

# Appendix 4

## Recruitment, Hiring & Promotions

### Compliance Assessments, by Paragraph

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## Recruitment, Hiring, and Promotions: ¶253

*253. The City and CPD will ensure that its recruitment, hiring, and promotion policies and practices are lawful, fair, and consistent with best practices, anti-discrimination laws, and the terms of this Agreement.*

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### Compliance Progress

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

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

The City and the CPD maintained Preliminary compliance with ¶253 in the eighth reporting period.

To assess Preliminary compliance with ¶253, we reviewed the City’s and the CPD’s relevant policies and documents following the process described in the Consent Decree (¶¶626–41), which outlines applicable consultation, resolution, workout, and public comment periods. To assess Secondary compliance with this paragraph, we need to review substantive data demonstrating that recruitment and hiring practices align with the requirements of this paragraph, including records reflecting the development of clear guidance on the relevant policies and procedures and the allocation of responsibility thereunder.<sup>1</sup>

#### *Progress before the Eighth Reporting Period*

This paragraph was assessed for the first time in the fourth reporting period when the IMT determined that the CPD failed to achieve Preliminary compliance. The City and the CPD first achieved Preliminary compliance in the fifth reporting period. During the fifth reporting period, we reviewed the CPD recruitment, hiring, and promotion records to determine if the City and the CPD developed and finalized policies, written in plain language, with proper procedures. We determined that the City and the CPD maintained Preliminary compliance with the submission of: (1) E05-34, *Department Recruitment, Selection and Hiring Plan* (produced March 2, 2022); (2) IAP 07-01, *CPD Sworn Member Recruitment* (produced June 30, 2022) (revised); and (3) IAP 07-02, *CPD Sworn Member Promotions* (produced June 30, 2022) (revised).

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<sup>1</sup> By way of example, as explained below, the documents submitted depicting Police Promotions Committee activities substantiate the City’s commitment to lawful and fair promotion practices, satisfying Secondary compliance for the promotions component of this paragraph. Submission of similar data related to recruitment and hiring practices would support Secondary compliance for the recruitment and hiring components of this paragraph.

The IAP 07-01 revisions added the requirement for submission to the IMT and the OAG (per ¶638) and a change in V(2) from every four years to every three years (per ¶1258). The IAP 07-02 revisions added the requirement for submission to the IMT and the OAG (per ¶638) and a change in III(2) from every four years to every three years (per ¶1261). The City and the CPD also produced multiple documents depicting Police Promotions Committee activities, substantiating the City's commitment to lawful and fair promotion practices.

E05-34 clearly established responsibility for ensuring that the CPD's recruitment and hiring practices are meeting the requirements of ¶1253. Section III(A) provided that the Office of the Inspector General will monitor employment activity, such as recruitment, selection, hiring, and promotions for Equal Employment Opportunity. While these policies made evident that recruitment, hiring, and promotions policies met ¶1253 requirements, substantial data demonstrating that recruitment and hiring practices align with requirements was not provided. The CPD, however, maintained Preliminary compliance.

The City and the CPD maintained Preliminary compliance during the seventh reporting period. The City and the CPD produced finalized and bates-stamped versions of E05-34 (July 2022), IAP 07-01 and IAP 07-02 (August 2022), and Police Promotions Committee Activities (August 2022) during the seventh reporting period but did not produce any new substantive data demonstrating that the recruitment and hiring practices align with the requirements of this paragraph to establish Secondary compliance.

#### *Progress in the Eighth Reporting Period*

During this reporting period, the City and the CPD produced the Recruitment and Retention Unit SOP ("Recruitment Unit SOP"). The Recruitment Unit SOP establishes unit objectives, provides a concise plan of action to achieve those objectives, provides a clear allocation of responsibilities of Unit command staff and members, and works toward the requirements of ¶1253. The IMT also reviewed the Department of Human Resources Police Promotions Committee, HR CPCD INPC01, which establishes protocols for DHR to fulfill its obligations under IAP 07-02 as related to assembling and leading the Police Promotions Committee.

The City and the CPD also submitted a Response to the IMT's Request for Information that provides demographic information from two recent Academy classes, as requested.

The IMT also reviewed the CPD's Recruitment Strategic Plan, which provides a recruitment roadmap through 2025. It details the commitment and efforts made by the CPD to recruit and hire the ideal police officer candidate.

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The City and the CPD maintained Preliminary compliance and made efforts toward Secondary compliance during this reporting period. The IMT looks forward to receiving substantive data for recruitment and hiring practices demonstrating Secondary compliance. More specifically, the additional document submissions during this reporting period establish that the CPD has developed guidance on recruitment and hiring policies and procedures that allocate related responsibilities. However, efforts towards compliance that demonstrate qualified and responsible individuals are in the designated positions and have received the requisite training, are not included.

### Paragraph 253 Compliance Progress History

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

## Recruitment, Hiring, and Promotions: ¶254

*254. CPD will provide clear guidance on its policies and procedures for recruiting, hiring, and promoting police officers and will clearly allocate responsibilities for recruitment, hiring, and promotion efforts.*

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### Compliance Progress

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

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

The City and the CPD maintained Preliminary compliance with ¶254 this reporting period.

To assess Preliminary compliance with ¶254, we reviewed the City’s and the CPD’s relevant policies and documents following the process described in the Consent Decree (¶¶626–41), which outlines applicable consultation, resolution, workout, and public comment periods. To fully assess Secondary compliance with this paragraph, we will need to review data demonstrating that the responsibilities allocated by the relevant policies are being executed by qualified individuals designated under such policy.

The IMT sought to review policy sources, data sources, and job sources including a review of the developed job descriptions and requirements for each sworn member.

#### *Progress before the Eighth Reporting Period*

This paragraph was assessed for the first time in the fourth reporting period when the IMT determined that the CPD failed to achieve Preliminary compliance. During the fifth reporting period, we reviewed the CPD recruitment, hiring, and promotion records, and the City and the CPD achieved Preliminary compliance for the first time. We noted that the collective documents included the specified responsibilities and roles that would demonstrate Preliminary compliance.

During the sixth reporting period, the City and the CPD submitted the following documents to substantiate compliance during the reporting period: E05-34, *Department Recruitment, Selection and Hiring Plan*; a revised version of IAP 07-01, *CPD Sworn Member Recruitment*; and a revised version of IAP 07-02, *CPD Sworn Member Promotions*.

These policies made evident that recruitment, hiring and promotions policies and procedures met ¶254 requirements by clearly allocating responsibilities for ¶254 efforts. However, no data was provided demonstrating that recruitment and hiring

activities articulated in the policies were occurring, facilitated by those designated in policy. Therefore, through submission of E05-34 combined with the revised versions of IAP 07-01 and IAP 07-02, CPD maintained Preliminary compliance, but did not achieve Secondary compliance.

The City and the CPD maintained Preliminary compliance during the seventh reporting period. The City and the CPD produced finalized and bates-stamped versions of E05-34 (July 2022), IAP 07-01 and IAP 07-02 (August 2022), and Police Promotions Committee Activities (August 2022) during the seventh reporting period, demonstrating that policies had been put in place for recruiting, hiring, and promoting police officers. However, the City and the CPD did not produce any new data demonstrating that recruitment and hiring activities articulated in the policies were occurring, facilitated by those designated in policy to address the requirements for Secondary compliance.

#### *Progress in the Eighth Reporting Period*

During this reporting period, the City and the CPD produced the Recruitment and Retention Unit SOP (“Recruitment Unit SOP”). The Recruitment Unit SOP establishes unit objectives, provides a concise plan of action to achieve those objectives, provides a clear allocation of responsibilities of Unit command staff and members, and works toward the requirements of ¶254. The IMT also reviewed the Department of Human Resources Police Promotions Committee, HR CPCD INPC01, which establishes protocols for DHR to fulfill its obligations under IAP 07-02 as related to assembling and leading the Police Promotions Committee.

The City and the CPD also submitted a Response to the IMT’s Request for Information that provides demographic information from two recent Academy classes, as requested.

The IMT also reviewed the CPD’s Recruitment Strategic Plan, which provides a recruitment roadmap through 2025. It details the commitment and efforts made by the CPD to recruit and hire the ideal police officer candidate.

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The City and the CPD maintained Preliminary compliance and made efforts toward Secondary compliance this reporting period. The IMT looks forward to receiving substantive data for recruitment and hiring practices demonstrating Secondary compliance. More specifically, the additional document submissions during this reporting period establish that the CPD has developed guidance on recruitment and hiring policies and procedures that allocate related responsibilities. However, efforts towards compliance that demonstrate qualified and responsible individuals are in the designated positions and have received the requisite training, are not included.

## Paragraph 254 Compliance Progress History

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

## Recruitment, Hiring, and Promotions: ¶255

*255. To further this goal, the City and CPD will publish job descriptions for each sworn member title code, specifying the current duties, responsibilities, and minimum qualifications for each position.*

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### Compliance Progress

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

**Preliminary:** *In Compliance (FIFTH REPORTING PERIOD)*

**Secondary:** *In Compliance (FIFTH REPORTING PERIOD)*

**Full:** *Not Yet Assessed*

The City and the CPD maintained Secondary compliance with ¶255 this reporting period.

To assess Preliminary compliance with ¶255, we reviewed the City’s and the CPD’s relevant policies and documents following the process described in the Consent Decree (¶¶626–41), which outlines applicable consultation, resolution, workout, and public comment periods. To assess Secondary compliance, we reviewed published job descriptions and requirements for each sworn member, as well as policy and standard operating procedures that guide the process of periodical updates to such job descriptions. To assess Full compliance, we will need to review data sufficient to demonstrate implementation and sustainment of a systematic policy- and procedure-guided process for developing, revising, and publishing job descriptions for each sworn member.

#### *Progress before the Eighth Reporting Period*

In previous reporting periods, the IMT assessed documents that the City and the CPD produced to demonstrate compliance. The City and the CPD achieved Preliminary and Secondary compliance in the fifth reporting period. The records demonstrated requirements for updating and publishing job descriptions, including key Consent Decree concepts.

During the sixth reporting period, the City and the CPD produced the following records as data to demonstrate compliance with ¶255: IAP 07-01 (*CPD Sworn Member Recruitment and Hiring*) and IAP 07-02 (*CPD Sworn Member Promotions*). IAP 07-01 § IV., *Job Descriptions*, requires the Department of Human Resources to review, update, and publish the job descriptions for each sworn and civilian member title code, specifying the current duties, responsibilities, and minimum qualifications for each position, as required by ¶255.

The City and the CPD produced finalized and bates-stamped versions of IAP 07-01 and IAP 07-02 (August 2022) during the seventh reporting period. The City and the



CPD did not provide a link or updates to job descriptions or activities during this reporting period related to job descriptions. The IMT examined some CPD job descriptions published online and did not identify any substantive changes during the seventh reporting period. Unlike in previous reporting periods, the CPD did not provide a link or updates to job descriptions or activities during the seventh reporting period related to job descriptions.

*Progress in the Eighth Reporting Period*

Revised IAP 0701, effective 27 January 2023, §IV., designates responsibilities for reviewing, updating, and publishing job descriptions. A spot check of online job descriptions revealed publication dates in 2021 and 2022. The IMT could not determine if updates to any job descriptions were made.

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The City and the CPD maintained Secondary compliance this reporting period. The CPD did not provide a link or updates to job descriptions or activities during this reporting period related to job descriptions. Looking forward, we expect the CPD to provide this information to continue to maintain Secondary compliance with ¶255. Full compliance will require the City and the CPD to demonstrate sufficient implementation and sustainment of a systematic policy- and procedure-guided process for developing, revising, and publishing job descriptions for each sworn member.

**Paragraph 255 Compliance Progress History**

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

## Recruitment, Hiring, and Promotions: ¶256

*256. The City and CPD will continue to review any hiring and promotional exams to ensure they are fair, validated, and properly administered.*

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### Compliance Progress

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

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

The City and the CPD maintained Preliminary compliance with ¶256 this reporting period.

To assess Preliminary compliance with ¶256, we reviewed the City’s and the CPD’s relevant policies and documents following the process described in the Consent Decree (¶¶626–41), which outlines applicable consultation, resolution, workout, and public comment periods. Our evaluation included a review of whether such policies and the processes described therein ensure fairness, validity, and proper administration of hiring and promotional exams. To assess Secondary compliance, we need to review data sufficient to determine if the City and the CPD are collecting, tracking, and maintaining data about hiring and promotional exams as required by this paragraph. The IMT will also need to assess job postings and hirings to determine if the City and the CPD have created the requisite positions and have staffed those positions with qualified personnel required to ensure fairness, validity, and proper administration of such exams.

#### *Progress before the Eighth Reporting Period*

In the fifth reporting period, the City and the CPD achieved Preliminary compliance with ¶256 by submitting the *CPD Sworn Member Recruitment and Hiring Policy* (IAP 07-01) and the *CPD Sworn Member Promotions Policy* (IAP 07-02). The policies included requirements for reviewing promotional exams and ensuring that they were administered according to Consent Decree requirements. We suggested that the City and the CPD make changes to the frequency of periodic reviews to align with all requirements of the Consent Decree.

In the seventh reporting period, we reviewed the CPD’s *Sworn Member Recruitment and Hiring* (IAP 07-01) and *Sworn Member Promotions* (IAP 07-02) policies. IAP 07-01 and IAP 07-02 required the Department of Human Resources (DHR) to review promotional examinations to ensure they are fair, validated, and properly administered. The policies further required each promotional exam, and its administration process, to be reviewed no less frequently than every three years.

We also reviewed the Department of Human Resources (DHR) Review of Hiring and Promotional Exams (DHR SOP). As noted in the sixth reporting period, the Department of Human Resources Standard Operating Procedure (DHR SOP) was intended to reflect the Department of Human Resources' process for review of hiring and promotional exams. The DHR SOP addressed the Department of Human Resources' responsibilities for exam review, development, and administration by category, substance of exam review, procuring a developing or administering consultant, exam development, exam administration, exam security, post exam activities, and review.

The City and the CPD also produced the Office of Public Safety Administration Standard Operating Procedure (OPSA SOP), which assured the IMT that the City and the CPD will review any hiring and promotional exams. However, the IMT noted that the OPSA SOP did not provide for when consultants would be utilized in exam development and administration. For certain category of positions, as written, it appeared that the use of consultants was discretionary under the OPSA SOP. The element of discretion leaves room for a process that may produce no transparency or no review of the hiring and promotional exams.

*Progress in the Eighth Reporting Period*

This reporting period, the City and the CPD did not produce any documentation that demonstrated efforts related to ¶256.

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The City and the CPD maintained Preliminary compliance this reporting period. Looking forward, achieving Secondary compliance will require the City and the CPD to demonstrate that they have sufficiently assessed processes to ensure fairness, validity, and proper administration of exams. Specifically, the IMT will assess policies, processes, and other records to determine if the City and the CPD are collecting, tracking, and maintaining data about hiring and promotional exams as required by this paragraph. The IMT will also assess job postings and hirings to determine if the City and the CPD have created the requisite positions and have staffed those positions with qualified personnel required to ensure fairness, validity, and proper administration of such exams.

## Paragraph 256 Compliance Progress History

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

COMPLIANCE PROGRESS:  
Not Applicable

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

COMPLIANCE PROGRESS:  
Not Applicable

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

COMPLIANCE PROGRESS:  
Status Update

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

COMPLIANCE PROGRESS:  
None

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

COMPLIANCE PROGRESS:  
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

## Recruitment, Hiring, and Promotions: ¶257

*257. CPD will inform officers of the role of the Office of the Inspector General (“OIG”) in overseeing the hiring and promotions processes.*

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### Compliance Progress

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

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

The City and the CPD reached Full compliance with ¶257 this reporting period.

To assess Preliminary compliance with ¶257, we reviewed the City’s and the CPD’s relevant policies and documents following the process described in the Consent Decree (¶¶626–41), which outlines applicable consultation, resolution, workout, and public comment periods. To assess Secondary compliance, we need to review current data demonstrating that the CPD has informed at least 95% of CPD officers of the Office of the Inspector General’s role and sufficiently and fully developed and implemented a sustainable process to inform CPD officers of the Office of the Inspector General’s role.

#### *Progress before the Eighth Reporting Period*

During the fifth reporting period, we reviewed CPD training records to assess compliance and found that the City and the CPD achieved Full compliance with this paragraph. We reviewed training records that showed a 98% completion for the e-learning training. The fifth reporting period was the second consecutive period of sustained Secondary compliance. We noted that to continue to sustain Full compliance, the City and the CPD would need to continue to demonstrate that they have implemented a sustainable process for informing CPD officers of the OIG’s role.

During the sixth reporting period, the City and the CPD submitted materials, which included a Mandatory eLearning Compliance Roster, Data Analysis Input Verification Form, and a screenshot of the OIG Hiring and Promotions eLearning training. These materials demonstrated that an Office of Inspector General eLearning course was created and was used to train at least 98% of CPD officers about this paragraph’s requirements. But that data source was only current through April of 2021 and the City and the CPD did not submit any data to demonstrate maintained compliance beyond April 2021.

In the previous reporting period, we reviewed the OIG eLearning Excel Sheet and OIG eLearning Dashboards, which demonstrated that 99% of eligible officers (excluding Academy recruits) successfully completed the requisite OIG eLearning course. The City and the CPD reached Secondary compliance because the City and the CPD provided data that showed continued compliance with the requirements of ¶257.

*Progress in the Eighth Reporting Period*

This reporting period, the City and the CPD produced the OIG eLearning Dashboard, OIG eLearning XLSX Spreadsheet, and Training Members data. The documentation indicated 98% compliance with the training requirements of ¶257. New hires are automatically enrolled. This is the second consecutive period of maintaining Secondary compliance, indicating that the City and the CPD has developed the capacity to maintain compliance with this paragraph.

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The City and the CPD reached Full compliance with ¶257 this reporting period. To maintain Full compliance, we will look for the City and the CPD to demonstrate they have fully developed and implemented a sustainable process to inform CPD officers, especially Academy recruits, of the Office of the Inspector General’s role in overseeing the hiring and promotional processes.

**Paragraph 257 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: Status Update</p>
<p>FOURTH REPORTING PERIOD JANUARY 1, 2021 – JUNE 30, 2021 COMPLIANCE PROGRESS: Secondary</p>	<p>FIFTH REPORTING PERIOD JULY 1, 2021 – DECEMBER 31, 2021 COMPLIANCE PROGRESS: Full</p>	<p>SIXTH REPORTING PERIOD JANUARY 1, 2022 – JUNE 30, 2022 COMPLIANCE PROGRESS: Preliminary</p>
<p>SEVENTH REPORTING PERIOD JULY 1, 2022 – DECEMBER 31, 2022 COMPLIANCE PROGRESS: Secondary</p>	<p>EIGHTH REPORTING PERIOD JANUARY 1, 2023 – JUNE 30, 2023 COMPLIANCE PROGRESS: Full</p>	

## Recruitment, Hiring, and Promotions: ¶258

*258. By December 31, 2020, and at least every three years thereafter, CPD will assess its recruitment and hiring processes to ensure that its policies and practices comply with the law, are transparent, and are consistent with this Agreement.*

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### Compliance Progress

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

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

**Preliminary:** *In Compliance* (FIFTH REPORTING PERIOD)

**Secondary:** *In Compliance* (NEW)

**Full:** *Not Yet Assessed*

The City and the CPD reached Secondary compliance with ¶258 this reporting period.

To assess Preliminary compliance with ¶258, we reviewed the City’s and the CPD’s relevant policies and documents following the process described in the Consent Decree (¶¶626–41), which outlines applicable consultation, resolution, workout, and public comment periods. To assess Secondary compliance, we reviewed an assessment prepared by a qualified consultant. Coleman and Associates were engaged to assess whether the CPD’s recruitment and hiring policies and practices comply with the law, are transparent, and are consistent with ¶258 requirements. This assessment has been completed, reviewed, and approved by the IMT.

#### *Progress before the Eighth Reporting Period*

During previous reporting periods, we reviewed the CPD’s recruitment, hiring, and promotion records, as well as the draft Assessment Scope from a third-party consultant and the operating procedure for consultant engagements. The City and the CPD reached Preliminary compliance in the fifth reporting period. We noted that the IMT would conduct a further assessment during the next reporting period, following the extended deadline provided due to the COVID-19 pandemic.

During the previous reporting period, we reviewed the CPD’s *Sworn Member Recruitment and Hiring* (IAP 07-01) and *CPD Sworn Member Promotions* (IAP 07-02) policies. Two days before the close of the seventh reporting period, the City and the CPD informally produced *Coleman & Associates’ Findings and Recommendations Report: Consent Decree PAR 258 and PAR 259*, which was not timely enough for the IMT to meaningfully review and evaluate it, as required for Secondary compliance with this paragraph.

In addition to the policy review, the IMT attended Recruitment, Hiring, and Promotions meetings where Coleman & Associates presented updates to their work, showing that the policy was being applied.

*Progress in the Eighth Reporting Period*

This reporting period, the City and the CPD submitted the Coleman Report. This report detailed the assessment of the CPD recruitment and hiring processes. Consistent with the requirements of IAP 07-01 §III.A & B, the City provided the requisite staff and resources for the qualified consultant’s work to be completed.

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The City and the CPD reached Secondary compliance during this reporting period. The third-party consultant’s report was formally produced and approved. For Full compliance, we will look for the City and the CPD to demonstrate by the consultant’s timely work-product submission, that the CPD’s recruitment and hiring processes comply with the law, are transparent, and are consistent with Consent Decree requirements to be regularly scheduled and completed every three years.

**Paragraph 258 Compliance Progress History**

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



## Recruitment, Hiring, and Promotions: ¶259

*259. The recruitment and hiring assessment will identify and consider: a. the core set of characteristics and capabilities of qualified recruits; b. methods for consideration of discriminatory or biased behavior by the applicant against a member of a protected class in hiring decisions; c. barriers and challenges to successfully completing the recruit application process; d. Department strategies for attracting and hiring qualified applicants that reflect a broad cross section of the Chicago community; e. input, which could consider surveys, from successful and unsuccessful applicants, recruits and other CPD members, community members, community-based organizations, legal and law enforcement professionals, and internal and external subject matter experts regarding the strengths and weaknesses of the recruitment and hiring processes; f. recommendations for any modifications to the current recruitment and hiring processes that would enable CPD to satisfy the requirements of this section; and g. a plan for implementing any recommended modifications with a timeline for implementation.*

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### Compliance Progress

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

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

The City and the CPD reached Secondary compliance with ¶259 this reporting period.

To assess Preliminary compliance with ¶259, we reviewed the City’s and the CPD’s relevant policies and documents following the process described in the Consent Decree (¶¶626–41), which outlines applicable consultation, resolution, workout, and public comment periods. To assess Secondary compliance, we need to review an assessment prepared by a qualified consultant engaged to assess whether the CPD’s recruitment and hiring policies and practices comply with the law, are transparent, and are consistent with ¶258 requirements. The IMT understands that this assessment has been completed, but not yet reviewed by IMT.

#### *Progress before the Eighth Reporting Period*

In the fifth reporting period, the IMT assessed documents the City and the CPD produced to demonstrate compliance and the City and the CPD reached Preliminary compliance. The documents showed that the CPD’s recruitment, hiring, and

promotion records, draft Assessment Scope, and the operating procedures, document the appropriate responsibilities and procedures required by this paragraph. The City and the CPD maintained Preliminary compliance in the sixth reporting period but did not reach Secondary compliance.

During the seventh reporting period, we reviewed the CPD's *Sworn Member Recruitment and Hiring* (IAP 07-01) and *CPD Sworn Member Promotions* (IAP 07-02) policies. Two days before the close of the seventh reporting period, the City and the CPD informally produced *Coleman & Associates' Findings and Recommendations Report: Consent Decree PAR 258 and PAR 259*, which was not timely enough for the IMT to meaningfully review and evaluate it, as required for Secondary compliance with this paragraph.

In addition to the policy review, the IMT attended Recruitment, Hiring, and Promotions meetings where the consultant presented updates to their work, obviating that the policy is being applied.

#### *Progress in the Eighth Reporting Period*

This reporting period, the City and the CPD formally produced *Coleman & Associates' Findings and Recommendations Report: Consent Decree PAR 258 and PAR 259* ("Coleman Report"). The Coleman Report, pages vi and vii, addresses all subparagraph requirements specified in ¶259. Multiple sources were identified and queried as part of this assessment. Information was generated through interviews, research, and expert evaluation. Overall, the report represents a rigorous review of the CPD's recruiting, hiring, and community policing practices with a narrow focus on how those areas comply with the applicable Consent Decree paragraphs.

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The City and the CPD reached Secondary compliance during this reporting period. The third-party consultant's report was formally produced and approved. For Full compliance, we will look for the CPD to demonstrate it has sufficiently implemented a method of regularly assessing recruitment and hiring processes in accordance with requirements every three years.

## Paragraph 259 Compliance Progress History

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

COMPLIANCE PROGRESS:  
Not Applicable

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

COMPLIANCE PROGRESS:  
Not Applicable

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

COMPLIANCE PROGRESS:  
Not Applicable

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

COMPLIANCE PROGRESS:  
None

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

COMPLIANCE PROGRESS:  
Preliminary

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

COMPLIANCE PROGRESS:  
Preliminary

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

COMPLIANCE PROGRESS:  
Preliminary

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

COMPLIANCE PROGRESS:  
Secondary

## Recruitment, Hiring, and Promotions: ¶260

*260. CPD will implement the plan above in Paragraph 259 in accordance with the specified timeline for implementation.*

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### Compliance Progress

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

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

The City and the CPD maintained Preliminary compliance with ¶260 this reporting period.

To assess Preliminary compliance with ¶260, we reviewed the City’s and the CPD’s relevant policies and documents following the process described in the Consent Decree (¶¶626–41), which outlines applicable consultation, resolution, workout, and public comment periods. To assess Secondary compliance, we need to review the final work product from a qualified consultant engaged to assess whether the CPD’s recruitment and hiring policies and practices comply with the law, are transparent, and are consistent with ¶259(a–g) requirements, as well as data demonstrating that the consultant’s assessments have been timely completed within eight months of the consultant’s engagement. The IMT acknowledges that this assessment has been completed, but not within the specified timeframe.

#### *Progress before the Eighth Reporting Period*

In previous reporting periods, the IMT assessed documents the City and the CPD produced to demonstrate compliance and the City and the CPD reached Preliminary compliance in the fifth reporting period. The documents showed that the recruitment, hiring, and promotion records included requirements that demonstrated Preliminary compliance. The City and the CPD maintained Preliminary compliance in the sixth reporting period, but did not reach Secondary compliance.

During the seventh reporting period, we reviewed the CPD’s *Sworn Member Recruitment and Hiring* (IAP 07-01) and *CPD Sworn Member Promotions* (IAP 07-02) policies. Two days before the close of the seventh reporting period, the City and the CPD informally produced *Coleman & Associates’ Findings and Recommendations Report: Consent Decree PAR 258 and PAR 259*, which was not timely enough for the IMT to meaningfully review and evaluate it, as required for Secondary compliance with this paragraph.

In addition to the policy review, the IMT attended Recruitment, Hiring, and Promotions meetings where the consultant presented updates to their work, obviating that the policy is being applied.

While IAP 07-01 mandates compliance with ¶259(a-g), Section III(E)(2) required the consultant to complete the *Recruitment and Hiring Assessment* and the *Recruitment and Hiring Implementation Plan* within eight months from the date that the consultant was retained. The City and the CPD did not produce data substantiating this, therefore it maintained Preliminary Compliance, but did not reach any further levels of compliance.

*Progress in the Eighth Reporting Period*

Although the Coleman Report was conducted, completed, and submitted, and the content meets ¶259 requirements, the report was not submitted and approved within the specified period. The next opportunity to reach an additional level of compliance with ¶260 will be in the three-year period when the next assessment becomes due.

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The City and the CPD maintained Preliminary compliance this reporting period. Moving forward, we expect the City and the CPD to substantiate that the third-party consultant’s assessment discussed above was completed and submitted in accordance with the requirements of this paragraph within the specified timeline to reach Secondary compliance.

**Paragraph 260 Compliance Progress History**

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

## Recruitment, Hiring, and Promotions: ¶261

**261.** *Within 18 months of the Effective Date, and at least every three years thereafter, CPD will obtain an independent expert assessment of its promotions processes for the ranks of Sergeant and Lieutenant to ensure that its policies and practices comply with the law, are transparent, and are consistent with this Agreement. The independent expert will review the existing Hiring Plan, and any relevant collective bargaining agreements in order to conduct the assessment of the Sergeant and Lieutenant promotions processes. The Sergeant and Lieutenant promotions assessment, at a minimum, will identify: a. the processes by which CPD selects candidates for promotion to Sergeant and Lieutenant who possess a core set of competencies, characteristics, and capabilities and, when applicable, who are effective supervisors in compliance with CPD policy and this Agreement; b. methods for consideration of each candidate’s disciplinary history in the selection process; c. Department strategies for promoting qualified applicants who reflect a broad cross section of the Chicago community; d. the frequency with which CPD should hold promotional exams; e. opportunities to increase transparency and officer awareness about the promotions process and promotions decisions, including, but not limited to, identifying criteria for promotions; and f. recommendations for any modifications to the current promotions processes, which would enable CPD to address the requirements of this section.*

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### Compliance Progress

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

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

**Preliminary:** *In Compliance (THIRD REPORTING PERIOD)*

**Secondary:** *In Compliance (THIRD REPORTING PERIOD)*

**Full:** *Not Yet Assessed*

The City and the CPD maintained Secondary compliance with ¶261 this reporting period.

To assess Preliminary compliance with ¶261, we reviewed the City’s and the CPD’s relevant policies and documents following the process described in the Consent Decree (¶¶626–41), which outlines applicable consultation, resolution, workout, and public comment periods. To assess Secondary compliance, we reviewed data to determine whether each promotional exam, and its administration process, are reviewed by a qualified expert no less frequently than every three years. Because

this paragraph requires a three-year assessment period, the next period to fully assess compliance, including the previously mentioned expert assessment documentation, ends in fourth quarter 2023.

*Progress before the Eighth Reporting Period*

In previous reporting periods, we reviewed the CPD recruitment, hiring, and promotion records, draft *Assessment Scope*, and the operating procedures documents. The City and the CPD maintained Preliminary and Secondary compliance. We noted that policies demonstrated requirements for periodic reviews of exams and the promotion process.

We also reviewed the Law Department Standard Operating Procedure 03-02, *Independent Sergeant and Lieutenant Expert Engagement*. This standard operating procedure designated the Law Department with responsibility for selecting and hiring the Expert to conduct the Sergeant and Lieutenant Assessment of the CPD's promotions processes for the ranks of Sergeant and Lieutenant following the requirements set forth in ¶261. The Public Safety Reform Division would implement this responsibility on behalf of the Department of Law, and § 1(1) required the Expert to complete the Sergeant and Lieutenant Assessment every three years. This process must be initiated with Expert engagement completed in fourth quarter 2023, and at least every three years thereafter. However, no such document was produced during the sixth or seventh reporting period.

During the sixth reporting period, the City and the CPD produced IAP 07-01, *CPD Sworn Member Recruitment and Hiring* and IAP 07-02, *CPD Sworn Member Promotions* towards compliance with ¶261, maintaining Preliminary and Secondary compliance.

The City and the CPD maintained Secondary compliance during the seventh reporting period. Because this paragraph requires promotions processes assessments every three years, the next period to fully assess compliance ends in fourth quarter 2023.

*Progress in the Eighth Reporting Period*

There was no progress towards compliance with ¶261 this reporting period.

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The City and the CPD maintained Secondary compliance this reporting period. Because this paragraph requires promotions processes assessments every three years, the next period to fully assess compliance ends in fourth quarter 2023.

## Paragraph 261 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:  
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



## Recruitment, Hiring, and Promotions: ¶262

*262. Within 60 days of the completion of the independent expert’s promotions assessment, CPD will develop an implementation plan to respond to any recommendations identified in the assessment, including any recommended modifications to the promotions processes and a timeline for implementation. Upon completion, CPD will share the results of the assessment and its implementation plan with the Monitor for review and approval. Within 60 days of receiving the Monitor’s approval, CPD will begin to implement the plan.*

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### Compliance Progress

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

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

The City and the CPD maintained Preliminary compliance with ¶262 this reporting period.

To assess Preliminary compliance with ¶262, we reviewed the City’s and the CPD’s relevant policies and documents following the process described in the Consent Decree (¶¶626–41), which outlines applicable consultation, resolution, workout, and public comment periods. Specifically, the IMT assessed Preliminary compliance by reviewing policies and data to determine whether the CPD has developed a policy to create, adopt, and implement an implementation plan based on the independent expert’s promotions assessment recommendations. To assess Secondary compliance, we will need to review the independent expert’s promotions assessment and data to determine whether the CPD has sufficiently developed an implementation plan to implement the expert’s recommendations as required by this paragraph. Our review will include a determination of whether the expert’s assessment and the implementation plan related to that assessment identified all requisite criteria, such as a job-task analysis.

#### *Progress before the Eighth Reporting Period*

During previous reporting periods, we reviewed the CPD’s recruitment, hiring, and promotional records. The City and the CPD achieved Preliminary compliance in the fifth reporting period because of the CPD’s requirement for a qualified expert to assess its promotions processes and develop an implementation plan related to the expert’s assessment and recommendations. We noted that Secondary compliance may be achieved when records produced demonstrate that the implementation plan is completed, shared, and approved.

The City and the CPD produced IAP 07-01, *CPD Sworn Member Recruitment and Hiring* and IAP 07-02 towards compliance with ¶262. We previously noted that the language of the policies, i.e., the requirement to engage qualified experts to assess the CPD’s promotions process for the ranks of Sergeant and Lieutenant, were sufficient to meet the requirements of ¶262 for Preliminary compliance. We noted that Secondary compliance required the City and the CPD to demonstrate that they have sufficiently developed the implementation plan required by this paragraph.

During the seventh reporting period, the City and the CPD produced revised versions of the CPD’s *Sworn Member Recruitment and Hiring* (IAP 07-01) and *Sworn Member Promotions* (IAP 07-02) policies, which required the City and the CPD to engage a qualified expert to assess the CPD’s promotions process for the ranks of Sergeant and Lieutenant, and commits the Law Department to take the necessary steps to hire an expert (“Expert”) to conduct an independent assessment (“Sergeant and Lieutenant Assessment”). The language within the policies continued to meet the requirements of ¶262 for Preliminary compliance. However, no additional data were submitted to substantiate either the selection of the expert or the selected expert’s work product.

*Progress in the Eighth Reporting Period*

This reporting period, the City and the CPD produced executed versions of IAP 07-01 and IAP 07-02, demonstrating full adoption of those policies. IAP 07-02 §IV.E.1. indicates the Law Department will take necessary steps to engage a qualified consultant to develop an implementation plan. The Plan will be developed within 60 days of the completion of the Sergeant and Lieutenant Assessment. The IMT did not receive any submissions demonstrating The City and the CPD have sufficiently developed the implementation plan.

\*\*\*

The City and the CPD maintained Preliminary compliance this reporting period. Looking forward, we expect the City and the CPD to demonstrate that they have sufficiently developed the implementation plan required by this paragraph to meet Secondary compliance. For Full compliance, we will look for the City and the CPD to develop and implement a full implementation plan required by ¶262.

## Paragraph 262 Compliance Progress History

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

COMPLIANCE PROGRESS:  
Not Applicable

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

COMPLIANCE PROGRESS:  
Not Applicable

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

COMPLIANCE PROGRESS:  
Not Applicable

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

COMPLIANCE PROGRESS:  
None

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

COMPLIANCE PROGRESS:  
Preliminary

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

COMPLIANCE PROGRESS:  
Preliminary

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

COMPLIANCE PROGRESS:  
Preliminary

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

COMPLIANCE PROGRESS:  
Preliminary

## Recruitment, Hiring, and Promotions: ¶263

**263.** *Within 365 days of the Effective Date, CPD will identify and publish, both internally and externally, for the ranks of Captain and Commander, the duties, eligibility criteria, knowledge, skills, and abilities considered to select qualified candidates who are effective supervisors in compliance with CPD policy and this Agreement.*

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### Compliance Progress

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

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

The City and the CPD maintained Preliminary compliance with ¶263 this reporting period.

To assess Preliminary compliance with ¶263, we reviewed the City’s and the CPD’s relevant policies and documents following the process described in the Consent Decree (¶¶626–41), which outlines applicable consultation, resolution, workout, and public comment periods. We also reviewed publicly available Captain and Commander job descriptions. To assess Secondary compliance, we need to review data sufficient to demonstrate that Captain and Commander job descriptions and eligibility criteria are published internally and externally as required by this paragraph. To assess Full compliance, we need to review data demonstrating that the CPD has developed a “feedback loop” with candidates to revise and improve future processes applicable to the hiring of Captain and Commander roles.

#### *Progress before the Eighth Reporting Period*

In the fifth reporting period, the City and the CPD achieved Preliminary and Secondary compliance. During the fifth reporting period, the City and the CPD produced documents that showed that the Captain and Commander job descriptions were revised and published. We noted that achieving Full compliance will require establishing a “feedback loop” with candidates. However, the City and the CPD did not maintain Secondary compliance in the sixth reporting period. The City and the CPD did not produce any additional data to substantiate either the selection of a qualified expert to conduct an independent assessment or the selected expert’s work product to meet the requirements of ¶263.

The IMT reviewed the CPD’s *Sworn Member Recruitment and Hiring* (IAP 07-01) and *Sworn Member Promotions* (IAP 07-02) policies and observed that IAP 07-02 § V(1-4), *Captain and Commander Promotions*, had the requisite language to es-

establish and maintain Preliminary compliance with ¶263. Specifically, IAP 07-02 provides that the “CPD will internally publish the above criteria on an ongoing basis, as needed.”

The IMT additionally reviewed publicly accessible Captain and Commander job descriptions. No links or actual job description documents or internal or external publications citing the duties, eligibility criteria, knowledge, skills, and abilities considered to select qualified candidates were directly provided as compliance data. We noted that these were required to demonstrate Secondary compliance.

The IMT informed the City and the CPD in the second reporting period that to achieve Full compliance, they should establish a “feedback loop” with candidates to revise and improve future processes. Compliance data submitted during the seventh reporting period did not substantiate the presence and adoption of that critical methodological step. The CPD also should ensure that step is included to close the communication loop with CPD personnel.

*Progress in the Eighth Reporting Period*

No substantively different data or materials towards compliance with ¶263 were submitted during this reporting period.

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The City and the CPD maintained Preliminary compliance this reporting period but did not reach Secondary compliance. For Secondary compliance, we expect the City and the CPD to demonstrate that job descriptions and eligibility criteria are published internally and externally. Additionally, the IMT informed the City and the CPD in the second reporting period that to achieve Full compliance, they should establish a “feedback loop” with candidates to revise and improve future processes.

**Paragraph 263 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: Under Assessment	FIFTH REPORTING PERIOD JULY 1, 2021 – DECEMBER 31, 2021 COMPLIANCE PROGRESS: Secondary	SIXTH REPORTING PERIOD JANUARY 1, 2022 – JUNE 30, 2022 COMPLIANCE PROGRESS: Preliminary
SEVENTH REPORTING PERIOD JULY 1, 2022 – DECEMBER 31, 2022 COMPLIANCE PROGRESS: Preliminary	EIGHTH REPORTING PERIOD JANUARY 1, 2023 – JUNE 30, 2023 COMPLIANCE PROGRESS: Preliminary	

## Recruitment, Hiring, and Promotions: ¶264

*264. Within 365 days of the Effective Date, CPD will develop strategies to increase transparency and awareness about the promotions process for the ranks of Captain and Commander, including, but not limited to, criteria for promotions and promotion decisions.*

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### 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 ¶264 this reporting period.

To assess Preliminary compliance with ¶264, we reviewed the City’s and the CPD’s relevant policies and documents following the process described in the Consent Decree (¶¶626–41), which outlines applicable consultation, resolution, workout, and public comment periods. We also reviewed publicly available Captain and Commander job descriptions. To assess Secondary compliance, we need to review data demonstrating the incorporation of the required promotions criteria required under this paragraph into policy. Specifically, that evaluation will include a review of data reflecting that the City and the CPD have developed and implemented strategic plans to improve internal communications among the CPD officers to increase transparency and officer awareness about the promotions process for the ranks of Captain and Commander.

#### *Progress before the Eighth Reporting Period*

The City and the CPD maintained Preliminary compliance but did not achieve Secondary compliance in the sixth reporting period. The documents showed that the CPD established communication plans to increase transparency and awareness and also revised Captain and Commander job descriptions. We noted that to assess Secondary compliance, we need to assess the incorporation of the required promotions criteria into policy and evaluate the CPD’s internal communication strategic plans.

The IMT reviewed the CPD’s *Sworn Member Recruitment and Hiring* (IAP 07-01) and *Sworn Member Promotions* (IAP 07-02) policies and observed that IAP 07-02 § V(4), *Captain and Commander Promotions*, has the requisite language for Preliminary compliance with ¶264. Specifically, IAP 07-02 provides that the “CPD will develop strategies to increase transparency and awareness about the promotions

process for the ranks of Captain and Commander, including, but not limited to, criteria for promotions and promotion decisions.”

No additional documents, except the CPD organizational charts, were submitted during the seventh reporting period to show efforts toward Secondary compliance.

*Progress in the Eighth Reporting Period*

No substantively different data or materials towards compliance with ¶264 were submitted during this reporting period.

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The City and the CPD maintained Preliminary compliance this reporting period. For Secondary compliance, the IMT will need to review policy, training, and data sources, including observing meetings and communications within the CPD; assess incorporation of required criteria for promotions into policy statements; and re-view the CPD’s internal communication strategic plans to evaluate effective outreach and transparency.

### Paragraph 264 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	