintain the Information Systems Development Group (ISDG) and providing meeting notes and agendas and a resource guide outlining the meeting process. The City and the CPD also provided documentation that the Information Systems Development Group continues to include relevant personnel, as required by this paragraph.

Progress in the Eighth Reporting Period

In the eighth reporting period, the CPD continued to maintain the Information Systems Development Group (ISDG), which is chaired by the Deputy Director of Information Technology. The CPD has provided ISDG meeting notes and agendas, as well as a resource guide which outlines the meeting process. The minutes continue to include relevant personnel, as required by ¶1608. Additionally, the resource guide outlines the meeting process, including determining priorities for meeting topics, procedures for opening and closing meetings, appropriate document templates for reviews, distribution of relevant materials, and the documentation of meeting notes.

We have continued to see each of the above elements in practice. For instance, in March and June of 2023, the IMT observed ISDG meetings where the City and the CPD discussed updates to the Secure Radio Program, the new computer aided dispatch (CAD) system, the Desktop Experience (DEX) system, the new computer roll outs, and the impending switch to a new records management system (RMS).

During the eighth reporting period, the ISDG and the RMS Sub-Committee completed the selection process to move forward with three potential vendors identified through the CDW Corporation. The next steps for ISDG were to begin the design review and business process review – system provisioning phases of the implementation timeline. However, in June 2023 it was disclosed that Department of Procurement Services (DPS) procedures were not followed in securing the RMS, requiring CPD to begin the process anew through the Department of Procurement Services (DPS) rather than through CDW. Although we acknowledge that the CPD,

and ISDG especially, have demonstrated valuable work in focusing on the requirements set forth by ¶608, the delay associated with the procurement process (a six-month delay at best) impacts the CPD’s ability to “ensur[e] CPD’s information collection mechanisms and data management technologies are in the best long-term interests of the Department.”

The City and the CPD maintained Secondary compliance with this paragraph in the eighth reporting period. Full compliance will require the CPD to continue to demonstrate its ability to appropriately select and prioritize agenda topics, provide sound guidance on data system integrity, and assist in the implementation of recommendations born out of the finalized ¶606 review.

Paragraph 608 Compliance Progress History

FIRST REPORTING PERIOD SEPTEMBER 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: Secondary	SIXTH REPORTING PERIOD JANUARY 1, 2022 – JUNE 30, 2022 COMPLIANCE PROGRESS: Secondary
SEVENTH REPORTING PERIOD JULY 1, 2022 – DECEMBER 31, 2022 COMPLIANCE PROGRESS: Secondary	EIGHTH REPORTING PERIOD JANUARY 1, 2023 – JUNE 30, 2023 COMPLIANCE PROGRESS: Secondary	

Data Collection, Analysis & Management: ¶609

609. *On an annual basis, to improve the accuracy, reliability, and efficiency of its data collection, CPD will review and, as necessary, revise departmental forms relating to: use of force, arrests, interactions with individuals in crisis, and the disciplinary process.*

Compliance Progress

(Reporting Period: January 1, 2023, through June 30, 2023)

Recurring Schedule: Annually

Met

Missed

Preliminary: *In Compliance (FOURTH REPORTING PERIOD)*

Secondary: *In Compliance (FOURTH REPORTING PERIOD)*

Full: *Not Yet Assessed*

In the eighth reporting period, the City and the CPD maintained Secondary compliance with ¶609.

To assess Preliminary compliance with ¶609, the IMT reviewed the CPD’s relevant policies and documents following the process described in the Consent Decree (¶¶626–41). To assess Secondary compliance, the IMT reviewed the CPD’s training development, implementation, and evaluation (¶286). To assess Full compliance, the IMT reviewed data sources relevant to the requirements of this paragraph.

Progress before the Eighth Reporting Period

The City and the CPD achieved Preliminary and Secondary compliance with ¶609 in the fourth reporting period by providing a revised version of Special Order S09-03-02, *Forms Management System*, which clearly states that the CPD will review departmental forms on an annual basis consistent with the requirements of this paragraph. Additionally, S09-03-02 identifies the process for ensuring that forms are reviewed annually, including the unit responsible for the overall process and the necessary steps for sending the forms to those conducting the review. The CPD also revised the forms related to use of force and interactions with individuals in crisis in the fourth reporting period. The CPD maintained S09-03-02 and related forms in subsequent reporting periods.

Progress in the Eighth Reporting Period

During the eighth reporting period, the CPD maintained Special Order S09-03-02, *Forms Management System*, which clearly states that the CPD will review depart-

mental forms on an annual basis consistent with the requirements of ¶609. Embedded within S09-03-02 is the “Transmittal/Response Sheet-Forms Management” form which serves to standardize the process for ensuring reviews of all CPD directives and data collection forms. The “Transmittal/Response Sheet-Forms Management” form, coupled with S09-03-02, continues to evidence Secondary compliance with the requirements of this paragraph.

However, the IMT has still not been provided with any completed “Transmittal/Response Sheet-Forms Management” forms, either during this reporting period or in the prior reporting period. Subsequent levels of compliance will depend on the CPD providing and the IMT reviewing these forms. We therefore recommend the CPD provide these to us as a regular part of the reporting period productions in future reporting periods.

The City and the CPD maintained Secondary compliance with ¶609 in the eighth reporting period. Moving forward, we request that the CPD provide completed “Transmittal/Response Sheet-Forms Management” forms for the IMT’s review.

Paragraph 609 Compliance Progress History

FIRST REPORTING PERIOD SEPTEMBER 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: 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: Secondary	EIGHTH REPORTING PERIOD JANUARY 1, 2023 – JUNE 30, 2023 COMPLIANCE PROGRESS: Secondary	