

Appendix 2

Impartial Policing

Compliance Assessments, by Paragraph

¶152	¶160	¶168	¶176
¶153	¶161	¶169	¶177
¶154	¶162	¶170	¶178
¶155	¶163	¶171	¶179
¶156	¶164	¶172	¶180
¶157	¶165	¶173	¶181
¶158	¶166	¶174	¶182
¶159	¶167	¶175	

Impartial Policing: ¶52

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

Compliance Progress

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

Preliminary: *In Compliance (THIRD REPORTING PERIOD)*

Secondary: *Not in Compliance*

Full: *Not Yet Assessed*

The City and the CPD maintained Preliminary compliance for ¶52 during this reporting period. The City and the CPD continue to develop the *Community Input and Engagement Plan* and related procedures and implemented a *Community Engagement in Policy Development Pilot* that will formalize the community engagement process.

To assess community engagement, the IMT continues to examine several dimensions: (1) outreach; (2) meetings, interactions, and problem-solving; (3) follow-up and sustainability of partnerships, community policing, and problem-solving activities; and (4) general police-community interactions regardless of context. We also assessed the CPD's efforts to engage community members and organizations with relevant knowledge and experience regarding impartial policing. Our assessment of the City and the CPD's efforts during this reporting period in each of the areas listed above is provided below.

Progress before the Eighth Reporting Period

In the last reporting period, the City and the CPD maintained Preliminary compliance but again failed to reach Secondary compliance with the requirements of ¶52 because the CPD again did not provide sufficient evidence to show it has established a sustainable community engagement process. The CPD reached Preliminary compliance in the third reporting period but has since struggled to provide evidence that their community engagement model would ensure that specific groups, as well as the public, had the opportunity to be heard and collaborate on problem solving, and that the data was being used effectively in the review of policy and training.

We are hopeful that the pilot program, as described by the City and the CPD results in formalized mechanisms for continued engagement with constitutionally protected classes of people and their advocates. In prior reports, we have acknowledged the CPD's effort to engage certain segments of the community, but we have also underscored the limitations of these efforts and the need to engage a cross-

section of community members and organizations with relevant knowledge and experience.

During the seventh reporting period, we assessed the CPD's efforts to involve qualified CPD personnel in planning and executing community engagement tasks. This included discussions and revisions to G01-03-01, D22-08 *Community Engagement in Policy Development Pilot*, and the corresponding plan. Last July, the City and the CPD produced the *2021 Community Policing Annual Report* and S02-03-15, *Positive Community Interactions*.¹

Through our written reviews and as discussed during meetings with the CPD, the IMT provided feedback centered on clearly defining how policies will be selected for community engagement, how the level of community engagement will be determined, and the methods of community engagement that will be employed. The IMT also highlighted the importance for the CPD to conduct a needs assessment to determine what resources the Office of Community Policing needs to adequately carry out the tasks and responsibilities noted within the policy.

Near the end of the seventh reporting period, the CPD proposed to conduct a pilot of the G01-03-01, *Community Engagement in Policy Development*. The pilot would allow the CPD to evaluate its proposed methodology and process as noted in the policy and adjust them before implementing it more broadly. At that time, the IMT recommended that the CPD consider the various aspects of the pilot before its implementation, such as establishing timelines, performance and evaluation measures, and protocols.

Progress in the Eighth Reporting Period

During this reporting period, the CPD implemented its pilot of G01-03-01, *Community Engagement in Policy Development*. Although implemented early in the eighth reporting period, the City and CPD were unable to provide the IMT with an update on the status of the implementation as it had yet to identify the evaluation measures for which to determine the success of the pilot. The IMT expects to receive an update and to further discuss the evaluation of the pilot with the City and the CPD soon. Further, the IMT continues to recommend further discussions on the CPD's overarching community engagement strategy.

1. Outreach

The Office of Community Policing continued its outreach efforts during the eighth reporting period and sought input from the community on a number of the poli-

¹ The CPD's *2021 Community Policing Annual Report* is publicly available here: <https://home.chicagopolice.org/wp-content/uploads/Community-Policing-2021-Annual-Report.pdf>.

cies. These included G08-06, *Sexual Misconduct* (¶163) and S04-19, *Search Warrants* (¶¶53, 54, 55). The CPD sought feedback on these policies through different methodologies and provided the IMT with documentation of that outreach. Near the end of the eighth reporting period, the City and the CPD noted that they also conducted outreach to various community groups as part of their efforts to further develop and revise the SO2-01-01 *Persons with Disabilities* policy. The CPD indicated that they conducted outreach to the deaf and hard of hearing community, though no formal documentation demonstrating this outreach has been provided to the IMT.

2. Meetings, Interactions, and Problem Solving

During the site visit in April 2022, the IMT observed a community meeting at the Chicago Hearing Society. This meeting included members of the deaf and hard of hearing community, as well as various interested members of the broader community. Topics of focus during this meeting were the City and the CPD's lack of engagement and follow-up on the disability policy for an extended period after receiving and, compounding this, their posting of an old, three-year policy for public comment of the same draft policy; incidents of CPD officers unwillingness to engage with deaf individuals in need of assistance; and the need for officers to be more attuned to the needs, culture, and customs of those whom are hard of hearing.

The IMT continues to encourage the CPD to create working groups that can review progress and offer advice on specific topics or multiple topics in the Impartial Policing Section. As noted in the IMT's previous reports, sending policy and training materials to specific organizations for review and comment is another viable model of engagement.

3. Follow-up and Sustainability

The IMT continues to assess whether the CPD's community engagement includes sufficient follow-up and efforts to sustain meaningful partnerships and problem-solving activities with community members. Further, the IMT continues to recommend that the CPD prepare brief public reports, based on community input, that describe emerging themes for different topics and how the CPD plans to address them. These reports would essentially become part of the CPD "share-back" process.

In discussions with the CPD about the importance of this share-back process, the IMT noted that providing little to no feedback to the community on how their input has been considered or integrated can negatively impact police-community relations and in turn result in limited engagement from the community engagement when input is sought.

The IMT continues to stress to the CPD that broader mechanisms to share-back how community input was incorporated in the policy review and training development be established. We have also recommended this consistently in the Community Policing and Crisis Intervention sections of this report. We also acknowledge that this process was noted to be part of the pilot mentioned above.

4. General Police-Community Interactions

Paragraph 52 requires that the CPD “seek input from members of the community and community organizations with relevant knowledge and experience.” As noted in previous reports, the IMT continues to recommend that the City plan to reliably and systematically gather feedback for policy and training purposes by outsourcing and sustaining a valid contact survey. With this wealth of data, the CPD can engage relevant subject-matter experts and community organizations in developing or refining policy and training.

In sum, the CPD maintained Preliminary compliance but has yet to reach Secondary compliance. Although we appreciate the CPD’s efforts thus far, much work is needed to codify its processes for gathering input from the community, seeking and developing relationships with various community groups directly affected by these policies, and following up with the community after the policies and trainings have been revised. It is the IMT’s hope that successful implementation and evaluation of the *Community Engagement in Policy Development* pilot and development of its *Community Engagement Plan* and/or strategies will place the City and the CPD on a pathway to preliminary compliance. Establishing these processes will provide the agency with the framework for sustainable implementation of the requirements of this paragraph and eventual achievement of full compliance.

We look forward to reviewing the CPD’s evaluation of the *Community Engagement in Policy Development* pilot. Further, the IMT looks forward to continuing to work with the CPD in the development and refinement of its broader community engagement roadmap and strategies.

Paragraph 52 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	

Impartial Policing: ¶53

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

Compliance Progress

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

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

The City and the CPD remain out of compliance for ¶53. Although the City and the CPD continued to develop and revise other policies and training curricula—the lack of an overarching policy, strategy, or plan that details how the CPD addresses this paragraph’s requirements, as well as those requirements in similar paragraphs (¶72), only serves hinder its ability to demonstrate compliance. Near the end of the reporting period, the IMT and the OAG held collaborative discussions with the City and the CPD regarding the requirements of ¶¶53-55, and how best to revise current methodologies to better capture the broad community engagement that is contemplated by these paragraphs.

As a result of these collaborative discussions, methodologies employed to assess Preliminary, Secondary, and Full compliance were revised. To assess Preliminary compliance, we will evaluate the CPD’s efforts to develop a plan or strategy to ensure that its policies and practices prohibit discrimination on the basis of any protected class. Further, as stipulated in this paragraph this plan or strategy should also ensure that the CPD’s policies and practices will prohibit retaliation consistent with the related sections of the Illinois Human Rights Act and the Municipal Code of Chicago.

Progress before the Eighth Reporting Period

During previous periods, the IMT reviewed revised versions of CPD policies that they assert incorporate requirements, including G02-01, *Protection of Human Rights* (¶53 and ¶54); G02-04, *Prohibition Regarding Racial Profiling and Other Biased-Based Policing* (¶55 and ¶56); and G08-05, *Prohibition on Retaliation*, and

S02-01-03, *Crime Victim and Witness Assistance* (¶53 and ¶54). The IMT submitted no objection notices on these policies in previous reporting periods.

Progress in the Eighth Reporting Period

The City and the CPD produced a revised S04-19, *Search Warrants* and addenda during this reporting period, and the IMT and the OAG provided feedback. The addenda included, among other things, *Post-Service Documentation and Review* forms, risk assessment, planning, and post-service forms, and information regarding D22-07 *Search Warrant Community Resources and Referrals Pilot Program*. Overall, the IMT appreciated and welcomed these new developments – particularly the pilot program – and suggested additional revisions to help further enhance its effectiveness. The City and the CPD remain in ongoing dialogues with the Coalition and other community members regarding the Search Warrant program. The IMT looks forward to reviewing revisions to S04-19 and the search warrant materials in light of further community engagement in the coming reporting period.

Further during this reporting period, the City and the CPD finalized its *Fair and Impartial Policing* training, receiving no objection notices from both the IMT and the OAG.

While the City and the CPD continue to make significant progress in the development of related trainings and policies, like those listed above, the requirements of this paragraph are so broad and inclusive of a broader approach and effort on behalf of the department. Thus, it is important for the City and the CPD to establish a plan or strategy that provides a framework and establishes the processes to ensure impartial policing and the requirements of this paragraph are woven into all of its policies and practices. Until this is complete, it will be difficult for the IMT, the OAG, the City and the CPD to accurately determine compliance with this paragraph. The IMT also notes that including training in the noted plan or strategy will also assist the City and the CPD in achieving levels of compliance with paragraph 72.

In sum, the City and the CPD did not achieve Preliminary compliance with ¶53 because they have not developed a broad and comprehensive Impartial Policing plan or strategy that provides the framework for which the CPD will meet the requirements of this paragraph.

Paragraph 53 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: 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	

Impartial Policing: ¶54

54. CPD will continue to require that all CPD members interact with all members of the public in an unbiased, fair, and respectful manner. CPD will require that officers refrain from using language or taking action intended to taunt or denigrate an individual, including using racist or derogatory language.

Compliance Progress

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

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

In the eighth reporting period, the City and the CPD achieved Preliminary compliance with the requirements of ¶54. To assess compliance, the IMT evaluated how the CPD codified this paragraph’s requirements into policy (per the ¶¶626–41 review process) and engaged the community as required by ¶52. During the seventh reporting period, the City and CPD finalized and published G02-01, *Protection of Human Rights*, and G02-04, *Prohibition Regarding Racial Profiling and Other Bias-Based Policing*. These policies serve as the core component in which the CPD requires that all CPD employees interact with all members of the public in an unbiased, fair, and respectful manner.

Progress before the Eighth Reporting Period

In previous reporting periods, we reviewed several policies the CPD asserted incorporate requirements for ¶¶53–56. The following policies completed the review process (¶¶626–41) prior to this reporting period and became effective:

- (1) General Order G08-05, *Prohibition of Retaliation* (effective December 30, 2020), designed to prohibit retaliation by a CPD employee against another CPD employee or a member of the public, and
- (2) Special Order S02-01-03, *Crime Victim and Witness Assistance* (effective November 3, 2022), designed to provide CPD employees with guidance regarding service and assistance to victims of crime.

To achieve Preliminary compliance, the CPD’s revised Special Order S04-19, *Search Warrants*, must complete the review process and be based on adequate community engagement (¶52). As noted in the fourth reporting period, we consider

search warrants relevant to Impartial Policing paragraphs of the Consent Decree (especially 53 and 54). The Parties have since agreed to that effect.²

In the seventh reporting period, the IMT reviewed the finalized versions of G02-01, *Protection of Human Rights*, and G02-04, *Prohibition Regarding Racial Profiling and Other Bias-Based Policing*. These policies were published during the seventh reporting period. At that time, the City and the CPD indicated their position that the finalization of these policies should be sufficient to meet the requirements for Preliminary compliance under this paragraph. As noted in paragraph 53, collaborative discussions between the IMT and the Parties ensued, resulting in the revision of the methodologies for paragraphs 53–55. In light of those ongoing discussions and anticipating revised methodologies, the City and the CPD remained under assessment for compliance at the end of the seventh reporting period.

Progress in the Eighth Reporting Period

In this reporting period, the IMT, the OAG, and the City and the CPD reached a resolution concerning the methodologies for ¶54. In light of this development, the City and the CPD achieved Preliminary compliance for this paragraph. The finalization of G02-01, *Protection of Human Rights*, and G02-04, *Prohibition Regarding Racial Profiling and Other Bias-Based Policing* provide direction and require that all CPD employees interact with all members of the public in an unbiased, fair, and respectful manner. As such, these policies provide the foundation for Preliminary compliance with this paragraph. It should be noted that improved compliance with this paragraph beyond Secondary compliance and relatedly the development and conduct of training rests in the City and the CPD's ability to demonstrate that it has established a comprehensive approach to ensuring its policing practices and processes are fair and impartial. The implementation and operationalization of ¶53 will be integral to the CPD achieving full compliance with ¶¶54-55.

Additionally, during this reporting period, the IMT reviewed a revised version of S04-19, *Search Warrants* as well as new materials related to Search Warrant planning, service, execution, and post-service. The City and the CPD have yet to complete the Consent Decree review process for S04-19, as it still requires additional revision to meet the requirements of this paragraph. The IMT looks forward to additional revisions to S04-19 and other policies to further demonstrate continued compliance. Further, during this reporting period, the IMT reviewed and provided a no objection notice on the *Fair and Impartial Policing* training. The implementation of S04-19, *Fair and Impartial Policing* training and other similar policies and

² See *Stipulation Regarding Search Warrants, Consent Decree Timelines, and the Procedure for "Full and Effective Compliance,"* (March 25, 2022), <https://cpdmonitoringteam.com/wp-content/uploads/2022/03/2022.03.25-Stipulation-Regarding-Search-Warrants-Consent-Decree-Timelin...pdf>.

trainings provide support to the CPD's efforts in finalizing G02-01 and G02-04 and continued compliance with this paragraph.

In sum, the City and the CPD achieved Preliminary compliance by finalizing G02-01 and G02-04. To achieve Secondary compliance, the City and the CPD must finalize and deliver any training implementing the requirements of this paragraph.

Paragraph 54 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: None	SIXTH REPORTING PERIOD JANUARY 1, 2022 – JUNE 30, 2022 COMPLIANCE PROGRESS: None
SEVENTH REPORTING PERIOD JULY 1, 2022 – DECEMBER 31, 2022 COMPLIANCE PROGRESS: Under Assessment	EIGHTH REPORTING PERIOD JANUARY 1, 2023 – JUNE 30, 2023 COMPLIANCE PROGRESS: Preliminary	

Impartial Policing: ¶55

55. CPD will prohibit officers from using race, ethnicity, color, national origin, ancestry, religion, disability, gender, gender identity, sexual orientation, immigration status, homeless status, marital status, parental status, military discharge status, financial status, or lawful source of income when making routine or spontaneous law enforcement decisions, except when such information is part of a specific subject description.

Compliance Progress

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

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

In the eighth reporting period, the City and the CPD achieved Preliminary compliance with ¶55. As noted in ¶53, collaborative discussions between the IMT and the Parties ensued, resulting in the revision of the methodologies for ¶¶53-55. These revisions and previous submission of the finalized policy G02-04, *Prohibitions Regarding Racial Profiling and Other Biased-Based Policing* moved this paragraph into Preliminary compliance (see paragraphs 53 and 54 for more detail on the changes to the methodologies).

To assess Preliminary compliance, we evaluated the CPD’s efforts to codify the requirements of this paragraph into policy (per the ¶¶626–41 review process) and engage the community as required by ¶52.

Progress before the Eighth Reporting Period

In the fourth reporting period, the IMT reviewed a revised version of CPD’s G02-04, *Prohibitions Regarding Racial Profiling and Other Biased-Based Policing*, which it asserts incorporates this paragraph’s requirements. However, the City and the CPD had yet to complete the Consent Decree review process for this policy by the end of the fifth reporting period.

At the beginning of the fifth reporting period, the IMT provided feedback on G02-04, *Prohibition Regarding Racial Profiling and Other Biased-Based Policing*, as the CPD worked towards compliance with this paragraph. While improved, the IMT holds that the revised directive needs to include mention of “age” as a factor that should be prohibited when making “routine or spontaneous law enforcement decisions” to comply with every Impartial Policing paragraph of the Consent Decree, not just the requirements of this paragraph.

At the beginning of the sixth reporting period, the IMT provided comments on G02-01 and G02-04 and reiterated the need to include mention of “age” as a factor that should be prohibited when making “routine or spontaneous law enforcement decisions” to comply with every Impartial Policing paragraphs of the Consent Decree, not just the requirements of this paragraph.³ The IMT reviewed further revised versions of the CPD’s G02-01, *Protection of Human Rights*, G02-04, *Prohibitions Regarding Racial Profiling and Other Biased-Based Policing*, and S04-19, *Search Warrants*, which it asserts incorporates this paragraph’s requirements. The City incorporated our suggested revisions to G02-01 and G02-04, and the IMT submitted no-objection notices on June 17, 2022. At the end of the sixth reporting period, S04-19 was still undergoing the review process. The IMT also reviewed evidence that certain CPD officers completed their in-service training for community policing during the previous reporting period.

Progress in the Eighth Reporting Period

As noted above, G02-01, *Protection of Human Rights*, and G02-04, *Prohibition Against Racial Profiling and Other Bias-Based Policing*, were finalized and published during the seventh reporting period. At that time, the City and CPD indicated their position that the finalization of these policies should be sufficient to meet the requirements for Preliminary compliance under this paragraph. Collaborative discussions between the IMT and the Parties ensued, resulting in the revision of the methodologies in IMR-8.

The City and the CPD also produced for review various related policies and training materials toward compliance with this paragraph, including – *Fair and Impartial Policing* training, *2023 Use of Force Policy Updates* training, and the *2023 Training Plan*, during this reporting period. The IMT reviewed and provided comments to the CPD regarding these training materials and policies during the reporting period and/or expects to provide comments on these materials at the beginning of IMR-9.

In sum, the City and the CPD achieved Preliminary compliance by finalizing G02-04, *Prohibitions Regarding Racial Profiling and Other Biased-Based Policing*. Moving forward, to assess Secondary compliance, the IMT will evaluate the CPD’s efforts to (1) incorporate these requirements into training, (2) evaluate said training, and (3) implement the training with CPD personnel. Assessing Full compliance will ultimately turn on the CPD’s ability to measure what matters and document im-

³ See ¶¶50 and 53 (requiring the CPD to (i) provide police services to all members of the public without bias and without reference to stereotypes based on many factors, including age and (ii) ensure its policies and practices prohibit discrimination on the basis of protected classes, including age).

provements in officers' street-level behavior and decision making including engaging in specific remedies to prevent bias-based policing and measuring changes in members' level of bias or impartial policing as a result of these remedies.

Paragraph 55 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: None	SIXTH REPORTING PERIOD JANUARY 1, 2022 – JUNE 30, 2022 COMPLIANCE PROGRESS: None
SEVENTH REPORTING PERIOD JULY 1, 2022 – DECEMBER 31, 2022 COMPLIANCE PROGRESS: Under Assessment	EIGHTH REPORTING PERIOD JANUARY 1, 2023 – JUNE 30, 2023 COMPLIANCE PROGRESS: Preliminary	

Impartial Policing: ¶56

56. CPD will provide guidance, through training and supervision, that reinforces to officers that substitutes or stereotypes for the demographic categories listed above in Paragraph 55, such as manner of dress, mode of transportation, or language ability, is prohibited when making routine or spontaneous law enforcement decisions, except when such information is part of a specific subject description.

Compliance Progress

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

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

The City and the CPD maintained Preliminary compliance with ¶56 during the eighth reporting period but failed to achieve Secondary compliance. Although the City and the CPD finalized its *Fair and Impartial Policing* training during the reporting period and receiving a no-objection notice for the training from the IMT, the delivery of this training has not yet been completed.

To assess Secondary compliance, the IMT will monitor the CPD’s efforts to train officers on G02-01 and G02-04 through its *Fair and Impartial Policing* training.

Progress before the Eighth Reporting Period

In previous reporting periods, the IMT reviewed a revised version of CPD’s G02-04, *Prohibitions Regarding Racial Profiling and Other Biased-Based Policing*, which the CPD asserts incorporates this paragraph’s requirements. However, the City and the CPD had not yet completed the Consent Decree review process for the policy due to the IMT concerns about G02-04 that were noted in previous monitoring reports. In addition, the IMT muse see more evidence of community engagement related to development and refinement of the directive.

In the seventh reporting period, the City and the CPD published finalized versions of G02-01, *Protection of Human Rights*, and G02-04, *Prohibitions Regarding Racial Profiling and Other Biased-Based Policing* and produced to the IMT the summaries of the community engagement processes used in the development and finalization of both directives. The City and the CPD also produced the *Fair and Impartial Policing* training and the AMCs regarding Traffic Stops in 2022 for review.

Progress in the Eighth Reporting Period

In this reporting period, the IMT completed its review of the *Fair and Impartial Policing* training curriculum and issued a no objection notice, prompting the City and the CPD to begin conducting said training in progress towards achieving Secondary compliance with the requirements of this paragraph.

Moving forward, in assessing Secondary compliance, we will continue to evaluate the CPD’s efforts to (1) incorporate these requirements into training, (2) evaluate said training, and (3) implement the training with CPD personnel. Assessing Full compliance will ultimately turn on the CPD’s ability to measure what matters and document improvements in officers’ street-level behavior and decision making including engaging in specific remedies to prevent bias-based policing and measuring changes in members’ level of bias or impartial policing as a result of these remedies.

Paragraph 56 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: None	SIXTH REPORTING PERIOD JANUARY 1, 2022 – JUNE 30, 2022 COMPLIANCE PROGRESS: Preliminary
SEVENTH REPORTING PERIOD JULY 1, 2022 – DECEMBER 31, 2022 COMPLIANCE PROGRESS: Preliminary	EIGHTH REPORTING PERIOD JANUARY 1, 2023 – JUNE 30, 2023 COMPLIANCE PROGRESS: Preliminary	

Impartial Policing: ¶57

57. CPD will continue to prohibit CPD members from posting, displaying, or transmitting content that is disparaging to a person or group based on race, religion, sexual orientation, or any other protected class on personal social media accounts.

Compliance Progress

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

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

The City and the CPD maintained Preliminary compliance by having an implemented policy on this paragraph—G09-01-06, *Use of Social Media Outlets*—that has completed the Consent Decree review process. The CPD has not achieved Secondary compliance, because they did not submit any records reflecting the CPD’s efforts (1) to complete a feedback loop with certain community organizations or (2) to train CPD personnel on G09-01-06 in this reporting period. The IMT notes that no further progress on this paragraph has been made since the third reporting period and stresses the importance for the City and the CPD to establish implementation priorities or a strategic plan for continuing progress on this paragraph and others in a similar state.

To assess Preliminary compliance, we evaluated the CPD’s efforts to codify the requirements of this paragraph into policy (per the ¶¶626–41 review process), engage the community as required by ¶52, and translate the policy into training. To assess Secondary compliance, the IMT monitored the CPD’s efforts to train personnel on this specific directive and to create supervisory practices designed to ensure members are implementing the policy as written.

Progress before the Eighth Reporting Period

In previous reporting periods, the CPD completed the ¶¶626–41 review process for G09-01-06, the CPD’s social-media policy. We also acknowledged that the CPD sought input from the Coalition (see ¶669), but the CPD did not incorporate many of their suggested edits. The training required by ¶57 was not developed. At the end of the seventh reporting period, the CPD produced a two-year review for G09-01-06, *Use of Social Media Outlets*, and the IMT committed to reviewing the material produced in the IMR-8 reporting period.

Progress in the Eighth Reporting Period

During the eighth reporting period, the IMT reviewed the documentation provided as part of the two-year review for G09-01-06, *Use of Social Media Outlets* production submitted at the end of December 2022. The CPD provided a memo noting that they were still in the process of conducting the two-year review of G09-01-06 and would provide an updated policy to review in the 8th reporting period. However, no additional documentation was provided. Because the City and the CPD did not submit any records this period reflecting their efforts to comply with this paragraph, we cannot assess whether they moved into Secondary compliance during this period. Still, as part of the two-year review process, the IMT reviewed G09-01-06, *Use of Social Media Outlets*.

To maintain Preliminary compliance, the CPD must submit records reflecting its efforts to comply with ¶52 as part of its two-year review of G09-01-06. For Secondary compliance, we will evaluate the CPD’s efforts to develop and implement training for members on the G09-01-06, which includes evidence that ninety-five percent of employees have completed the training. The training assessment will be linked to compliance with ¶¶72 and 74 and will require ¶52 community engagement.

The IMT looks forward to working with the CPD as it develops training materials related to this paragraph to achieve Secondary compliance.

Paragraph 57 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	

Impartial Policing: ¶58

58. Within 90 days of the Effective Date, CPD will clarify in policy that CPD officers will permit members of the public to photograph and record CPD officers in the performance of their law enforcement duties in a public place, or in circumstances in which the officer has no reasonable expectation of privacy. The policy will also provide that officers may take reasonable action to maintain safety and control, secure crime scenes and accident sites, protect the integrity and confidentiality of investigations, and protect the safety of officers or others.

Compliance Progress

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

Preliminary: *In Compliance (SEVENTH REPORTING PERIOD)*

Secondary: *Not in Compliance*

Full: *Not Yet Assessed*

In this reporting period, the City and the CPD maintained Preliminary compliance with ¶58. To assess Secondary compliance, the IMT will assess the CPD’s efforts to train officers on the underlying directive(s).

Progress before the Eighth Reporting Period

In earlier reporting periods, we reviewed G02-01, *Human Rights and Human Resources*; G01-02-05, *Religious Interactions*; and G02-02, *First Amendment Rights*. These directives still required additional revisions to meet requirements of this paragraph. In addition, the IMT recommended community engagement in the policy development processes for these directives.

During the seventh reporting period, the CPD submitted for review revisions to *First Amendment* eLearning, S03-14, *Body Worn Cameras*, and the *Constitutional Policing* training course. After a round of revisions, the IMT submitted to the City and the CPD a no-objection notice for the *First Amendment* eLearning course. Further, the IMT also submitted comments to the City and the CPD on the *Constitutional Policing* course and S03-14. Further, in light of the extensive dialogues with the Coalition concerning soliciting and incorporating feedback from community members, the IMT expects to see the City and the CPD engage with communities concerning S03-14. Soliciting community input is consistent with ¶52 of the Consent Decree. G01-02-05, *Religious Interactions*, and G02-02, *First Amendment Rights*, were also issued in December 2022. Further, the IMT submitted a no objection notice of G02-01, *Human Rights and Human Resources* in June 2022 and this policy was finalized in August 2022. At the end of the seventh reporting period, the City and the CPD provided the IMT materials demonstrating that 95% of its personnel have been trained in the *First Amendment* eLearning course.

Progress in the Eighth Reporting Period

During this reporting period, the City and the CPD produced revised materials related to the *Constitutional Policing* training course. After informal productions of revised materials and discussions between the parties, as well as a review of comments made by the ACLU in a separate matter, the IMT issued a no objection notice.

Moving forward, we will assess Secondary and Full compliance based on the CPD’s efforts to train officers on these requirements and ensure the policies (G01-02-05, *Religious Interactions*, G02-02, *First Amendment Rights*, and G02-01, *Human Rights and Human Resources*) and trainings are implemented in practice.

Paragraph 58 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: 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: Preliminary	EIGHTH REPORTING PERIOD JANUARY 1, 2023 – JUNE 30, 2023 COMPLIANCE PROGRESS: Preliminary	

Impartial Policing: ¶59

59. Consistent with the requirements in the Accountability and Transparency section of this Agreement and CPD policy, CPD will require that CPD members immediately report to a CPD supervisor all incidents where they observe other CPD members who have engaged in misconduct, including discrimination, profiling, or other bias-based policing.

Compliance Progress

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

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

In this reporting period, the City and the CPD maintained Preliminary compliance with ¶59 but did not achieve Secondary compliance.

To assess Secondary compliance, we reviewed the CPD's efforts to train officers on these requirements and ensure the policies and training are implemented in practice.

Progress before the Eighth Reporting Period

As mentioned in ¶53, during previous periods, the IMT reviewed revised versions of CPD policies that they assert incorporate the requirements of ¶59, including G02-01, *Protection of Human Rights* (¶53 and ¶54), and G02-04, *Prohibition Regarding Racial Profiling and Other Biased-Based Policing* (¶55 and ¶56). At the end of the seventh reporting period, the City and the CPD submitted the *Fair and Impartial Policing* training curriculum for review.

Progress in the Eighth Reporting Period

The City and the CPD provided training materials for its *Fair and Impartial Policing* training, and the IMT issued a no objection notice. The IMT still awaits documentation demonstrating 95% completion of training among in-service CPD officers. As such, the City and the CPD have maintained Preliminary compliance with this paragraph, but the IMT expects to see documentary evidence of the implementation of the policies underlying this paragraph.

Moving forward, we will assess Secondary and Full compliance based on the CPD's efforts to train officers on these requirements and ensure the policies and training are implemented in practice.

Paragraph 59 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: None	SIXTH REPORTING PERIOD JANUARY 1, 2022 – JUNE 30, 2022 COMPLIANCE PROGRESS: Preliminary
SEVENTH REPORTING PERIOD JULY 1, 2022 – DECEMBER 31, 2022 COMPLIANCE PROGRESS: Preliminary	EIGHTH REPORTING PERIOD JANUARY 1, 2023 – JUNE 30, 2023 COMPLIANCE PROGRESS: Preliminary	

Impartial Policing: ¶60

60. Within 365 days of the Effective Date, CPD will develop and implement a policy guiding officers' interactions with members of religious communities. The policy will include, but not be limited to, instruction on interacting and searching individuals with garments or coverings of religious significance.

Compliance Progress

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

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

The City and the CPD have maintained Preliminary compliance with ¶60 through its continued work to implement and finalize G02-01-05, *Religious Interactions*.

To assess Secondary compliance, we evaluated the CPD's efforts to train its officers on the new policy, including community engagement, and ensure adequate supervisory oversight is in place to ensure the policy is implemented into practice.

Progress before the Eighth Reporting Period

In the previous reporting periods, we assessed the CPD's efforts to engage faith-based community members and organizations in the development of G02-01-05 and incorporate this feedback into the policy development process. The CPD continued to make real progress by responding to faith-based organizations and, in the fifth reporting period, was also able to document and produce to the IMT how it used the feedback from faith-based organizations and surveys to improve the draft policy, resulting in a nearly finalized policy at the end of the fifth reporting period.

In the sixth reporting period, the CPD significantly improved G02-01-05, addressing various concerns raised by the IMT, the Office of the Illinois Attorney General, and community feedback, resulting in a policy effective at achieving its purpose: providing guidance regarding the proper treatment and accommodations of individuals with various religious backgrounds. The IMT provided a no objection notice in July 2022. The City and the CPD received continual input from the community and involved stakeholders and has made various revisions to the policy to address this feedback. At the end of the seventh reporting period, the CPD submitted a finalization package detailing its posting of the policy on social media sites, announcements, solicitation of comments from the public, the actual public comments, the lockup facility weekly inspection report, among other things. Further, the CPD has begun offering paper head coverings for use.

Progress in the Eighth Reporting Period

During this reporting period, the CPD indicated that it continues to work with community groups and has intent to continue working with faith-based groups in developing the related training.

Moving forward, we will assess the CPD’s efforts to train its officers on the new policy, including community engagement, and ensure adequate supervisory oversight is in place to ensure the policy is implemented into practice.

Paragraph 60 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: None	SIXTH REPORTING PERIOD JANUARY 1, 2022 – JUNE 30, 2022 COMPLIANCE PROGRESS: Preliminary
SEVENTH REPORTING PERIOD JULY 1, 2022 – DECEMBER 31, 2022 COMPLIANCE PROGRESS: Preliminary	EIGHTH REPORTING PERIOD JANUARY 1, 2023 – JUNE 30, 2023 COMPLIANCE PROGRESS: Preliminary	

Impartial Policing: ¶61

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

Compliance Progress

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

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

In this reporting period, the City and the CPD maintained Preliminary compliance with ¶61 but did not achieve Secondary compliance, as training on topics related to this paragraph has not yet been conducted.

To assess Preliminary compliance, we evaluated the CPD's efforts to codify the requirements of this paragraph into policy (per the ¶¶626–41 review process) and engage the community as required by ¶52.

Progress before the Eighth Reporting Period

The City and the CPD achieved Preliminary compliance in the fourth reporting period by finalizing and completing the public comment period for G02-01-03, *Interactions with Transgender, Intersex, and Gender Nonconforming (TIGN) Individuals* and G06-01-01, *Field Arrests*, and by engaging community members and organizations with relevant knowledge for their input on those policy revisions. The final revised version of G02-01-03 became effective on the last day of the fourth reporting period.

According to the City and the CPD, changes in leadership among the community stakeholders involved in the development and revision of G02-01-03 as part of the TIGN Working Group halted much of CPD's efforts to reengage the group in the development of the related training.

Progress in the Eighth Reporting Period

The only materials produced in this reporting period related to this paragraph were the *Custody, Arrests, Booking and Detention* recruit training, the *Constitutional Policing* course and the *Fair and Impartial Policing* course, but as referenced in previous paragraph assessments, there are still improvements to be made. Part of our Secondary compliance review process includes not only the content of the materials but also the quality of training evaluations associated with the training. We also sought updates from the CPD regarding any changes in practices and in the development of training related to G02-01-03, *Interactions with Transgender, Intersex, and Gender Nonconforming (TIGN) Individuals* and the related General Order G06-01-01, *Field Arrest Procedures*. The IMT also monitors the CPD's supervisory oversight methods (*e.g.*, discipline, coaching, and other interventions) employed to ensure the policy is implemented as written.

The City and the CPD provided training materials for the *Fair and Impartial Policing* training course that the IMT reviewed and issued a no objection notice. The City and the CPD also produced training materials for the *Constitutional Policing* course and the IMT issued a no objection notice on March 1, 2023.

In sum, the City and the CPD maintained Preliminary compliance but still need to develop improved training and internal accountability measures to ensure that the policy is well implemented in practice. Further, the IMT reiterates that the TIGN Working Group expressed a desire to continue providing feedback as the CPD develops training related to this policy, and the CPD has agreed to this arrangement. As noted above, collaboration with the TGIN Working Group has continued to be limited, mostly due to changes in staff and leadership amongst the community organizations participating in the working group. The CPD continues to note that it

will seek to re-engage the TIGN Working Group and other community stakeholders as it works on the related training.

As noted in previous reports, the IMT continues to stress the importance of timeliness and continued engagement of these community stakeholders on policies and training. For Full compliance, we will assess whether the policy and training have been sufficiently implemented such that the CPD can demonstrate a positive impact on how CPD officers interact with TIGN individuals. Measuring the impact of the policy and training may involve a review of (1) police reports to ensure that CPD officers are completing them as proscribed in G02-01-03 and (2) contact survey responses from people who have had recent contact with a CPD officer.

Paragraph 61 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: 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	

Impartial Policing: ¶62

62. CPD will require that officers comply with CPD policies related to officer response to allegations of sexual assault, sexual abuse, stalking, and domestic violence. All officers will receive in-service training every three years to ensure CPD’s response to allegations of gender-based violence, including dispatch response, initial officer response, and on-scene and follow-up investigation, is both effective and unbiased.

Compliance Progress

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

Recurring Schedule: Every Three Years Met Missed
(December 31, 2022)

Preliminary: *Not in Compliance*

Secondary: *Not Yet Assessed*

Full: *Not Yet Assessed*

The City and the CPD have not achieved Preliminary compliance with the requirements of ¶62.

To assess Preliminary compliance, we evaluated the CPD’s efforts to codify the requirements of this paragraph into policy (per the ¶¶626–41 review process) and engage the community as required by ¶52. Although the City and the CPD have produced a number of related policies that peripherally address this topic, the IMT has requested that the CPD demonstrate compliance with the paragraph by producing policies and protocols that more specifically and directly address these requirements.

Progress before the Eighth Reporting Period

In the previous reporting periods, the CPD had experienced difficulty engaging the community in its policy development process. Community engagement continued to be a significant obstacle to the CPD’s compliance with this paragraph, as the CPD had not followed through on its plan to create a working group to allow organizations with knowledge and expertise to have a voice in this reform process.

The CPD had made tremendous strides in previous reporting periods, including introducing an eight-hour online training titled, *Trauma-informed Response to Sexual Assault*; drafting an eight-hour online training titled, *The Psychology of Domestic Violence*; and receiving a grant from the U.S. Department of Justice, Office of Violence Against Women (OVW) that included proposed training on responses to gender-based violence. The CPD previously partnered with the National Police Foundation (NPF) to engage local stakeholders to identify CPD training needs around gender-based violence. A dozen virtual or in-person focus groups were

completed, including meetings with survivors, advocates, prosecutors, and CPD officers (including Domestic Violence Liaison officers). Training on Gender Based Violence was subsequently developed as part of these efforts.

In the seventh reporting period, the City and the CPD produced a revised version of the *Crime Victims Assistance* eLearning, and the IMT submitted a no-objection notice and feedback on October 29, 2022.

Progress in the Eighth Reporting Period

During the previous reporting period, the City and the CPD have indicated that G04-04, *Domestic Incidents*, would be forthcoming in the eighth reporting period. Unfortunately, the IMT did not receive this production during this reporting period.

To achieve Preliminary compliance with ¶162, the IMT must review and issue a no objection notice for G04-04 and more importantly, the CPD must develop a gender-based violence policy or set of protocols that directly address the paragraph requirements. These may include protocols related to the investigation and response to incidents involving gender-based violence, *i.e.*, Domestic Violence/Sexual Assault investigatory protocols. The IMT continues to recommend that the City and the CPD consider seeking targeted technical assistance in the development of this policy and related resources.⁴ To assess Secondary compliance, the IMT will review documentation demonstrating that officers have received the training on the courses developed. These include *Fair and Impartial Policing* training and *Gender-based Violence* training.

Paragraph 62 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: 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	

⁴ In Independent Monitoring Report 5, the IMT recommended CPD consider adopting the *Response-to-Sexual-Assault-Report Review Checklist* developed by the International Association of Chiefs of Police (IACP). See *Response to Sexual Assault Report Review Checklist*, IACP (January 1, 2017), <https://www.theiacp.org/resources/document/response-to-sexual-assault-report-review-checklist>.

Impartial Policing: ¶63

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

Compliance Progress

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

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

The City and the CPD achieved Preliminary compliance with ¶63 because the CPD completed the required ¶¶626–41 review process for General Order G08-06, *Prohibition of Sexual Misconduct*.⁵ The City and the CPD provided a revised draft of G08-06 for review and, subsequently, the IMT and the OAG issued no objection notices.

To assess Preliminary compliance, we evaluated the CPD’s efforts to codify the requirements of this paragraph into policy (per the ¶¶626–41 review process) and engage the community as required by ¶52. The IMT assessed Preliminary compliance based on the quality of directive G08-06 and the extent of community engagement in its development.

Progress before the Eighth Reporting Period

During previous reporting periods, the CPD submitted a draft directive of G08-06 on February 28, 2020, for early consultation review. The IMT provided comments on March 29, 2020. On April 22, 2020, the CPD submitted a revised version of the directive, and the IMT provided additional comments on May 22, 2020. After engaging community leaders and victim advocates, the CPD produced a revised G08-06 on October 6, 2021, and the IMT provided additional comments to the City on November 19, 2021. On March 16, 2022, the City and the CPD provided a revised draft of G08-06 for review. On March 28, 2022, the CPD asked the IMT and the OAG to withhold review and comment until receiving a further revised draft. In the meantime, the IMT provided informal comments on April 5, 2022. On April 28, 2022, the City and the CPD provided a further revised G08-06 (dated April 7, 2022) and on May 11, 2022, the IMT provided comments. At the end of the seventh reporting period, the City and the CPD provided a revised draft of G08-06 for review.

⁵ The CPD originally numbered this policy G08-05 but has numbered it G08-06 since the May 5, 2021 draft.

Progress in the Eighth Reporting Period

Overall, we found this draft of G08-06 to be improved from the previous versions and we issued a no objection notice. We continue to emphasize, however, the importance of obtaining and considering community feedback during the CPD's development of policy and training materials. We expect to receive updates about these community engagement efforts, including information about community input gathered and the outcomes of such input.

In future reporting periods, the IMT looks forward to seeing continued community engagement efforts and training materials developed on G08-06. Preliminary compliance depended on CPD's efforts to codify the requirements of this paragraph into policy and receiving no objection notices from both the IMT and OAG. Secondary compliance depends on the quality of the training lesson plans, the level of community engagement in developing the training, the quality of the training delivered, and the evaluations used to measure effectiveness.

Paragraph 63 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: None	SIXTH REPORTING PERIOD JANUARY 1, 2022 – JUNE 30, 2022 COMPLIANCE PROGRESS: None
SEVENTH REPORTING PERIOD JULY 1, 2022 – DECEMBER 31, 2022 COMPLIANCE PROGRESS: None	EIGHTH REPORTING PERIOD JANUARY 1, 2023 – JUNE 30, 2023 COMPLIANCE PROGRESS: Preliminary	

Impartial Policing: ¶64

64. Within 180 days of the Effective Date, CPD will review and, to the extent necessary, revise its language access policy to provide meaningful access to CPD programs and services for individuals who have a limited ability to speak, read, write, or understand English. CPD will ensure that its language access policy provides timely and meaningful access to police services for individuals with limited English proficiency (“LEP”). CPD will also require that qualified and Department-authorized interpreters are used in accordance with CPD policy, including for the provision of Miranda warnings. CPD will publish its language access policy on its website and, consistent with the requirements of Paragraph 28 of the Community Policing section of this Agreement, make the policy available to community-based group serving LEP communities in Chicago.

Compliance Progress

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

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

The City and the CPD have not yet achieved Preliminary compliance with the requirements of ¶64. During this reporting period, the CPD provided S02-01-05, *Limited English Proficiency (LEP)* for review. On March 27, 2023, the IMT submitted comments to the City and CPD on this policy. We look forward to reviewing updates to this policy.

To assess Preliminary compliance, we will evaluate the CPD’s efforts to codify the requirements of this paragraph into policy (per the ¶¶626–41 review process) and engage the community as required by ¶52.

Progress before the Eighth Reporting Period

During the previous reporting periods, the IMT reviewed and commented on drafts of S02-01-05 and monitored the CPD’s efforts to implement targeted community engagement for input on revising the policy. We also reviewed the City’s Language Access Coordinator’s actions, status reports, recommendations, and implementation plans. Those records reflect an excellent roadmap of changes that we hoped the CPD would incorporate in the next iteration of S02-01-05. Throughout the various reviews of S02-01-05, we noted significant improvements to the policy but highlighted significant issues, such as the CPD’s lack of analysis of community feedback and the absence of a mechanism or process for verification and certification for Department-Authorized interpreters.

In the seventh reporting period, the IMT attended a site visit in October 2022, that included significant discussion of the LanguageLine⁶ pilot, a mobile application that can provide immediate translation services in a variety of languages, including those required in the Consent Decree, and attendance from the CPD Language Access Coordinator. Further, on December 28, 2022, the City and the CPD provided the IMT with a revised draft of S02-01-05 along with a summary of the community engagement efforts related to the policy.

Progress in the Eighth Reporting Period

During this reporting period, the CPD provided S02-01-05, *Limited English Proficiency (LEP)* for review. On March 27, 2023, the IMT submitted comments to the City and the CPD on this policy. Comments from the IMT centered around community engagement on the policy, and revisions related to the use of multilingual personnel and the certification process. The IMT looks forward to reviewing updates to this policy.

During the site visit in April of 2023, the IMT and the CPD held collaborative discussions around the paragraph requirements and the methodology. The IMT also learned during this site visit that the LanguageLine is now available on 2,800 phones/devices with all officers having a phone available when going on patrol shifts. Right now, officers typically transfer phones in and out from the Strategic Decision Support Centers when coming on or off shift. The CPD's goal is to provide a phone with LanguageLine to every officer on patrol and other units that regularly interact with the community, approximately 9,000 devices.

As the CPD increases the availability of LanguageLine for all its officers, it should ensure that it is tracking language access needs and usage data across different units and districts. This will assist in both ensuring that needs are being met and assist the CPD in better understanding the effectiveness of the Language Line Application. Further, depending on its effectiveness, and because of its extensive availability to all officers, the CPD should consider using LanguageLine as one alternative to certified translators. The process for certifying officers has become cumbersome and LanguageLine, because of its availability and ease of use, can be an alternative to ensuring that the community is being provided with meaningful access to CPD programs and services for individuals who have a limited ability to speak, read, write, or understand English. With that said, certified translators, through certified translators, will be necessary for those in the deaf and hard of hearing community as the features of LanguageLine are not as helpful for this community. The IMT recommends that the CPD work with these communities to de-

⁶ See *Public Safety*, LANGUAGELINE SOLUTIONS, <https://www.language.com/industries/public-safety>.

termine the best way forward and consider either certifying officers in ASL or securing a memorandum of understanding with an organization to provide these services.

Further, if the CPD makes changes noted above, they must be outlined in the revised S02-01-05 policy. In future reporting periods, we will continue to monitor the CPD’s efforts to seek input from community members and organizations with relevant experience and knowledge in revision S02-01-05. Evidence of such engagement should include an analysis of how the CPD incorporated community input to inform S02-01-05 policy revisions. We will also assess the CPD’s efforts to finalize S02-01-05 according to the ¶¶626–41 review process. Once S02-01-05 is finalized and implemented, we will monitor the CPD’s efforts to train its officers in how to provide community members with meaningful access to the City’s limited English proficiency programs and services. Moving forward, we will review the CPD’s process of auditing and evaluating its success with the citywide rollout of Language-Line’s mobile application.

Paragraph 64 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: 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	

Impartial Policing: ¶65

65. Within 180 days of the Effective Date, the City will designate a language access coordinator who will coordinate with CPD and review CPD’s compliance with its language access policy and Section 2-40 of the Municipal Code of Chicago. The City’s language access coordinator will assess the effectiveness and efficiency of CPD’s policies on an ongoing basis and will report to the Superintendent or his or her designee any recommendations to revise policy, if necessary.

Compliance Progress

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

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

In this reporting period, the City and the CPD maintained Preliminary compliance, which it achieved with the hiring of the Language Access Coordinator but has yet to achieve Secondary compliance because the Language Access Coordinator (LAC) has yet to establish a system of review to “assess the effectiveness and efficacy of CPD’s policies on an ongoing basis.”

To evaluate Preliminary compliance, the IMT assessed whether the City and the CPD established and hired a Language Access Coordinator, which they accomplished in the second reporting period. To evaluate Secondary compliance, we monitored the CPD’s efforts to develop a system of data collection to assess limited English proficiency needs and services, including changes to CPD reports and CPD policy. We also reviewed the City’s or CPD’s efforts to evaluate or audit the delivery of language access services to ensure complete and impartial coverage.

Progress before the Eighth Reporting Period

In previous reporting periods, we credited the City’s and the CPD’s Language Access Coordinator for developing a working relationship within the Department and has roles clearly delineated in S02-01-05, *Limited English Proficiency*.⁷ The CPD’s Language Access Coordinator offered a number of proposals to enhance the CPD’s responsiveness to the needs of individuals with limited English proficiency and developed a *Language Access Plan* in April 2021 that guides assessment of language

⁷ The language access policy indicates that CPD’s Language Access Coordinator is expect to “establish a monitoring program to ensure compliance with the LEP policy, including the: implementation of the policy; assignment, and use of multilingual Department members; and necessity of translating Department forms, publications, and distribution materials.”

needs for the department and operating procedures for translation and interpretation services. The *Language Access Plan* did not, however, provide the process of data collection and the metrics by which the CPD's Language Access Coordinator will assess the effectiveness and efficacy of the CPD's policies as required by this paragraph. Furthermore, the CPD's Language Access Coordinator developed a website geared towards individuals with limited English proficiency and posted materials, ranging from feedback and complaint forms to victim assistance, in five different languages.⁸

Progress in the Eighth Reporting Period

While the CPD maintained Preliminary compliance with this paragraph, the IMT noted in the March 27, 2023 review of S02-01-05, *Limited English Proficiency*, that the updated policy makes clear whether the Language Access Coordinator established a system of review to "assess the effectiveness and efficacy of CPD's policies on an ongoing basis." While the policy is still under review and revision before finalizing, the IMT appreciates the incorporation of elements of this paragraph into this policy.

Further, during the site visit conducted in April 2023, the Language Access Coordinator provided an update on the continued effort to provide LanguageLine access to all officers, noted in ¶164, including a discussion on the uses of the app for deaf and hard of hearing individuals. The coordinator noted that the CPD used LanguageLine for American Sign Language (ASL) translation 54 times in the last year with 2 uses in the detective division. The IMT discussed concerns of effectiveness of ASL in this medium given the screen size of phones noting a high preference for in-person ASL translation to ensure effective communication with deaf and hard of hearing individuals.

In assessing Secondary compliance in future reporting periods, we will monitor the CPD's efforts to operationalize and develop a system of data collection to assess limited English proficiency needs and services, including changes to CPD reports and CPD policy. This system is necessary to Language Access Coordinator's ability to evaluate the CPD's compliance with S02-01-05 and Section 42-40 of the Municipal Code of Chicago and to assess the effectiveness and efficiency of the CPD's policies as they relate to the provision of impartial and timely access to high-quality limited English proficiency services.⁹

⁸ See *Language Access Policy of the Chicago Police Department*, CHICAGO POLICE DEPARTMENT, <https://home.chicagopolice.org/community-policing-group/language-access/>.

⁹ Municipal Code of Chicago, Chapter 2-40, *Citywide Language Access to Ensure the Effective Delivery of City Services*. https://codelibrary.amlegal.com/codes/chicago/latest/chicago_il/0-0-0-2598829.

Paragraph 65 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: Preliminary	THIRD REPORTING PERIOD MARCH 1, 2020 – DECEMBER 31, 2020 COMPLIANCE PROGRESS: Preliminary
FOURTH REPORTING PERIOD JANUARY 1, 2021 – JUNE 30, 2021 COMPLIANCE PROGRESS: Preliminary	FIFTH REPORTING PERIOD JULY 1, 2021 – DECEMBER 31, 2021 COMPLIANCE PROGRESS: Preliminary	SIXTH REPORTING PERIOD JANUARY 1, 2022 – JUNE 30, 2022 COMPLIANCE PROGRESS: Preliminary
SEVENTH REPORTING PERIOD JULY 1, 2022 – DECEMBER 31, 2022 COMPLIANCE PROGRESS: Preliminary	EIGHTH REPORTING PERIOD JANUARY 1, 2023 – JUNE 30, 2023 COMPLIANCE PROGRESS: Preliminary	

Impartial Policing: ¶66

66. Within 365 days of the Effective Date, OEMC will provide training to its police communication supervisors, call-takers, and dispatchers (collectively, “tele-communicators”) that is adequate in quality, quantity, type, and scope, and that addresses procedures consistent with CPD policy for responding to calls requiring language access services.

Compliance Progress

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

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

During the eighth reporting period, the City and the Office of Emergency Management and Communications (OEMC) maintained Preliminary compliance with the requirements of ¶66. They did not achieve Secondary compliance because the OEMC may need to update its training to ensure the procedures are (1) consistent with the CPD’s policy S02-01-05, *Limited English Proficiency*, which is still undergoing the ¶¶626–41 review and revision process; and (2) respond to the data collection needs that provide the foundation for improved limited English Proficiency services in Chicago.

To evaluate Preliminary compliance, the IMT examined whether OEMC developed a training directive to meet requirements of this paragraph and in alignment with current CPD policy S02-01-05. To evaluate Secondary compliance, the IMT examined development, implementation, and evaluation of said training materials.

Progress before the Eighth Reporting Period

During the previous reporting periods, OEMC produced a revised *Training Notice* 19-004 to address requirements of this paragraph. In review of this production, the IMT found that OEMC addressed the last outstanding comments regarding expectations for dispatchers as well as differentiated training content for all three articulated roles in this paragraph.

As mentioned in previous paragraphs, the CPD is actively revising S02-01-05; thus, trainings to meet requirements of this paragraph must also include alignment with the finalized policy to ensure the training is fully “consistent with CPD policy,” as required by this paragraph.

The IMT is satisfied with the current content of *Training Notice* 19-004 for the OEMC requirements of this paragraph. Since OEMC needs to conduct an alignment assessment with the finalized CPD directive, expected in a future reporting period,

Secondary compliance with this paragraph is contingent upon further action by the CPD.

In addition, while the IMT is not currently assessing Full compliance with this paragraph, OEMC also presented language translation usage, and time to connect data during the site September 2022 visit. It was encouraging that OEMC is already thoughtfully collecting the types of data needed to demonstrate Full compliance.

Progress in the Eighth Reporting Period

The City and the OEMC maintained Preliminary compliance but have not met Secondary compliance. Moving forward, we will assess the OEMC’s efforts to update TNG 19-004 based on CPD’s final S02-01-05, and any feedback that the CPD receives from relevant community stakeholders. After finalizing an updated TNG 19-004, we will assess the OEMC’s implementation and evaluation of the training and related usage data.

Paragraph 66 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: Preliminary	THIRD REPORTING PERIOD MARCH 1, 2020 – DECEMBER 31, 2020 COMPLIANCE PROGRESS: Preliminary
FOURTH REPORTING PERIOD JANUARY 1, 2021 – JUNE 30, 2021 COMPLIANCE PROGRESS: Preliminary	FIFTH REPORTING PERIOD JULY 1, 2021 – DECEMBER 31, 2021 COMPLIANCE PROGRESS: Preliminary	SIXTH REPORTING PERIOD JANUARY 1, 2022 – JUNE 30, 2022 COMPLIANCE PROGRESS: Preliminary
SEVENTH REPORTING PERIOD JULY 1, 2022 – DECEMBER 31, 2022 COMPLIANCE PROGRESS: Preliminary	EIGHTH REPORTING PERIOD JANUARY 1, 2023 – JUNE 30, 2023 COMPLIANCE PROGRESS: Preliminary	

Impartial Policing: ¶67

67. Within 180 days of the Effective Date, and as necessary thereafter, CPD will translate its language access policy into any non-English language spoken by a limited or non-English proficient population that constitutes 5% or 10,000 individuals, whichever is less, in Chicago, as outlined in Section 2-40-020 of the Chicago Municipal Code. CPD will publish translated versions of its language access policy on its website.

Compliance Progress

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

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

The City and the CPD maintained Secondary compliance with this paragraph because the CPD's *Language Access Plan* sufficiently provides for a schedule and system to consistently review language access data to determine whether additional translations are necessary and to make revisions as needed to Special Order S02-01-05, *Limited English Proficiency*.

The City and the CPD have not achieved Full compliance because we have not assessed whether the day-to-day operations and supervisory oversight suffices to determine that the translations' review schedule and system of review for S02-01-05 have been institutionalized. As of the end of the eighth reporting period, there have been no opportunities for the CPD to put the review process in practice considering that S02-01-05 is still under ¶¶626–41 review.

Progress before the Eighth Reporting Period

In previous reporting periods, the City and the CPD achieved Preliminary compliance because the CPD translated its Special Order S02-01-05 into Spanish, Polish, Chinese, and Arabic. In the third reporting period, the City and the CPD achieved Secondary compliance by providing evidence that it has the managerial practices in place to confirm that the languages selected for translations represent all groups that meet the criteria outlined in this paragraph. The CPD approved its Language Access Coordinator's *Language Access Plan* during the fourth reporting period. The *Plan* outlines an annual schedule and system to review language access data to determine if additional translations are needed. During the fifth and sixth reporting period, the City and the CPD did not produce any materials related to additional levels of compliance for this paragraph.

Progress in the Eighth Reporting Period

In this reporting period, the City and the CPD produced a revised S02-01-05 for review under this paragraph. The IMT maintains its assessment of this paragraph from the previous reporting period. The CPD has maintained Secondary compliance and has made good efforts to institutionalize the translations review and revision process.

The IMT produced comments that highlighted the need to incorporate outstanding elements as required by this paragraph in response to the production of the latest version of S02-01-05, on March 27, 2023. The CPD plans to finalize this special order in the next reporting period. In addition, the CPD posted additional translations of the language access policy to the CPD website as required by this paragraph.¹⁰

Since the review process has not yet been completed, we cannot yet say the City and the CPD have reached Full compliance. The IMT continues to acknowledge issues in staffing and the impact of these shortages on tasks like the completion of the annual review of the *Language Access Plan* and stresses to the City and the CPD the importance of addressing these shortages in reaching compliance with the Consent Decree.

Moving forward, we will continue to monitor the CPD’s efforts to adhere to the translation and review process outlined in *the Language Access Plan*, including the CPD’s efforts to translate S02-01-05 once it is finalized.

Paragraph 67 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: Preliminary	THIRD REPORTING PERIOD MARCH 1, 2020 – DECEMBER 31, 2020 COMPLIANCE PROGRESS: Secondary
FOURTH REPORTING PERIOD JANUARY 1, 2021 – JUNE 30, 2021 COMPLIANCE PROGRESS: Secondary	FIFTH REPORTING PERIOD JULY 1, 2021 – DECEMBER 31, 2021 COMPLIANCE PROGRESS: Secondary	SIXTH REPORTING PERIOD JANUARY 1, 2022 – JUNE 30, 2022 COMPLIANCE PROGRESS: Secondary
SEVENTH REPORTING PERIOD JULY 1, 2022 – DECEMBER 31, 2022 COMPLIANCE PROGRESS: Secondary	EIGHTH REPORTING PERIOD JANUARY 1, 2023 – JUNE 30, 2023 COMPLIANCE PROGRESS: Secondary	

¹⁰ *Language Access – Office of Community Policing*, CHICAGO POLICE Department, <https://home.chicagopolice.org/community-policing-group/community-liaisons-out-reach/language-access/>.

Impartial Policing: ¶68

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

Compliance Progress

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

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

The City and the CPD did not achieve Preliminary compliance regarding this paragraph because the CPD has not finished revising its policies for ensuring effective communication and meaningful access to CPD services for individuals with physical, mental, or developmental disabilities.

To assess Preliminary compliance, the IMT assessed compliance based on the quality of directive S02-01-01, *People with Disabilities*, and extent of community engagement in its development.

Progress before the Eighth Reporting Period

In previous reporting periods, the City and the CPD did not achieve Preliminary compliance because the CPD had not started or completed the ¶¶626–41 review process regarding Special Order S02-01-01, *People with Disabilities*. The IMT's primary concerns regarding the submitted policy is that it could benefit from clearer and more precise language regarding use and certification of interpreters for deaf and hard-of-hearing individuals as specified in ¶68(d).

In addition, the standing plan for the policy to meet the requirements of this paragraph is that S02-01-01 would serve as the “parent” policy for individuals with disabilities and that the CPD would also develop sub-policies on responding to persons with 1) physical, 2) mental, and 3) developmental disabilities.

Progress in the Eighth Reporting Period

In this reporting period, the CPD did not provide any evidence of further compliance with this paragraph.

The CPD and the City did produce a revised *Constitutional Policing* course in this reporting period, which includes training concepts ancillary to this paragraph. On March 1, 2023, the IMT provided a no objection on this training and appreciates the inclusion of content related to this paragraph. However, the IMT cautions that the CPD will need to review the training once it finalizes S02-01-01 and its sub-policies to ensure alignment and consistency with the eventual policy(ies).

While the City and the CPD made limited progress on this paragraph in the eighth reporting period, the CPD indicated that they have started to gather community input on S02-01-01 which includes significant engagement with individuals and organizations representing those from the deaf and hard of hearing communities. The CPD noted that they plan to incorporate previous community engagement efforts into the next draft of the policy and hold discussions with relevant community members regarding the draft policy. It should also be noted that in the process of requesting community feedback on this policy during this reporting period, several community organizations noted that it appeared that previous feedback submitted to CPD on the policy, over one and a half years ago, had not been taken into consideration. The CPD assured us that previous feedback provided would be incorporated into the revised policy and sub-policies drafted. The IMT highlights the importance of communication, transparency, and feedback to those community that provide feedback on its policies.

The IMT looks forward to reviewing revised drafts of S02-01-01 along with the sub-policies mentioned above. We also look forward to assessing the CPD’s progress to engage members of the community directly affected by these policies as part of the development process.

Moving forward, we will assess the CPD’s efforts to finalize S02-01-01 and incorporate these requirements into training. We will also continue to assess the CPD’s efforts to engage relevant disability communities and their advocates. Lastly, the IMT plans to engage the CPD on how to improve the condition of holding areas for arrested individuals with disabilities as it moves forward with Full compliance.

After the CPD finalizes S02-01-01 and any other policies related to this paragraph, we will assess the CPD’s efforts to train its officers on the updated policies, including the extent to which training aligns with the CPD’s efforts to comply with ¶69.

Paragraph 68 Compliance Progress History

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

Impartial Policing: ¶69

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

Compliance Progress

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

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

The City and the CPD did not achieve Preliminary compliance during this reporting period because the CPD has not finished developing its training bulletins on interactions with people with disabilities.

To assess Preliminary compliance, the IMT assessed whether the CPD had finalized training bulletins on topics specified in this paragraph and in alignment with the related polic(ies).

Progress before the Eighth Reporting Period

During previous reporting periods, the CPD produced the following draft training bulletins: (1) People with Disabilities; (2) Autism and Police Response; (3) Interacting with the Deaf Community; (4) What is a Service Animal?; (5) Understanding Diabetes, (6) A Law Enforcement Perspective; and Alzheimer's Disease and Related Dementias. The ADA Liaison was meaningfully involved in the bulletin-development process, providing initial content for the general training bulletin on individuals with disabilities. However, the guiding policies for these training bulletins, most notably Special Order S02-01-01, People with Disabilities, had not been finalized, and thus, the IMT could not assess if these bulletins aligned with S02-01-

01. We also monitored the CPD’s continuing efforts to engage community members and organizations with relevant knowledge and experience in developing and revising the relevant training bulletins.

Progress in the Eighth Reporting Period

During this reporting period, the CPD did not produce any evidence of compliance related to this paragraph. Although, as noted in ¶168, additional discussion regarding the development of related policies during this reporting period indicated progress and planned community engagement on the S02-01-01 policy and related sub-policies.

Special Order S02-01-01, *People with Disabilities*, and its related sub-policies have not been finalized, and thus the IMT could not assess whether the draft training bulletins aligned with the policy. We look forward to reviewing the revisions to S02-01-01, the related sub-policies, the associated training bulletins, and the CPD’s efforts to engage the community in the development of these requirements.

Paragraph 69 Compliance Progress History

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

Impartial Policing: ¶70

70. Within 180 days of the Effective Date, CPD will designate at least one member as an Americans with Disabilities Act (“ADA”) liaison who will coordinate CPD’s efforts to comply with the ADA and: a. regularly review the effectiveness and efficiency of CPD’s policies and training as they relate to individuals with disabilities and report to the Superintendent, or his or her designee, any recommended revisions, if necessary, to ensure compliance with the law and this Agreement; b. serve as a resource to assist CPD members in providing meaningful access to police services for individuals with disabilities; and c. act as a liaison between CPD and individuals with disabilities.

Compliance Progress

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

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

The City and the CPD maintained Preliminary compliance with the requirements of ¶70 because the CPD designated an ADA Liaison in the third reporting period. However, the CPD did not achieve Secondary compliance for the current reporting period because the CPD still needs to demonstrate that the ADA Liaison is integrated into CPD processes and practices.

To evaluate Preliminary compliance, we assessed the CPD’s efforts to designate an ADA Liaison. To evaluate Secondary compliance, we assessed the CPD’s efforts to integrate the ADA Liaison into CPD processes and practices specific to this paragraph, as well as CPD policies that codify the role of the ADA Liaison, most specifically in S02-01-01. Annual reports will be used to determine the extent to which the ADA Liaison is integrated into CPD processes and practices.

Progress before the Eighth Reporting Period

In previous reporting periods, we acknowledged that the CPD’s designated ADA Liaison is qualified for the role, having 27 years of police experience, including experience with ADA issues while at the CPD. The CPD also provided S02-01-01 and two standard operating procedures covering the ADA Liaison’s role and responsibilities. However, these productions were still in revision because S02-01-01 is not yet final.

Progress in the Eighth Reporting Period

In this reporting period, the CPD did not produce any materials related to additional levels of compliance for this paragraph and S02-01-01, which codifies the role of the Liaison, is still being revised.

During the April 2023 site visit, the ADA Liaison summarized the progress since the last site visit and discussed initiatives she is undertaking in support of requirements of this paragraph. She mentioned surveying officers on the interest in use of American Sign Language (ASL). Over 200 officers noted interest and CPD collaborated with City Colleges of Chicago to develop a 10-week course specifically for law enforcement interactions with first classes being held last summer. The City Colleges and the CPD began offering the course on March 28, 2023, and it included instructors from the Chicago Hearing Society.

The City and the CPD maintained Preliminary compliance because the ADA Liaison's activities and efforts align with the requirements outlined in this paragraph. Moving forward, for Secondary compliance, we will assess the CPD's effort to finalize the relevant policies and procedures codifying the ADA Liaison's role and responsibilities. We will also assess the CPD's effort to implement supervisory oversight to ensure that the policies and procedures are implemented and effective. Finally, we will look for the collection of data on the effectiveness of the CPD's policies and training regarding CPD's interactions and responses to individuals with disabilities. The CPD must articulate a method for determining whether these individuals are being treated with dignity and respect by CPD personnel and receiving the services they need.

Paragraph 70 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: Preliminary	EIGHTH REPORTING PERIOD JANUARY 1, 2023 – JUNE 30, 2023 COMPLIANCE PROGRESS: Preliminary	

Impartial Policing: ¶71

71. *Within 180 days of the Effective Date, CPD will develop a policy for transporting arrested or detained individuals that requires CPD officers to notify OEMC of the start and end of a transport and whether the individual is a juvenile or adult.*

Compliance Progress

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

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

The City and the CPD maintained Preliminary compliance with the requirements of ¶71 because the CPD implemented a policy addressing the requirements in this paragraph. See G04-01, *Preliminary Investigations* (effective December 30, 2020). The City and the CPD did not achieve Secondary compliance as the related training materials have not yet been finalized and training has not yet been conducted.

To assess Preliminary compliance, the IMT assessed compliance based on the quality of directive G04-01 and extent of community engagement in its development. To assess Secondary compliance, the IMT assessed training materials developed based on the policy, such as the *Constitutional Policing* course.

Progress before the Eighth Reporting Period

During previous reporting periods, we assessed the CPD's efforts to review and revise G04-01 and related policies that reinforce the requirements of this paragraph. Because this paragraph is a relatively straightforward requirement, we were satisfied with the CPD's limited method of community engagement.

In addition, the City and the CPD submitted *Constitutional Policing* course in relation to this paragraph during the sixth reporting period. While we found that the training course was comprehensive, we noted additional improvements were necessary, particularly around including additional discussion on ensuring impartial-policing practices during enforcement actions and noting the importance of reinforcing these concepts and referencing related CPD directives to demonstrate how impartial policing builds positive community perspectives and improves legitimacy.

Progress in the Eighth Reporting Period

In this reporting period, the CPD submitted revised materials for the *Constitutional Policing* training and received a no-objection from the IMT on March 1, 2023. This training included mention of the requirement to notify OEMC of transport per this

paragraph. In addition, the CPD submitted on March 30, 2023, a *Juvenile Processing* training for recruits to also satisfy requirements of this paragraph. The IMT provided comments on April 29, 2023. While requirements of this paragraph specific to juveniles were included in the training, the IMT recommended additional explanation, examples, and scenarios be included in the training since many of these concepts can be hard to operationalize based solely on the policy. The IMT also recommended that the CPD consider trauma-informed policing strategies when responding to juveniles in crisis or that may have disabilities.

The City and the CPD maintained Preliminary compliance because the implemented G04-01 codifies the requirement that officers notify the Office of Emergency Management and Communications (OEMC) of the start and end of a transport and whether the individual is a juvenile or an adult. Moving forward, for Secondary compliance, the IMT appreciates incorporating requirements of this paragraph into relevant trainings and we will assess the CPD’s efforts to train officers on these requirements and collect evaluation data on implementation of this training. For Full compliance, we will assess whether the CPD has sufficiently implemented the requirement by evaluating the CPD’s efforts to assess whether officers are complying with the requirements of ¶71 and adjust policy and training to address any concerns regarding their effectiveness.

Paragraph 71 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: Preliminary	EIGHTH REPORTING PERIOD JANUARY 1, 2023 – JUNE 30, 2023 COMPLIANCE PROGRESS: Preliminary	

Impartial Policing: ¶72

72. The Parties recognize that training is a necessary component of impartial policing. CPD will integrate the concept of impartial policing into related CPD training courses when appropriate, including, but not limited to, use of force courses, weapons training courses, and Fourth Amendment subjects courses.

Compliance Progress

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

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

The City and the CPD did not achieve Preliminary compliance with ¶72 during this reporting period because the CPD has not developed a training strategy that codifies its efforts to adequately incorporate the concept of impartial policing into related CPD training courses. Although the CPD provided its *2023 Training Plan* to the IMT for review and noted within the courses it will deliver in 2023 that incorporate impartial policing, a broader strategy or plan is necessary for the department to achieve Preliminary compliance. A broader strategy or plan will also ensure the institutionalization and sustainability of these topics within training and not be dependent on whether these topics are included within the annual training plans. As noted in the collaborative discussions mentioned in paragraphs 53-55, the IMT recommends incorporating this broader training strategy into the Impartial Policing Strategy or Plan developed as part of ¶53.

To assess Preliminary compliance, the IMT assessed whether the CPD has reviewed its training courses and created an effective plan to integrate the concept of impartial policing into those related courses. To assess Secondary compliance, the IMT assessed the integration and delivery of topics such as impartial policing, procedural justice, and de-escalation into trainings.

Progress before the Eighth Reporting Period

In the fifth reporting period, the CPD produced several training directives relevant to ¶72 and 74. Namely, the CPD produced S11-10, *Department Training*; S11-10-01, *Recruit Training*; S11-10-02, *Pre-Service Training*; and *In-Service Training*, S11-10-03 (collectively “Training Suite”). The IMT provided no-objection notices on these directives on February 15, 2022, to accompany the no-objection notice for S11-10-01 in the previous reporting period to complete the “Training Suite” provided by the City.

While the “Training Suite” incorporates concepts of Impartial Policing and requirements of this paragraph, the IMT continued to urge the City and the CPD to develop a training strategy or plan to outline the courses in which impartial policing has been integrated into training, the number of training hours, and specific topics covered. This should guide all training on impartial policing to meet the requirements of this paragraph.

In addition, as noted in ¶71, the City and the CPD submitted *Constitutional Policing* course in relation to this paragraph in the sixth reporting period. While we found that the training course was comprehensive, we noted additional improvements were necessary, particularly around including additional discussion on ensuring impartial-policing practices during enforcement actions and noting the importance of reinforcing these concepts and referencing related CPD directives to demonstrating how impartial policing builds positive community perspectives and improves legitimacy.

Progress in the Eighth Reporting Period

Throughout the reporting period, the City and the CPD submitted revised and finalized training materials. The CPD finalized S11-10, *Department Training*, and S11-10-03, *In-Service Training*, with both including mention of impartial policing principles in annual trainings for officers. The CPD also produced a revised *2023 Annual Training Plan* that included requirements of this paragraph. During the period, the CPD also produced revised materials including the *Constitutional Policing* in-service course materials; *BIA eLearning*; *Recruit Use of Force* training including the *De-escalation, Response to Resistance, and Use of Force Training (DRTRUOF)* update; *Fair and Impartial Policing* training; and *Use of Force Policy Updates* training; *Prohibition on Retaliation eLearning*; *Integrating Communications, Assessment, and Tactics (ICAT)* training; and *Recruit Force Options* Training in relation to this paragraph.

The CPD also produced training attendance records related to this paragraph to demonstrate that 95% or more of CPD officers have completed the training such as Crime Victim Assistance, 40-hour in-service, Juvenile Processing; ABLE; and DRTRUOF training related to the Impartial Policing paragraphs of the Consent Decree.

The IMT issued several no objection notices for these various trainings including the *Fair and Impartial Policing* training, the *Gender-Based Violence In-Service* training, S11-10, *Department Training*; S11-10-03, *In-Service Training*; and the *2023 Annual Training Plan*. For other noted productions, the IMT had comments regarding other sections of the Decree related to these training materials. As a result, the CPD will be finalizing these training materials, hopefully, in the IMR-9 reporting period. The IMT will assess the final materials as it relates to this paragraph, and

related records for this training for Secondary Compliance in a future reporting period.

Lastly, during the site visit in April 2023, the IMT discussed how to make more measurable progress on the requirements of this paragraph with the City and the CPD. As noted in previous reporting periods, while the provided materials incorporate aspects of impartial policing and the requirements of this paragraph, integration of impartial policing concepts requires not only these training efforts but also lasting direction on this issue. The IMT and the Parties discussed how to better capture the CPD’s efforts for this and continues to recommend that the CPD develop a training plan or strategy that would guide integration of these principles throughout the trainings specified in this paragraph.

Paragraph 72 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: 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	

Impartial Policing: ¶73

73. The Parties acknowledge that CPD has developed, with the aid of subject-matter experts, a three-part course called Procedural Justice, which covers certain impartial policing subjects including the principles of procedural justice, the importance of police legitimacy, and the existence of and methods for minimizing the impact of implicit bias. By the end of the year 2020, all officers, including supervisors, will complete the Procedural Justice course.

Compliance Progress

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

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

The City and the CPD maintained Secondary compliance with this paragraph because it ensured that all officers, including supervisors, completed the *Procedural Justice* (PJ) courses.

To assess Preliminary compliance, we assessed the CPD’s efforts to ensure its officers completed the training. We also reviewed the materials and observed classes to assess the quality of its content. To assess Secondary compliance, the IMT assessed how the CPD implemented the training of Procedural Justice courses and assessed the results. To assess Full compliance for this paragraph the IMT will assess whether the data indicate that CPD officers are engaging in procedurally just behaviors in the field. Operational data such as complaints, stops, arrests, uses of force must be submitted by the CPD and will be reviewed by the IMT to determine Full compliance.

Progress before the Eighth Reporting Period

From 2018 to early 2021, the CPD offered a three-part Procedural Justice training as part of the CPD’s in-service program. The course embodied concepts of impartial policing. Based on our review of the materials, we found that the procedural justice training offered a strong introduction to the concepts for all officers. We observed the *Procedural Justice* training, and Parts I and II were taught largely by CPD instructors who exhibited a solid understanding of how procedural justice can be applied to police work. The CPD out-sourced Part III’s instruction to the Anti-Defamation League (ADL) Midwest. The ADL provided a solid 4-module training on implicit bias and strategies for managing it to 11,500 CPD officers.

In the fifth reporting period, only 88% of the CPD officers had completed the Procedural Justice Part III (PJ-3) course. As a result, the CPD and the Anti-Defamation

League (ADL) Midwest, the provider of the initial Procedural Justice courses for CPD, developed a curriculum on “*Inclusive Policing*” that is available to officers who did not receive the original *Procedural Justice III*.¹¹ The IMT reviewed the training materials and we are satisfied with the content, thus CPD remained in Preliminary compliance.

At the end of the sixth reporting period, the CPD produced documents demonstrating completion of the *Inclusive Policing Procedural Justice III* training, as well as evidence of completion of community policing in-service training, and evidence of use of force in-service training. The CPD then achieved Secondary Compliance for this paragraph.

In the sixth reporting period, the CPD achieved Secondary compliance through the completion of the *Inclusive Policing Procedural Justice III*. In the seventh reporting period, the CPD provided the final training records for the Procedural Justice III (PJ3) course and requirements of this paragraph. Overall, 10,416 officers (or 98% of CPD officers) completed the PJ-3 course, meeting IMT training requirement thresholds for Secondary compliance.

Progress in the Eighth Reporting Period

During this reporting period, the City and CPD maintained Secondary compliance with this paragraph. During the reporting period, the IMT provided a no-objection notice to the *2023 Annual Training Plan* on March 28, 2023. Within the plan, CPD included mention of how they were incorporating content and elements of the Procedural Justice courses throughout training for officers. In doing so, the CPD is demonstrating how the concepts of these courses will sustain themselves beyond the delivery of the initial PJ courses delivered. The IMT recognizes the importance of this integration as the CPD continues to work on these important topics.

Full compliance for this paragraph will require the CPD to provide data indicating that CPD officers are engaging in procedurally just behaviors in the field. In June 2023, the IMT provided feedback to the CPD on the analytical and data components it will need to capture and produce in order for the IMT to assess operational compliance. Further, Full compliance will also be contingent on the extent to which the CPD incorporates the feedback and evaluation of this training into its annual training plans. The outcome data gathered from the field should be used to measure successes and inform future training. Thus, we encourage the CPD to use its new contact survey to measure these outcomes and consider how best to measure operational compliance with this paragraph.

¹¹ ADL no longer has proprietary ownership over the original Procedural Justice III course, so they needed to develop a new course. The Inclusive Policing class is also called Procedural Justice III Training 2021–2022.

Because of the interplay and overlap between paragraphs 72–74, operational compliance of this paragraph will also be measured as part of the CPD’s operationalization of its Impartial Policing Strategy or Plan and its annual training. The CPD must also demonstrate for this paragraph that it has a plan and approach to assess whether the concepts taught in the procedural justice training are being implemented in practice. This may include outlining and identifying the data that will be used to assess implementation, measures of success, and how the CPD will use such data to inform changes to future training on procedural justice.

Moving forward, we will assess the CPD’s efforts to use the foundation established with this Procedural Justice course and requirements of this paragraph as it works to comply with ¶¶72 and 74.

Paragraph 73 Compliance Progress History

<p>FIRST REPORTING PERIOD SEPTEMBER 1, 2019 – AUGUST 31, 2019 COMPLIANCE PROGRESS: Not Applicable</p>	<p>SECOND REPORTING PERIOD SEPTEMBER 1, 2019 – FEBRUARY 29, 2020 COMPLIANCE PROGRESS: Not Applicable</p>	<p>THIRD REPORTING PERIOD MARCH 1, 2020 – DECEMBER 31, 2020 COMPLIANCE PROGRESS: Not Applicable</p>
<p>FOURTH REPORTING PERIOD JANUARY 1, 2021 – JUNE 30, 2021 COMPLIANCE PROGRESS: Preliminary</p>	<p>FIFTH REPORTING PERIOD JULY 1, 2021 – DECEMBER 31, 2021 COMPLIANCE PROGRESS: Preliminary</p>	<p>SIXTH REPORTING PERIOD JANUARY 1, 2022 – JUNE 30, 2022 COMPLIANCE PROGRESS: Secondary</p>
<p>SEVENTH REPORTING PERIOD JULY 1, 2022 – DECEMBER 31, 2022 COMPLIANCE PROGRESS: Secondary</p>	<p>EIGHTH REPORTING PERIOD JANUARY 1, 2023 – JUNE 30, 2023 COMPLIANCE PROGRESS: Secondary</p>	

Impartial Policing: ¶74

74. Consistent with the requirements set forth in the Training section of this Agreement, CPD will incorporate the concept of impartial policing into its annual in-service training for all officers, including supervisors and command staff, by providing training on the following topics: a. CPD’s anti-bias and impartial policing policies, including, but not limited to, the policies referenced in this section unless otherwise required; b. refreshers of topics covered in Procedural Justice; c. appropriate use of social media; d. cultural competency training that prepares officers to interact effectively with people from diverse communities including, but not limited to, people of color, LGBTQI individuals, religious minorities, and immigrants; e. recognizing when a person has a physical, intellectual, developmental or mental disability, including protocols for providing timely and meaningful access to police services for individuals with disabilities; and f. the specific history and racial challenges in the City of Chicago.

Compliance Progress

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

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

The City and the CPD met Secondary compliance during this reporting period because its 2022 and 2023 in-service training plans adequately incorporates the concepts of Impartial Policing. Further, in 2022, the CPD met its in-service training requirements.

Continued Secondary compliance will be contingent on the CPD’s ability to incorporate Impartial Policing into its annual training plans and carry out said training per the requirements of the Consent Decree.

Progress before the Eighth Reporting Period

In previous reporting periods, the CPD submitted a draft version of Special Order S11-10-03, *In-Service Training*, reflecting its efforts to codify ¶74’s requirements. However, previous versions of this directive did not describe the topics that the annual in-service impartial policing training will cover and S11-10 was still under ¶¶626–41. In the sixth reporting period, the IMT reviewed a revised S11-10-03 and provided a no-objection notice on February 15, 2022, on this directive. This updated directive addresses the requirements of this paragraph and satisfied Preliminary Compliance requirements for this paragraph.

In addition, the City and the CPD provided a training titled *Constitutional Policing 2022* for review under this paragraph. On June 18, 2022, the IMT provided comments on this training specific to this paragraph. Overall, the training reflects many of the requirements of this paragraph and recommendations the IMT has made on previous trainings about pedagogy and delivery such as class exercises, knowledge checks, scenarios, and discussions on external and internal procedural justice. However, the IMT recommended revisions to this training to fully reflect the requirements of this paragraph. For example, the IMT recommended the CPD include not only examples of proper pat downs but also illustrative examples of improper pat downs. The IMT also found the evaluations and assessments for this course to not be sufficient or comprehensive for this training, particularly with communication during law enforcement actions.

Progress in the Eighth Reporting Period

As mentioned in ¶172, throughout the reporting period, the City and the CPD submitted revised training materials including a finalized S11-10, *Department Training*, and S11-10-03, *In-Service Training*, with both including mention of impartial policing principles in annual trainings for officers. The CPD also produced a revised *2023 Annual Training Plan* that included requirements of this paragraph. Specifically, the *2023 Annual Training Plan* noted the projected delivery of training on various topics related to Impartial Policing, such as fair and impartial policing, hate crimes, gender-based violence, procedural justice, constitutional policing, and de-escalation.

During the period, the CPD also produced revised materials including the *Constitutional Policing* in-service course materials; *BIA eLearning*; *Recruit Use of Force* training including the *De-escalation, Response to Resistance, and Use of Force Training* update; *Fair and Impartial Policing* training; and *Use of Force Policy Updates* training; *Prohibition on Retaliation eLearning*; *ICAT* training; and *Recruit Force Options* training in relation to ¶174. The CPD also produced a training completion record for the *Gender-Based Violence* training.

The IMT issued a no objection notice for the *Fair and Impartial Policing* training on May 18, 2023. This, plus revised materials, are a good step towards Secondary compliance with this paragraph. However, the other materials are still under revision. The IMT will assess the final materials, and related training records, as well as compliance with the *2023 Annual Training Plan* for continued Secondary Compliance in future reporting periods.

As noted in previous reports, the IMT will examine whether the CPD has employed a sufficient number of qualified analysts to ensure that the in-service and other training programs can be properly evaluated. Evaluations of the effectiveness of these trainings are necessary for the CPD to demonstrate Full compliance.

Further, although the CPD provided its *2023 Annual Training Plan* to the IMT for review and noted within the in-service courses it will deliver in 2023 that incorporate impartial policing, a broader strategy and plan, as noted in paragraph 72, is also necessary for the department to achieve Full compliance.

Paragraph 74 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: None	SIXTH REPORTING PERIOD JANUARY 1, 2022 – JUNE 30, 2022 COMPLIANCE PROGRESS: Preliminary
SEVENTH REPORTING PERIOD JULY 1, 2022 – DECEMBER 31, 2022 COMPLIANCE PROGRESS: Preliminary	EIGHTH REPORTING PERIOD JANUARY 1, 2023 – JUNE 30, 2023 COMPLIANCE PROGRESS: Secondary	

Impartial Policing: ¶75

75. OEMC currently provides diversity awareness training to all new telecommunicators which, among other things, addresses the existence of and methods for minimizing the impact of implicit bias. OEMC will continue to provide training on this topic to all new tele-communicators and, beginning in 2020, will provide all tele-communicators with refresher training every two years on this topic that is adequate in quantity, quality, type, and scope.

Compliance Progress

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

Recurring Schedule: Every Two Years **Not Yet Applicable**

Preliminary: *Under Assessment*

Secondary: *Under Assessment*

Full: *Not Yet Assessed*

At the end of the reporting period, the City remained under assessment for Preliminary compliance with the requirements of ¶75.

To assess Preliminary compliance, the IMT assessed whether the OEMC had finalized the development of its training on the topics specified in this paragraph. To assess Secondary compliance, the IMT will assess the implementation and evaluation of the Diversity Awareness Training.

Although the IMT submitted a no objection notice to OEMC’s diversity awareness training, OAG provided comments on this training and recently resent that comment letter; the OEMC has not yet addressed those comments.¹² As such our review of preliminary and secondary compliance is under assessment.

¹² On October 21, 2020, under Section XII of the Consent Decree (review procedures), the City and the OEMC provided the *Diversity Awareness Training* for review with ¶75. On November 5, 2020, the OEMC submitted a revisited training and provided a corresponding standard operating procedure, *Diversity Awareness and Implicit Bias Training Program* (the SOP) on June 4, 2021. On July 6, 2022, the OEMC informally provided a further revised training, which was later formally produced on July 14, 2022. This production included training slide decks, lesson plans, and evaluation forms. On July 14, 2022, the City and the OEMC also provided a revised standard operating procedure for review. On September 8, 2022, the OEMC, the IMT, and the OAG discussed these materials. The OAG submitted comments related to these materials on September 19, 2022. On July 27, 2023, the OAG raised these comments again and resent the comments to the OEMC, soliciting questions from the City. Corresponding discussions have continued in the ninth reporting period.

Progress before the Eighth Reporting Period

In previous reporting periods, we assessed the OEMC’s efforts to codify this paragraph’s requirements into training. We reviewed multiple versions of the *Diversity Awareness* training and noted OEMC’s collaboration with the Mayor’s Office of Equity and Racial Justice¹³ on the development of the training with suggestions for revisions on each of those iterations.

Progress in the Eighth Reporting Period

During this reporting period, the OEMC made significant strides in relation to compliance with this paragraph. Throughout the reporting period, the OEMC produced revised materials for the *Diversity Awareness* training and an updated SOP 23-001, *Diversity Awareness and Implicit Bias Training Program*. While the IMT provided some comments on these materials during the reporting period, OEMC adequately addressed our comments and the IMT issued a no objection notice for these materials on July 1, 2023. OAG provided comments on this training in September 2022 and recently resent that comment letter. The OEMC did not respond in the eighth reporting period. In addition, during this reporting period OEMC produced a training log that included the diversity awareness with over 95% completion rate.

In this reporting period, the City and the OEMC did not meet Preliminary and Secondary compliance; although the requirements are codified in the in the related policy and training a similarly issues no-objection notice is needed from OAG. Moving forward, we will also assess the outcomes of the OEMC’s efforts to ensure all telecommunicators adhere to the concepts set forth in the training of minimizing implicit bias and evaluate these training efforts.

Paragraph 75 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: None	SIXTH REPORTING PERIOD JANUARY 1, 2022 – JUNE 30, 2022 COMPLIANCE PROGRESS: None
SEVENTH REPORTING PERIOD JULY 1, 2022 – DECEMBER 31, 2022 COMPLIANCE PROGRESS: Under Assessment	EIGHTH REPORTING PERIOD JANUARY 1, 2023 – JUNE 30, 2023 COMPLIANCE PROGRESS: Under Assessment	

¹³ *Office of Equity and Racial Justice*, CITY OF CHICAGO, <https://www.chicago.gov/city/en/sites/office-of-equity-and-racial-justice/home.html>.

Impartial Policing: ¶76

76. By January 1, 2020, CPD will review and, to the extent necessary, revise its policies and procedures to ensure that allegations and complaints of hate crimes, as defined by federal, state, and local law, are comprehensively investigated.

Compliance Progress

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

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

The City and the CPD maintained Preliminary and Secondary compliance in this reporting period. To assess Full compliance, the IMT will review whether the CPD has sufficiently implemented its policy and training and assess the CPD's efforts to operationalize the requirements of this paragraph.

Progress before the Eighth Reporting Period

During the previous reporting periods, the CPD developed a supplemental standard operating procedure that responded to both community and IMT concerns about hate crime investigations.¹⁴ The CPD developed a standard operating procedure to clarify the role of supervisors to ensure a complete and timely investigation of the crime, while being sensitive to the needs of the crime victim. This standard operating procedure is helpful, but we did not see any evidence in this standard operating procedure or the hate crime policy indicating that the CPD will seek to educate the community about what constitutes a hate crime and how to report it.

During the seventh reporting period, the City and the CPD provided an updated *Hate Crimes eLearning* training for IMT review. This revised version addressed the IMT's outstanding comments from previous iterations and the IMT provided a no-objection notice for the training on September 15, 2022. In addition, at the end of the reporting period, the City and the CPD produced training completion logs for the *Hate Crimes eLearning* with 10,804 officers or 96.5% of CPD completing the training. This met the IMT's threshold for Secondary Compliance training completion.

¹⁴ This standard operating procedure is titled *Hate Crimes – Responses, Reporting, Investigating and Outreach*.

Progress in the Eighth Reporting Period

During this reporting period, the City produced the *2022 Annual Hate Crimes Report* (see ¶178) in an effort to begin to capture outcomes related to this paragraph. While these annual reports work towards demonstrating Full compliance, additional outcome measures and community involvement will be needed to comprehensively assess compliance with this paragraph.

Looking forward, for Full compliance, we will assess the CPD’s efforts to evaluate the effectiveness of their compliance with the requirements of this paragraph as well as outcomes and community interactions.

Paragraph 76 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: 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	

Impartial Policing: ¶77

77. CPD will ensure that all officers receive in-service training every two years on methods, strategies, and techniques for recognizing and responding to hate crimes, including CPD's procedures for processing reports and complaints.

Compliance Progress

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

Deadline:	December 31, 2022	<input checked="" type="checkbox"/>	Met
Recurring Schedule:	Every Two Years	<input checked="" type="checkbox"/>	Not Yet Applicable
Preliminary:	<i>In Compliance</i> (SIXTH REPORTING PERIOD)		
Secondary:	<i>In Compliance</i> (SEVENTH REPORTING PERIOD)		
Full:	<i>Not Yet Assessed</i>		

During this reporting period, the City and the CPD maintained Preliminary and Secondary compliance with the requirements of ¶77. To assess Full compliance, the IMT will assess CPD's efforts to evaluate the effectiveness of this training and compliance with this paragraph.

Progress before the Eighth Reporting Period

In previous reporting periods, the CPD submitted a draft Special Order S11-10, *Department Training*, which provides that officers will receive in-service training every two years on topics regarding hate crimes. We noted that S11-10 does not provide the same level of specificity required by this paragraph and recommended that the CPD reconcile that inconsistency.

In the sixth reporting period, the IMT provided no-objection notices to both S11-10 *Department Training* and S11-10-03, *In Service Training*. As a result of finalizing these directives, including completing community input and public comment on these policies in the fifth reporting period, the City and the CPD achieved Preliminary compliance with the requirements of this paragraph.

In the seventh reporting period, the City and the CPD provided an updated *Hate Crimes eLearning* training for IMT review in the seventh reporting period and the IMT provided a no-objection notice for the training on September 15, 2022. At the end of the seventh reporting period, the CPD provided documentation to show that 95% of its officers have completed the *Hate Crimes eLearning* training, achieving Secondary compliance with this paragraph.

Progress in the Eighth Reporting Period

In this reporting period, the CPD finalized S11-10, *Department Training*, which includes requirements of this paragraph. In addition, the City produced the *2022 Annual Hate Crimes Report* in an effort to begin to capture outcomes related to this paragraph. While these annual reports are one method to demonstrate Full compliance, additional outcome measures and community involvement will be needed to comprehensively assess compliance with this paragraph.

For Full compliance, we will assess the CPD’s efforts to evaluate the effectiveness of their compliance with the requirements of this paragraph and in assessing the impact of training on the CPD organization and its field operations.

Paragraph 77 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: None	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	

Impartial Policing: ¶78

78. *Within 180 days following the expiration of each calendar year of the term of this Agreement, CPD will publish an annual report summarizing reported hate crimes and non-criminal incidents motivated by hate during the previous calendar year (“CPD Hate Crime Report”). The CPD Hate Crime Report will provide information regarding the total number of reported hate crimes and non-criminal incidents motivated by hate, organized by type of crime, classification of bias motivation, and disposition of hate crime investigations in each district.*

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

Recurring Schedule: Annual **Met** **Missed**

Preliminary: *In Compliance (FIFTH REPORTING PERIOD)*

Secondary: *In Compliance (SEVENTH REPORTING PERIOD)*

Full: *Not Yet Assessed*

In the eighth reporting period, the City and the CPD maintained Preliminary and Secondary compliance. During this reporting period, the City and the CPD submitted, and published its *2022 Annual Hate Crimes Report*, as required by the Consent Decree.¹⁵

For Full compliance, the IMT will assess the City and the CPD’s continual submission and publication of the annual report as well as whether the reports addressed this paragraph’s requirements, the quality of data that the CPD used to develop the report, and the department’s efforts to outreach and engage in meaningful dialogue with the community and stakeholders about these reports and data.

Progress before the Eighth Reporting Period

In previous reporting periods, we received the *Hate Crime in Chicago: 2019 Annual Report* and *Hate Crime in Chicago: 2020 Annual Report*. Neither of these reports included important disposition data as required by ¶78 and as requested by the IMT. The 2019 and 2020 reports did not include important information regarding the disposition of hate-crime investigations. The only disposition data included in the 2019 and 2020 Reports was whether the hate crime incident was “Bona Fide,” “Undetermined,” or “Unfounded.” However, the IMT and the public expected ad-

¹⁵ See *Hate Crimes 2022 Review*, CHICAGO POLICE DEPARTMENT, <https://home.chicagopolice.org/wp-content/uploads/2022-Hate-Crimes-Report-FOR-PUBLICATION.pdf>.

ditional disposition data, such as whether the CPD conducted a follow-up investigation; whether a suspect was identified, arrested, charged with a hate crime, and convicted; and whether the investigation remains open. Also, we continued to encourage the CPD to break down these dispositions by the protected classes to ensure the public that the CPD's decisions and actions do not reflect any bias.

In the fifth reporting period, the City and the CPD finalized G04-06, *Hate Crimes and Related Incidents Motivated by Bias or Hate*, which included annual reporting requirements of this paragraph. As a result, the City and the CPD achieved Preliminary compliance with this paragraph in the last reporting period. In the sixth reporting period, the CPD did not submit a 2021 annual hate-crimes report to review but did provide the outline for the 2021 report. The IMT subsequently provided comments to the City and the CPD, which included expanding sections of the report that note the efforts that CPD has taken to address hate crimes and educate the community about reporting and the resources available to victims. The CPD published the *2021 Hate Crimes Annual Report* on August 29, 2022.¹⁶

Progress in the Eighth Reporting Period

On June 29, 2023, the CPD published the *2022 Annual Hate Crimes Report* to the CPD website. In this most recent hate crimes report, the CPD included reporting on the requirements of this paragraph such as the total number of reported hate crimes and non-criminal incidents motivated by hate, organized by type of crime, classification of bias motivation, and disposition of hate crime investigations in each district. The IMT appreciates the CPD's attention to the requirements of this paragraph and addressing the IMT's comments in development of this latest report.

As noted in previous reports, we encourage the CPD to engage community members and organizations with relevant knowledge who can provide feedback regarding the hate-crimes data-collection efforts and the information included in the annual report and dashboard. Such outreach efforts will also be used to determine the City and the CPD's achievement with Full compliance.

¹⁶ See *Hate Crimes 2021 Review*, CHICAGO POLICE DEPARTMENT, <https://home.chicagopolice.org/wp-content/uploads/Hate-Crimes-Annual-Report-2021-English-1.pdf>.

Paragraph 78 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: Secondary	EIGHTH REPORTING PERIOD JANUARY 1, 2023 – JUNE 30, 2023 COMPLIANCE PROGRESS: Secondary	

Impartial Policing: ¶¶79–82

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

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

81. *If at any point, the City’s obligations under the August 6, 2015 Investigatory Stop and Protective Pat Down Settlement Agreement (“ACLU Agreement”) terminate, CPD will include all stops effectuated by CPD members that were subject to the ACLU Agreement in the assessment required by this Part.*

82. *Nothing in this Part will be interpreted to require CPD to analyze statistical data beyond that currently collected and maintained in electronic databases unless otherwise required under this Agreement. In instances in which race or gender data is not maintained in an electronic database, CPD may use geographic data in its assessment. For purposes of this paragraph, information contained solely in a scanned PDF document or other image of a document, and not otherwise collected and maintained in an electronic database, is not considered data maintained in an electronic database.*

Compliance Progress

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

Recurring Schedule:	Annual	<input type="checkbox"/> Met	<input checked="" type="checkbox"/> Missed
	¶¶79/82		¶¶80/82
Preliminary:	<i>Not in Compliance</i>		<i>Not in Compliance</i>
Secondary:	<i>Not Yet Assessed</i>		<i>Not Yet Assessed</i>
Full:	<i>Not Yet Assessed</i>		<i>Not Yet Assessed</i>

The City and the CPD have not yet achieved Preliminary compliance for ¶¶79 or 80 because no revisions to the proposed methodology, as required by this paragraph were provided and no report was prepared.¹⁷

To assess Preliminary compliance, the IMT assesses the methodology the CPD will use to comply with requirements of ¶¶79 and 80 for administrative notices of violation (ANOVs) and misdemeanor arrests.

Progress before the Eighth Reporting Period

In previous reporting periods, we monitored the CPD’s efforts to assess misdemeanor arrest and ANOVs, focusing mostly on the CPD’s proposed methodologies. We did not approve the CPD’s preliminary methodology, as required by ¶80.

During the sixth reporting period, we continued to inquire about the CPD’s efforts to revise the methodology based on our earlier feedback. On June 16, 2022, the CPD and the City provided a memo on the circumstances surrounding the lack of progress regarding the requirements of this paragraph—specifically, the developed but not produced draft ANOVs report as required by this paragraph. The memo noted a lack of reliable data and lack of change in the results over the five-year period examined.

While the IMT appreciated the production of a memo on the circumstances of this report, the IMT remained concerned that there was no update or planned timeline for progress on these paragraphs. The provided memo did not materially relate to the lack of an IMT-approved methodology for this paragraph, nor the lack of progress on these paragraphs. For the IMT to consider compliance with this paragraph, the City and the CPD must provide a proposed methodology for the ANOVs report, as a starting point. Given the length of time since the IMT reviewed but never approved these methodologies, the IMT recommends a renewed discussion

¹⁷ Paragraph 81 does not require a compliance assessment at this time since the ACLU Agreement remains in effect. If, however, the ACLU Agreement is terminated, ¶81 will be activated and IMT will expect the same data and apply the same standards. Independent of ¶81, the IMT reserves the right to request investigatory stops data to assess outcomes specified in the Consent Decree regarding impartial policing and other reforms.

during regular check-ins with the City and the CPD on the requirements of this paragraph.

Progress in the Eighth Reporting Period

In this reporting period, the City and the CPD did not produce any materials related to these paragraphs. In interactions with CPD during the reporting period, the CPD indicated that they were not expecting to undertake related audits required under this paragraph in 2023 and that staffing availability was the primary challenge related to lack of progress on these paragraphs. The IMT continues to urge the CPD to assess its staffing needs to meet the requirements of the Consent Decree.

In sum, the City and the CPD did not achieve Preliminary compliance with these paragraphs because the CPD did not provide a revised proposed methodology for IMT to review, nor has the CPD developed a plan to address the remaining concerns, including a plan and timeline to eventually automate the collection and electronic storage of ANOVs demographic data (*e.g.*, race, age, and gender). Moving forward, we will monitor the CPD’s efforts to revise its methodology for approval. After we approve the methodology, we will assess the CPD’s efforts to conduct the ¶79 assessment and publish the findings.

Paragraph 79–82 Compliance Progress History¹⁸

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: 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	

¹⁸ As above, ¶81 does not require a compliance assessment at this time since the ACLU Agreement remains in effect. If, however, the ACLU Agreement is terminated, ¶81 will be activated and IMT will expect the same data and apply the same standards. Independent of ¶81, the IMT reserves the right to request investigatory stops data to assess outcomes specified in the Consent Decree regarding impartial policing and other reforms.