

Appendix 6

Training

Compliance Assessments, by Paragraph

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¶283	¶301	¶318	¶337
¶284	¶302	¶319	¶338
¶285	¶303	¶320	¶339
¶286	¶304	¶321	¶340
¶287	¶305	¶322	
¶288	¶306	¶323	
¶289	¶307	¶324	

Training: ¶270

270. *The TOC, or other similarly-structured oversight entity, will continue to review and oversee the Department’s training program and will be chaired by the First Deputy Superintendent, or other high-ranking member of CPD’s command staff. The TOC will also include, in some capacity, personnel from various units of the Department that are responsible for overseeing patrol field operations; administering training; providing legal advice; coordinating and exercising supervision over disciplinary matters; managing data, technology, and information systems; overseeing and coordinating the community relations strategy; and reviewing reportable use of force incidents. It will meet at least once a month and continue to record meeting minutes.*

Compliance Progress

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

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

Preliminary: *In Compliance (FIFTH REPORTING PERIOD)*

Secondary: *In Compliance (FIFTH REPORTING PERIOD)*

Full: *Under Assessment*

The City and the CPD maintained Preliminary and Secondary compliance with the requirements of ¶270 during this reporting period.

To evaluate Preliminary compliance with ¶270, 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. This review focused on determining whether the requirements of this paragraph are written into policy and if the structure of the Training Oversight Committee (also known as the TOC) is clearly outlined and understandable to CPD personnel. To evaluate Secondary compliance with this paragraph, we reviewed data to determine whether TOC meetings occurred with required representatives in attendance and whether TOC meetings were held monthly as required with meeting minutes produced following each meeting. To evaluate Full compliance, we reviewed data points to determine whether sufficient resources have been allocated to consistently conduct the annual needs assessment, training planning, and training delivery processes in a timely and sequentially appropriate fashion.

Progress before the Eighth Reporting Period

During the fifth reporting period, the City and the CPD achieved Preliminary and Secondary compliance based on the produced CPD training records and the Training Oversight Committee (TOC) meeting materials. The City and the CPD demonstrated continued compliance with ¶270 during the six and seventh reporting periods. Compliance records reviewed by the IMT included meeting materials from the Training Oversight Committee meetings in which the *Annual Training Plans were presented to and voted on by the TOC members.*

During the seventh reporting period, the City and the CPD demonstrated improvements to create and produce the annual Needs Assessment and the Annual Training Plan in advance of the 2023 calendar year and in the appropriate sequence for effective training planning, development, and delivery.

Progress in the Eighth Reporting Period

During the eighth reporting period, the City and the CPD created a new TOC format involving five new subcommittees empaneled to more thoroughly address TOC meeting issues and topics. The subcommittees include Recruit Training, In-Service Training, Field Training, Pre-Service Training, and Career Development.¹ This appears to be a substantial enhancement to TOC preparation between meetings and quality engagement during the meetings. TOC Liaisons team with Training supervisors to staff each subcommittee.

The City and the CPD maintained Preliminary and Secondary compliance and moved significantly close to full compliance during this reporting period. Looking forward, to demonstrate Full compliance the Training Oversight Committee must assure sufficient resources are allocated and applied to conduct and implement the annual needs assessment, training planning, and delivery processes ***in a timely and sequentially appropriate*** fashion.

¹ See 23 March 2023 TOC minutes for more details on the subcommittee structure and composition.

Paragraph 270 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:
None

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

Training: ¶271

271. *Within 180 days of the Effective Date, and on an annual basis thereafter, CPD’s Education and Training Division will, under the supervision of the TOC, conduct a needs assessment, which will, among other things identify and consider: a. information collected from use of force reviews, discipline and civilian complaints, and reports of officer safety issues; b. input from CPD members of all ranks and their respective collective bargaining units, if applicable; c. input from members of the community; d. recommendations from CPD oversight entities, including, but not limited to COPA, the Deputy Inspector General for Public Safety (“Deputy PSIG”), and the Police Board; e. changes in the law, to the Illinois Law Enforcement Training and Standards Board requirements, and to CPD policy, if any; f. court decisions and litigation; g. research reflecting the latest in training and law enforcement best practices; h. information obtained from evaluation of training courses, instructors, and FTOs; and i. member reaction to, and satisfaction with, the training they received.*

Compliance Progress

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

Recurring

Annual



Met



Missed

Preliminary:

In Compliance (SECOND REPORTING PERIOD)

Secondary:

In Compliance (FIFTH REPORTING PERIOD)

Full:

Under Assessment

The City and the CPD maintained Preliminary and Secondary compliance with the requirements of ¶271 in this reporting period.

To evaluate Preliminary compliance with ¶271, 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 evaluate Secondary compliance with this paragraph, we reviewed data to determine whether the annual *Needs Assessment* sufficiently addressed the requirements of this paragraph. To evaluate Full compliance, we reviewed data points to determine whether sufficient resources have been allocated to timely and consistently conduct the ongoing annual needs assessments required by this paragraph, including the appropriate sequencing of the annual *Needs Assessment* and *Training Plan*.

Progress before the Eighth Reporting Period

The CPD and the City first gained Preliminary compliance with ¶271 in the second reporting period. During the sixth and seventh reporting periods, the CPD and the City demonstrated improvements to create and produce the annual Needs Assessment and the annual Training Plan in advance of the 2023 calendar year and in the appropriate sequence for effective training planning, development, and delivery.

In the seventh reporting period, the IMT reviewed CPD training policy and data sources to evaluate compliance, including meeting materials from the Training Oversight Committee meetings occurring in September, October, and November 2022. The IMT also virtually attended and observed the Training Community Advisory Committee meeting on July 21, 2022, in which CPD reviewed the *Draft 2023 Training Plan* with the committee members. The meeting materials included information about the *2023 Needs Assessment* produced during the previous reporting period. The documents produced not only demonstrate that the Training Oversight Committee met, but also were substantively involved in reviewing, deliberating, and decision-making exercises consistent with their oversight responsibilities. The IMT also reviewed documents produced for the *2023 Annual Training Plan*, including meeting materials from the September 2022 Training Oversight Committee meeting in which the *2023 Training Plan* was presented and voted on by the committee members.

Progress in the Eighth Reporting Period

During the eighth reporting period, the City and the CPD submitted *The 2023 Needs Assessment* for the *2024 Training Plan* in a timely manner and was approved, as required by the requirements of ¶271.

The City and the CPD maintained Secondary compliance through this reporting period. Looking forward, achieving Full compliance requires a determination that the City and the CPD have allocated sufficient resources to conduct ongoing annual needs assessments while demonstrating consistency in executing these approaches. This is the first *Needs Assessment* and *Training Plan* cycle where the CPD has demonstrated the ability to timely sequence the *Needs Assessment* with the annual *Training Plan*. Continued Secondary compliance through another full year cycle should result in a Full compliance finding as the CPD will have demonstrated consistency in executing these processes.

Paragraph 271 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:
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

Training: ¶272

272. *Within one year of the Effective Date, and on an annual basis thereafter, the Education and Training Division will develop—and the TOC will review and approve—a written Training Plan for CPD’s recruit, field, in-service, and pre-service promotional training to ensure that CPD members are trained to safely, effectively, and lawfully carry out their duties in accordance with the law, CPD policy, best practices, and this Agreement. CPD will implement the Training Plan in accordance with the specified timeline for implementation. The Training Plan will:* a. *identify training priorities, principles, and broad goals consistent with this Agreement;* b. *prioritize the needs identified during the needs assessment and identify those needs that will be addressed by the plan;* c. *include a plan and schedule for delivering all CPD training as necessary to fulfill the requirements and goals of this Agreement;* d. *identify subject areas for CPD training;* e. *determine the mandatory and elective courses, consistent with this Agreement, to be provided as part of the In-Service Training Program;* f. *develop a plan to inform officers about the In-Service Training Program, its course offerings, and its requirements;* g. *determine which aspects of the In-Service Training Program can be delivered in a decentralized manner, including e-learning, and which training requires more intensive, centralized delivery, to ensure effective delivery and comprehension of the material;* h. *address any needed modification of the Field Training and Evaluation Program to fulfill the requirements and goals of this Agreement;* i. *identify necessary training resources including, but not limited to, instructors, curricula, equipment, and training facilities;* j. *determine the content, consistent with this Agreement, to be provided as part of pre-service promotional training for Sergeants, Lieutenants, Captains, and command staff;* k. *develop a plan to implement and utilize a centralized electronic system for scheduling and tracking all CPD training;* l. *develop a plan to implement and utilize a system for assessing the content and delivery of all CPD training, including training provided by outside instructors or non-CPD entities;* and m. *identify community-based organizations that represent a broad cross section of the City to participate, as feasible, practical, and appropriate, in the development and delivery of the curriculum regarding subjects including, but not limited to, procedural justice, de-escalation, impartial policing, and community*

policing, and make efforts to encourage such participation by such organizations.

Compliance Progress

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

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

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 ¶272 during this reporting period.

To evaluate Preliminary compliance with ¶272, 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. This included a review of the *2022 Training Plan*. To evaluate Secondary compliance with this paragraph, we reviewed data sources to determine whether the annual *Training Plan* required under this paragraph sufficiently met each of the enumerated requirements of this paragraph and was executed pursuant to those requirements, including the timely completion and proper sequencing of the annual *Training Plan*.

Progress before the Eighth Reporting Period

The City and the CPD first gained preliminary compliance with ¶272 in the third reporting period. Productions in the sixth and seventh reporting period demonstrated improvements by the CPD to create and implement the annual Needs Assessment and the Annual Training Plan in advance of the 2023 calendar year and in the appropriate sequence for effective training planning and development.

During the seventh reporting period, the City and the CPD produced documents related to the *2023 Annual Training Plan*, including meeting materials and minutes from the September 2022 Training Oversight Committee (TOC) meeting in which the *2023 Training Plan* was presented and voted on by the committee members. Future Training Oversight Committee minutes should better document questions and responses raised during TOC discourse on the Training Plan. We noted that alignment between the Needs Assessment and Training Plan should be clearly evident in future reporting periods.

Progress in the Eighth Reporting Period

During the eighth reporting period, the City and the CPD submitted *The 2023 Needs Assessment* for the *2024 Training Plan* in a timely manner and approved, as required by the requirements of ¶272.

The City and the CPD maintained Preliminary compliance during this reporting period. Looking forward, Secondary compliance may be achieved by timely submission and approval of the *2023 Training Plan* prior to the start of the new training year and incorporating ¶272 requirements into one or more prominent training directives.

Paragraph 272 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	

Training: ¶273

273. *With oversight from the TOC, CPD will develop and implement recruit, field, in service, and pre-service promotional training curricula and lesson plans that comport with CPD's Training Plan and that address the requirements and goals of this Agreement.*

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 ¶273 during this reporting period.

To evaluate Preliminary compliance with ¶273, 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 evaluate Secondary compliance, we reviewed data to determine whether the CPD has developed and implemented the trainings required by this paragraph and that such trainings comport with the annual *Training Plan* and address Consent Decree requirements. Specifically, to assess both Preliminary and Secondary compliance, the IMT reviewed training curricula, lesson plans, special orders, Training Oversight Committee (TOC) meeting documents, and other policy, training, and data sources. These sources are needed to determine whether the CPD has sufficiently developed training, curricula, and lesson plans in alignment with the requirements of this paragraph.

Progress before the Eighth Reporting Period

The City and the CPD first gained Preliminary compliance in the third reporting period. During the sixth reporting period, we determined that the CPD maintained Preliminary compliance but did not achieve Secondary compliance. We noted that to achieve Secondary compliance, produced documents should demonstrate that the *Needs Assessment*, *Training Plan* and corresponding Training Oversight Committee approval, course curriculum development and corresponding Training Oversight Committee approval, and training delivery occur in sequential steps that demonstrate adherence to the requirements in this paragraph. Further, we noted that post-delivery evaluation documentation is required for Secondary compliance.

During the seventh reporting period, the IMT reviewed Special Order S11-11 (*Training Oversight Committee*) and found that Section III(A)(7) includes language

that met ¶273 requirements. A review of submitted documents indicated the timeline and sequence of the *Needs Assessment*, *Training Plan* and corresponding Training Oversight Committee approval, course curriculum development and corresponding Training Oversight Committee approval, and training delivery improved and moved towards adherence to the requirements in this paragraph. Once again, we noted that post-delivery evaluation documentation is required for Secondary compliance and must also be produced for a full compliance assessment.

Progress in the Eighth Reporting Period

During this reporting period, the TOC discussed and approved standardized lesson plan templates for recruit training. IMT reviewed and approved multiple lesson plans, including Fair and Impartial Policing, Active Bystandership for Law Enforcement (ABLE), Officer Wellness and Support, Crisis Intervention Training, Gender Based Violence and Constitutional Policing. A lesson plan covering each training plan topic was produced and reviewed by the IMT.

Although not submitted for compliance this reporting period, the IMT reviewed policy S11-10. S11-10 § IV.A requires Department training be reviewed and approved prior to implementation. It mandates completion of a New Course Approval Form. S11-10 § B requires all Department training lesson plans use the Standardized Lesson Plan. New lesson plans must be created using the Standardized Lesson Plan and existing lesson plans will transition to the new format when they are revised or updated. Only lesson plans submitted using the Standardized format will be approved.

The City and the CPD maintained Preliminary compliance during this reporting period. Looking forward, attaining Secondary compliance requires determining if the CPD has sufficiently developed training in alignment with the requirements of this paragraph and evaluating the implementation of that training. No evaluative or follow-up documents were produced that demonstrate that the CPD has sufficiently developed, implemented, and delivered training in alignment with the requirements of this paragraph during this reporting period.

Paragraph 273 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	

Training: ¶274

274. *Under the supervision of the TOC, CPD’s Education and Training Division, pursuant to the Training Plan, will develop and approve training curricula, lesson plans, and course materials that are (a) consistent across subjects; (b) of sufficient quality to adequately communicate the intended subject matter to CPD members; and (c) in accordance with the law, CPD policy, best practices, and this Agreement.*

Compliance Progress

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

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

The City and the CPD maintained Preliminary compliance with the requirements of ¶274 during this reporting period.

To evaluate Preliminary compliance with ¶274, 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 evaluate Secondary compliance, we reviewed data to determine whether the CPD Education and Training Division (also known as the ETD), pursuant to the terms of the annual *Training Plan*, has reviewed and approved the training curricula, lesson plans, and course materials with Training Oversight Committee (TOC) supervision, that are consistent across subjects, quality, lawful, and within policy and best practices. Data sources assessed for this review included training criteria and plans, training attendance, Training Oversight Committee documents, and the IMT’s in-person and virtual observations of training sessions. The IMT also sought to verify sufficient attendance records (*i.e.*, 95% of relevant personnel), including hours attended.

Progress before the Eighth Reporting Period

The City and the CPD first gained Preliminary compliance with ¶274 in the third reporting period. During the fourth through sixth reporting periods, the IMT reviewed CPD training curricula, lesson plans, special orders, Training Oversight Committee meeting documents, and other policy, training, and data sources. In the sixth reporting period, we determined that the City and the CPD maintained Preliminary compliance but did not achieve Secondary compliance. We noted that produced documents should demonstrate that the *Needs Assessment, Training Plan* and corresponding Training Oversight Committee approval, course curriculum, development and corresponding Training Oversight Committee approval, and

training delivery occur in sequential steps that demonstrate adherence to requirements in this paragraph. Further, we noted that post-delivery evaluation documentation is required for Secondary compliance.

During the seventh reporting period, the City and the CPD submitted Training Oversight Committee meeting agendas, minutes, and materials for the monthly Training Oversight Committee meetings occurring in June through December 2022, to demonstrate compliance with ¶274. The Training Oversight Committee meeting materials included materials regarding the Field Training and Evaluation Program (FTEP) program. The City and the CPD also submitted a draft *2023 Annual Training Plan* that included the *Master 2023 Training Plan*, further demonstrating sustained Preliminary compliance.

Progress in the Eighth Reporting Period

To demonstrate compliance during this reporting period, the City and the CPD produced the *2023 Annual Training Plan*, as well as agenda and minutes for TOC meetings held in January through April 2023. The TOC discussed and approved standardized lesson plan templates for recruit training. IMT reviewed and approved multiple lesson plans, including Fair and Impartial Policing, Active Bystandership for Law Enforcement (ABLE), Officer Wellness and Support, Crisis Intervention Training, Gender Based Violence and Constitutional Policing. A lesson plan covering each training plan topic was not produced and reviewed by the IMT.

No evaluative or follow-up documents were produced that demonstrate that the CPD has sufficiently developed, implemented, and delivered training in alignment with the requirements of this paragraph during this reporting period.

The City and the CPD has maintained Preliminary compliance during this reporting period. Looking forward, attaining Secondary compliance requires determining whether the CPD Education and Training Division, pursuant to the terms of the *Annual Training Plan*, has reviewed and approved all training curricula, lesson plans, and course materials with TOC supervision, which are consistent across subjects, quality, lawful, and within policy and best practices and evaluating the implementation of that training. Full compliance requires the CPD Education and Training Division to demonstrate a systematic methodology to regularly review and approve training in accordance with ¶274 requirements.

Paragraph 274 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

Training: ¶275

275. The TOC will oversee the integration of the concepts of procedural justice, de-escalation, impartial policing, and community policing into CPD training, including, but not limited to use of force, weapons training, and Fourth Amendment subjects, as appropriate.

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 has maintained Preliminary compliance during this reporting period.

To evaluate Preliminary compliance with ¶275, 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 evaluate Secondary compliance with this paragraph, we reviewed data to determine whether the CPD has fully implemented Training Oversight Committee (TOC) oversight of key concepts integration that also are consistent with the CPD’s *Annual Training Plan*. Specifically, we reviewed Training Oversight Committee minutes, directives, and other policy, training, and job sources, including lesson plans and curricula, to determine whether they substantiate the Training Oversight Committee’s review and oversight of CPD training to ensure that they have appropriately integrated the key concepts of procedural justice, de-escalation, impartial policing, and community policing.

Progress before the Eighth Reporting Period

The City and the CPD first gained Preliminary compliance with ¶275 in the third reporting period. During the sixth reporting period, the IMT found the City and the CPD maintained Preliminary compliance but did not achieve Secondary Compliance. Data submitted indicated that Training Oversight Committee oversight policy S11-11 was consistent with ¶275 requirements. We noted that the Training Oversight Committee meeting minutes provided did not detail any discussions or deliberations on the key concepts. We pointed out the absence of a separate report or record documenting the Training Oversight Committee’s efforts to ensure integration of the key concepts into CPD training materials. Additionally, a substantial proportion of the lesson plans and course curricula reviewed during the sixth reporting period post-Training Oversight Committee review and approval were returned with IMT and Office of the Illinois Attorney General comments, which suggested the need to enhance the integration of at least one of these core concepts,

thus indicating a need for more Training Oversight Committee rigor in their oversight.

During the seventh reporting period, the City and the CPD submitted Training Oversight Committee meeting agendas, minutes, and materials for the monthly Training Oversight Committee meetings that occurred in June through December 2022. The Training Oversight Committee meeting materials included a *Field Training and Evaluation Program Report (FTEP) to the TOC slide deck* and *FTEP Report to the TOC TO/FROM to Office of Supt.* (December 2022). The City and the CPD also submitted a draft *2023 Annual Training Plan* that included the *Master 2023 Training Plan*. The concepts required by this paragraph are mentioned in some of the produced TOC meeting minutes. However, there is not a clear indication that the TOC provided active oversight of the actual integration of these concepts throughout training development.

Progress in the Eighth Reporting Period

During the eighth reporting period, the TOC went beyond Consent Decree requirements and added “Constitutional Policing” to the core concepts integrated into CPD training. The IMT’s review of training course exams found that the exams challenged the student’s understanding of these core concepts. This is a very strong, positive move toward Secondary compliance that ultimately should affect CPD culture. The City and the CPD should ensure that all lesson plans and course content are produced for IMT review and they also reflect the integration of these core concepts.

The City and the CPD has maintained Preliminary compliance during this reporting period. Looking forward, to assess Secondary compliance the IMT will review data demonstrating continued application of controlling policy, curricula, lesson plans, and course material that sufficiently integrate the required key concepts into CPD trainings. The City and the CPD will need to produce Training Oversight Committee meeting minutes that reflect guidance on these key concepts and submit lesson plans and curricula for IMT review that consistently integrate the key concepts of procedural justice, de-escalation, impartial policing, and community policing.

Full compliance requires the CPD to sufficiently develop a method for the Training Oversight Committee to sustain regular review and oversight of required key concepts into CPD trainings.

Paragraph 275 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

Training: ¶276

276. The TOC will oversee continued development and integration of instructional strategies that incorporate active learning methods such as problem-solving, scenario-based activities, and adult learning techniques—in addition to traditional lecture formats—into training delivery.

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*

The City and the CPD has maintained Preliminary compliance with the requirements of ¶276 through this reporting period.

To evaluate Preliminary compliance with ¶276, 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 evaluate Secondary compliance with this paragraph, we reviewed data reflecting training development, implementation, and evaluation to determine whether the City and the CPD have developed training plans and curricula with appropriate Training Oversight Committee (TOC) input and delivered that training to the relevant personnel during the necessary intervals. Where applicable, we assessed whether the City and the CPD have created the requisite positions and staffed those positions with qualified personnel in order to achieve the requirements of this paragraph. We also reviewed data to assess whether the training required under this paragraph is evidence-based and conforms to best practices, as applicable, and that data include sufficient attendance records (*i.e.*, 95% of relevant personnel), including data reflecting hours attended.

Progress before the Eighth Reporting Period

The City and the CPD first gained Preliminary compliance with ¶276 in the fourth reporting period. During previous reporting periods, the CPD submitted revised trainings, TOC minutes and meeting materials. During the sixth reporting period, the City and the CPD submitted Special Order S11-11, *Training Oversight Committee*. The IMT determined that Training Oversight Committee policy S11-11 was consistent with ¶276 requirements. We noted that the Training Oversight Committee meeting minutes provided did not detail any discussions or deliberations on the integration of the required instructional strategies of this paragraph into training delivery. We pointed out the absence of separate reports or records produced

documenting the Training Oversight Committee’s effort to ensure integration of these strategies into CPD trainings.

During the seventh reporting period, the City and the CPD submitted Training Oversight Committee meeting agendas, minutes, and materials for the monthly Training Oversight Committee meetings occurring in June through December 2022. The City and the CPD also submitted a draft *2023 Annual Training Plan* that included the *Master 2023 Training Plan*. The concepts required by this paragraph were mentioned in some of the produced TOC meeting minutes. However, there was not a clear indication that TOC provided active oversight of the actual integration of these concepts throughout training development.

Progress in the Eighth Reporting Period

During this reporting period, the CPD produced the *2023 Training Plan* and minutes and agenda for the TOC meetings. These materials show that the TOC was actively involved in reviewing and approving the 2023 Field Training Office (FTO) Refresher course. This training utilizes scenario-based training methodologies and VirTra simulator training, and TOC minutes frequently discuss hands-on training. While it is clear the TOC is actively involved in course content discussions, whether the CPD has developed a method for how TOC reviews, oversees, and ensures integration of instructional strategies and the degree to which their deliberations venture into integration of instructional strategies that incorporate active learning methods, is not evident.

The City and the CPD has maintained Preliminary compliance through this reporting period. Looking forward, Secondary compliance can be achieved by the CPD developing a method for how the Training Oversight Committee reviews, oversees, and ensures integration of the instructional strategies required by this paragraph.

Full compliance may be demonstrated by fully developing and implementing a systematic method for the Training Oversight Committee to sustain regular instructional strategies review and oversight following ¶1276 requirements.

Paragraph 276 Compliance Progress History

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

COMPLIANCE PROGRESS:
Not Applicable

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

COMPLIANCE PROGRESS:
Not Applicable

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

COMPLIANCE PROGRESS:
Status Update

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

COMPLIANCE PROGRESS:
Preliminary

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

COMPLIANCE PROGRESS:
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

Training: ¶277

277. Where it would add to the quality or effectiveness of the training program, the Education and Training Division will seek the assistance of outside expertise, as feasible, practical, and appropriate, either in developing or reviewing CPD curricula and lesson plans, or reviewing pilot versions of CPD courses.

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 have maintained Preliminary compliance with ¶277 during this reporting period.

To evaluate Preliminary compliance with ¶277, 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 evaluate Secondary compliance with this paragraph, we reviewed data to determine whether the City and the CPD have created and staffed positions with qualified personnel, including creating and implementing a process to acquire “outside expertise” as required by ¶277. This process must ensure that such outside experts are qualified to “add to the quality or effectiveness of the training program.” Where applicable, we assessed whether the City and the CPD have created the requisite positions and staffed those positions with qualified personnel in order to achieve the requirements of this paragraph. The IMT also sought to verify sufficient attendance records (*i.e.*, 95% of relevant personnel), including hours attended.

Progress before the Eighth Reporting Period

The City and the CPD first achieved Preliminary compliance with ¶274 in the fourth reporting period. To demonstrate sustained compliance with ¶277 during the sixth reporting period, the Training Community Advisory Committee (also known as the TCAC) invitation signed by Deputy Chief inviting community partners to attend several Training Community Advisory Committee meetings scheduled in September and October 2021. The City and the CPD produced the agenda and meeting notes from the TCAC meetings in 2021 and 2022, along with TCAC feedback offered to the CPD. Finally, the CPD also submitted *Community Group Training for School Resource Officers* that the CPD described as being developed by several Chicago area community groups.

In the seventh reporting period, the IMT reviewed Training Directives S11-10 (*Department Training Records Maintenance*) and S11-11 (*Training Oversight Committee*). S11-10 § VII(A)(3) (29 December 2021), which tracked ¶1277 language and met the requirements for Preliminary compliance. We reiterated that the City and the CPD had not articulated or enacted processes to hire, retain, evaluate, and terminate outside experts, nor had they established a criterion for the selection and retention of outside experts, which are required to obtain Secondary compliance. We suggested the City and the CPD should include these steps in the controlling policy to reach Secondary compliance.

Additionally, the City and the CPD produced TCAC notes indicating several community members representing multiple organizations were involved in discussing the Training Plan and Hates Crimes eLearning course. Constitutional Policing documents include COPA and TCAC member comments on the training. On both accounts, the IMT noted that the City and the CPD would be well-served by documenting how engaging the selected external parties adds to the quality or effectiveness of the training program.

The City and the CPD additionally produced training records during the seventh reporting period indicating that 100% of CPD School Resource Officers (SRO) assigned to work in Chicago schools have completed training provided by the National Association of School Resource Officers (NASRO). The CPD did not articulate the quality or effectiveness objectives of this particular outside training vendor, and the IMT recommended that the CPD should consider applying a systematic process for selecting and receiving outside expertise in the future.

Progress in the Eighth Reporting Period

During this reporting period, the City and the CPD produced the *2023 Annual Training Plan* and Training Directives S11-10 and S11-10-03. The *Annual Training Plan* discusses using outside expertise to inform training solutions that affect the community. The CPD brought in outside instructors from the Fair and Impartial Policing (FIP) National Training Team once again to instruct the Fair and Impartial Policing courses for the 2023 In-Service Training. The CPD also sought and received community input on the FIP courses.

Notwithstanding these laudable efforts, criteria for identifying and selecting subject-matter experts are not evident in documents produced for review, as required by this paragraph.

The City and the CPD have maintained Preliminary compliance during this reporting period. Looking forward, Secondary compliance requires the CPD to sufficiently

take steps to implement a plan to receive subject-matter expert assistance, including outside experts.

Full compliance requires the CPD to have implemented a plan to continue to receive subject-matter expert assistance and standards to evaluate subject-matter expert contributions for impact on training programs' quality and effectiveness.

Paragraph 277 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: 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	

Training: ¶278

278. *The TOC will continue to oversee a process that effectively incorporates material changes in relevant case law, statutes, and the CPD policy into recruit, field, in-service, and preservice promotional training in a timely and effective manner.*

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 ¶278 during this reporting period.

To evaluate Preliminary compliance with ¶278, 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 evaluate Secondary compliance with this paragraph, we reviewed data to determine whether the City and the CPD have a reliable process to substantiate Training Oversight Committee (TOC) oversight for incorporation of material changes in case law, statutes, and CPD policy into trainings and Training Oversight Committee meeting discussions on such material changes. The IMT also sought to verify sufficient attendance records (*i.e.*, 95% of relevant personnel), including hours attended. Where applicable, we assessed whether the City and the CPD have created the requisite positions and staffed those positions with qualified personnel in order to achieve the requirements of this paragraph.

Progress before the Eighth Reporting Period

The City and the CPD first achieved Preliminary compliance with ¶278 in the third reporting period. To demonstrate continued Preliminary compliance with ¶278 in the fifth reporting period, the City and the CPD submitted TOC minutes and meeting materials for Training Oversight Committee meetings, and virtual approval votes for training materials. The IMT also reviewed a *Revised 2022 Training Plan* and *Needs Assessment for the 2023 Training Plan* that was discussed in the April and May 2022 Training Oversight Committee meetings.

The IMT also reviewed Special Order S11-11, *Training Oversight Committee*. S11-11 § III(A)(12) tracked the language of ¶278 and met the requirements of Preliminary compliance. Data indicated TOC oversight policy S11-11 was consistent with ¶278 requirements. However, the TOC meeting minutes provided did not detail any discussions or deliberations on timely and effectively incorporating material

changes in relevant case law, statutes, and CPD policy as required by ¶1278. There were no separate reports or records produced documenting the Training Oversight Committee’s effort to ensure timely and effective incorporation of these material changes in relevant case law, statutes, and CPD policy into CPD trainings.

During the seventh reporting period, the City and the CPD submitted Training Oversight Committee meeting agendas, minutes, and materials for the monthly TOC meetings occurring in June through December 2022. The Training Oversight Committee meeting materials included a presentation regarding the Field Training and Evaluation Program (FTEP). The City and the CPD also submitted a draft *2023 Annual Training Plan* that included the *Master 2023 Training Plan*.

The IMT noted that two regular TOC agenda items are especially relevant to this paragraph: the Training Needs Monthly Report §§ iv. “LAD: changes in the law, ILETSB requirements, court decisions, and litigation” and viii. “R&D: changes to CPD policy.” The IMT did not identify substantive discussion or discourse on these agenda items and the process required by this paragraph is not immediately apparent in the documents produced. The presence of a process that both timely and effectively incorporates ¶1278 requirements was not apparent.

Progress in the Eighth Reporting Period

During the eighth reporting period, the CPD changed the format of the monthly TOC meeting and overall organizing structure. The IMT observed the TOC meeting in April 2023, and while the new format appeared to accomplish the goals outlined by the TOC to improve coordination and preparation for the TOC meetings, the agenda was changed, removing the two standing agenda items previously designated for regular discussion of ¶1278 required topics. The April 2023 minutes did not reflect a TOC discussion of these required topics. Training offerings appear to incorporate legal and policy changes. However, the existence of a process overseen by TOC is not presently evident.

The City and the CPD maintained Preliminary compliance during this reporting period. Looking forward, Secondary compliance may be achieved by substantiating the TOC oversight process for incorporation of material changes in case law, statutes, and CPD policy into trainings and TOC meeting discussions on such material changes. Full compliance may be demonstrated after the CPD sustains oversight of the process described in ¶1278.

Paragraph 278 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	

Training: ¶279

279. All training materials disseminated to CPD members and displayed at CPD facilities will reflect current CPD policy.

Compliance Progress

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

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

The City and the CPD maintained Preliminary compliance with the requirements of ¶279 during this reporting period.

To evaluate Preliminary compliance with ¶279, 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 evaluate Secondary compliance with this paragraph, we reviewed data to determine whether the City and the CPD have a reliable process to ensure that training materials disseminated to CPD officers and displayed at every CPD facility reflect current CPD policy. Where applicable, we assessed whether the City and the CPD have created the requisite positions and staffed those positions with qualified personnel in order to achieve the requirements of this paragraph. The IMT also sought to verify sufficient attendance records (*i.e.*, 95% of relevant personnel), including hours attended.

Progress before the Eighth Reporting Period

We first assessed ¶279 compliance during the fourth reporting period, and the City and the CPD achieved Preliminary compliance in the fifth reporting period. In the fifth reporting period, the IMT found that the City and the CPD achieved Preliminary compliance because training directive S11-10, *Department Training Records Maintenance* met the requirements of this paragraph. In the last reporting period, the City and the CPD did not submit any data relevant to ¶279, thereby maintaining Preliminary compliance. We noted that to achieve Secondary compliance, we would need to assess the dissemination, audit, and inspection processes to ensure that training materials disseminated to CPD officers and displayed at every CPD facility reflect current CPD policy. We recommended that additional auditing or site inspection processes should be considered.

To substantiate compliance with this paragraph, the City and the CPD submitted *Recruit Use of Force Training* (produced on September 22, 2022), and *Gender Based Violence Curriculum* (produced December 8, 2022). Neither production ob-

viates that the CPD has established a process to ensure training materials disseminated to CPD members and displayed at every CPD facility reflect current CPD policy.

Progress in the Eighth Reporting Period

During the eighth reporting period, the City and the CPD produced training on Use of Force Options, Use of Force Policy Updates, Recruit Force Options, and De-escalation, Response to Resistance, and Use of Force Policy Updates. The CPD also produced policies S11-10, Department Training, and S11-10-03, In-Service Training. CPD policies mandate ¶279 requirements and the policy update training reinforces uniformity. However, none of the documents produced demonstrate the CPD has established a process to ensure training materials disseminated to the CPD and displayed at every CPD facility reflect current CPD policy.

The City and the CPD maintained Preliminary compliance during this reporting period. Looking forward, to achieve Secondary compliance, the CPD must establish a process to ensure that training materials disseminated to CPD officers and displayed at every CPD facility reflect current CPD policy. While some document control may be ascertained with the requirement that the Graphic Arts and Print Shop, Public Safety Administration ensures that the production of all training materials reflect Training and Support Group approved content, additional auditing or site inspection processes should also be considered.

Paragraph 279 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: Under Assessment	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	

Training: ¶280

280. CPD will develop, implement, and utilize a centralized electronic system for scheduling and tracking all CPD training to allow the Education and Training Division to effectively plan and manage training schedules and instructor assignments for all training.

Compliance Progress

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

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

The City and the CPD maintained Preliminary compliance with the requirements of ¶280 during this reporting period.

To evaluate Preliminary compliance with ¶280, 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 evaluate Secondary compliance with this paragraph, we reviewed data to determine whether the CPD has established and uses a centralized electronic system for scheduling and tracking all CPD training to allow the Education and Training Division to effectively plan and manage training schedules and instructor assignments for all trainings. We also confirmed whether this system is in continual use and whether the City and the CPD have developed policies for the Education and Training Division to use the system as required.

Progress before the Eighth Reporting Period

The City and the CPD first achieved Preliminary compliance with ¶280 in the third reporting period. During the previous reporting period, the City and the CPD did not submit any data to substantiate maintained Preliminary compliance. The IMT reviewed Training Directives S11-10 (*Department Training Records Maintenance*) and S11-11 (*Training Oversight Committee*). We determined that Preliminary compliance was maintained because S11-10 § XIII included language regarding the utilization of “a centralized electronic system for scheduling and tracking all Department officers’ training, and a centralized electronic file system for assessing the content and delivery of all Department training.” This language met the policy requirements of ¶280.

Progress in the Eighth Reporting Period

During this reporting period, the IMT reviewed Training Directive S11-10 (*Department Training*) and the 2023 Annual Training Plan. The IMT determined that Preliminary compliance was maintained because S11-10 § XIV included language regarding the utilization of “a centralized electronic system for scheduling and tracking all Department officers’ training, and a centralized electronic file system for assessing the content and delivery of all Department training.” This language met the policy requirements of ¶1280, however no additional data demonstrating higher compliance levels were submitted.

The City and the CPD maintained Preliminary compliance during this reporting period. Looking forward, Secondary compliance requires the CPD to use a centralized electronic system for scheduling and tracking all CPD training to allow the Education and Training Division to effectively plan and manage training schedules and instructor assignments for all training.

Full compliance requires the CPD’s continuous and ongoing use of a centralized electronic system for scheduling and tracking all CPD training and for the Education and Training Division to effectively plan and manage training schedules and instructor assignments for all training using this system.

Paragraph 280 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	

Training: ¶281

281. *The City will be responsible for providing appropriate training facilities that offer adequate access to safe and effective training.*

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 during this reporting period.

To evaluate Preliminary compliance with ¶281, 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 evaluate Secondary compliance with this paragraph, we will need to review data to determine whether the City and the CPD have developed and begun the implementation of plans and appropriate guidance and staffing to provide appropriate training facilities, including allocating sufficient resources. The IMT will also seek to verify sufficient attendance records (*i.e.*, 95% of relevant personnel), including hours attended. Where applicable, we will assess whether the City and the CPD have created the requisite positions and staffed those positions with qualified personnel in order to achieve the requirements of this paragraph.

Progress before the Eighth Reporting Period

The City and the CPD first achieved Preliminary compliance with ¶281 in the sixth reporting period. During the seventh reporting period, the City and the CPD did not submit any written data to substantiate Secondary compliance during this reporting period. In support of Preliminary compliance, the IMT conducted site visits to the Academy, the Professional Development Center, and the new Public Safety Training Facility that had just opened. We were very impressed by the progress and potential of the new Public Safety Training Facility, particularly with regards to opportunities for improving overall officer training. We provided the CPD verbal feedback and recommendations on potential additional uses and improvements to the facility. We did observe that our previous recommendations with regards to adding certain amenities to the existing community room were taken and implemented.

The IMT further suggested that the City and the CPD should provide documents that detail training facility needs and the City’s strategic approach to addressing

those needs, which would allow the IMT to further assess compliance with ¶1281 requirements.

Progress in the Eighth Reporting Period

The new Joint Public Safety Training Facility opened during this reporting period with limited training operations. The CPD launched the scenario-based training arena for recruit and in-service training during April 2023.

According to the *2023 Annual Training Plan*, the Training and Support Group (TSG) practices effective resource management in planning and scheduling, resource utilization, resource capacity as well as resource prioritization and allocation. The TSG's process for collecting information on equipment, staffing and facility needs is streamlined and compiled through the Training Needs Monthly Report (TNMR). The training sections include recruit, in-service, and pre-service training. The TSG section supervisors provide input on equipment and resources by consistently communicating with their teams and evaluating feedback from class participant surveys, the TNMR provides a way for the TSG to plan, schedule and allocate resources with maximum efficiency. The TSG training sections communicate their needs regarding training resources, equipment, and staffing in a monthly report to the Commanding Officer of their section. The Commanding Officer of the Operations Training Section aggregates information regarding adequate classroom space, sufficient staffing, office space for instructors, non-classroom facility needs, equipment, and general concerns from each section. The Operations Commanding Officer compiles and evaluates the information and reports findings to the Deputy Chief, TSG to ensure the TSG maintains a proper training and learning environment. Equipment and supplies are replenished through the TSG's Procurement & Facilities Management Section.

The acquisition of equipment, supplies, goods, and services are subject to the TSG Special Order 15-21 "Requests for Equipment, Vendor Services and Monthly Supplies/Special Orders." Equipment for the TSG and specifically for the training programs have been evaluated and, subsequently, equipment has been ordered in anticipation of training. Equipment for the Joint Public Safety Training Campus (JPSTC) has been ordered by the design team and through the Director of Facility's, Office of Public Safety Administration. With a high-level understanding of what's needed to manage and execute training, the TSG uses the Tableau application to effectively plan and measure utilization and efficiency. Two Tableau Dashboards were created in order to assess staffing. The Academy Staffing Dashboard shows the total staffing, allocation of staffing, and supervision for the Training Division. This Dashboard allows the Deputy Chief and Commander the ability to keep track of their staffing levels on a daily basis. The Academy Recruits Dashboard allows the TSG to keep track of how many recruits are currently being trained. The TSG con-

tinually assesses staffing to ensure adequate personnel to accomplish the Department's training goals. The TSG continuously monitor staffing levels to discover underused or inefficiently used resources within the Department to make adjustments as needed. To monitor and address staffing levels, the topic was added to the standing agenda at the monthly Training Oversight Committee (TOC) meetings.

Staffing needs analyses indicate there is currently and a projected continuing deficit in staff, instructor, and Field Training resources.² This is especially concerning considering the mixed messages of the CPD's decision to terminate the contract of an authorized external cadre of contract instructors. While staffing solutions³ have been articulated, IMR9 will allow the IMT to determine if actual realistic measures are implemented to substantively overcome staffing and instructor resource deficits.

While the CPD has begun implementation of plans to provide adequate training facilities, sufficient resources are not yet allocated, as required by this paragraph.

The City and the CPD maintained Preliminary compliance during this reporting period. Looking forward, Secondary compliance can be substantiated with policies, procedures, plans, evaluations, and training materials that indicate the City and the CPD have developed and begun the implementation of plans to provide appropriate training facilities, including allocating sufficient resources.

Full compliance may be achieved after the CPD provides evidence that adequate, safe, and effective training is conducted in its facilities according to the requirements of ¶281. Policies, procedures, plans, processes, and demonstrations of system operations may all be used to substantiate compliance.

² See *2023 Annual Training Plan*, "Resource Management," at 118–28.

³ *Id.* at 124.

Paragraph 281 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	

Training: ¶282

282. All CPD training instructors must be appropriately qualified for their instructional roles and use only approved curricula and lesson plans. CPD will actively recruit and retain qualified instructors to ensure that CPD has sufficient qualified instructors to meet the needs of the Department and requirements of the Training Plan.

Compliance Progress

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

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

The City and the CPD maintained Preliminary compliance during this reporting period.

To evaluate Preliminary compliance with ¶282, 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 evaluate Secondary compliance with this paragraph, we will need to review data to determine whether the City and the CPD have plans and criteria in place to acquire qualified experts to develop and instruct courses. Assessment sources include policy, procedure, qualifications, and training plans to determine if the City and the CPD have sufficiently taken steps to evaluate and acquire experts to develop and instruct courses. The IMT will also seek to verify sufficient attendance records (*i.e.*, 95% of relevant personnel), including hours attended. Where applicable, we will assess whether the City and the CPD have created the requisite positions and staffed those positions with qualified personnel in order to achieve the requirements of this paragraph.

Progress before the Eighth Reporting Period

Training Directive S11-10 (*Department Training Records Maintenance*) produced in the fifth reporting period supported Preliminary compliance. We noted in the fifth reporting period that Secondary compliance could be achieved by implementing a strategy to determine and review instructor qualifications and to ensure that instructors use only approved lesson plans and curricula.

To further demonstrate compliance efforts during the seventh reporting period, the City and the CPD submitted documents regarding outside Instructor Qualifications (produced on December 8, 2022). Included in these documents is a Professional Law Enforcement Training (PLET) Group Instructor approval letter from the

Illinois Law Enforcement Training and Standards Board (ILETSB). Overall, these documents demonstrated that the City and the CPD have vetted and received ILETSB approval for several PLET Group instructors to teach 2022 CPD Officer Wellness In-Service Training and Gender Based Violence In-Service Training courses.

These documents moved the CPD closer to establishing a process for vetting outside instructors. The next step for the CPD is to provide an instructor recruiting and retention strategy that ensures the CPD has the requisite qualified instructors to meet the CPD's *Needs Assessment* and *Training Plan* requirements.

Progress in the Eighth Reporting Period

Staffing needs analyses in this reporting period indicate there is currently and a projected continuing deficit in staff, instructor, and field training resources.⁴ This is especially concerning considering the mixed messages of the CPD's decision to terminate the contract of an authorized external cadre of contract instructors (PLET Group). While staffing solutions have been articulated⁵, IMR9 will allow the IMT to determine if actual realistic measures are implemented to substantively overcome staffing and instructor resource deficits.

The City and the CPD maintained Preliminary compliance during this reporting period. Looking forward, Secondary compliance may be achieved by articulating and implementing a strategy to determine and review instructor qualifications and to ensure that instructors use only approved lesson plans and curricula.

Full compliance requires the CPD to systematically determine and review appropriate instructor qualifications and ensure that instructors use only approved lesson plans and curricula. The CPD's periodically refined instructor recruiting and retention strategy must ensure that there are sufficient qualified instructors to meet the CPD's *Needs Assessment* and *Training Plan* requirements.

⁴ See *2023 Annual Training Plan*, "Resource Management," pages 118–28.

⁵ *Id.* at 124.

Paragraph 282 Compliance Progress History

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

COMPLIANCE PROGRESS:
Not Applicable

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

COMPLIANCE PROGRESS:
Not Applicable

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

COMPLIANCE PROGRESS:
None

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

COMPLIANCE PROGRESS:
None

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

COMPLIANCE PROGRESS:
Preliminary

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

COMPLIANCE PROGRESS:
Preliminary

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

COMPLIANCE PROGRESS:
Preliminary

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

COMPLIANCE PROGRESS:
Preliminary

Training: ¶283

283. *As appropriate to accomplish the requirements and goals of this Agreement, CPD will incorporate experts and guest speakers to participate in the development and instruction of relevant courses, as feasible, practical, and appropriate, including, but not limited to: a. CPD members of all ranks; b. members of the community; c. legal and law enforcement professionals, such as judges, prosecutors, and public defenders; d. crime victims; and e. subject matter experts.*

Compliance Progress

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

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

The City and the CPD maintained Secondary compliance with the requirements of ¶283 during this reporting period.

To evaluate Preliminary compliance with ¶283, 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 evaluate Secondary compliance with this paragraph, we reviewed data to determine whether the City and the CPD have developed a strategy to incorporate experts and guest speakers to participate in the development and instruction of relevant courses, as feasible, practical, and appropriate in accordance with the requirements of this paragraph. Specifically, the IMT reviewed CPD policy, lesson plans, training plans, and training schedules to determine if the CPD has sufficiently implemented its policy and training plans, that course instructors’ qualifications comply with the requirements of this paragraphs, and that guest speakers, including CPD officers, community members, and outside experts, are involved in course instruction where feasible, practical, and appropriate.

Progress before the Eighth Reporting Period

The City and the CPD first achieved Preliminary compliance with ¶283 in the fourth reporting period. During reporting periods that followed, the IMT assessed compliance by reviewing Training Community Advisory Committee (TCAC) meeting agenda, notes for TCAC meetings, and comments responding to feedback provided TCAC members. The IMT determined the CPD maintained Preliminary compliance according to the language included in Training Directive S11-10, *Department Training Records Maintenance*. Data indicated that the CPD has incorporated experts and guest speakers to participate in the development and instruction of relevant

courses, as required by this paragraph. We advised that Secondary compliance requires the CPD to demonstrate that it has sufficiently taken steps to evaluate and acquire appropriate experts to develop and instruct courses as required by this paragraph.

To demonstrate compliance during the seventh reporting period, the City and the CPD submitted TCAC, outside instructor qualifications, SRO training records, and training materials for the 2023 Constitutional Policing In-Service Training and Gender Based Violence In-Service Training. The IMT also attended several CPD training classes virtually and in person during the seventh reporting period. We noted, for example, that some segments of the *Crisis Intervention Training Refresher* courses conducted in June 2022 used outside actors and an instructor. We also reviewed and attended the Gender Based Violence course. Overall, the data submitted indicated that the CPD incorporated experts and guest speakers to participate in the development and instruction of relevant courses, as required by this paragraph.

Progress in the Eighth Reporting Period

The City and the CPD produced 2023 Annual Training Plan, Gender Based Violence 2022 Course Completion Records, and Active Bystandership for Law Enforcement (ABLE) Training 2022 Course Completion Records. In addition to the reviewing submitted documents, the IMT also attended courses that were created and sometimes taught by outside entities, including ABLE, Fair and Impartial Policing, Officer Wellness, and Gender Based Violence.

The City and the CPD removed PLET outside instructors during this reporting period. This action, after having the entire instructor cadre ILETSB approved, raises concerns about standards applied to not just qualify but also disqualify outside instructors. The City and the CPD should develop, approve, and adhere to an objective and transparent professional standard in qualifying and disqualifying experts and guest speakers to develop and instruct courses. This requirement will be applied going forward to Secondary and Full compliance considerations.⁶

The City and the CPD maintained Secondary compliance during this reporting period but risks losing compliance in the next reporting period without demonstrating adequate qualifying and disqualifying standards. Looking forward, Full compliance may be achieved after sustained Secondary compliance where the CPD sufficiently evaluates and acquires experts to initially and periodically develop and instruct courses in accordance with the requirements of this paragraph.

⁶ Stated in Methodologies document, Assessment Sources criteria column, for Secondary and Full compliance as “qualifications.”

Paragraph 283 Compliance Progress History

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

Training: ¶284

284. CPD will require that all new and current Education and Training Division instructors and curriculum developers are certified by the Illinois Law Enforcement Training and Standards Board and, as appropriate to their roles, receive initial and annual refresher training on subjects including, but not limited to, effective teaching, adult-learning techniques, and curriculum development. CPD will further require that instructors are trained in the specific subject matter they are assigned to teach and are also cross-trained in other related subjects so that they are equipped to deliver effective interdisciplinary instruction. Instructor training will also include peer review.

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 the requirements of ¶284 during this reporting period.

To evaluate Preliminary compliance with ¶284, 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 evaluate Secondary compliance with this paragraph, we reviewed data to determine whether the City and the CPD have developed and implemented a process for course and instructor training evaluation, including officer feedback and analysis of the extent to which such training is reflected in how officers perform, if this information is used in creating the *Needs Assessment*, and whether the CPD has demonstrated that training is having the intended impact. Specifically, we reviewed the CPD’s training plans and curricula and data demonstrating that training was delivered to the relevant personnel during the necessary intervals. This assessment included a review of the City’s, the CPD’s, and the other relevant entities’ training development, implementation, and evaluation to determine whether training is evidence-based and conforms to best practices, as applicable. The IMT also sought to verify through data sufficient attendance records (*i.e.*, 95% of relevant personnel), including hours attended. Where applicable, we assessed whether the City and the CPD have created the requisite positions and staffed those positions with qualified personnel in order to achieve the requirements of this paragraph.

Progress before the Eighth Reporting Period

The City and the CPD first achieved Preliminary compliance with ¶284 in the fourth reporting period. During the reporting periods that followed, the City and the CPD did not submit any data to establish Secondary compliance. However, Training Directive S11-10 (*Department Training Records Maintenance*) produced in the prior reporting period continued to support Preliminary compliance.

The IMT attended several training courses in-person during the sixth and seventh reporting periods. We noted and discussed with CPD supervisors an observation where students and the instructors were almost solely focused on the tactics specific to that training and missed opportunities to reinforce routine principles and practices that are native to other officer disciplines. This demonstrated an absence of the cross-training in interdisciplinary instruction as required by this paragraph.

To further demonstrate compliance efforts during the seventh reporting period, the City and the CPD submitted documents regarding outside Instructor Qualifications (produced on December 8, 2022). Included in these documents is a Professional Law Enforcement Training (PLET) Group Instructor approval letter from the Illinois Law Enforcement Training and Standards Board (ILETSB). Overall, these documents demonstrated that the City and the CPD have vetted and received ILETSB approval for several PLET Group instructors to teach 2022 CPD Officer Wellness In-Service Training and Gender Based Violence In-Service Training courses.

It was clear that at least some CPD instructors had received ILETSB approval. No documents were produced that demonstrate instructors received initial and annual refresher training on the required courses, are trained in the specific subject matter they are required to teach and are also cross trained in other related subjects so that they are equipped to deliver effective interdisciplinary instruction.

Progress in the Eighth Reporting Period

To substantiate compliance with the requirements of ¶284, the City and the CPD produced policies S11-10, S11-10-02, and S11-10-03 and the 2023 Annual Training Plan. These documents demonstrate adherence to Preliminary compliance requirements. The IMT is aware from information shared in monthly meetings that the CPD helps instructor training courses during this reporting period. However, no documents were produced that demonstrate instructors actually received initial and annual refresher training on the required courses, are trained in the specific subject matter they are required to teach and are also cross-trained in other related subjects so that they are equipped to deliver effective interdisciplinary instruction.

The City and the CPD maintained Preliminary compliance during this reporting period. Looking forward, achieving Secondary compliance will require the CPD to implement a plan to ensure that all instructors are properly credentialed. Full compliance will require Secondary compliance status and for all instructors to be credentialed in accordance with ¶284 standards on an ongoing basis.

Paragraph 284 Compliance Progress History

FIRST REPORTING PERIOD SEPTEMBER 1, 2019 – AUGUST 31, 2019 COMPLIANCE PROGRESS: Not Applicable	SECOND REPORTING PERIOD SEPTEMBER 1, 2019 – FEBRUARY 29, 2020 COMPLIANCE PROGRESS: Not Applicable	THIRD REPORTING PERIOD MARCH 1, 2020 – DECEMBER 31, 2020 COMPLIANCE PROGRESS: Status Update
FOURTH REPORTING PERIOD JANUARY 1, 2021 – JUNE 30, 2021 COMPLIANCE PROGRESS: Preliminary	FIFTH REPORTING PERIOD JULY 1, 2021 – DECEMBER 31, 2021 COMPLIANCE PROGRESS: 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	

Training: ¶285

285. The Education and Training Division will conduct annual instructor performance reviews. Performance reviews will include classroom observations, member feedback, and in-person meetings with instructors to discuss performance and areas of improvement. These performance reviews will be considered in assessing whether instructors may continue to serve in that role.

Compliance Progress

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

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

The City and the CPD maintained Preliminary compliance with the requirements of ¶285 during this reporting period.

To evaluate Preliminary compliance with ¶285, 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 evaluate Secondary compliance with this paragraph, we will need to review data to determine whether the City and the CPD have developed policies and procedures to conduct annual instructor performance reviews according to the requirements of ¶285.

Progress before the Eighth Reporting Period

The City and the CPD first achieved Preliminary compliance with ¶285 in the fifth reporting period. During the previous reporting period, the City and the CPD did not submit any data to establish Secondary compliance. However, Training Directive S11-10 (*Department Training Records Maintenance*) produced in the fifth reporting period continued to support Preliminary compliance. We noted that Secondary compliance could be achieved once the City and the CPD substantiate through policies, procedures, plans, training materials, and communication materials that they have established and implemented a process to conduct annual instructor performance reviews as required by this paragraph.

Progress in the Eighth Reporting Period

The City and the CPD submitted policies S11-10 and S11-10-03 and the 2023 Annual Training Plan to substantiate proof of Preliminary compliance. S11-10 § V.J. contains ¶285 required language. The City and the CPD did not submit any data to establish Secondary compliance.

The City and the CPD maintained Preliminary compliance during this reporting period. Looking forward, Secondary compliance may be achieved by producing policies and procedures, plans, training materials, and communication materials that substantiate the City and the CPD have established and implemented a process to conduct annual instructor performance reviews according to the requirements of ¶285. A training methodology that includes reviewing the City’s, the CPD’s, and the other relevant entities’ training development, implementation, and evaluation (¶286) also applies. The IMT will rely upon the “ADDIE model” of curriculum development and implementation as our evaluation standard, which typically incorporates the following elements: training needs assessment, curriculum design, curriculum development, training implementation (training delivery), and training evaluation. Each of these five elements is considered an essential component of effective training. Training evaluation includes student and trainee evaluations—both formative and summative evaluations—as well as measurements of how specific training goals are implemented at the organizational level. We will also assess whether training is evidence-based and conforms to best practices, as applicable. We will also use this model to measure the effectiveness of the trainers (¶¶283–85). When applicable, we will also assess whether the City, the CPD, and the other relevant entities adequately sought, received, and incorporated community input and facilitated community participation. The IMT will also seek to verify sufficient attendance records (*i.e.*, 95% of relevant personnel), including hours attended.

Full compliance may be achieved by demonstrating through policies, procedures, plans, processes, and demonstrations of systems operations, reports, and audits, that the City and the CPD have fully implemented annual instructor performance reviews according to the requirements of this paragraph.

Paragraph 285 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: 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	

Training: ¶286

286. The review and analysis of the content and delivery of training will enable CPD to determine whether the training provided to members effectively prepares them to police fairly, safely, and in accordance with the law, CPD policy, best practices, and this Agreement.

Compliance Progress

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

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

The City and the CPD did not achieve any level of compliance with the requirements of ¶286 during this reporting period.

To evaluate Preliminary compliance with ¶286, 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 evaluate Secondary compliance with this paragraph, we reviewed data to determine whether the City and the CPD have developed acceptable policies, procedures, and plans to conduct an analysis and review of the content and delivery of training according to the requirements of ¶286.

Progress before the Eighth Reporting Period

During the fifth reporting period, the IMT first assessed compliance with this paragraph for the first time by reviewing policies and procedures and found that the City and the CPD did not achieve any level of compliance. During the last reporting period, the City and the CPD did not produce any documents substantiating Preliminary compliance, and the City indicated its position that this paragraph lacks an assessable requirement. The IMT respectfully disagreed and noted that Secondary compliance may be substantiated by providing documentation demonstrating that the CPD has established and implemented a process to analyze the content and delivery of training. The City and the CPD have not produced any new documents relevant to ¶286 during the reporting periods since the fifth reporting period.

Progress in the Eighth Reporting Period

The City and the CPD submitted the *2023 Annual Training Plan* to substantiate compliance. The Annual Training Plan does not substantiate development of acceptable policies, procedures, and plans to conduct an analysis and review of the content and delivery of training according to the requirements of ¶286.

The City and the CPD did not achieve any level of compliance during this reporting period. Looking forward, Preliminary compliance requires the City and the CPD to develop acceptable policies, procedures, and plans to conduct an analysis and review of the content and delivery of training according to the requirements of ¶286.

Secondary compliance will require policy and procedure, planning, training materials, communication materials, and meeting minutes, including but not limited to from Training Community Advisory Committee and Training Oversight Committee meetings, to substantiate whether the CPD has established and implemented a process to analyze and review the content and delivery of training according to the requirements of this paragraph.

Full compliance may be achieved when records submitted indicate and substantiate that the City and the CPD have conducted an analysis and review of the content and delivery of trainings and the CPD has determined if trainings are effective in preparing officers according to the requirements of this paragraph.

Paragraph 286 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: 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	

Training: ¶287

287. Pursuant to its Training Plan, CPD will develop and implement a process that provides for the collection, analysis, and review of course and instructor evaluations to document the effectiveness of existing training and to improve the quality of future instruction and curriculum. This process will include member feedback on the training they have received and analysis of the extent to which such training is reflected in how members perform. The Education and Training Division will consider this information in conducting its annual needs assessment.

Compliance Progress

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

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

The City and the CPD did not achieve any level of compliance with the requirements of ¶287 during this reporting period.

To evaluate Preliminary compliance with ¶287, 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 evaluate Secondary compliance with this paragraph, we reviewed data to determine whether the annual *Training Plan* or related policies require the CPD to develop and implement a process for collection, analysis, and review of course and instructor training evaluations, including officer feedback and an analysis of the extent to which such training is reflected in how officers perform and how this information will be used in the annual *Needs Assessment*. The IMT also sought to verify sufficient attendance records (*i.e.*, 95% of relevant personnel), including hours attended. Where applicable, we assessed whether the City and the CPD have created the requisite positions and staffed those positions with qualified personnel in order to achieve the requirements of this paragraph.

Progress before the Eighth Reporting Period

During the previous reporting periods, the City and the CPD did not submit any data to establish any level of compliance. Notwithstanding, the IMT assessed compliance during the previous reporting period by reviewing the *2022 Training Plan* and training directives S11-10 (*Department Training Records Maintenance Program*), S11-10-01 (*Training Notification and Attendance Responsibilities*) and S11-

11 (*Training Oversight Committee*). We found that these plans and directives attempted to include the language required in this paragraph but lacked documentation containing the requisite language. We determined that the City and the CPD had not yet achieved Preliminary compliance. We noted that supporting documentation with the necessary language would be necessary to demonstrate Preliminary compliance.

Progress in the Eighth Reporting Period

The City and the CPD submitted the Annual Training Plan and 2022 In-Service Supervisors Post Training Evaluation Results. The Evaluation Results are for In-Service Supervisor Training only. The Results demonstrate the CPD's ability to collect course and instructor evaluative data. This is but one step in the required process. The CPD fails to cite a controlling policy that specifies the entire evaluation process. The analysis of the extent to which the training is reflected in how members perform is not submitted. Documents submitted do not record the effectiveness of existing training nor how the CPD will apply this data to improve the quality of future instruction and curriculum.

According to the 2023 Annual Training Plan, the Training Division created a short term and long-term plan to address training related evaluations. The short-term plan is to follow the evaluations for recruit, in-service, and pre-service described throughout the training plan. To ensure consistency the Training Division assigned the Lieutenant of the Instructional Design and Quality Control Section to coordinate this effort. The long-term program is to create a Quality Control Section that consists of the following units: Consent Decree Compliance, Accreditation, Examinations, Evaluations, and Instructor Development. The Quality Control Section will identify training and performance needs based on analysis of the Department's annual Training Needs Assessment, evaluations, and surveys, as well as the annual Training Plan. The Examinations, Evaluations, and Instructor Development Unit will develop, maintain, and administer examinations to validate recruit, in-service, and pre-service training programs and ensure that testing is administered in a reliable and fair manner. The unit will develop and implement a process to maintain audits, reviews, assessments, and evaluations of the sufficiency and effectiveness of the training programs.⁷

The City and the CPD did not achieve any level of compliance during this reporting period. Looking forward, Preliminary compliance requires the City and the CPD to develop and implement a process for collection, analysis, and review of course and instructor training evaluation, including officer feedback and analysis of the extent

⁷ CPD 2023 Annual Training Plan at 120.

to which such training is reflected in how officers perform and how this information will be used in the annual *Needs Assessment*.

To achieve Secondary compliance, the City and the CPD must demonstrate that they have implemented a process for course and instructor training evaluations, including officer feedback and analysis of the extent to which such training is reflected in how officers perform. This information must then be used in the annual training *Needs Assessment* to determine whether the CPD has demonstrated that training is having the intended impact.

Full compliance may be achieved when policies, lesson plans, training plans, training schedules, and evaluation instruments are components of a sustained evaluation process that meets the requirements of this paragraph.

Paragraph 287 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	

Training: ¶288

288. *The Education and Training Division will develop and implement a process to maintain audits, reviews, assessments, or evaluations of the sufficiency or effectiveness of the training programs.*

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 any level of compliance with the requirements of ¶288 during this reporting period.

To evaluate Preliminary compliance with ¶288, 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 evaluate Secondary compliance with this paragraph, we will need to review data to determine whether the Education and Training Division has developed and implemented a process to maintain audits, reviews, assessments, or evaluations of the sufficiency or effectiveness of the CPD’s training program. The IMT will also seek to verify sufficient attendance records (*i.e.*, 95% of relevant personnel), including hours attended. Where applicable, we will assess whether the City and the CPD have created the requisite positions and staffed those positions with qualified personnel in order to achieve the requirements of this paragraph.

Progress before the Eighth Reporting Period

The City and the CPD has not seek Preliminary compliance for this paragraph in prior reporting periods.

Progress in the Eighth Reporting Period

During the eighth reporting period, the City and the CPD submitted the Annual Training plan to demonstrate compliance with this paragraph. The IMT additionally reviewed S11-10, although it wasn’t submitted as a compliance proof.

According to the 2023 Annual Training Plan, the Training Division created a short term and long-term plan to address training related evaluations. The short-term plan is to follow the evaluations for recruit, in-service, and pre-service described throughout the training plan. To ensure consistency the Training Division assigned the Lieutenant of the Instructional Design and Quality Control Section to coordinate this effort. The long-term program is to create a Quality Control Section that

consists of the following units: Consent Decree Compliance, Accreditation, Examinations, Evaluations, and Instructor Development. The Quality Control Section will identify training and performance needs based on analysis of the Department's annual Training Needs Assessment, evaluations and surveys, as well as the annual Training Plan. The Examinations, Evaluations, and Instructor Development Unit will develop, maintain, and administer examinations to validate recruit, in-service, and pre-service training programs and ensure that testing is administered in a reliable and fair manner. The unit will develop and implement a process to maintain audits, reviews, assessments, and evaluations of the sufficiency and effectiveness of the training programs, as required by this paragraph.⁸

According to S11-10 § III.C.7. (issued December 31, 2022), the Examinations, Evaluations, and Instructor Development Unit develops, maintains, and administers examinations to validate recruit, pre-service, and in-service training programs and ensures that testing is administered in a reliable and fair manner. The Examinations, Evaluations, and Instructor Development Unit, in conjunction with the training sections, designs and develops both knowledge-based and performance-based tests according to best practices that assess the knowledge and skills required for successful job performance that align with the materials delivered in training. The Examinations, Evaluations, and Instructor Development Unit coordinates the evaluation of instructor performance and curriculum development for the Instructor Development Program. In addition, the Examinations, Evaluations, and Instructor Development Unit monitors, evaluates, and makes recommendations in regard to the delivery of training, course content, and course needs for overall effectiveness and relevance. The unit is responsible for reporting findings to the Training Oversight Committee on a monthly basis.

Although the Training Plan articulates audit maintenance as the Examination, Evaluations, and Instructor Development Unit's role, S11-10 excludes that language, creating tension in clearly assigning responsibility for these ¶1288 requirements.

The City and the CPD did not achieve any level of compliance during this reporting period. Looking forward, Preliminary compliance requires the City and the CPD to develop and implement plans and controlling policies for Education and Training Division to develop and implement a process to maintain audits, reviews, assessments, or evaluations of the sufficiency or effectiveness of the CPD's training programs.

⁸ CPD 2023 Annual Training Plan at 120.

To achieve Secondary compliance, the City and the CPD must demonstrate that they have established a process to maintain audits, reviews, assessments, or evaluations of the sufficiency or effectiveness of the training programs.

Full compliance may be achieved when the Education and Training Division has fully developed and implemented a process to maintain audits, reviews, assessments, or evaluations of the sufficiency or effectiveness of the CPD’s training programs.

Paragraph 288 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: None	EIGHTH REPORTING PERIOD JANUARY 1, 2023 – JUNE 30, 2023 COMPLIANCE PROGRESS: None	

Training: ¶289

289. CPD will develop and implement testing policies and procedures to ensure that any member testing that is administered is reliable and fair. To achieve this purpose, both knowledge-based and performance-based tests will be designed, developed, administered, and scored according to best practices. All tests will assess the knowledge and skills required for successful job performance and will align with the materials delivered in training.

Compliance Progress

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

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

The City and the CPD maintained Preliminary compliance with ¶289 during this reporting period.

To evaluate Preliminary compliance with ¶289, 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 evaluate Secondary compliance with this paragraph, we reviewed data to determine whether the CPD has developed testing policies and procedures consistent with the requirements of this paragraph. The IMT also sought to determine if the CPD has established a process to ensure that testing that is administered is reliable and fair and uses both knowledge-based and performance-based tests that are designed, developed, administered, and scored according to best practices. The IMT further sought to determine that all tests are designed to assess the knowledge and skills required for successful job performance and align with the materials delivered in trainings. Where applicable, we assessed whether the City and the CPD have created the requisite positions and staffed those positions with qualified personnel in order to achieve the requirements of this paragraph.

Progress before the Eighth Reporting Period

The City and the CPD first achieved Preliminary compliance with ¶289 in the fifth reporting period. During the sixth reporting period, the IMT assessed compliance by reviewing BIA eLearning materials, including draft eLearning materials and a pre-and post-tests. These documents alone did not demonstrate that the CPD had established a process to ensure that testing that is administered is reliable and fair and uses both knowledge-based and performance-based tests that are designed, developed, administered, and scored according to best practices.

To demonstrate compliance with ¶289, during the previous reporting period the CPD submitted BIA eLearning training materials, including draft eLearning materials and a pre-and post-test Training (produced August 18, 2022, and November 9, 2022). Again, we noted that these documents alone did not demonstrate that the CPD has established a process to ensure that testing that is administered is reliable and fair, and uses both knowledge based and performance-based tests that are designed, developed, administered, and scored according to best practices.

Progress in the Eighth Reporting Period

The City and the CPD submitted the following documents to demonstrate compliance during this reporting period:

- BIA eLearning
- Crime Victim’s Assistance eLearning – 95% Completion
- Juvenile Processing eLearning – 95%
- 95 Percent 40 Hour In Service Training
- ICAT Training
- Gender Based Violence 2022 95% Completion
- CIT In Service Training 95% Completion
- De-escalation, Response to Resistance, and Use of Force Training 95% Completion
- Use of Force Policy Update Training
- ABLE Training 95% Completion
- Officer Wellness Training
- ABLE Refresher Training
- Fair and Impartial Policing Training
- CPD Constitutional Policing Training Materials
- DRTUOF Policy Updates Training
- 2023 Annual Training Plan
- Firearms Restraining Order eLearning
- Prohibition on Retaliation eLearning
- 2023 Officer Wellness Training
- Child Abuse eLearning

The IMT also examined S11-10 although it was not submitted as a compliance proof. Many of these courses included knowledge and performance-based tests, indicating the CPD has developed and implemented testing procedures. The IMT could not determine from submitted documents what validation efforts the CPD conducted to ensure examinations were reliable and fair, or how design, development, administration and scoring comports with best practices.

According to page 120 of the 2023 Annual Training Plan, the Training Division created a short term and long-term plan to address training related evaluations. The short-term plan is to follow the evaluations for recruit, in-service, and pre-service

described throughout the training plan. To ensure consistency the Training Division assigned the Lieutenant of the Instructional Design and Quality Control Section to coordinate this effort. The long-term program is to create a Quality Control Section that consists of the following units: Consent Decree Compliance, Accreditation, Examinations, Evaluations, and Instructor Development. The Quality Control Section will identify training and performance needs based on analysis of the Department's annual Training Needs Assessment, evaluations and surveys, as well as the annual Training Plan. The Examinations, Evaluations, and Instructor Development Unit will develop, maintain, and administer examinations to validate recruit, in-service, and pre-service training programs and ensure that testing is administered in a reliable and fair manner.

According to S11-10 § III.C.7. (issued December 31, 2022), the Examinations, Evaluations, and Instructor Development Unit develops, maintains, and administers examinations to validate recruit, pre-service, and in-service training programs and ensures that testing is administered in a reliable and fair manner. The Examinations, Evaluations, and Instructor Development Unit, in conjunction with the training sections, designs and develops both knowledge-based and performance-based tests according to best practices that assess the knowledge and skills required for successful job performance that align with the materials delivered in training. The Examinations, Evaluations, and Instructor Development Unit coordinates the evaluation of instructor performance and curriculum development for the Instructor Development Program. In addition, the Examinations, Evaluations, and Instructor Development Unit monitors, evaluates, and makes recommendations in regard to the delivery of training, course content, and course needs for overall effectiveness and relevance. The unit is responsible for reporting findings to the Training Oversight Committee on a monthly basis. S11-10 § VI.D.(1-4) also contains the requisite language.

The City and the CPD, through S11-10 and the Annual Training Plan, maintained Preliminary compliance during this reporting period. Looking forward, Secondary compliance may be achieved after the CPD has established a process to ensure that testing that is administered is reliable and fair, and that testing uses both knowledge-based and performance-based tests that are designed, developed, administered, and scored according to best practices. All tests are designed to assess the knowledge and skills required for successful job performance and align with materials developed in training. Assessment sources include policy, procedure, plans and processes, and testing materials.

Full compliance may be demonstrated when the CPD implements testing policies and procedures that are reliable and fair and use both knowledge-based and per-

formance-based tests that are designed, developed, administered, and scored according to best practices, and when the CPD demonstrates that all tests assess the knowledge and skills required for successful job performance and align with the materials delivered in training.

Paragraph 289 Compliance Progress History

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

Training: ¶290

290. CPD will develop, implement, and utilize a centralized electronic file system for assessing the content and delivery of all CPD training, including training provided by outside instructors or non-CPD entities. This system will allow the Education and Training Division to electronically track and maintain complete and accurate records of all training provided to CPD members, including curricula, lesson plans, training delivered, member feedback, assessments, and other training materials. This system will, at a minimum: a. maintain training records for each member of the Department; b. record the course description, duration, curriculum, date, location, and the members who completed the training; and c. identify members who did not complete required training and describe remedial training actions that were taken.

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 any level of compliance with the requirements of this paragraph during this reporting period.

To evaluate Preliminary compliance with ¶290, 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 evaluate Secondary compliance with this paragraph, we will need to review data to determine whether the City and the CPD have established a process to implement an electronic file system in accordance with the requirements of this paragraph. The IMT will also seek to verify sufficient attendance records (*i.e.*, 95% of relevant personnel), including hours attended. Where applicable, we will assess whether the City and the CPD have created the requisite positions and staffed those positions with qualified personnel in order to achieve the requirements of this paragraph.

Progress before the Eighth Reporting Period

During the previous reporting periods, the City and the CPD did not submit any data to establish any level of compliance during this reporting period, and we found that the City and the CPD did not achieve any level of compliance with this paragraph. The City previously indicated that the CPD intended to work towards

Preliminary compliance during the sixth reporting period by memorializing the requirements of this paragraph into policy.

Progress in the Eighth Reporting Period

The City and the CPD submitted the Annual Training Plan and policies S11-10 and S11-10-03 to substantiate compliance. S11-10 § XIV. requires the Training Division to utilize a centralized electronic system for scheduling and tracking all Department members’ training, and a centralized electronic file system for assessing the content and delivery of all Department training. S11-10 does not specify system tracking and record maintenance capabilities as required by ¶290.

The City and the CPD did not achieve any level of compliance with this paragraph during this reporting period. Looking forward, achieving Secondary compliance will require the CPD to establish an “electronic file system” in accordance with the requirements of this paragraph. Assessment sources would include policies, procedures, plans and processes, and demonstrations of system operations.

Paragraph 290 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	

Training: ¶291

291. *The Education and Training Division will document all training provided to or received by CPD members, whether required or not. Members will sign an acknowledgement of attendance or digitally acknowledge completion of training.*

Compliance Progress

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

Preliminary: *Not in Compliance* (NEW: LOST COMPLIANCE)
Secondary: *Not Yet Assessed*
Full: *Not Yet Assessed*

The City and the CPD failed to maintain Preliminary compliance with the requirements of ¶291 during this reporting period.

To evaluate Preliminary compliance with ¶291, 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 evaluate Secondary compliance with this paragraph, we will need to review data to determine whether the City and the CPD have sufficiently established a process to document all CPD trainings. Assessment sources would include policy, procedure, and training records. The IMT will also seek to verify sufficient attendance records (*i.e.*, 95% of relevant personnel), including hours attended. Where applicable, we will assess whether the City and the CPD have created the requisite positions and staffed those positions with qualified personnel in order to achieve the requirements of this paragraph.

Progress before the Eighth Reporting Period

During the fifth reporting period, the IMT first assessed compliance by reviewing the submitted Training Directives S11-10 (*Department Training Records Maintenance*) and S11-11 (*Training Oversight Committee*) and found that the City and the CPD did not maintain Preliminary compliance with the requirements of this paragraph because they did not submit any documents or data to establish its compliance during the prior reporting period.

To demonstrate compliance with ¶291, in the sixth reporting period the City and the CPD submitted a cover letter seeking to clarify its position that the Training Directives S11-10 (*Department Training Records Maintenance*), S11-10-01 (*Recruit Training*), S11-10-02 (*Pre-Service Training*), and S11-10-03 (*In-Service Training*) to support Preliminary compliance with the requirements of this paragraph. Additionally, the IMT reviewed Employee Resource E05-04 (*Merit Board*), E05-04-01 (*Academic Selection Board*), and E02-07 (*Travel, Department-Funded Training, and*

Reimbursement Guidelines). S11-10 § III(A), and §§ VII(B) & (C) provided the requisite language for Preliminary compliance.

The City and the CPD did not submit any documents to demonstrate compliance with ¶291 during the seventh reporting period. However, the IMT reviewed Employee Resource E05-04 (*Merit Board*), E05-04-01 (*Academic Selection Board*), and E02-07 (*Travel, Department-Funded Training, and Reimbursement Guidelines*), as well as S11-10 (*Department Training Records Maintenance*). S11-10 § III(A), and §§ VII(B) & (C) provided the requisite language to support continued Preliminary compliance.

Progress in the Eighth Reporting Period

The City and the CPD did not submit any documents to demonstrate compliance with ¶291 this reporting period. However, the IMT reviewed S11-10 (*Department Training*).

S11-10 § VI.B. (issued December 31, 2022) declares the Standardized Attendance Sheet Form ([CPD-63.203](#)) will be the only form used to record the attendance of Department members participating in any in-person in-service or Department conducted training. Section IX.A. declares the Learning Management System to be a computerized system used to track training attendance. Section VII.C(2) grants the Deputy Chief, Training and Support Group or designee, authority to approve non-Departmental training to be entered into a member's training record. Although the language in this directive partially satisfies ¶291 requirements, it fails to meet ¶291 requirements. The CPD has a process to document all CPD training, but the S11-10 policy does not require that all external training be documented. The policy only provides the Training and Support Group Deputy Chief with authority to approve or disapprove training, which is not sufficient to meet ¶291 requirements. Preliminary compliance is therefore lost.

The City and the CPD failed to maintain Preliminary compliance during this reporting period. Looking forward, the CPD may achieve Secondary compliance when it demonstrates that it has sufficiently established a process to document all CPD trainings. Assessment sources would include policy, procedure, training records, and training attendance records.

Paragraph 291 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:
Preliminary

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:
None

A submission consistent with ¶292(f) requirements could not be identified in review of the documents produced. The IMT recognized that the CPD had been working on an In-Service Training Deviation Dashboard that may ultimately, in part, address this requirement, but that its applicability is limited to In-Service Training and had not yet achieved No Objection status. The IMT advised that all other ¶292 Secondary compliance requirements appeared to be met, but Secondary compliance failed because of the ¶292(f) requirement.

No new documents demonstrating compliance were submitted the seventh reporting period. The *2022 Training Plan* and Training Directive S11-10-01 (*Training Notification and Attendance Responsibilities*) were both reviewed during the previous reporting period and allowed the CPD to maintain Preliminary Compliance. At the time of the seventh reporting period report, the IMT stated we anticipated that the City and the CPD would provide the *2022 Annual Training Report* and *2023 Training Plan* during the eighth reporting period, possibly substantiating higher compliance levels.

Progress in the Eighth Reporting Period

The City and the CPD produced policies S11-10 and S11-10-03, 2023 Annual Training Plan, and Annual Training Report to the TOC and Superintendent. S11-10 § VII.A.7(c) requires the Deputy Chief, Training and Support Group, or designee, will prepare and submit annually a Needs Assessment Report, a Training Plan, and an Annual Training Summary Report. The Annual Training Summary Report is an annual report submitted to the Training Oversight Committee and the Superintendent of Police. The report contents include ¶292 proscriptions. The submission of the Annual Training Report with ¶292 required criteria to the TOC and Superintendent meets Secondary compliance requirements.

The City and the CPD maintained Preliminary compliance during this reporting period. Looking forward, Full compliance may be achieved after the CPD has sustained the annual report on training, as required.

Paragraph 292 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:
Preliminary

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

Training: ¶294

294. CPD will ensure that upon graduation from the Academy, recruits demonstrate a firm grasp of the basic technical and tactical skills, critical thinking, problem-solving, and interpersonal skills that form the basis for safe and effective policing. In order to do so, CPD will rely on appropriate evaluation tools to measure recruits' skills and qualifications.

Compliance Progress

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

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

The City and the CPD failed to achieve any level of compliance with the requirements of ¶294 during this reporting period.

To evaluate Preliminary compliance with ¶294, 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 evaluate Secondary compliance with this paragraph, we reviewed data to determine whether the CPD has a policy that requires recruits to demonstrate the requirements of this paragraph. Such policy should also fully align with the CPD's training goals generally.

Progress before the Eighth Reporting Period

During the previous reporting periods, the City and the CPD did not submit any documents to demonstrate compliance with the requirements of this paragraph. During the fourth reporting period, we determined that the CPD had written the recruit requirements of this paragraph into policy, but we noted that for continued Preliminary compliance, the CPD would need to demonstrate the validity of the recruit evaluation tools. As the CPD did not provide any data of such validity during the fifth reporting period, we determined that the CPD had lost Preliminary compliance. The City previously indicated that the CPD planned to work towards Secondary compliance during the sixth reporting period.

The IMT did not identify any data submitted by the City and the CPD to establish compliance with ¶294.

Progress in the Eighth Reporting Period

The *2023 Annual Training Plan* was submitted to document compliance during this reporting period. The IMT could not qualify any Training Plan language for any level of ¶294 compliance.

The City and the CPD failed to achieve any level of compliance during this reporting period. Looking forward, Preliminary compliance requires the CPD to have a policy that requires recruits to demonstrate the requirements of this paragraph and that also fully aligns with the training goals of this paragraph. Secondary compliance requires the CPD to have developed and use tools designed to measure recruits' grasp of the basic technical and tactical skills, critical thinking, problem-solving, and interpersonal skills that form the basis for safe and effective policing. To do so, the CPD must rely on appropriate evaluation tools to measure recruits' skills and qualifications upon graduation from the Academy.

Paragraph 294 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: Preliminary	FIFTH REPORTING PERIOD JULY 1, 2021 – DECEMBER 31, 2021 COMPLIANCE PROGRESS: None	SIXTH REPORTING PERIOD JANUARY 1, 2022 – JUNE 30, 2022 COMPLIANCE PROGRESS: None
SEVENTH REPORTING PERIOD JULY 1, 2022 – DECEMBER 31, 2022 COMPLIANCE PROGRESS: None	EIGHTH REPORTING PERIOD JANUARY 1, 2023 – JUNE 30, 2023 COMPLIANCE PROGRESS: None	

Training: ¶295

295. *The Parties acknowledge that CPD, through its Recruit Curriculum Working Group, revised and updated the content and delivery of its recruit training curriculum in 2017. CPD will further modify the amount, content, and delivery of its recruit training to comport with its Training Plan and the requirements and goals of this Agreement.*

Compliance Progress

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

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

The City and the CPD maintained Preliminary compliance with these requirements during this reporting period.

To evaluate Preliminary compliance with ¶295, 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 evaluate Secondary compliance with this paragraph, we will need to review data to determine whether the CPD has policy, plans, and processes for modifying recruit training in accordance with this paragraph. The IMT will also seek to verify sufficient attendance records (*i.e.*, 95% of relevant personnel), including hours attended.

Progress before the Eighth Reporting Period

The City and the CPD first achieved Preliminary compliance with this paragraph during the fifth reporting period. During the sixth reporting period, the IMT reviewed the Annual Training Report, Training Oversight Committee Minutes (23 Mar 22), Annual Training Report presentation, and a To-From from First Deputy to the Superintendent. The Training Oversight Committee Minutes indicated the Annual Training Report was delivered to the Training Oversight Committee on March 23, 2022, and the To-From from the First Deputy to the Superintendent indicated the Annual Training Report was delivered on April 20, 2021. The IMT advised that more information was needed to resolve this date conflict. Neither the Annual Training Report nor any other document produced indicated modifications to the amount, content, and delivery of recruit training to comport with the *Training Plan*. The materials identify differences between the basic state curriculum and the CPD Academy training requirements but did not provide any information regarding year-to-year changes to the CPD recruit training itself.

The 2022 *Training Plan* and Training Directive S11-11-01 (*Training Notification and Attendance Responsibilities*), submitted during the fifth reporting period, continue to substantiate Preliminary compliance.

Progress in the Eighth Reporting Period

The 2023 Annual Training Plan was submitted to substantiate compliance during this reporting period. The IMT further reviewed S11-10 for evidence of compliance. S11-10 § III.C(6) declares recruit curriculum is developed, designed, and modified by the Instructional Design Section units.

According to Training Plan page 36, the Needs Assessment revealed that Community Members recommended training in the following areas that should be added or revised in 2023: Community Policing, Crisis Intervention, Cultural Competency, Interactions with Young People, Interactions with Religious Communities, Leadership, and Accountability and Officer Conduct. Changes to the 2023 recruit curriculum include additional hours to scenario-based training, a new course on the revised de-escalation and use of force course, a course on initial medical response, courses on updated Department technology, courses on policy updates, and courses on updates on fundamentals of report writing.

Training Plan Appendix E identifies courses where Procedural Justice, De-Escalation, Impartial Policing, and Community Policing have been integrated.

The CPD has clearly developed a process to meet ¶295 requirements. Substantiating the process has been **established** requires verifying changes in courses, course content, and exam questions by lesson plan, curriculum, and exam question changes.

The City and the CPD maintained Preliminary compliance and made substantial progress towards Secondary compliance during this reporting period. Looking forward, Secondary compliance requires the CPD to have established a verifiable process to modify recruit training. Full compliance requires the CPD to have sufficiently modified recruit training to align with the requirements of its *Training Plan* and ¶295.

Paragraph 295 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

Training: ¶296

296. CPD will ensure that the Academy is sufficiently staffed to effectively train recruits. CPD will further ensure that, except in extraordinary circumstances, courses are scheduled with sufficient advance time for instructors to be notified of the class and to properly prepare and deliver quality instruction.

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 the requirements of ¶296 during this reporting period.

To evaluate Preliminary compliance with ¶296, 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 evaluate Secondary compliance with this paragraph, we reviewed data to determine whether the City and the CPD have effective policies and plans for ensuring adequate staffing levels in the Academy. We further sought to review data to determine whether the City and the CPD have developed training plans and curriculum and delivered that training to the relevant personnel during the necessary intervals. Our review requires the CPD to provide data reflecting sufficient attendance records (*i.e.*, 95% of relevant personnel), including hours attended. Where applicable, we assessed whether the City and the CPD have created the requisite positions and staffed those positions with qualified personnel in order to achieve the requirements of this paragraph.

Progress before the Eighth Reporting Period

The City and the CPD first achieved Preliminary compliance with ¶296 in the fifth reporting period. During the previous reporting period, the City and the CPD did not submit any data to establish any level of compliance. However, Training Directive S11-10-01 (*Training Notification and Attendance Responsibilities*) produced in the prior reporting period continued to support Preliminary compliance.

The IMT also participated in a site visit to the Academy occurring over multiple days in June 2022 and November 2022. We spoke with and observed staff officers who the CPD deployed to other CPD assignments to the detriment of being able to fully focus on meeting the training objectives of the CPD. Academy personnel in some cases had worked more than three consecutive weeks without a day off. Training staff must be able to plan, implement, train, evaluate, remediate, and

modify trainings. The IMT advised that the CPD's training mission could not be adequately met without investing in and maintaining the requisite staffing resources.

Progress in the Eighth Reporting Period

The City and the CPD submitted the 2023 Annual Training Plan to substantiate compliance with this paragraph. The IMT also reviewed S11-10-03 (issued February 28, 2022) although it wasn't produced to demonstrate compliance.

S11-10-03 § III.E. says, "The Deputy Chief, Training and Support Group (TSG), will ensure that the academy is sufficiently staffed to effectively train recruits and ensure that, except in extraordinary circumstances, courses are scheduled with sufficient advance time for instructors to be notified of the class and to properly prepare and deliver quality instruction." TSG uses the Tableau application to effectively plan and measure utilization and efficiency. Two Tableau Dashboards were created in order to assess staffing. The Academy Staffing Dashboard shows the total staffing, allocation of staffing, and supervision for the Training Division. This Dashboard allows the Deputy Chief and Commander the ability to keep track of their staffing levels on a daily basis.

The Training Plan documented 263 members are assigned to the Training Support Group, but only 220 were on active duty. The Academy Staffing Dashboard indicates there are 30 staff members assigned to Recruit Training. The IMT cannot determine what, if any, staffing configuration and solutions are specifically applied to Recruit Training needs.⁹

The Training Plan further articulates the Department is currently working towards solutions to the staffing deficiency at the Academy. The strategies include:

- Detail instructors from their current unit of assignment to the Academy for their tour of duty;
- Instructors who volunteer to work on their regular day off or furlough;
- Internal overtime for current instructors at the Academy;
- In the process of hiring civilian contractors;
- Increasing civilian hiring for non-sworn positions;
- Exempts as subject matter experts;
- Cross-training and efficient scheduling.

While CPD policy clearly establishes responsibility for ensuring adequate Academy staffing, insufficient data is provided to determine the efficacy of applied staffing solutions. Subsequent submissions should include data demonstrating an effective process.

⁹ See 2023 Annual Training Plan, Figure 10, page 126.

The City and the CPD maintained Preliminary compliance during this reporting period. Looking forward, Secondary compliance requires the CPD to establish a process to ensure adequate Academy staffing levels. Full compliance can be achieved if policy, procedure, processes, staffing levels, training schedules, materials for instructors, communication or notification, and other materials are submitted to demonstrate that the CPD maintains sufficient Academy staffing levels and that courses are scheduled with sufficient advance time in accordance with ¶296 requirements.

Paragraph 296 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	

Training: ¶297

297. CPD will require end-of-course training evaluations of recruits that ensure they graduate with the requisite knowledge and skills to engage in policing activities safely, effectively, and lawfully.

Compliance Progress

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

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

The City and the CPD maintained Preliminary compliance with these requirements during this reporting period.

To evaluate Preliminary compliance with ¶297, 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 evaluate Secondary compliance with this paragraph, we will need to review data to determine whether the City and the CPD are constructing and administering a validated end-of-course knowledge and skills evaluation to ensure recruits can police safely, effectively, and lawfully.

Progress before the Eighth Reporting Period

During the fifth reporting period, the IMT assessed compliance by reviewing Training Directive S11-10-01 (*Training Notification and Attendance Responsibilities*). We determined that the City and the CPD achieved Preliminary compliance by incorporating the requirements of this paragraph into policy. We noted that Secondary compliance requires constructing and administering a validated end-of-course knowledge and skills evaluation to ensure recruits can police safely, effectively, and lawfully.

The City and the CPD did not submit any data to establish any level of compliance during this seventh reporting period. However, Training Directive S11-10-01 (*Training Notification and Attendance Responsibilities*) initially produced in the fifth reporting period continued to support Preliminary compliance.

Progress in the Eighth Reporting Period

The City and the CPD submitted the 2023 Annual Training Plan to demonstrate compliance during this reporting period. The IMT further reviewed S11-10-01 although it wasn’t submitted as a compliance proof.

S11-10-01 § III.F. states “The Deputy Chief, Training and Support Group, will require end-of-course training evaluations of recruits that ensure they graduate with the requisite knowledge and skills to engage in policing activities safely, effectively, and lawfully.”

According to the Training Plan (page 37, “Recruit Evaluations”), recruits must demonstrate a firm grasp of basic police foundational knowledge, Department procedures, technical and tactical skills, critical thinking, problem-solving, and interpersonal skills that form the basis for safe and effective policing. Recruits are continually evaluated throughout the Basic Recruit Training Program to ensure they have the requisite knowledge and skills to engage in policing activities safely, effectively, and lawfully before they are sent to the Field Training and Evaluation Program. The entire recruit evaluation process is directed by Department directive Special Order S11-10-01 “Recruit Training.” Recruits are evaluated on their comprehension of course materials in a number of ways, including written testing and skills demonstration, including de-escalation and community policing skills. All recruits are required to achieve a cumulative academic average of 70% for the academic examinations throughout the training program. Recruits also must pass the State Comprehensive Certification Examination in order to complete the recruit phase of training and enter the field training phase.

There is some tension between ¶297 requirement for an end-of-course evaluation and the CPD’s approach to requiring the maintenance of a cumulative 70% academic average but not having a comprehensive “final” exam.

The City and the CPD maintained Preliminary compliance during this reporting period. Looking forward, Secondary compliance requires constructing and administering a validated end-of-course knowledge and skills evaluation to ensure recruits can police safely, effectively, and lawfully. Full compliance can be achieved when end-of-course evaluations demonstrate efficacy in identifying recruits with the requisite knowledge and skills to engage in policing activities.

Paragraph 297 Compliance Progress History

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

COMPLIANCE PROGRESS:
Not Applicable

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

COMPLIANCE PROGRESS:
Not Applicable

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

COMPLIANCE PROGRESS:
None

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

COMPLIANCE PROGRESS:
None

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

COMPLIANCE PROGRESS:
Preliminary

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

COMPLIANCE PROGRESS:
Preliminary

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

COMPLIANCE PROGRESS:
Preliminary

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

COMPLIANCE PROGRESS:
Preliminary

Training: ¶298

298. *An effective field training program is necessary for reinforcing the policies, practices, and skills taught in recruit training and instilling in new police officers the principles of safe, effective, and lawful policing that will guide them throughout their careers. CPD will sufficiently staff, supervise, and manage its field training program (“Field Training and Evaluation Program”) to train and evaluate new officers in the necessary skills required to deescalate or use force in accordance with the sanctity of life, the law, CPD policy, and this Agreement.*

Compliance Progress

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

Preliminary: *In Compliance (SIXTH REPORTING PERIOD)*

Secondary: *Not Yet Assessed*

Full: *Not Yet Assessed*

The City and the CPD maintained Preliminary compliance with the requirements of ¶298 during this reporting period.

To evaluate Preliminary compliance with ¶298, 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 evaluate Secondary compliance with this paragraph, we will need to review data to determine whether the City and the CPD have developed acceptable policies, procedures, and plans to sufficiently staff, supervise, and manage its field training program according to requirements of ¶298. “Sufficiently staff” must also be clearly defined by objective criteria.

Progress before the Eighth Reporting Period

During the sixth reporting period, the IMT assessed compliance by reviewing a revised version of Training Directive S11-02 (*Field Training and Evaluation Program*) and found that the City and the CPD achieved Preliminary compliance. No other documents were produced to demonstrate Secondary compliance, which involves the implementation of a process to review and revise the Field Training and Evaluation Program (also known as the FTEP) as necessary.

During the previous reporting period, the City and the CPD submitted S11-02 *Field Training and Evaluation Program* (FTEP) and S11-02-01 *Field Training and Evaluation and Review Board* and the FTO Initial Training to demonstrate compliance. The policy block of documents contained the ¶298 required language for Preliminary compliance. None of the documents submitted during the previous reporting period substantiated that the City and the CPD had established and implemented a

process and applicable formulas to sufficiently staff, supervise, and manage its field training program according to requirements of ¶298 needed to establish Secondary compliance.

Progress in the Eighth Reporting Period

To demonstrate compliance, the City and the CPD submitted 2023 Annual Training Plan, FTO Initial Training and S11-02 (*Field Training and Evaluation Program*). S11-02 § II.A.(1-3). states, “The primary objective of the Field Training and Evaluation Program (FTEP) is to:

1. ensure that all Probationary Police Officers (PPOs) receive effective field training, predicated upon staffing the Field Training Officer (FTO) position with qualified officers.
2. instill the guiding principles of safety and lawful policing that will sustain PPOs throughout their career.
3. ensure through proper training and evaluation that only competent, motivated, and ethical individuals become Chicago police officers.”

Section VI. states, “The FTEP will be administered through a partnership between the Training and Support Group and the Bureau of Patrol to ensure the FTEP program is sufficiently staffed, supervised, and able to provide proper management for the FTEP program.”

The 2023 Annual Training Plan (page 40) states, “The Superintendent's Office, Human Resources, BOP and TSG work together to support and ensure the FTEP program is sufficiently staffed, supervised, and able to provide proper management.”

During this reporting period, the CPD reported experiencing significant deficits of FTOs during this reporting period. As a result, the CPD held an FTO exam in February 2023, FTO classes in March and appointed multiple “ACT Ups” to assure the requisite 1:1 FTO/PPO ratios were maintained. The CPD also created Community Service options for some recruits during the initial weeks after the Academy to gain community policing experience. The CPD was transparent about the deficits and addressed their efforts to resolve the deficits during the monthly Training Group meetings with IMT and OAG. Additional FTO exams were scheduled for later this year.

While FTO deficits are undesirable, the CPD does deserve credit for anticipating the shortages and creating alternatives to address them. The CPD should examine incentives and other opportunities to ensure adequate program staffing.

Continuous evaluation of the CPD’s staffing efforts will determine if its efforts are sufficient to staff, manage, and supervise its FTO program.

The City and the CPD maintained Preliminary compliance during this reporting period. Looking forward, Secondary compliance may be achieved by the City and the CPD establishing and implementing a process and determining and applying objective applicable methodologies to sufficiently staff, supervise, and manage its field training program according to requirements of ¶298.

Paragraph 298 Compliance Progress History

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

Training: ¶299

299. CPD will revise, as necessary and appropriate, the Field Training and Evaluation Program to comport with CPD's Training Plan and this Agreement.

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*

The City and the CPD maintained Preliminary compliance during this reporting period.

To evaluate Preliminary compliance with ¶299, 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 evaluate Secondary compliance with this paragraph, we reviewed data to determine whether CPD policies and plans follow the requirements for Field Training and Evaluation Program operation, and to determine whether the CPD has sufficiently taken steps to follow requirements for Field Training and Evaluation Program operation as required by this paragraph. The IMT also sought to verify sufficient attendance records (*i.e.*, 95% of relevant personnel), including hours attended. Where applicable, we assessed whether the City and the CPD have created the requisite positions and staffed those positions with qualified personnel in order to achieve the requirements of this paragraph.

Progress in the Eighth Reporting Period

The City and the CPD first achieved Preliminary compliance with ¶299 in the fourth reporting period. During the sixth reporting period, the IMT assessed compliance by reviewing a revised versions of S11-02, *Field Training and Evaluation Program* (May and June 2022), including a Comments Matrix showing changes to the prior version of S11-02 produced in the last reporting period and the CPD's responses to comments offered by the IMT. The finalized policy along with finalized revisions to S11-02-01 (Field Training and Evaluation Review Board) were issued effective June 30, 2022, and produced July 2, 2022. Because the language of S11-02 § VI(F) tracks ¶299, the CPD met the requirements for Preliminary compliance.

During the seventh reporting period, the City and the CPD submitted S11-02, *Field Training and Evaluation Program (FTEP)* and S11-02-01, *Field Training and Evaluation and Review Board* and the FTO Initial Training (produced September 8, 2022) to demonstrate compliance. The policy block of documents contained the ¶299

required language for Preliminary compliance. The FTO initial training blocks contained 103 hours of FTO training courses (see ¶298 assessment above for the course listings). None of the documents submitted substantiate that the CPD has revised, as necessary and appropriate, the Field Training and Evaluation Program to comport with the CPD's Training Plan according to requirements of ¶299.

Progress in the Eighth Reporting Period

During this reporting period, the City and the CPD submitted the 2023 Annual Training Plan, FTO Initial Training, and S11-02, *Field Training and Evaluation Program*.

S11-02 § II.A.(1-3). states, "The primary objective of the Field Training and Evaluation Program (FTEP) is to:

1. ensure that all Probationary Police Officers (PPOs) receive effective field training, predicated upon staffing the Field Training Officer (FTO) position with qualified officers.
2. instill the guiding principles of safety and lawful policing that will sustain PPOs throughout their career.
3. ensure through proper training and evaluation that only competent, motivated, and ethical individuals become Chicago police officers."

Section VI.F. states "Periodic revisions to the FTEP will be made based on the Department's annual Needs Assessment Report, the Department Training Plan, the Annual Training Summary Report, and recommendations from the Training Oversight Committee."

According to the 2023 Annual Training Plan (page 40), the Training Support Group, as an ongoing effort, is updating the pre-service FTO curriculum to incorporate feedback from surveys and input letters. Updates to annual in-service training for FTOs have been made to following areas: management and mentoring, community policing, effective problem-solving techniques, ethics, diversity, and communication. Substantive changes were also made to the recruit curriculum. Changes to the recruit curriculum include additional hours to scenario-based training, a new course on the revised de-escalation and use of force course, a course on initial medical response, courses on updated Department technology, courses on policy updates, and courses on updates on fundamentals of report writing. New and advanced training identified as critical to improvements within the Department will continue to be pursued, implemented, and prioritized toward the FTOs and their PPOs.

The FTO Initial Training included multiple courses covering ¶303/304 requirements, including FTO refresher BLE changes, Effective Communications, Law Review, Leadership, and Procedural Justice.

The CPD has clearly developed a process to meet ¶299 requirements. The actual process isn't set forth in policy. FTO Initial and Refresher courses are evidence of the existence of that process. Substantiating the process has been **established** requires verifying changes in courses, course content, and exam questions by lesson plan, curriculum, and exam question changes. Documents produced this reporting period moves the CPD significantly toward Secondary compliance.

The City and the CPD maintained Preliminary compliance during this reporting period but moved significantly toward Secondary compliance. Looking forward, assessing Secondary compliance requires reviewing policy, procedure, plans, and other submissions to determine if the CPD has established a process to review and revise the Field Training and Evaluation Program, as necessary. Full compliance requires the CPD to have sufficiently reviewed and modified the Field Training and Evaluation Program to align with the requirements of its Training Plan and ¶299.

Paragraph 299 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: 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	

Training: ¶300

300. *The Field Training and Evaluation Program will follow recruit training and be at least 12 weeks in duration and include at least three training cycles. The Field Training and Evaluation Program will not designate probationary police officers (“PPOs”) as “field qualified,” as defined by this Agreement, until they have successfully completed the entire program.*

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 the requirements of ¶300 during this reporting period.

To evaluate Preliminary compliance with ¶300, 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 evaluate Secondary compliance with this paragraph, we reviewed data to determine whether the CPD has written the requirements of this paragraph into policy. Policy direction should include guidance on how changes to training curricula will be addressed. Data should further allow the IMT to determine whether the CPD has taken steps to deliver initial and refresher training in an effective manner, including sufficient attendance records (*i.e.*, 95% of relevant personnel), including hours attended. Where applicable, we will assess whether the City and the CPD have created the requisite positions and staffed those positions with qualified personnel in order to achieve the requirements of this paragraph.

Progress before the Eighth Reporting Period

In the fifth reporting period, the IMT assessed compliance by reviewing three areas of amended policy in Training Directive S11-02 (*Field Training and Evaluation Program*) and found the City and the CPD achieved Preliminary compliance for the first time. Secondary compliance requires substantive documents demonstrating that the CPD has implemented the approved policy, directive, and standard operating procedure reflected in this paragraph. We noted that the IMT will rely on the ADDIE model of curriculum development as our evaluation standard, including

evaluations of student and instructors.¹⁰ We advised that we would also consider whether the City and the CPD integrated community input, as applicable.

The City and the CPD submitted the S11-02 *Field Training and Evaluation Program (FTEP)* and S11-02-01 *Field Training and Evaluation and Review Board* and FTO Initial Training (produced September 8, 2022) to demonstrate compliance during the previous reporting period. The policy block of documents contained the ¶300 required language for Preliminary compliance. The FTO initial training blocks contained 103 hours of FTO training courses (see ¶298 assessment above for the course listings). None of the documents submitted substantiated that ¶300 requirements were achieved to establish Secondary compliance.

Progress in the Eighth Reporting Period

To demonstrate compliance, the City and the CPD submitted 2023 Annual Training Plan, FTO Initial Training, and S11-02, *Field Training and Evaluation Program*.

S11-02 § VIII.A.(1-8) provides the requisite language for policy compliance.

FTO Initial Training course list indicates Pre-service FTO Training courses contain 103 hours of FTO training courses, including topics mandated by ¶¶303/304.

To demonstrate adherence to policies requires the CPD to provide evidence that each PPO attended and completed training within the specified time period, FTEP imperatives followed, including receiving adequate field training with proper supervision (1:1 PPO/FTO ratio), proper evaluations during the FTEP phase (DORs), and designated “field qualified” after successfully completing the entire program.

The City and the CPD maintained Preliminary compliance during this reporting period. Looking forward, to meet Secondary compliance the CPD must demonstrate that it has implemented the approved policy, directive, and standard operating procedure reflecting training imperatives of this paragraph. A training methodology that includes reviewing the City’s, the CPD’s, and the other relevant entities’ training development, implementation, and evaluation (¶286) also applies to Secondary compliance requirements.

When applicable, we will also assess whether the City, the CPD, and the other relevant entities adequately sought, received, and incorporated community input

¹⁰ The IMT evaluates training materials using as our standard the “ADDIE” model of curriculum development and implementation: Analysis, Design, Development, Implementation, and Evaluation.

and participation. The IMT will also seek to verify sufficient attendance records, including hours attended.

The Field Training and Evaluation Program training records should correspond with policy and procedural requirements.

Paragraph 300 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	

Training: ¶301

301. CPD will review and revise as necessary its FTO selection policies and procedures to establish and implement a program that effectively attracts and retains qualified FTOs.

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 ¶301 during this reporting period.

To evaluate Preliminary compliance with ¶301, 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 evaluate Secondary compliance with this paragraph, the IMT will review data to determine whether the CPD’s policies and plans for reviewing and revising its Field Training Officer selection policies and procedures follow the requirements of ¶301. Where applicable, we assessed whether the City and the CPD have created the requisite positions and staffed those positions with qualified personnel in order to achieve the requirements of this paragraph.

Progress before the Eighth Reporting Period

During the seventh reporting period, the City and the CPD produced S11-02 (*Field Training And Evaluation Program*) and S11-02-01 (*Field Training And Evaluation Review Board*). However, neither contained the requisite language for compliance with ¶301. Therefore, Preliminary compliance had not yet been achieved.

Progress in the Eighth Reporting Period

To demonstrate compliance, the City and the CPD submitted FTO Compliance Packet E05-08, FTO Initial Training, and S11-02, *Field Training and Evaluation Program*.

Employee resource E05-08 is the Application for Police Officer (Assigned as Field Training Officer). This document is provided to CPD officers below the rank of sergeant to announce new FTO application and exam processes. E05-08 specifies the purpose, assignment and duties, eligibility, application procedures, selection process, reference material, and eligibility list for an upcoming FTO selection process.

Section X of the policy cites a requirement to review and revise FTO selection policies as required by ¶301, therefore providing the requisite language to establish Preliminary compliance.

The City and the CPD achieved Preliminary compliance during this reporting period. Looking forward, Secondary compliance may be achieved after the City and the CPD have reviewed and revised its Field Training Officer selection policies and procedures and implemented a Field Training Officer program that follows the requirements of this paragraph. Secondary assessment sources include policy, procedure, processes, training schedules, Field Training Officer, Probationary Police Officers, and other evaluations, reports, Notice of Job Opportunities, job descriptions, and personnel allocation records that show course completion for Probationary Police Officers.

Paragraph 301 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: 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	

Training: ¶302

302. *CPD’s policies and procedures will continue to delineate the criteria and methodology for selecting FTOs. Subject to its collective bargaining agreements with the CPD unions, CPD will review and, as appropriate, revise its eligibility criteria and promotional practices to ensure that FTOs are selected based on their applications, previous performance as police officers, FTO training examination scores, and disciplinary histories.*

Compliance Progress

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

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

The City and the CPD maintained Preliminary compliance with the requirements of ¶302 during this reporting period.

To evaluate Preliminary compliance with ¶302, 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 evaluate Secondary compliance with this paragraph, we will need to review data to determine whether the City and the CPD have developed a process to review and revise eligibility criteria and promotional practices and have created acceptable policies, procedures, and plans to continue to delineate the criteria and methods for selecting Field Training Officers according to requirements of ¶302.

Progress before the Eighth Reporting Period

Until the sixth reporting period, no relevant documents were submitted by the City and the CPD to demonstrate any level of compliance. The IMT reviewed S11-02 (*Field Training and Evaluation Program*) during the sixth reporting period and found no applicable sections satisfied the requirements of this paragraph. As a result, we determined the Preliminary compliance requirements were not met.

The City and the CPD submitted the FTO Initial Training and E05-08 *Application for Police Officer (Assigned as Field Training Officer)* to demonstrate compliance during the seventh reporting period. The FTO initial training blocks contained 103 hours of FTO training courses (see ¶298 assessment above for the course listings). The CPD finalized and posted directive E05-08 for the FTO job application process on July 11, 2022.

E05-08 set forth FTO assignment and duties, eligibility, application procedures, selection processes and describes the reference material, eligibility list, FTO responsibilities and some additional conditions. We determined the policy specifications met ¶302 requirements for Preliminary compliance.

Progress in the Eighth Reporting Period

To demonstrate compliance, the City and the CPD submitted FTO Compliance Packet E05-08, FTO Initial Training, and S11-02, *Field Training and Evaluation Program*.

The FTO initial training blocks contain 103 hours of FTO training courses (see ¶298 assessment above for the course listings). The CPD finalized and issued directive E05-08 for the FTO job application process on January 6, 2023.

E05-08 sets forth FTO assignment and duties, eligibility, application procedures, selection processes and describes the reference material, eligibility list, FTO responsibilities and some additional conditions. The policy specifications meet ¶302 requirements for Preliminary compliance.

The City and the CPD achieved Preliminary compliance during this reporting period. Secondary compliance requires the City and the CPD to establish and implement a process to continue to delineate the criteria and methodology for selecting Field Training Officers and the resultant policies and procedures, according to requirements of ¶302.

Paragraph 302 Compliance Progress History

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

Training: ¶303

303. FTOs will receive initial and refresher training that is adequate in quality, quantity, scope, and type, and that addresses subjects including, but not limited to management and mentoring, community policing, effective problem-solving techniques, ethics, diversity, field communication, and any recent substantive changes made to the recruit training curriculum. FTOs will receive refresher training on an annual basis as part of the In-Service Training Program outlined in this Agreement. FTOs will be promptly notified of any substantive changes to policies and practices that affect their roles as mentors and trainers of PPOs.

Compliance Progress

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

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

Preliminary: *In Compliance (FIFTH REPORTING PERIOD)*

Secondary: *Not in Compliance*

Full: *Not Yet Assessed*

The City and the CPD maintained Preliminary compliance with the requirements of ¶303 during this reporting period.

To evaluate Preliminary compliance with ¶303, 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 evaluate Secondary compliance with this paragraph, we reviewed data to determine whether the CPD has developed plans and policies for evaluating Field Training Officer proficiency in managing and mentoring Probationary Police Officers, teaching key principles, and maintaining documentation of Field Training Officer trainings and evaluations. The IMT also sought to determine if the CPD has sufficiently taken steps to evaluate Field Training Officer proficiency in managing and mentoring Probationary Police Officers and to maintain documentation of Field Training Officer training and evaluation.

Progress before the Eighth Reporting Period

The City and CPD first achieved Preliminary compliance with ¶303 in the fifth reporting period. During the sixth reporting period, the IMT assessed compliance by reviewing the *2022 Annual In-Service Field Training Officer Refresher Training Curriculum* (March 2022), a revised *2022 Annual In-Service Field Training Officer Refresher Training Curriculum* (June 2022), and a revised version of Training Directive S11-02, *Field Training and Evaluation Program* (May and June 2022), including a

Comments Matrix showing changes to the prior version of S11-02 produced in the prior reporting period and the CPD's responses to comments offered by the IMT.

S11-02 § VIII(B)(1), (2)(a), and (2)(d) committed the City and the CPD to all aspects of ¶303. Collectively, these policies affirmed Preliminary compliance status during the sixth reporting period. The training data demonstrated the adequacy of the training courses in fulfilling ¶303 requirements. However, no documents were produced indicating that at least 95% of Field Training Officers had received the required annual refresher training needed to establish Secondary compliance.

During the seventh reporting period, the City and the CPD submitted S11-02, *Field Training and Evaluation Program (FTEP)*, S11-02-01 *Field Training and Evaluation and Review Board*, 2022 Annual In-Service FTO Refresher Training Curriculum, FTO Initial Training, and 2022 Annual In-Service FTO Refresher Training Curriculum. The FTO initial training blocks contained 103 hours of FTO training courses (see ¶298 assessment above for the course listings). The training documents provided indicate that all of the ¶303 Preliminary compliance requirements were met during the seventh reporting period. We noted that Secondary compliance would require additional documentation that FTOs received the training. All other Secondary compliance requirements appear to be met.

Progress in the Eighth Reporting Period

To demonstrate compliance, the City and the CPD submitted policies S11-10, S11-10-02 and S11-10-03, FTO Initial Training, and S11-02, *Field Training and Evaluation Program*.

The FTO initial training blocks contain 103 hours of FTO training courses (see ¶298 assessment above for the course listings). The CPD finalized and issued directive E05-08 for the FTO job application process on January 6, 2023.

E05-08 sets forth FTO assignment and duties, eligibility, application procedures, selection processes and describes the reference material, eligibility list, FTO responsibilities and some additional conditions.

S11-02 § VIII(B)(1), (2)(a), and (2)(d) commit the City and the CPD to all aspects of ¶303. Collectively, these policies affirm Preliminary compliance status during this reporting period. Additionally, the 2023 Annual Training Plan (page 104 and Table 22, page 112) describes refresher training courses consistent with ¶303 requirements.

Substantiation that initial and refresher training occurs requires not only review of policies and lesson plans but attendance records must also be produced. No FTO attendance data was provided for review.

The City and the CPD maintained Preliminary compliance during this reporting period. Looking forward, the CPD may achieve Secondary compliance after it has sufficiently documented effective training delivery. Full compliance may be realized when FTOs routinely receive initial and refresher training and the CPD has incorporated and documented all ¶303 requirements.

Paragraph 303 Compliance Progress History

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

Training: ¶304

304. FTOs will be required to maintain and demonstrate their proficiency in managing and mentoring PPOs, as well as modeling and teaching, by their example, procedural justice, de-escalation, impartial policing, and community policing. The Education and Training Division will maintain documentation of the training of FTOs. The Bureau of Patrol will maintain documentation of the evaluations of FTOs.

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 the requirements of ¶304 during this reporting period.

To evaluate Preliminary compliance with ¶304, 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 evaluate Secondary compliance with this paragraph, we reviewed data to determine whether the CPD has developed plans and policies for evaluating Field Training Officer proficiency in managing and mentoring Probationary Police Officers (also known as PPOs), teaching key principles, and maintaining documentation of Field Training Officer training and evaluation. The IMT also sought to determine if the CPD has sufficiently taken steps to evaluate Field Training Officer proficiency in managing and mentoring Probationary Police Officers and to maintain documentation of Field Training Officer training and evaluation. The IMT also sought to verify sufficient attendance records (*i.e.*, 95% of relevant personnel), including hours attended. Where applicable, we assessed whether the City and the CPD have created the requisite positions and staffed those positions with qualified personnel in order to achieve the requirements of this paragraph.

Progress before the Eighth Reporting Period

During previous reporting periods, the IMT assessed compliance by reviewing CPD Training Directive S11-02 (*Field Training and Evaluation Program*) and found this training directive included the requisite language required by this paragraph to achieve Preliminary compliance. The City and the CPD first achieved Preliminary compliance in the fifth reporting period and have since sustained Preliminary compliance.

During the seventh reporting period, the City and the CPD submitted S11-02, *Field Training and Evaluation Program (FTEP)*, S11-02-01 *Field Training and Evaluation and Review Board*, 2022 Annual In-Service FTO Refresher Training Curriculum, FTO Initial Training, and 2022 Annual In-Service FTO Refresher Training Curriculum.

The 2022 Annual In-Service FTO Refresher Training included a lesson plan, curriculum, revised PowerPoint slides to ensure course materials covered all ¶303 requirements, and a pre- and post-test. The FTO initial training blocks contained 103 hours of FTO training courses (see ¶298 assessment above for the course listings).

Taken together, these S11-10 (*Department Training Records Maintenance*) subparagraphs exhibited the requisite language to meet Preliminary compliance status. No submitted documents demonstrated Field Training Officer proficiency in managing and mentoring Probationary Police Officers, or document Field Training Officer training and evaluations necessary to establish Secondary compliance.

Progress in the Eighth Reporting Period

To demonstrate compliance, the City and the CPD produced Field Training and Evaluation Program Survey, FTO Initial Training, and S11-02, *Field Training and Evaluation Program*.

The survey is a satisfaction survey of PPOs toward their FTOs and the FTO program and may be combined with objective data to evaluate FTO performance.

The FTO initial training blocks contain 103 hours of FTO training courses (see ¶298 assessment above for the course listings).

S11-02 § VIII(B)(2)(b-c), VIII(J)(2), and VIII(I)(7) commit the City and the CPD to all aspects of ¶304. Collectively, these policies affirm Preliminary compliance status during this reporting period.

Taken together, these S11-02 (*Field Training and Evaluation Program*) subparagraphs exhibit the requisite language to meet Preliminary compliance status. No submitted documents demonstrate Field Training Officer proficiency in managing and mentoring Probationary Police Officers, or document Field Training Officer training and evaluations necessary to establish Secondary compliance. Substantiation that initial and refresher training occurs requires not only review of policies and lesson plans, but also review of produced attendance records. No FTO attendance data was provided for review during this reporting period.

The City and the CPD maintained Preliminary compliance during this reporting period. Looking forward, Secondary compliance may be achieved after the CPD has sufficiently taken steps to evaluate Field Training Officer proficiency in managing

and mentoring Probationary Police Officers and maintained documentation of Field Training Officer training and evaluation. Secondary assessment sources include policy, procedure, processes, training schedules, training and evaluation records, and other policy, data, jobs, and training sources.

Paragraph 304 Compliance Progress History

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

Training: ¶305

305. CPD will revise the Field Training and Evaluation Program to ensure that no more than one PPO is assigned to an FTO during each training cycle. The City will provide CPD with the necessary support and resources to designate a sufficient number of FTOs to meet the requirements of this Agreement. Officers performing FTO duties in a temporary capacity are considered FTOs under this Agreement so long as they meet the requirements set forth for FTOs in this Agreement, except for the selection requirements.

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 Secondary compliance with ¶305 during this reporting period.

To evaluate Preliminary compliance with ¶305, 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 evaluate Secondary compliance with this paragraph, we reviewed data to determine whether the CPD has developed policy and plans to revise Field Training and Evaluation Program to meet ¶305 requirements. Such data must confirm that Field Training and Evaluation Program revisions are completed and implemented. The IMT also sought to verify sufficient attendance records (*i.e.*, 95% of relevant personnel), including hours attended. Where applicable, we assessed whether the City and the CPD have created the requisite positions and staffed those positions with qualified personnel in order to achieve the requirements of this paragraph.

Progress before the Eighth Reporting Period

The City and the CPD first achieved Preliminary compliance with ¶305 in the fourth reporting period. To demonstrate continued compliance with ¶305 in the reporting periods since the fourth period, the CPD submitted revised versions of Training Directive S11-02, *Field Training and Evaluation Program* (May and June 2022), including a Comments Matrix showing changes to the prior version of S11-02 and the CPD’s responses to comments offered by the IMT.

During the seventh reporting period, the IMT reviewed S11-02, *Field Training and Evaluation Program (FTEP)* and S11-02-01, *Field Training and Evaluation and Review Board*). S11-02 § VII(C) provided the requisite language for Preliminary compliance.

Additionally, the City and the CPD provided a survey link to data gathered from Quarter 4 2021 through Quarter 2 2022. The Field Training Officer Quarterly surveys are given to allow Probationary Police Officers (PPO) to provide feedback about their training and for Field Training Officers to provide feedback regarding the Field Training and Evaluation Program.

We also reviewed FTO Initial Training, FTO/PPO Quarterly Surveys, the Field Training and Evaluation Program (FTEP) Report to the TOC and TOC Minutes. The Field Training and Evaluation Program Report to the Training Oversight Committee included a slide presentation that discussed FTO/PPO ratios and efforts to maintain the 1:1 ratio. This discussion was further substantiated by minutes of the December 21, 2022, Training Oversight Committee meeting where this presentation occurred.

The IMT met with the CPD and Department of Human Resources during our IMR-7 site visit and discussed FTO/PPO ratios. We were made aware of the need for the CPD to expedite onboarding of new Act-Up FTOs to avoid violating ¶305 requirements in 2023. It was evident that the City and the CPD held an FTO exam during the eighth reporting period. The City and the CPD had thus far demonstrated appropriate sensitivity to ¶305 mandates and appear from the IMT's perspective to be making adjustments as required by this paragraph to maintain the required 1:1 FTO/PPO ratio. Acute FTO shortages elevate the criticality of adhering to ¶305 requirements.

Progress in the Eighth Reporting Period

To demonstrate compliance, the City and the CPD submitted the 2023 Annual Training Plan, E05-08 Application for Field Training Officer, FTO Initial Training, and S11-02, *Field Training and Evaluation Program*.

During this reporting period, the CPD reported experiencing significant deficits of FTOs during this reporting period. As a result, the CPD held an FTO exam in February 2023, FTO classes in March and appointed multiple "ACT Ups" to assure the requisite 1:1 FTO/PPO ratios were maintained. The CPD also created Community Service options for some recruits during the initial weeks after the Academy to gain community policing experience. The CPD was transparent about the deficits and addressed their efforts to resolve the deficits during the monthly Training Group meetings with IMT and OAG. Additional FTO exams were scheduled for later this year.

While FTO deficits are undesirable, the CPD does deserve credit for anticipating the shortages and creating alternatives to address them. The CPD should continue to examine incentives and other opportunities to ensure adequate program staffing.

Continuous evaluation of the CPD’s staffing efforts will determine if its efforts are sufficient to staff, manage, and supervise its FTO program.

The City and the CPD maintained Secondary compliance during this reporting period. Looking forward, Full compliance is demonstrated when data confirms a one-to-one Probationary Police Officer to Field Training Officer ratio sustained through training cycles and the CPD has implemented a process that will ensure that Probationary Police Officers are not placed on assignments in the field without adequate supervision.

Paragraph 305 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: 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	

Training: ¶306

306. CPD will ensure that PPOs in the Field Training and Evaluation Program train with different FTOs during each of their training cycles.

Compliance Progress

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

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

The City and the CPD maintained Preliminary compliance with the requirements of ¶306 during this reporting period.

To evaluate Preliminary compliance with ¶306, 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 evaluate Secondary compliance with this paragraph, we reviewed data to determine whether ¶306 requirements are met. Specifically, we reviewed policy, processes, Probationary Police Officers (also known as PPOs) and Field Training Officer assignments, and Field Training and Evaluation Program-related materials. These data sources must confirm a one-to-one Probationary Police Officer to Field Training Officer ratio sustained through training cycles and that Probationary Police Officers train with a different Field Training Officer each training cycle. Such data must also demonstrate that CPD has implemented a process that will ensure that Probationary Police Officers are not placed on assignments in the field without adequate supervision, and that they train with a different Field Training Officer each training cycle.

Progress before the Eighth Reporting Period

The City and the CPD first achieved Preliminary compliance with ¶306 in the fourth reporting period. During the sixth reporting period, the IMT assessed compliance by reviewing revised versions of Training Directive S11-02, *Field Training and Evaluation Program* (May and June 2022), including a Comments Matrix showing changes to the prior version of S11-02 produced in the fifth reporting period and the CPD’s responses to comments offered by the IMT. S11-02 § VIII(A)(3) matched the language in ¶306, substantiating Preliminary compliance.

No additional documents provided by the CPD indicated Secondary compliance.

During the seventh reporting period, we reviewed S11-02 *Field Training and Evaluation Program (FTEP)* and determined that S11-02 § VIII(A)(3) provided the requisite language for Preliminary compliance.

We also reviewed FTO Initial Training, FTO/PPO Quarterly Surveys, the Field Training and Evaluation Program (FTEP) Report to the TOC and TOC Minutes.

The City and the CPD provided a survey link to data gathered from Q4 2021 through Q2 2022. The FTO Quarterly surveys were given to allow PPOs to provide feedback about their training and for FTOs to provide feedback regarding the FTEP.

The FTEP Report to the TOC included a slide presentation that discussed FTO/PPO ratios and efforts to maintain the 1:1 ratio. This discussion was further substantiated by minutes of the December 21, 2022, TOC meeting where this presentation occurred.

No additional documents or schedules were provided by the CPD indicating Secondary compliance the previous reporting period.

Progress in the Eighth Reporting Period

To demonstrate compliance, the City and the CPD submitted the 2023 Annual Training Plan, E05-08 Application for Field Training Officer, FTO Initial Training, and S11-02, *Field Training and Evaluation Program*.

S11-02 § VIII(A)(3) provides the requisite language for Preliminary compliance. No additional documents or schedules were provided by the CPD documenting and verifying that each PPO trained with different FTOs during each training cycle.

The City and the CPD maintained Preliminary compliance during this reporting period. Looking forward, Secondary compliance may be achieved by demonstrating the Probationary Police Officers in the Field Training and Evaluation Program train with different Field Training Officers during each of their training cycles. Secondary assessment sources may include policy, procedure, processes, training schedules, and training evaluation records. Full compliance may be achieved when the CPD has sufficiently, systemically, and consistently ensured and substantiated that Probationary Police Officers placed in field assignments train with different Field Training Officers during each of their training cycles.

Paragraph 306 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:
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

Training: ¶307

307. CPD will ensure that PPOs awaiting assignment to an FTO will not be placed on assignments in the field without adequate supervision. CPD will track and document all instances of PPOs placed in field assignments prior to starting the Field Training and Evaluation Program.

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*

The City and the CPD maintained Preliminary compliance with ¶307 during this reporting period.

To evaluate Preliminary compliance, 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 evaluate Secondary compliance with this paragraph, we reviewed data to determine if Field Training and Evaluation Program revisions are completed and implemented. Data must confirm that a one-to-one Probationary Police Officer to Field Training Officer ratio is sustained through training cycles and that the CPD has implemented a process that will ensure that Probationary Police Officers are not placed on assignments in the field without adequate supervision. The IMT also sought to verify sufficient attendance records (*i.e.*, 95% of relevant personnel), including hours attended. Where applicable, we assessed whether the City and the CPD have created the requisite positions and staffed those positions with qualified personnel in order to achieve the requirements of this paragraph.

Progress before the Eighth Reporting Period

The City and the CPD first achieved Preliminary compliance with ¶307 in the fourth reporting period. During the sixth reporting period, the CPD submitted a revised version of Training Directive S11-02, *Field Training and Evaluation Program* (May and June 2022), including a Comments Matrix showing changes to the prior version of S11-02 produced in the last reporting period and the CPD’s responses to comments offered by the IMT.

The IMT reviewed S11-02 and found S11-02 § VI(D) contained the requisite language for Preliminary compliance with ¶307. As a result, Preliminary compliance was maintained. No additional data of Secondary compliance were submitted or reviewed in the sixth or seventh reporting periods.

Progress in the Eighth Reporting Period

During this reporting period the City and the CPD submitted the FTO Initial Training and S11-02, *Field Training and Evaluation Program* to demonstrate compliance.

S11-02 § VI(D) provides the requisite language for Preliminary compliance. No additional documents or schedules were provided by the CPD documenting and verifying PPO field assignments prior to starting the FTEP, and that no PPOs were placed on assignments in the field without adequate supervision.

The City and the CPD maintained Preliminary compliance during this reporting period. Looking forward, Secondary compliance may be achieved if policies, processes, assignments, Field Training and Evaluation Program-related materials, and other policy, data, job, and training sources indicate the requirements of this paragraph are fully met. Full compliance may be achieved when data confirms a one-to-one Probationary Police Officer to Field Training Officer ratio sustained through training cycles and the CPD has implemented and maintained a process that will ensure that Probationary Police Officers are not placed on assignments in the field without adequate supervision.

Paragraph 307 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: 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	

Training: ¶308

308. *The Field Training and Evaluation Program will continue to require that FTOs document PPO progress and performance each day in the Daily Observation Report, at the end of each of the first two cycles in the Cycle Summary Report, at the end of the third cycle in the Final Summary Report and, if necessary, at the end of any additional cycles in the Remedial Summary Report. FTOs will identify and document in those reports areas for PPO improvement.*

Compliance Progress

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

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

The City and the CPD maintained Preliminary compliance during this reporting period.

To evaluate Preliminary compliance with ¶308, 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 evaluate Secondary compliance with this paragraph, we will need to review data to determine if the CPD’s plans and policies ensure that Field Training Officers document Probationary Police Officers (also known as PPOs) progress and performance as specified in this paragraph. Data must demonstrate that Field Training Officer training on policy has been completed and that a full training cycle has been completed.

Progress before the Eighth Reporting Period

The City and the CPD first achieved Preliminary compliance with ¶308 in the fifth reporting period. During the previous reporting periods, the CPD submitted versions of S11-02 *Field Training and Evaluation Program (FTEP)*, which tracked the requisite language of ¶308, thus maintaining Preliminary compliance. In the seventh reporting period, in addition to S11-02, the CPD submitted S11-02-01 *Field Training and Evaluation and Review Board* and the FTO Initial Training (produced September 8, 2022). S11-02 §§ VIII(B)(2)(e–j) and VIII(B)(3), which also tracked the language from ¶308, therefore met the Preliminary compliance threshold for this paragraph. No additional documents were submitted during the previous reporting period to substantiate the Secondary compliance requirements of this paragraph.

Progress in the Eighth Reporting Period

To demonstrate compliance with this paragraph, the City and the CPD produced E05-08 Application for Field Training Officer, FTO Initial Training, and S11-02 *Field Training and Evaluation Program*.

S11-02 §§ VIII(B)(2)(e-j) and VIII(B)(3) track the language from ¶1308, therefore meeting the Preliminary compliance threshold for this paragraph. No additional documents were submitted this reporting period to substantiate the Secondary compliance requirements of this paragraph.

The City and the CPD has maintained Preliminary compliance during this reporting period. Looking forward, Secondary compliance can be attained with plans and policies for insuring Field Training Officers document Probationary Police Officers' progress and performance as specified in this paragraph. Field Training Officer and supervisor training on policy and a full training cycle must, at minimum, be completed. Secondary assessment sources include policy, training plans, and observation reports.

Paragraph 308 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	

Training: ¶309

309. In each Cycle Summary Report, the FTO will assess whether the PPO should progress to the next cycle of training based on the PPO's performance and compliance with the Field Training and Evaluation Program standards.

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 during this reporting period.

To evaluate Preliminary compliance with ¶309, 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 evaluate Secondary compliance with this paragraph, we reviewed data to determine if the CPD's plans and policies provide for Field Training Officer assessment and reporting as specified in this paragraph. Data must establish that Field Training Officer and supervisors training on policy has been completed and that at least a full training cycle has been completed.

Progress before the Eighth Reporting Period

The City and the CPD first achieved Preliminary compliance with ¶309 in the fifth reporting period. During the previous reporting periods, the CPD submitted versions of S11-02 *Field Training and Evaluation Program (FTEP)*, which tracked the requisite language of ¶309, thus maintaining Preliminary compliance. In the seventh reporting period, in addition to S11-02, the CPD submitted S11-02-01 *Field Training and Evaluation and Review Board* and the FTO Initial Training (produced September 8, 2022). S11-02 §§ VIII(B)(2)(e–j) and VIII(B)(3), which also tracked the language from ¶309, met the Preliminary compliance threshold for this paragraph. No additional documents were submitted during the previous reporting period to substantiate the Secondary compliance requirements of this paragraph.

Progress in the Eighth Reporting Period

To demonstrate compliance with this paragraph, the City and the CPD produced E05-08 Application for Field Training Officer, FTO Initial Training, and S11-02 *Field Training and Evaluation Program*.

S11-02 § VIII(B)(2)(g) and (h) and § VIII(D)(4) track the language from ¶1309, therefore meeting the Preliminary compliance threshold for this paragraph. No additional documents were submitted this reporting period to substantiate the Secondary compliance requirements of this paragraph.

The City and the CPD maintained Preliminary compliance during this reporting period. Looking forward, Secondary compliance will require IMT review of Field Training Reports, including Cycle Summary reports, which were not submitted by the end of this reporting period. The City and the CPD will achieve Secondary compliance when Field Training Officer training on policy is finalized and a full training cycle has been completed with ¶1309 required documentation. Full compliance can be attained when Field Training Officer training on policy and methodology is completed and multiple consecutive training cycles meeting these requirements are successfully completed.

Paragraph 309 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	

Training: ¶310

310. A PPO must be deemed “field qualified” in order to complete the Field Training and Evaluation Program. For a PPO to be deemed “field qualified,” all end-of-cycle reports must be completed by the FTO and reviewed and approved by the necessary supervisors.

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 during this reporting period.

To evaluate Preliminary compliance with ¶310, 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 evaluate Secondary compliance with this paragraph, we reviewed data to determine whether the CPD’s plans and policies ensure Probationary Police Officers (also known as PPOs) are deemed “field qualified” at completion of the Field Training and Evaluation Program and that end-of-cycle reports are completed by the Field Training Officer and approved by the necessary supervisors as specified in this paragraph.

Progress before the Eighth Reporting Period

Since the fifth reporting period, the IMT assessed compliance by reviewing policy and data sources, processes, and Field Training and Evaluation Program-related materials to determine whether the CPD had policies and processes in place to ensure Probationary Police Officers (PPOs) are field qualified before completing the Field Training and Evaluation Program. We reviewed Training Directive S11-02 (*Field Training and Evaluation Program*) and found the directive to include the requisite language to achieve Preliminary compliance in the fifth reporting period. We noted that the IMT must review Field Training and Evaluation Program-related materials and Field Training Reports, including but not limited to Cycle Summary Reports, and Daily Observation Reports to advance to Secondary compliance. We also advised that CPD must provide finalized Field Training Officer and supervisors training on policy and training records demonstrating that 95% of eligible CPD officers have been trained for at least a full training cycle.

During the seventh reporting period, the IMT reviewed S11-02 Field Training and Evaluation Program (FTEP) and S11-02-01 Field Training and Evaluation and Review Board.

The IMT identified S11-02 § III, S11-02 § VIII(B)(1–7), S11-02 § VIII(D)(4), S11-02 § VIII(E)(4), and S11-02 § VIII(G)(1), as key sections that reflect the policy language required to achieve Preliminary compliance. S11-02 subsections, woven together, form the policy framework that substantiates Preliminary compliance with ¶1310 during this reporting period. No additional documents substantiating Secondary compliance were submitted or reviewed this reporting period.

Progress in the Eighth Reporting Period

To demonstrate compliance with this paragraph, the City and the CPD produced E05-08 Application for Field Training Officer, FTO Initial Training, and S11-02 *Field Training and Evaluation Program*.

No documents submitted this reporting period changed the compliance assessment from the previous review period.

The City and the CPD maintained Preliminary compliance during this reporting period. Looking forward, Secondary compliance requires the IMT to review Field Training and Evaluation Program-related materials and Field Training Reports, including but not limited to Cycle Summary Reports and Daily Observation Reports. The CPD must also provide finalized Field Training Officer and supervisors training on policy and training records demonstrating that 95% of eligible CPD officers have been trained for at least a full training cycle. Full compliance requires Field Training Officer and supervisors training on policy and methodology is completed and multiple consecutive training cycles meeting these requirements are successfully completed.

Paragraph 310 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

Training: ¶311

311. FTOs may recommend specific remedial field or classroom training for a PPO. Any recommendation for remedial training will be provided as promptly as possible to the necessary supervisors and must be documented in the PPO’s training record, including, but not limited to, the Final Summary Report or Remedial Summary Report. Recommendations for remedial training must be reviewed by the necessary supervisors and, if approved, recommended training must be completed by the PPO before the PPO completes the Field Training and Evaluation Program.

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 during this reporting period.

To evaluate Preliminary compliance with ¶311, 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 evaluate Secondary compliance with this paragraph, we reviewed data to determine if the CPD’s plans and policies ensure that remedial training is provided promptly and is documented as required by the paragraph.

Progress before the Eighth Reporting Period

In the sixth reporting period, the City and the CPD submitted revised versions of Training Directive, *Field Training and Evaluation Program*, including a Comments Matrix showing changes to the prior version of S11-02 produced in the fifth reporting period and the CPD’s responses to comments offered by the IMT. S11-02 § VIII(B)(4–5) reflected the policy language required to achieve Preliminary compliance.

During the seventh reporting period, we reviewed S11-02 *Field Training and Evaluation Program (FTEP)*, S11-02-01 *Field Training and Evaluation and Review Board*, FTO Initial Training, Field Training and Evaluation Program (FTEP) Report to the Training Oversight Committee (TOC) (produced December 30, 2022) and TOC Minutes.

The IMT identified S11-02 § VIII(B)(4–5) as key sections that reflect the policy language required to achieve Preliminary compliance. Revisions stipulating that remedial training be provided “immediately” met the requirements for Preliminary compliance.

Additionally, the produced FTEP Report to the TOC included a slide presentation that discussed FTO/PPO ratios and efforts to maintain the 1:1 ratio. This discussion was further substantiated by minutes of the December 21, 2022, TOC meeting where this presentation occurred.

Progress in the Eighth Reporting Period

To demonstrate compliance with this paragraph, the City and the CPD produced E05-08 Application for Field Training Officer, FTO Initial Training, and S11-02 *Field Training and Evaluation Program*.

No documents submitted this reporting period changed the compliance assessment from the previous review period.

The City and the CPD maintained Preliminary compliance during this reporting period. Looking forward, Secondary compliance requires the CPD to demonstrate that Field Training Officer and supervisors training on applicable policy is completed and all ¶311 requirements are met and maintained for a full training cycle.

Paragraph 311 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: 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: Preliminary</p>
<p>SEVENTH REPORTING PERIOD JULY 1, 2022 – DECEMBER 31, 2022 COMPLIANCE PROGRESS: Preliminary</p>	<p>EIGHTH REPORTING PERIOD JANUARY 1, 2023 – JUNE 30, 2023 COMPLIANCE PROGRESS: Preliminary</p>	

Training: ¶312

312. *The Field Training and Evaluation Review Board, or other entity with similar responsibilities, will review a PPO's performance at the request of an assigned FTO or supervisor and have the power to recommend separation, re-training by the Academy, or additional field training. A request for review by the Board must be made, and the Board must convene, if a PPO is not deemed "field qualified" at the end of any remedial training cycle. The Field Training and Evaluation Review Board will provide all such referrals and recommendations for action to the Chief of the Bureau of Patrol.*

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 maintained Preliminary compliance with the requirements of ¶312 during this reporting period.

To evaluate Preliminary compliance with ¶312, 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 evaluate Secondary compliance with this paragraph, we reviewed data to determine if the CPD's plans and policies ensure remedial training is provided promptly and is documented as required in this paragraph. Such data must establish that Field Training Officers' and supervisors' training on the relevant policy is completed and that a full training cycle is completed.

Progress before the Eighth Reporting Period

During the sixth reporting period, the IMT assessed compliance by reviewing S11-02 *Field Training and Evaluation Program (FTEP)* and S11-02-01 *Field Training and Evaluation and Review Board*. S11-02 § VIII(B)(5), S11-02-01 § II(F), S11-02-01 §V(B), and S11-02-01 § V(F) tracked the language from ¶312, thereby achieving Preliminary compliance.

In the previous reporting period, the IMT reviewed S11-02 *Field Training and Evaluation Program (FTEP)*, S11-02-01 *Field Training and Evaluation and Review Board* (produced July 2, 2022) and the FTO Initial Training (produced September 8, 2022). S11-02 and S11-02-01 contained the requisite language of ¶312 to maintain Pre-

liminary compliance. No additional documents were submitted during the previous reporting period to substantiate the Secondary compliance requirements of this paragraph.

Progress in the Eighth Reporting Period

To demonstrate compliance with this paragraph, the City and the CPD produced E05-08 Application for Field Training Officer, FTO Initial Training, and S11-02, *Field Training and Evaluation Program*.

The compliance review for this reporting period is exactly the same as the previous reporting period.

The City and the CPD maintained Preliminary compliance during this reporting period. Looking forward, to achieve Secondary compliance, the CPD must demonstrate that Field Training Officers, supervisors, and Field Training and Evaluation Program Review Board training on the applicable policy is completed and substantiated, and this paragraph’s requirements achieved for a full recruit training cycle. Full compliance can be ascertained when Field Training Officer, supervisors, and Field Training and Evaluation Program Review Board training on policy and methodology is completed and substantiated and multiple consecutive training cycles meeting these requirements are successfully completed.

Paragraph 312 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: 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	

Training: ¶313

313. CPD will create a mechanism for PPOs to provide confidential feedback regarding their field training, including the extent to which their field training was consistent with what they learned at the Academy; whether their FTOs did or did not provide effective guidance and instruction; and suggestions for changes to recruit training based upon their experience in the Field Training and Evaluation Program.

Compliance Progress

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

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

The City and the CPD maintained Preliminary compliance with the requirements of ¶313 during this reporting period.

To evaluate Preliminary compliance with ¶313, 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 evaluate Secondary compliance with this paragraph, we will need to review data to determine whether the CPD’s plans and policies provide for receiving and reviewing Probationary Police Officer (also known as PPO) feedback.

Progress before the Eighth Reporting Period

In the sixth reporting period, the City and the CPD achieved Preliminary compliance. The IMT reviewed a revised version of Training Directive S11-02, *Field Training and Evaluation Program* (May and June 2022), including a Comments Matrix showing changes to the prior version of S11-02 produced in the fifth reporting period and the CPD’s responses to comments offered by the IMT. The CPD also submitted the *2022 Annual In-Service Field Training Officer Refresher Training Curriculum* (June 2022), including a revised PowerPoint, a revised outline of the Curriculum, 2022 Field Training Officer Pre- and Post-Training Test Questions, and a Comment Review document showing the CPD’s responses and edits based on feedback from the IMT and the Office of the Illinois Attorney General to the earlier version of the training materials. S11-02 § VIII(A)(9) requires Probationary Police Officers to critique the Field Training and Evaluation Program (also known as FTEP) quarterly by completing the Field Training and Evaluation Program Critique Survey and forwarding it directly and confidentially to the Field Training and Evaluation Pro-

gram Section, Bureau of Patrol. The policy specifies the parameters for that feedback to include ¶1313 required language, and thus met the Preliminary compliance threshold.

During the previous reporting period, the City and the CPD submitted S11-02 *Field Training and Evaluation Program (FTEP)* and S11-02-01 *Field Training and Evaluation and Review Board*. The IMT also reviewed 2022 Annual In-Service FTO Refresher Training Curriculum, FTO Initial Training, FTO/PPO Quarterly Surveys, FTEP Report to the TOC and TOC Minutes.

S11-02 § VIII(A)(9) provided the requisite language to maintain Preliminary compliance.

The City and the CPD provided a survey link to data gathered from Q4 2021 through Q2 2022. The FTO Quarterly surveys are given to allow PPOs to provide feedback about their training and for FTOs to provide feedback regarding the FTEP.

The FTEP Report to the TOC included a slide presentation that discussed FTO/PPO ratios and efforts to maintain the 1:1 ratio. This discussion was further substantiated by minutes of the December 21, 2022, Training Oversight Committee meeting where this presentation occurred.

Documents provided by the CPD demonstrate that FTO training content is completed and ready for dissemination. No records were produced to demonstrate FTOs, supervisors, and recruits have all been trained on the policy or received an orientation. Secondary compliance requires proofs showing that training has occurred, plus one full recruit training cycle to be successfully completed.

Progress in the Eighth Reporting Period

To demonstrate compliance with this paragraph, the City and the CPD produced E05-08 Application for Field Training Officer, FTO Initial Training, and S11-02 *Field Training and Evaluation Program*.

S11-02 § VIII(A)(9) provides the requisite language to maintain Preliminary compliance. No records were produced to demonstrate FTOs, supervisors, and recruits have all been trained on the policy or received an orientation.

The City and the CPD maintained Preliminary compliance during this reporting period. Looking forward, Secondary compliance can be demonstrated by completion of Field Training Officer, supervisors and recruit training or orientation on the policy and completion of a full recruit training cycle using the prescribed feedback process. The IMT will assess policy, training plans, Field Training and Evaluation

Program-related materials, and data collection instruments rate to assess Secondary compliance with the requirements of this paragraph.

Paragraph 313 Compliance Progress History

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

Training: ¶314

314. *The Education and Training Division and Bureau of Patrol will review, consistent with their scope of responsibility within the Field Training and Evaluation Program, aggregate PPO feedback on a quarterly basis; document their responses, including the rationale behind any responsive action taken or decision to take no action; and share such feedback with the TOC and, as necessary, FTOs and FTO supervisors.*

Compliance Progress

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

Recurring Schedule: Quarterly **Met** **Missed**

Preliminary: *In Compliance (SIXTH REPORTING PERIOD)*

Secondary: *Not in Compliance*

Full: *Not Yet Assessed*

The City and the CPD maintained Preliminary compliance with the requirements of ¶314 during this reporting period.

To evaluate Preliminary compliance with ¶314, 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 evaluate Secondary compliance with this paragraph, we reviewed data to determine if the CPD’s plans and policies ensure that the Education and Training Division and Bureau of Patrol review aggregate Probationary Police Officers’ feedback on a quarterly basis, documents their responses as required by this paragraph, and share such feedback with the Training Oversight Committee (TOC), Field Training Officers (FTOs) and FTO supervisors as appropriate and necessary.

Progress before the Eighth Reporting Period

In the sixth reporting period, the City and the CPD achieved Preliminary compliance. The CPD provided plans and policies to aggregate Probationary Police Officer feedback on a quarterly basis as indicated in this paragraph. We reviewed a revised version of Training Directive S11-02, *Field Training and Evaluation Program* (May and June 2022), including a Comments Matrix showing changes to the prior version of S11-02 produced in the fifth reporting period and the CPD’s responses to comments offered by the IMT. We found that S11-02 § VIII (A)(9) requires Probationary Police Officers to critique the Field Training and Evaluation Program quarterly by completing the Field Training and Evaluation Program Critique Survey and forwarding it directly and confidentially to the Field Training and Evaluation Program Section, Bureau of Patrol. We also noted that S11-02 § VIII(A)(9)(c) requires

the Strategic Initiatives Division to collect and enter the information into a Tableau dashboard for the Bureau of Patrol and Training and Support Group to review, document, share relevant feedback and submit documentation to the Training Oversight Committee, as required by ¶314. Moreover, S11-02 § VIII(I)(7) requires the Field Training and Evaluation Section, Bureau of Patrol, to “conduct and maintain documentation of the Field Training and Evaluation Program Critique Survey quarterly and share feedback with the Training and Support Group, the Training Oversight Committee, and as necessary to FTOs and FTO supervisors...” We found that these collective policies met the requirements of ¶314, reaching the Preliminary compliance threshold.

During the seventh reporting period, we reviewed S11-02 *Field Training and Evaluation Program (FTEP)*. We found that S11-02 continued to satisfy the requirements of ¶314, thus maintaining Preliminary compliance.

The City and the CPD also provided a link to the FTO/PPO quarterly surveys. However, they did not provide substantive data indicating that the Education and Training Division (ETD) and Bureau of Patrol (BoP) conducted quarterly reviews of the PPO/FTO survey data, documented their responses and shared that data with the TOC, FTOs, and FTO Supervisors, as required to attain Secondary compliance.

Progress in the Eighth Reporting Period

To demonstrate compliance with this paragraph, the City and the CPD produced E05-08 Application for Field Training Officer, FTO Initial Training, and S11-02 *Field Training and Evaluation Program*.

S11-02 § A.9 (a-d) satisfies the policy requirements of ¶314, thus maintaining Preliminary compliance. No documentation of ETD, BOP, FTOs, FTO Supervisors and TOC training or orientation on this policy was provided.

The City and the CPD maintained Preliminary compliance during this reporting period. Looking forward, to achieve Secondary compliance status, the Education and Training Division, Bureau of Patrol, Field Training Officers, Field Training Officer supervisors, and Training Oversight Committee training or orientation on the applicable ¶314 compliant policy must be completed, and a full recruit training cycle completed. Full compliance requires that the Education and Training Division, Bureau of Patrol, Field Training Officers, Field Training Officer supervisors, and Training Oversight Committee training or orientation on policy is completed and Probationary Police Officer feedback is reviewed, documented, and shared as required by this paragraph.

Paragraph 314 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:
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

Training: ¶315

315. CPD will create a mechanism for FTOs to provide feedback regarding the quality of the Field Training and Evaluation Program, including suggestions for changes to FTO training, the PPO evaluation process, and recruit training. The Education and Training Division and Bureau of Patrol will review, consistent with their scope of responsibility within the Field Training and Evaluation Program, FTO feedback on a quarterly basis and, as necessary and appropriate, share such feedback with the Training Oversight Committee, FTOs, and FTO supervisors.

Compliance Progress

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

Recurring Schedule: Quarterly

Met

Missed

Preliminary: *In Compliance (NEW)*

Secondary: *Not in Compliance*

Full: *Not Yet Assessed*

The City and the CPD achieved Preliminary compliance with the requirements of ¶315 during this reporting period.

To evaluate Preliminary compliance with ¶315, 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 evaluate Secondary compliance with this paragraph, we reviewed data to determine if the CPD’s plans and policies ensure that a mechanism is in place for Field Training Officers (FTO) to provide feedback regarding the quality of the Field Training and Evaluation Program as required by this paragraph and that the Education Training Division and Bureau of Patrol review FTO feedback quarterly and share such feedback with the Training Oversight Committee, FTOs and FTO supervisors as necessary and appropriate. The IMT also sought to determine if the Education and Training Division, Bureau of Patrol, FTO, FTO supervisors, and Training Oversight Committee training or orientation on the policy required under this paragraph is completed and that a full recruit training cycle completed.

Progress before the Eighth Reporting Period

During the previous reporting periods, the City and the CPD did not submit any data to establish any level of compliance. The IMT reviewed a memorandum dated January 19, 2022, from the First Deputy to the Superintendent regarding the 2021 Annual Field Training and Evaluation Review. That document stated as follows:

Paragraph 315 of the Consent Decree requires Field Training Officer feedback on the program. The Field Training and Evaluation Section continues to conduct quarterly surveys. Field Training Officer feedback was aggregated, and responses were documented. The survey results are shared with the Training and Support Group to assist training development and modifications. The feedback recommends more training in report writing, traffic-related offenses, arrest procedures, and more scenario-based interactive training for the Probationary Police Officers before leaving the academy.

The IMT further reviewed Training Oversight Committee minutes from December 14, 2021. Item #6 is recorded as “Field Training & Evaluation Program 2021 Annual Review.” A presentation was included in the minutes, indicating the Field Training Officer feedback was shared with the Training Oversight Committee, as required by this paragraph. There was no indication that this information was shared with Field Training Officers and Field Training Officer supervisors or that there was CPD policy guidance mandating this ¶315 required process. Accordingly, no level of compliance was achieved.

The City and the CPD submitted S11-02 *Field Training and Evaluation Program (FTEP)*. We found that S11-02 §VIII(B)(10)(d) prescribed the FTO to “complete the anonymous survey regarding the Field Training and Evaluation Program administered by the Bureau of Patrol quarterly.” S11-02 §VIII(I)(7) requires the Field Training and Evaluation Section (FTES) of the Bureau of Patrol to “conduct and maintain documentation of the field training and evaluation program critique survey quarterly and share feedback with the Training and Support Group, the Training Oversight Committee, and as necessary to FTO and FTO supervisors, including but not limited to (a) concerning comments on FTO performance (b) rationale to any responsive action taken and (c) rationale to any decision to take no action.” §VIII(I)(8) required FTES to complete and maintain documentation of FTO surveys and share the FTOs’ feedback quarterly with the Training and Support Group, the Training Oversight Committee, and as necessary to FTOs and FTO supervisors.

We determined that while the policies submitted during the seventh reporting period approximate ¶315 requirements, they did not specifically require feedback, including suggestions for changes to FTO training, the PPO evaluation process, and recruit training, as mandated by ¶315. Thus, Preliminary compliance was not achieved this reporting period.

Progress in the Eighth Reporting Period

During this reporting period, the City and the CPD submitted a revised draft of S11-02 *Field Training and Evaluation Program*. The City and the CPD also produced

2022 4th Quarter FTO Survey, Field Training and Evaluation Program (FTEP) Panel 07 Feb 2023 Agenda and Notes, and E05-08 Application for Field Training Officer.

The revised version of S11-02 meets ¶315 requirements, specifically §§ IX(B)(10)(g), IX(I)(8), and IX(J)(7). These sections require feedback, including suggestions for changes to FTO training, the PPO evaluation process, and recruit training, as mandated by ¶315. Because the policy establishes these topics as survey imperatives, Preliminary compliance requirements are met.

The City and the CPD achieved Preliminary compliance during this reporting period. Looking forward, several additional data sources are required to demonstrate Secondary compliance, including a sample of quarterly surveys. Substantive questions soliciting feedback on Probationary Police Officer evaluations are needed. Field Training Officer surveys from each previous and contiguous quarter are needed to demonstrate the quarterly feedback is captured as required. Data reflecting that the Education and Training Division and the Bureau of Patrol have reviewed each quarter’s feedback and shared, as appropriate, with the Training Oversight Committee, Field Training Officers and Field Training Officer supervisors are needed.

Full compliance can be demonstrated when the Education and Training Division, the Bureau of Patrol, Field Training Officers, Field Training Officer supervisors, and Training Oversight Committee training or orientation on policy are completed and multiple consecutive full recruit training cycles meeting ¶315 requirements are successfully completed as required.

Paragraph 315 Compliance Progress History

FIRST REPORTING PERIOD SEPTEMBER 1, 2019 – AUGUST 31, 2019 COMPLIANCE PROGRESS: Not Applicable	SECOND REPORTING PERIOD SEPTEMBER 1, 2019 – FEBRUARY 29, 2020 COMPLIANCE PROGRESS: Not Applicable	THIRD REPORTING PERIOD MARCH 1, 2020 – DECEMBER 31, 2020 COMPLIANCE PROGRESS: Status Update
FOURTH REPORTING PERIOD JANUARY 1, 2021 – JUNE 30, 2021 COMPLIANCE PROGRESS: Preliminary	FIFTH REPORTING PERIOD JULY 1, 2021 – DECEMBER 31, 2021 COMPLIANCE PROGRESS: 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	

Training: ¶316

316. *The TOC will annually review the Field Training and Evaluation Program and consider best practices in this area as well as feedback and recommendations from FTOs and PPOs. Additionally, the TOC will review referrals and recommendations by the Field Training and Evaluation Review Board to the Bureau of Patrol. Based on this information, the TOC will recommend to the Superintendent the implementation of any appropriate changes to policies or procedures related to the Field Training and Evaluation Program.*

Compliance Progress

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

Recurring Schedule: Annually



Met



Missed

Preliminary: *In Compliance (SIXTH REPORTING PERIOD)*

Secondary: *Not in Compliance*

Full: *Not Yet Assessed*

The City and the CPD maintained Preliminary compliance with the requirements of ¶316 during this reporting period.

To evaluate Preliminary compliance with ¶316, 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 evaluate Secondary compliance with this paragraph, we reviewed data to determine if the requirements of this paragraph are written into policy. Specifically, the IMT reviewed policy, data, and training sources, including Training Oversight Committee meeting notes, special orders, Field Training and Evaluation Program (FTEP) documentation, and other documents including annual reviews and recommendations provided to the Superintendent, to determine if the Field Training and Evaluation Program Review Board (FTEPRB), Education and Training Division (ETD), Bureau of Patrol (BOP), Field Training Officers (FTO), Field Training Officer supervisors, and Training Oversight Committee (TOC) training or orientation on policy is completed and a full annual training cycle completed. Such data must demonstrate that the CPD has established a reliable process for documenting the referrals and recommendations received from these sources. The IMT also sought to verify sufficient attendance records (*i.e.*, 95% of relevant personnel), including hours attended.

Progress before the Eighth Reporting Period

During the sixth reporting period, the IMT reviewed meeting materials from Training Oversight Committee meetings occurring in December of 2021 and January of

2022, a *Field Training and Evaluation Program Recommendation Memorandum*, dated January 19, 2022, from the First Deputy to the Superintendent regarding the 2021 Annual Field Training and Evaluation Review, and Training Oversight Committee minutes from December 14, 2021. These documents were important components of the compliance requirement for ¶316 and reflected that the ¶316 requirements were enshrined in CPD policy contained in S11-11 (*Training Oversight Committee*) § III.A.13. Accordingly, Preliminary compliance was achieved. No documents were submitted during this reporting period to substantiate Secondary compliance.

During the seventh reporting period, we reviewed FTO/PPO Quarterly Surveys. The quarterly surveys provided evidence that PPO input was being received. However, the surveys themselves did not substantiate compliance with ¶316 requirements. Instead, a review of previously submitted Training Oversight Committee Special Order S11-11 § (III)(A)(13) indicated the ¶316 requirements were enshrined within that policy. Accordingly, the CPD has maintained Preliminary compliance during this reporting period, but no data was submitted to substantiate Secondary compliance.

Progress in the Eighth Reporting Period

During this reporting period, the City and the CPD produced TOC meeting minutes and agenda to demonstrate compliance. The IMT also reviewed Training Oversight Committee Special Order S11-11.

TOC meeting minutes captured meetings held January through April 2023. There was a Field Training Program agenda item in the 20 April 2023 meeting minutes. FTEP discussion topics included FTO exam, pre-service training, FTO to PPO ratio, ratio shortfall plan, and FTEP next steps. The breadth of the topics did not span a year, therefore could not have been considered an annual report. No FTEP Review Board referrals and recommendations to the TOC were recorded in the meeting minutes. No FTEP-related discussions were recorded during the other meetings. No documents demonstrated FTEPRB, ETD, BOP, FTOs, FTO supervisors and TOC training and orientation on the policies has been conducted.

The City and the CPD maintained Preliminary compliance during this reporting period. Secondary compliance may be demonstrated through Training Oversight Committee meeting notes, special orders, Field Training and Evaluation Program documentation, and other documents including annual reviews and recommendations provided to the Superintendent. Additionally, Secondary compliance requires that Field Training and Evaluation Program Review Board, Education and Training Division, Bureau of Patrol, Field Training Officers, Field Training Officer supervisors, and Training Oversight Committee training or orientation on policy to be

completed and for a full annual training cycle to be completed. The CPD must have established a reliable process to document the referrals and recommendations received from these sources.

Paragraph 316 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: 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	

Training: ¶317

317. Regular in-service training is critical to ensure that CPD officers continue to hone important policing skills and remain up-to-date on changes in the law, CPD policy, technology, community expectations, and developments in best practices. In-service training should, as appropriate, reinforce CPD's commitment to procedural justice, de-escalation, impartial policing, and community policing.

Compliance Progress

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

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

The City and the CPD maintained Preliminary compliance with these requirements during this reporting period.

To evaluate Preliminary compliance with ¶317, 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 evaluate Secondary compliance with this paragraph, we reviewed data to determine whether the City and the CPD have developed reliable procedures to demonstrate that training, lesson plans, and curricula across all appropriate in-service training and evaluations demonstrate the requirements of this paragraph. The IMT also sought to verify sufficient attendance records (*i.e.*, 95% of relevant personnel), including hours attended.

Progress before the Eighth Reporting Period

The City and the CPD first achieved Preliminary compliance with the requirements of ¶317 in the third reporting period. In the following reporting periods, the CPD submitted S11-10-03 *In-Service Training* (fifth reporting period) and Bureau of Internal Affairs (BIA) eLearning materials, including Pre- and Post-tests (sixth reporting period). We determined that these submissions continued to support Preliminary compliance. We noted that Secondary compliance may be achieved by submitting data reflecting that training lesson plans and curricula across all appropriate in-service training and evaluations fulfill the requirements of this paragraph. The City and the CPD did not submit such data during these reporting periods.

In the previous reporting period, the City and the CPD submitted the following documents:

- BIA eLearning Training (produced August 18, 2022)

- Child Abuse and Neglect eLearning Training (produced September 8, 2022)
- Communication in Police Environment eLearning (produced September 29, 2022)
- Crime Victim Assistance eLearning (produced October 13, 2022)
- Annual Carbine Operator Qualification Training (produced October 20, 2022)
- 2023 Annual Use of Force – Integrating Communications Assessments and Tactics (ICAT) Training (produced October 20, 2022)
- BIA eLearning Training (produced November 9, 2022)
- 2023 Annual Training Plan (produced December 1, 2022)
- Child Abuse and Neglect eLearning Training (produced December 1, 2022)
- Communication in Police Environment eLearning (produced December 15, 2022)
- Evidence of 95% BIA eLearning Training (produced December 28, 2022)

These documents reflected the eLearning and classroom course content intended for in-service training classes. The content included some pre- and post-tests and slide presentations, along with evidence of completion of the BIA eLearning course. The *Annual Training Plan* included all in-service courses intended for delivery in 2023.

These submissions substantiated the maintenance of Preliminary compliance with §1317 requirements. However, once again, the City and the CPD did not submit training lesson plans and curricula across all appropriate in-service training and pre- and post-course evaluations, thus failing to achieve Secondary compliance during the seventh reporting period.

Progress in the Eighth Reporting Period

The City and the CPD produced the following documents to demonstrate compliance during this reporting period:

- Firearms Restraining Order Act (produced February 16, 2023)
- BIA eLearning (produced February 16, 2023)
- Annual Training Plan (produced February 16, 2023)

- Crime Victim’s Assistance eLearning – 95% Completion (produced March 9, 2023)
- 95 Percent 40 Hour In Service Training (produced March 9, 2023)
- Juvenile Processing eLearning – 95% (produced March 9, 2023)
- ICAT Training (produced March 16, 2023)
- CIT In-Service Training 95% Completion (produced March 30, 2023)
- Use of Force Policy Update Training (produced March 30, 2023)
- Fair and Impartial Policing Training (produced April 6, 2023)
- DRTUOF Policy Updates Training (produced May 25, 2023)
- 2023 Annual Training Plan (produced May 25, 2023)
- Firearms Restraining Order eLearning (produced June 15, 2023)
- Prohibition on Retaliation eLearning (produced June 15, 2023)
- Child Abuse eLearning (produced June 15, 2023)

These documents reflect the eLearning and classroom course content intended for in-service training classes. The content includes lessons plans, curricula, some pre- and post-tests and slide presentations, along with evidence of completion of eLearning courses. The *Annual Training Plan* includes all in-service courses intended for delivery in 2023. Annual Training Plan Appendix E demonstrates the integration of Procedural Justice, De-Escalation, Impartial Policing and Community Policing in Training. Everything required to substantiate Secondary compliance is provided **except** evaluations.

The City and the CPD maintained Preliminary compliance during this reporting period. Looking forward, to achieve Secondary compliance the CPD must demonstrate that training, lesson plans, and curricula across all appropriate in-service training and evaluations demonstrate the requirements of this paragraph. Full compliance may be demonstrated when training lesson plans and curricula across all in-service training demonstrate the requirements of this paragraph and training delivery and evaluations reflect those requirements.

Paragraph 317 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

Training: ¶318

318. *The Parties recognize that CPD has begun to develop and implement an In-Service Training Program for its officers. The Parties acknowledge that CPD has developed a project plan establishing development and implementation of the In-Service Training Program from 2018 through 2019 that includes the following components: a. a list of planned courses, including the status of the development and approval of any new course curricula; b. the dates that CPD officers collectively will start and complete the planned courses; c. the identification of any need for additional instructors, equipment, and training facilities and a schedule for addressing the needs; and d. a list of CPD personnel responsible for overseeing each project plan task.*

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>

The City and the CPD achieved Preliminary compliance with ¶318 during this reporting period.

To evaluate Preliminary compliance with ¶318, 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 evaluate Secondary compliance with this paragraph, we reviewed data to determine whether the City and the CPD have developed acceptable policies, procedures, and plans to transition from a project plan to develop and fully implement the In-Service Training Program according to the requirements of this paragraph. The IMT seek to verify sufficient attendance records (*i.e.*, 95% of relevant personnel), including hours attended. Where applicable, we assessed whether the City and the CPD have created the requisite positions and staffed those positions with qualified personnel in order to achieve the requirements of this paragraph.

Progress before the Eighth Reporting Period

Prior to the seventh reporting period, no documents were submitted or reviewed to substantiate any compliance level.

During the seventh reporting period, the City and the CPD submitted S11-02, *Field Training and Evaluation Program* and S11-02-01, *Field Training and Evaluation Board* as proof of compliance with ¶318. However, ¶318 refers to the in-service

training of CPD officers, while the submitted policies refer to field training. As such, no documents responsive to ¶318 requirements were submitted or reviewed to establish any level of compliance during the seventh reporting period.

Progress in the Eighth Reporting Period

During this reporting period, the City and the CPD submitted policies S11-10 and S11-10-03, the Annual Training Plan, and Training Oversight Committee (TOC) minutes and agenda to substantiate compliance during this reporting period.

S11-10 designates formal authority and responsibilities to each segment of the Education and Training Division. S11-10 § III.C.3, *In Service Training Section*, establishes and delegates responsibility for developing and presenting in service training to the In-Service Training Section. The 2023 Annual Training Plan provides a list of planned and TOC approved courses, training calendars, resource, instructor, and facility needs and assignments, and the Training Section primarily responsible for training delivery. In service training has clearly evolved from a project plan into an integral and fully operational CPD Training function. More information is needed to substantiate personnel qualifications, surveys, and evaluations.

The City and the CPD achieved Preliminary compliance during this reporting period. Looking forward, Preliminary compliance requires the City and the CPD to have developed acceptable policies, procedures, and plans to transition from a project plan to develop and fully implement the In-Service Training Program according to the requirements of this paragraph. Secondary compliance requires the City and the CPD to have fully developed, implemented, and institutionalized the In-Service Training Program according to the requirements of this paragraph.

Paragraph 318 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: Not Applicable</p>
<p>FOURTH REPORTING PERIOD JANUARY 1, 2021 – JUNE 30, 2021</p> <p>COMPLIANCE PROGRESS: Not Applicable</p>	<p>FIFTH REPORTING PERIOD JULY 1, 2021 – DECEMBER 31, 2021</p> <p>COMPLIANCE PROGRESS: Not Applicable</p>	<p>SIXTH REPORTING PERIOD JANUARY 1, 2022 – JUNE 30, 2022</p> <p>COMPLIANCE PROGRESS: None</p>
<p>SEVENTH REPORTING PERIOD JULY 1, 2022 – DECEMBER 31, 2022</p> <p>COMPLIANCE PROGRESS: None</p>	<p>EIGHTH REPORTING PERIOD JANUARY 1, 2023 – JUNE 30, 2023</p> <p>COMPLIANCE PROGRESS: Preliminary</p>	

Training: ¶319

319. CPD will implement the In-Service Training Program to comport with the Training Plan and the requirements and goals of this Agreement.

Compliance Progress

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

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

The City and the CPD maintained Preliminary compliance with the requirements of ¶319 during this reporting period.

To evaluate Preliminary compliance with ¶319, 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 evaluate Secondary compliance with this paragraph, we reviewed data to determine if the CPD has implemented an In-Service Training Program that comports with the annual training plan and with all other applicable Consent Decree requirements.

Progress before the Eighth Reporting Period

During the fifth reporting period, the IMT reviewed policies that require implementation of In-Service Training that is consistent with the applicable *Annual Training Plan* and Consent Decree requirements. We reviewed the *2022 Training Needs Assessment* and the *2022 Training Plan* and found that Preliminary compliance requirements were met in each relevant paragraph.

In the sixth and seventh reporting periods, the City and the CPD did not submit any data to establish any level of compliance. However, consistent with our methodology applied during the previous reporting period, we applied the results of the following related paragraphs to assign a rating:

¶	Section	Compliance Rating in the Seventh Reporting Period
272	Training	Preliminary
317	Training	Preliminary
318	Training	None
320	Training	Preliminary
321	Training	Preliminary
322	Training	Secondary
323	Training	Preliminary
324	Training	Preliminary
326	Training	Preliminary
327	Training	Preliminary
328	Training	Preliminary
329	Training	Preliminary

Progress in the Eighth Reporting Period

The City and the CPD did not submit any data to establish any level of compliance during this reporting period. However, consistent with our methodology applied during the previous reporting period, we applied the results of the following related paragraphs to assign a rating this reporting period as follows:

¶	Section	Compliance Rating in the Eighth Reporting Period
272	Training	Preliminary
317	Training	Preliminary
318	Training	Preliminary
320	Training	Secondary
321	Training	Secondary
322	Training	Secondary
323	Training	Secondary
324	Training	Preliminary
326	Training	Preliminary
327	Training	Preliminary
328	Training	Preliminary
329	Training	Preliminary

Documents and data submitted this reporting period substantiate Preliminary compliance with these paragraphs. These compliance proofs advance the CPD toward Secondary compliance as well.

The City and the CPD maintained Preliminary compliance during this reporting period but advanced toward Secondary compliance. Looking forward, Secondary compliance requires actually implementing and operating the In-Service Training program in a manner that complies with the requirements of ¶¶317–29 and consistent with ¶272(e), (f), (g), (i), (k), (l), and (m) requirements. Secondary compliance in all these paragraphs and subparagraphs is *prima facie* evidence of Secondary compliance in this paragraph.

Paragraph 319 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	

Training: ¶320

320. The In-Service Training Program will require that all non-probationary police officers who are active duty and available for assignment, including supervisors and command staff, receive, at a minimum, the following amount of in-service training each year: a. 16 hours by the end of 2018; b. 24 hours by the end of 2019; c. 32 hours by the end of 2020; and d. 40 hours by the end of 2021, and in each subsequent year.

Compliance Progress

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

Deadline: March 5, 2023* **Met** **Missed**
*Extended from December 31, 2022, due to COVID-19¹¹

Preliminary: *In Compliance (THIRD REPORTING PERIOD)*

Secondary: *In Compliance (NEW)*

Full: *Not Yet Assessed*

The City and the CPD maintained Preliminary compliance this reporting period and gained Secondary compliance.

To evaluate Preliminary compliance with ¶320, 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 evaluate Secondary compliance with this paragraph, we reviewed data to determine whether CPD documentation demonstrates that 95% of eligible personnel received the training required by this paragraph.

Progress before the Eighth Reporting Period

During the previous reporting periods, the IMT assessed compliance and determined that the City and the CPD maintained Preliminary compliance. We reviewed training materials and completion data for the following In-Service Training courses: De-Escalation, Response to Resistance, and Use of Force Training, Active Bystandership for Law Enforcement (ABLE) Training, Gender-Based Violence In-Service Training, In-Service CIT Training, and Constitutional Policing. Additionally, the IMT reviewed a cover letter (2022 May 5) seeking to clarify the CPD’s position that the Training Directives S11-10 (*Department Training Records Maintenance*), S11-01 (*Recruit Training*), S11-10-02 (*Pre-Service Training*), and S11-10-03 (*In-Service Training*) previously produced on December 29, 2021 support Preliminary compliance with the requirements of this paragraph.

¹¹ The training year is returning to the calendar year in 2023.

The cover letter clarifying S11-10-03 (*In-Service Training*) allowed the City and the CPD to maintain Preliminary compliance. The IMT advised that documentation establishing 95% or higher attendance in each 2021 In-Service Training course was required to substantiate Secondary compliance. Some, but not all, attendance records were provided during the last reporting period. The IMT advised that Full compliance requires sustainment of Secondary compliance for at least two consecutive reporting periods.

During the previous reporting period, Special Order S11-10-03 (*In-Service Training*) continues to support Preliminary compliance. Documentation establishing 95% or higher attendance in each In-Service Training class is required to substantiate Secondary compliance. As with the previous reporting periods, some, but not all, of the necessary attendance records were provided during the seventh reporting period, thus failing to establish Secondary compliance.

Progress in the Eighth Reporting Period

The City and the CPD submitted the following documents to demonstrate compliance during this reporting period:

- Chicago Police Department - Constitutional Policing Training Materials (produced January 26, 2023)
- Officer Wellness Training (produced February 9, 2023)
- Firearms Restraining Order Act (produced February 16, 2023)
- Booster Plan (produced February 16, 2023)
- BIA eLearning (produced February 16, 2023)
- Annual Training Plan (produced February 16, 2023)
- Crime Victim's Assistance eLearning – 95% Completion (produced March 9, 2023)
- 95 Percent 40 Hour In Service Training (produced March 9, 2023)
- Juvenile Processing eLearning – 95% (produced March 9, 2023)
- ICAT Training (produced March 16, 2023)
- CPD Training Division: Gender Based Violence 2022 95% Completion (produced March 30, 2023)
- CIT In-Service Training 95% Completion (produced March 30, 2023)
- De-escalation, Response to Resistance, and Use of Force Training 95% Completion (produced March 30, 2023)
- Use of Force Policy Update Training (produced March 30, 2023)
- ABLE Training 95% Completion (produced March 30, 2023)
- Officer Wellness Training (produced April 6, 2023)
- ABLE Refresher Training (produced April 6, 2023)
- Fair and Impartial Policing Training (produced April 6, 2023)
- CPD Constitutional Policing Training Materials (produced April 13, 2023)
- DRTUOF Policy Updates Training (produced May 25, 2023)

- 2023 Annual Training Plan (produced May 25, 2023)
- Firearms Restraining Order eLearning (produced June 15, 2023)
- Prohibition on Retaliation eLearning (produced June 15, 2023)
- 2023 Officer Wellness Training (produced June 15, 2023)
- Child Abuse eLearning (produced June 15, 2023)

The IMT also reviewed Special Order S11-10-03 (*In-Service Training*). Special Order S11-10-03 § III.A. (*In-Service Training*) and the Annual Training Plan continues to support Preliminary compliance. Documentation establishing 95% or greater non-probationary police officers who are active duty and available for assignment, including supervisors and command staff, received at least 40 hours of in-service training, is required to substantiate Secondary compliance. The 95% 2022 40 Hour In-Service Training documents provide that substantive proof.

The City and the CPD achieved Secondary compliance during this reporting period. Looking forward, data establishing 95% or higher attendance in each In-Service Training class is required to substantiate Secondary compliance. Some, but not all, were provided this reporting period. Full compliance requires sustainment of Secondary compliance for at least two consecutive reporting periods.

Paragraph 320 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: Secondary	

Training: ¶321

321. *CPD’s In-Service Training Program will include specific courses that will be mandatory for every officer in that training year.*

Compliance Progress

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

Recurring Schedule: March 5, 2022* **Met** **Missed**

*Extended from December 31, 2021, due to COVID-19

Preliminary: *In Compliance (THIRD REPORTING PERIOD)*

Secondary: *In Compliance (NEW)*

Full: *Not Yet Assessed*

The City and the CPD maintained Preliminary compliance with ¶321 during this reporting period.

To evaluate Preliminary compliance with ¶321, 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 evaluate Secondary compliance with this paragraph, we reviewed data to determine whether CPD’s In-Service Training Program includes the courses required by this paragraph and that CPD documentation demonstrates that 95% of eligible personnel received the training required under this paragraph.

Progress before the Eighth Reporting Period

During the sixth reporting period, the IMT assessed compliance and determined that the City and the CPD maintained Preliminary compliance. We reviewed training materials and attendance data for the following In-Service Training courses: De-Escalation, Response to Resistance, and Use of Force Training, Active Bystanderism for Law Enforcement (ABLE) Training, Gender-Based Violence In-Service Training, In-Service CIT Training, and Constitutional Policing. The IMT found that the documents submitted supported Preliminary compliance and while we appreciated the volume of documents submitted as data to support compliance, attendance records for each course were required to support Secondary compliance, and those records were not provided during the sixth reporting period.

In the last reporting period, the City and the CPD produced the training materials for the following courses: 2022 CIT In-Service Training, Child Abuse and Neglect eLearning Training, Evidence of Traumatic Incident Stress Management Program (TISMP) eLearning Training, Communication in Police Environment eLearning, Crime Victim Assistance eLearning, Constitutional Policing In-Service Training, 2023 Annual Use of Force – Integrating Communications Assessments and Tactics

(ICAT) Training, BIA eLearning Training, 2023 ABLE Refresher Training, Child Abuse and Neglect eLearning Training, Fair and Impartial Policing Training, Gender Based Violence In-Service Training, 2023 Policy Updates Use of Force Training, Communication in Police Environment eLearning, and Evidence of 95% BIA eLearning Training.

The documents submitted continue to support Preliminary compliance with this paragraph. While the IMT appreciates the volume of documents submitted as data to support compliance this reporting period, as we advised last reporting period, attendance records for each in-service training course are required to attain Secondary compliance, which were not provided this reporting period.

Progress in the Eighth Reporting Period

The City and the CPD produced the following documents to demonstrate compliance during this reporting period:

- Chicago Police Department - Constitutional Policing Training Materials (produced January 26, 2023)
- Officer Wellness Training (produced February 9, 2023)
- Firearms Restraining Order Act (produced February 16, 2023)
- Booster Plan (produced February 16, 2023)
- BIA eLearning (produced February 16, 2023)
- Annual Training Plan (produced February 16, 2023)
- Crime Victim's Assistance eLearning – 95% Completion (produced March 9, 2023)
- 95 Percent 40 Hour In Service Training (produced March 9, 2023)
- Juvenile Processing eLearning – 95% (produced March 9, 2023)
- ICAT Training (produced March 16, 2023)
- CPD Training Division: Gender Based Violence 2022 95% Completion (produced March 30, 2023)
- CIT In-Service Training 95% Completion (produced March 30, 2023)
- De-escalation, Response to Resistance, and Use of Force Training 95% Completion (produced March 30, 2023)
- Use of Force Policy Update Training (produced March 30, 2023)
- ABLE Training 95% Completion (produced March 30, 2023)
- Officer Wellness Training (produced April 6, 2023)
- ABLE Refresher Training (produced April 6, 2023)
- Fair and Impartial Policing Training (produced April 6, 2023)
- CPD Constitutional Policing Training Materials (produced April 13, 2023)
- Audit of In-Service Training Records (produced April 27, 2023)
- DRTUOF Policy Updates Training (produced May 25, 2023)
- 2023 Annual Training Plan (produced May 25, 2023)

- Firearms Restraining Order eLearning (produced June 15, 2023)
- Prohibition on Retaliation eLearning (produced June 15, 2023)
- 2023 Officer Wellness Training (produced June 15, 2023)
- Child Abuse eLearning (produced June 15, 2023)

IMT also reviewed Special Order S11-10-03 (In-Service Training). Special Order S11-10-03 III.A. (*In-Service Training*) and the Annual Training Plan continues to support Preliminary compliance. The 2023 Annual Training Plan lists mandatory courses (Table 11.) The additional submitted records include proof that 95% of CPD attended required In-Service Training courses. Attendance proofs were audited, and audit results also were provided.

The City and the CPD achieved Secondary compliance during this reporting period. Looking forward, Secondary compliance requires the CPD documentation demonstrating that 95% of eligible personnel received the training required by this paragraph. The CPD will need to submit training attendance records to demonstrate that at least 95% of all eligible personnel attended each required training to establish Secondary compliance. Full compliance requires sustained Secondary compliance.

Paragraph 321 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: Secondary	

Training: ¶322

322. *CPD’s In-Service Training Program may also offer specific courses as elective subjects. The elective subjects will be selected and approved by the TOC in accordance with the Training Plan. The TOC will solicit and consider officer requests and will rely on the Education and Training Division’s needs assessments when selecting and evaluating elective subjects.*

Compliance Progress

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

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

The City and the CPD maintained Secondary compliance with the requirements of ¶322 during this reporting period.

To evaluate Preliminary compliance with ¶322, 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 evaluate Secondary compliance with this paragraph, we reviewed data to demonstrate that elective and mandatory subjects of the CPD’s In-Service Training Program are approved by the Training Oversight Committee and that the Training Oversight Committee has solicited and considered officer requests and relied on the *Needs Assessment* when selecting and evaluating elective subjects.

Progress before the Eighth Reporting Period

During previous reporting periods, the IMT determined that the City and the CPD maintained Preliminary and Secondary compliance with this paragraph. We reviewed the *2022 Training Needs Assessment*, the *2022 Training Plan*, a memorandum regarding the 95% completion of in-service training, and Training Oversight Committee (TOC) meeting materials. The IMT also reviewed Training Directive S11-11 (*Training Oversight Committee*). Meeting minutes from the December 2021 and January 2022 Training Oversight Committee meetings were submitted as additional data to establish compliance in the prior reporting period. The data submitted during the previous reporting supported Preliminary and Secondary compliance.

During the seventh reporting period, the IMT reviewed the *2023 Training Plan* to establish ongoing compliance with this paragraph. Additionally, the data submitted during prior reporting periods, as described above, remain valid and continue to support both Preliminary and Secondary compliance this reporting period.

Given that the CPD was working in the seventh reporting period to align its Training Calendar with the calendar year, continued compliance with this paragraph must be reestablished by the production of documents and proofs maintaining compliance during the eighth reporting period.

Progress in the Eighth Reporting Period

The City and the CPD submitted the 2023 Annual Training Plan and 2023 Officer Wellness Training documents to substantiate compliance during this reporting period. The IMT additionally reviewed Special Order S11-11 (Training Oversight Committee). S11-11 §III.A.3(g) and §III.A.11 contains the requisite language for Preliminary compliance. Documents submitted for other paragraphs demonstrate. ¶1271 Needs Assessment requires the TOC, through the Education and Training Division, to solicit and consider officer requests. Secondary compliance with ¶1271 and ¶1272 would offer additional support this paragraph. ¶1272 has achieved mere Preliminary compliance during this reporting period. Nevertheless, documentation submitted demonstrates elective and mandatory subjects were TOC approved and the TOC considered officer requests.

The City and the CPD maintained Secondary compliance during this reporting period. Looking forward, to demonstrate Full compliance, the CPD must further demonstrate they have fully implemented and established a full process that aligns with requirements of ¶322. That includes providing data that courses listed as elective were actually offered. This may be established in the Training Summary Report and with attendance data for each elective topic.

Paragraph 322 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: Preliminary</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: Secondary</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>	

Training: ¶323

323. *As part of the In-Service Training Program, mandatory and elective courses will be apportioned as follows: a. in 2018, CPD will require that each officer receive at least 16 hours of in person mandatory courses; b. in 2019, CPD will require that each officer receive at least 16 hours of in person mandatory courses, with the remaining 8 hours to be provided either as mandatory or elective courses, as determined by the TOC; c. in 2020, CPD will require that each officer receive at least 24 hours of in-person mandatory courses, with the remaining 8 hours to be provided either as mandatory or elective courses, as determined by the TOC; d. starting in 2021, and every year thereafter, CPD will require that each officer receive at least 24 hours of in-person mandatory courses with the remaining 16 hours to be provided either as mandatory or elective courses, as determined by the TOC; and e. this Agreement does not require CPD to provide more than 40 hours of annual department-wide in-service training.*

Compliance Progress

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

Deadline: March 5, 2022* **Met** **Missed**
*Extended from December 31, 2021, due to COVID-19¹²

Preliminary: *In Compliance (THIRD REPORTING PERIOD)*

Secondary: *In Compliance (NEW)*

Full: *Not Yet Assessed*

The City and the CPD achieved Secondary compliance with ¶323 during this reporting period.

To evaluate Preliminary compliance with ¶323, 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 evaluate Secondary compliance with this paragraph, we reviewed data to determine whether course attendance for each course required under ¶323(d) meets or exceeds 95% of eligible personnel required to receive the training required by this paragraph.

Progress before the Eighth Reporting Period

During previous reporting periods, the IMT assessed compliance and found the City and the CPD maintained Preliminary compliance with this paragraph. In the

¹² The CPD is returning to the calendar year for training in 2023.

sixth reporting period, we reviewed training materials and attendance records for the following In-Service Training courses: De-Escalation, Response to Resistance, and Use of Force Training, Active Bystandership for Law Enforcement (ABLE) Training, Gender-Based Violence In-Service Training, In-Service CIT Training, and Constitutional Policing. We advised that Secondary compliance requires the CPD to demonstrate that at least 95% of officers received the ¶323 required mix of training. Although some of the training documents produced included snapshots of the Tableau Dashboard demonstrating that at least 95% of eligible attendees received the training, that verification was not submitted for each ¶323(d) course.

During the previous reporting period, the City and the CPD produced the following training materials and attendance records for the following In-Service Training courses to demonstrate compliance with this paragraph:

- 2022 CIT In-Service Training
- Child Abuse and Neglect eLearning Training
- Evidence of Traumatic Incident Stress Management Program (TISMP) eLearning Training
- Communication in Police Environment eLearning
- 2022 CIT In-Service Training
- Crime Victim Assistance eLearning
- Constitutional Policing In-Service Training
- 2023 Annual Use of Force – Integrating Communications Assessments and Tactics (ICAT) Training
- BIA eLearning Training
- 2023 ABLE Refresher Training
- Child Abuse and Neglect eLearning Training
- Fair and Impartial Policing Training
- Gender Based Violence In-Service Training
- 2023 Policy Updates Use of Force Training
- Communication in Police Environment eLearning

The IMT found that these documents substantiated maintenance of Preliminary compliance. However, while some compliance records were produced last reporting period demonstrating that at least 95% of officers received the ¶323 required mix of training, that verification was not submitted for each ¶323(d) course, thus failing to establish Secondary compliance.

Progress in the Eighth Reporting Period

The City and the CPD provided the following documents to demonstrate compliance during this reporting period:

- Chicago Police Department - Constitutional Policing Training Materials (produced January 26, 2023)
- Officer Wellness Training (produced February 9, 2023)
- Booster Plan (produced February 16, 2023)
- BIA eLearning (produced February 16, 2023)
- Annual Training Plan (produced February 16, 2023)
- Crime Victim's Assistance eLearning – 95% Completion (produced March 9, 2023)
- 95 Percent 40 Hour In Service Training (produced March 9, 2023)
- Juvenile Processing eLearning – 95% (produced March 9, 2023)
- ICAT Training (produced March 16, 2023)
- CPD Training Division: Gender Based Violence 2022 95% Completion (produced March 30, 2023)
- CIT In-Service Training 95% Completion (produced March 30, 2023)
- De-escalation, Response to Resistance, and Use of Force Training 95% Completion (produced March 30, 2023)
- Use of Force Policy Update Training (produced March 30, 2023)
- ABLE Training 95% Completion (produced March 30, 2023)
- Officer Wellness Training (produced April 6, 2023)
- ABLE Refresher Training (produced April 6, 2023)
- Fair and Impartial Policing Training (produced April 6, 2023)
- CPD Constitutional Policing Training Materials (produced April 13, 2023)
- Audit of In-Service Training Records (produced April 27, 2023)
- DRTUOF Policy Updates Training (produced May 25, 2023)
- 2023 Annual Training Plan (produced May 25, 2023)
- Firearms Restraining Order eLearning (produced June 15, 2023)
- Prohibition on Retaliation eLearning (produced June 15, 2023)
- TOC Meeting Minutes and Agenda (produced June 15, 2023)
- 2023 Officer Wellness Training (produced June 15, 2023)
- Child Abuse eLearning (produced June 15, 2023)

The IMT additionally reviewed Special Order S11-10-03 for compliance support purposes.

S11-10-03 §III(A) states “All non-probationary police officers who are active duty and available for assignment, including sworn supervisors and command staff, will receive, at a minimum, 40 hours of training which includes 24 hours mandatory courses and 16 hours of either mandatory or elective courses, as determined by the Training Oversight Committee (TOC) and the training requirements established by the Illinois [Law]Enforcement Training and Standards Board.”

The additional documents submitted along with the Annual Training Report of 2022 Training, provide all ¶1323 proofs required to substantiate Secondary compliance. A listing of all In-Service courses is provided along with curricula, lesson plans, exam information, training schedules, training location, and attendance confirmation. According to the Annual Training Report of 2022 Training, the following mandatory courses were part of the 40-Hour In-Service Training Program. Make-up sessions for these courses extended beyond the 2022 calendar year until March 3, 2023.

Classroom:

- 2022 Active Bystandership for Law Enforcement (ABLE)
- 2022 De-escalation, Response to Resistance, and Use of Force (DRTRUOF)
- 2022 Gender-Based Violence (GBV)
- 2022 In-Service Crisis Intervention 8-Hour Classroom Training (CIT)

Online:

- 2022 Curfew Enforcement 2-Part Program
- 2022 Foot Pursuit Policy Program
- 2022 Hate Crimes Refresher 8-Part Program
- BIA Accountability 8-Part Program (2022)
- Crime Victim and Witness Assistance Program 2022
- Crisis Intervention Team (CIT) Policy Online 2-Part Program
- First Amendment Rights 4-Part Program
- Processing of Juveniles and Minors Under Department Control Program (2022)
- Traumatic Incident Stress Management Program: 3-Part (2022)

Additional courses are identified as Mandatory (as applicable), Mandatory and Elective, and Elective.

The City and the CPD achieved Secondary compliance during this reporting period. Looking forward, full and sustained implementation of ¶1323 Preliminary and Secondary compliance requirements as demonstrated by training records, training attendance records, and lesson plans, may result in Full compliance with this paragraph.

Paragraph 323 Compliance Progress History

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

COMPLIANCE PROGRESS:
None

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

COMPLIANCE PROGRESS:
None

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

COMPLIANCE PROGRESS:
Preliminary

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

COMPLIANCE PROGRESS:
Preliminary

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

COMPLIANCE PROGRESS:
Preliminary

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

COMPLIANCE PROGRESS:
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

Training: ¶324

324. Various sections of this Agreement contain in-service training requirements which require CPD to provide some or all of its members with training on specific topics. CPD retains the discretion to determine the sequencing, scheduling, and location of such training, unless otherwise specified by this Agreement, provided that: all in-service training identified herein will begin no later than the 2021 calendar year; is adequate in quantity, quality, type, and scope; and is consistent with the terms of this Agreement.

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 the requirements of ¶324 during this reporting period.

To evaluate Preliminary compliance with ¶324, 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 evaluate Secondary compliance with this paragraph, we reviewed data to ascertain if the CPD’s training lesson plans, instructor selections, training schedules, and curricula across all in-service training demonstrate compliance with the requirements of this paragraph. Such data must also demonstrate that the CPD has fully implemented the requirements of this paragraph and that training delivery has been initiated within the specified timeline and conditions. The IMT also sought to verify sufficient attendance records (*i.e.*, 95% of relevant personnel), including hours attended.

Progress before the Eighth Reporting Period

During the fifth reporting period, the IMT assessed compliance with this paragraph by reviewing the *2022 Training Plan* and Training Directive S11-10-03 (*In-Service Training*). We determined that the City and the CPD maintained Preliminary compliance. The CPD indicated that additional documentation reflecting “evidence documenting 95% completion of training” would be submitted in the sixth reporting period to demonstrate Secondary compliance.

Sections of the Consent Decree that require officers to receive in-service training on specific topics including the following:

Consent Decree Section	Consent Decree Reference Paragraph(s)
Community Policing	37
Impartial Policing	72–5
Crisis Intervention	126
Use of Force	243–46
Officer Wellness and Support	414
Accountability and Transparency	527–28

To demonstrate compliance with ¶324 in the sixth reporting period, the CPD submitted course materials for the following trainings: *De-Escalation, Response to Resistance, and Use of Force Training, Active Bystandership for Law Enforcement (ABLE) Training, Gender-Based Violence In-Service Training, In-Service Crisis Intervention Team Training, and Constitutional Policing Course*. We found the submitted documents supported Preliminary compliance with the requirements of this paragraph and were essential components for establishing Secondary compliance. However, we noted that to establish Secondary compliance the City and the CPD must also demonstrate that all required training has commenced, and course attendance met or exceeded the 95% threshold for those assigned and required to take the course. We advised that data depicting the percentage attendance in each ¶324 area would help substantiate Secondary compliance in future reporting periods.

To demonstrate compliance with this paragraph during the seventh reporting period, the City and the CPD submitted the 2023 Annual Training Plan. The IMT also reviewed S11-10-03. Those documents contained the prescribed policy language required for the maintenance of Preliminary compliance. The City and the CPD did not submit data during the seventh reporting period depicting the percentage attendance in each ¶324 area that are needed to substantiate Secondary compliance.

Progress in the Eighth Reporting Period

To demonstrate compliance during this reporting period, the City and the CPD submitted S11-10 and S11-10-03.

The IMT also reviewed documents considered for compliance in ¶¶282, 286, and 321-323. S11-10-03 §III provides requisite language for Preliminary compliance. Documents provided for ¶¶321-323 strongly support Secondary compliance for ¶324 as well. However, because this paragraph requires training is “adequate in ...quality...,” evaluative and quality control requirements of ¶282 and ¶286 apply to Secondary compliance standards for ¶324 mandated courses. Secondary compliance fails.

The City and the CPD maintained Preliminary compliance during this reporting period. Looking forward, achieving Secondary compliance requires the CPD to demonstrate that all required training has commenced and training plans, lesson plans, training schedules, course curriculum, and evaluations demonstrate that the training is “adequate in quantity, quality, type, and scope.” Data depicting the percentage attendance in each ¶324 area also will help to substantiate Secondary compliance.

Secondary compliance also requires training lesson plans, instructor selections, training schedules, and curricula across all in-service training to demonstrate compliance with the requirements of this paragraph. Full compliance may be achieved when the CPD has fully implemented the requirements of this paragraph and training delivery has been initiated within the specified timeline and conditions.

Paragraph 324 Compliance Progress History

FIRST REPORTING PERIOD SEPTEMBER 1, 2019 – AUGUST 31, 2019 COMPLIANCE PROGRESS: None	SECOND REPORTING PERIOD SEPTEMBER 1, 2019 – FEBRUARY 29, 2020 COMPLIANCE PROGRESS: None	THIRD REPORTING PERIOD MARCH 1, 2020 – DECEMBER 31, 2020 COMPLIANCE PROGRESS: Preliminary
FOURTH REPORTING PERIOD JANUARY 1, 2021 – JUNE 30, 2021 COMPLIANCE PROGRESS: 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	

Training: ¶326

326. *Training provided through the In-Service Training Program may take place at the Academy or in a decentralized manner, including at the district or unit level, so long as the training is: a. developed by the Education and Training Division; b. reviewed by the TOC and approved by the Education and Training Division before training is delivered; and c. taught by instructors pursuant to the requirements provided above Part D of this section.*

Compliance Progress

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

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

The City and the CPD maintained Preliminary compliance with these requirements during this reporting period.

To evaluate Preliminary compliance with ¶326, 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 evaluate Secondary compliance with this paragraph, we reviewed data to ascertain if the CPD has delivered training following the requirements of ¶326 as demonstrated through training plans, lesson plans, course curricula, training schedules, and other training and data sources and in accordance with ¶282–85 instructor selection and development requirements.

Progress before the Eighth Reporting Period

During the previous reporting periods, the IMT assessed compliance with this paragraph and determined that the City and the CPD achieved Preliminary compliance.

To demonstrate compliance with this paragraph during the seventh reporting period, the City and the CPD submitted the 2023 Annual Training Plan and 2023 Policy Updates Use of Force Training.

The IMT also reviewed S11-10-03 §II(B) which indicates, “In service training will be conducted using multiple platforms such as classroom instruction, eLearning, roll call training, and streaming videos and may take place in a decentralized manner, including at the district or unit level, through eLearning, or through other electronic means.” This language allowed the CPD to maintain Preliminary compliance with this paragraph. Records were not submitted this reporting period to establish Secondary compliance.

Progress in the Eighth Reporting Period

The City and the CPD produced the following documents to substantiate compliance during this reporting period:

- S11-10 & S11-10-03 (produced February 9, 2023)
- Annual Training Plan (produced February 16, 2023)
- CPD Training Division: Gender Based Violence 2022 95% Completion (produced March 30, 2023)
- CIT In-Service Training 95% Completion (produced March 30, 2023)
- De-escalation, Response to Resistance, and Use of Force Training 95% Completion (produced March 30, 2023)
- Use of Force Policy Update Training (produced March 30, 2023)
- ABLE Training 95% Completion (produced March 30, 2023)
- Officer Wellness Training (produced April 6, 2023)
- ABLE Refresher Training (produced April 6, 2023)
- Fair and Impartial Policing Training (produced April 6, 2023)
- CPD Constitutional Policing Training Materials (produced April 13, 2023)
- DRTUOF Policy Updates Training (produced May 25, 2023)
- 2023 Annual Training Plan (produced May 25, 2023)
- TOC Meeting Minutes and Agenda (produced June 15, 2023)
- 2023 Officer Wellness Training (produced June 15, 2023)

S11-10-03 §II(B) states, “In service training will be conducted using multiple platforms such as classroom instruction, eLearning, roll call training, and streaming videos and may take place in a decentralized manner, including at the district or unit level, through eLearning, or through other electronic means.” S11-10-03 §II(F) mandates all Department in-service training being developed by the Training Division and then reviewed and approved by the TOC before training is delivered. S11-10-03 §II(G) mandates all instructors of Department in-service training will meet the qualifications and requirements outlined in the directive titled [Department Training](#) and conform to the Department Training Plan. Collectively, this language allows the CPD to maintain Preliminary compliance with this paragraph.

The Annual Training Plan, course content and attendance documents support Secondary compliance. However, adherence to ¶1282–85 related requirements (¶1326 (c)) are not demonstrated, as required for Secondary compliance.

The City and the CPD maintained Preliminary compliance during this reporting period. Looking forward, Secondary compliance requires the CPD to deliver training following the requirements of ¶1326, as demonstrated through training plans, lesson plans, course curricula, training schedules, and other training and data sources

and in accordance with ¶¶282–85 instructor selection and development requirements. Full compliance can be achieved when the CPD has fully implemented the requirements of this paragraph and training delivery has been initiated within the specified timeline and conditions.

Paragraph 326 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	

Training: ¶327

327. Courses offered by CPD to fulfill the portion of the In-Service Training Program not required to be delivered in person may be provided through e-learning or other electronic means, so long as they are reviewed and approved by the TOC and are consistent with this Agreement. In considering e-learning courses for approval, the TOC will ensure that instructional objectives can be sufficiently achieved through e-learning. Following the completion of any e-learning course provided as part of the In-Service Training Program, CPD will test participants on their comprehension of the underlying subject matter.

Compliance Progress

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

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

The City and the CPD maintained Preliminary compliance during this reporting period.

To evaluate Preliminary compliance with ¶327, 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 evaluate Secondary compliance with this paragraph, we reviewed data to determine if the CPD’s applicable policies, lesson plans, attendance records, training plans, and other training and data sources demonstrate that it has established and implemented e-learning course development and delivery in accordance with the requirements of this paragraph, including evidence of appropriate Training Oversight Committee review and approval of e-learning courses and appropriate post-course evaluations. The IMT also sought to verify sufficient attendance records (*i.e.*, 95% of relevant personnel), including hours attended.

Progress before the Eighth Reporting Period

In previous reporting periods, the IMT assessed compliance with this paragraph and determined that the City and the CPD achieved Preliminary compliance. During the fifth reporting period, we reviewed Training Directive S11-10-03 (*In-Service Training*), Training Oversight Committee meeting materials, and the Psychology of Domestic Violence eLearning. The CPD advised that an additional document, “Evidence documenting 95% completion of training,” would be produced during the sixth reporting period. We found that S11-10-03 incorporated the ¶327 requirements into policy, meeting Preliminary compliance.

In the sixth reporting period, the CPD submitted BIA eLearning materials (April 2022), including draft eLearning materials and a pre- and post-test. We determined that documents or information that are required to demonstrate Secondary compliance for ¶327 were not provided.

To demonstrate compliance with ¶327 during the seventh reporting period, the CPD submitted BIA eLearning materials, including Module 1-5 Articulate links, and Pre- and Post-test Articulate links. The CPD also submitted BIA eLearning Training, 2023 Annual Training Plan, and Evidence of 95% BIA eLearning Training.

The following information and documents are required to demonstrate Secondary compliance.

¶327 requirements written into policy	S11-10-03
Full list of courses offered by CPD to fulfill the portion of the In-Service Training Program not required to be delivered in person	Not Provided
Reviewed and approved by the Training Oversight Committee (Training Oversight Committee minutes)	Not provided
Consistent with Consent Decree requirements (No objection notices on eLearning course)	Not provided
Training Oversight Committee ensures that instructional objectives can be sufficiently achieved (Training Oversight Committee minutes)	Not provided
Following the completion of any e-learning course provided as part of the In-Service Training Program, CPD will test participants on their comprehension of the underlying subject matter. (Curriculum or actual exams)	Only BIA eLearning test provided

As a result, the City and the CPD maintained Preliminary compliance during this reporting period but failed to achieve Secondary compliance.

Progress in the Eighth Reporting Period

The following information and documents are required to demonstrate Secondary compliance.

¶327 requirements written into policy	S11-10-03
Full list of courses offered by CPD to fulfill the portion of the In-Service Training Program not required to be delivered in person	Annual Training Plan, 2022 Annual Training Summary
Reviewed and approved by the Training Oversight Committee (Training Oversight Committee minutes)	Not provided
Consistent with Consent Decree requirements (No objection notices on eLearning course)	Not provided
Training Oversight Committee ensures that instructional objectives can be sufficiently achieved (Training Oversight Committee minutes)	Not provided
Following the completion of any e-learning course provided as part of the In-Service Training Program, CPD will test participants on their comprehension of the underlying subject matter. (Curriculum or actual exams)	Only Prohibition on retaliation eLearning test provided

The City and the CPD submitted the following documents to demonstrate compliance during this reporting period:

- S11-10 & S11-10-03 (produced February 9, 2023)
- BIA eLearning (produced February 16, 2023)
- Annual Training Plan (produced February 16, 2023)
- Crime Victim's Assistance eLearning - 95% Completion (produced March 9, 2023)
- 95 Percent 40 Hour In Service Training (produced March 9, 2023)
- Juvenile Processing eLearning – 95% (produced March 9, 2023)
- 2023 Annual Training Plan (produced May 25, 2023)
- Firearms Restraining Order eLearning (produced June 15, 2023)
- Prohibition on Retaliation eLearning (produced June 15, 2023)
- Child Abuse eLearning (produced June 15, 2023)

Many of the requirements to substantiate Secondary compliance, as indicated in the chart above, have not been met.

The City and the CPD maintained Preliminary compliance during this reporting period. Looking forward, Secondary compliance may be achieved when the CPD's policies, lesson plans, attendance records, training plans, and other training and

data sources demonstrate that the CPD has established and implemented eLearning course development and delivery in accordance with the requirements of this paragraph, including evidence of appropriate Training Oversight Committee review and approval of e-learning courses and appropriate post-course evaluations.

Paragraph 327 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	

Training: ¶328

328. CPD will develop and implement a process for addressing non-compliance with training requirements to ensure that all officers who are active duty and available for assignment, including supervisors and command staff, successfully complete all required training programs within the time frames set out in this Agreement.

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*

The City and the CPD maintained Preliminary compliance with the requirements of ¶328 during this reporting period.

To evaluate Preliminary compliance with ¶328 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 evaluate Secondary compliance with this paragraph, we reviewed data to determine if the CPD has established a process to require officers returning to active duty to meet the training requirements specified in this paragraph.

Progress before the Eighth Reporting Period

During the fifth reporting period, the City and the CPD submitted Training Deviation materials, including a Screenshot of an In-Service Training Deviation Dashboard and a Deviation Spreadsheet and the 2021 Annual Training Report. Along with S11-10 (*Department Training*), these materials satisfied Preliminary compliance, but did not yet establish Secondary compliance, which we advised could be demonstrated by the submission of documentation establishing that each step of the process for addressing non-compliance with training requirements is functional and operates as described in policy.

We advised that to substantiate that the Training Deviation process is fully implemented in order to meet Secondary and eventually Full compliance, the CPD must submit additional documents demonstrating that each step of the process is functional and operates as described in policy. The number of training deviation investigations should approximate the number of personnel who did not attend required trainings. Each step enumerated in policy S11-10 (*Department Training Records Maintenance Program*) §XII was not demonstrated in the data submitted during the sixth reporting period. Secondary compliance was therefore not achieved.

In the seventh reporting period, the IMT reviewed the previously submitted policy S11-10, which allowed the CPD to continue to maintain Preliminary compliance. However, no additional documents were submitted during the seventh reporting period to substantiate Secondary compliance, including documentation showing the CPD’s adherence to its policy regarding training deviations.

Progress in the Eighth Reporting Period

The City and the CPD did not produce any documents to demonstrate compliance during this reporting period.

The IMT did however review Special Order S11-10 for evidence of compliance with this Paragraph.

S11-10, *Department Training*, §XIII (issued December 31, 2022), describes the training deviation process and the CPD’s process for addressing ¶1328 requirements. This policy allows the CPD to maintain Preliminary compliance. However, no additional documents were submitted this reporting period to substantiate Secondary compliance, including proofs showing the CPD’s adherence to its policy regarding training deviations.

The City and the CPD maintained Preliminary compliance during this reporting period. Looking forward, to further substantiate that this process is fully implemented to meet Secondary and eventually Full compliance, the CPD must submit additional documents demonstrating that each step of the process required by this paragraph is functional and operates as described in policy. The number of training deviation investigations should approximate the number of personnel who did not attend required trainings.

Paragraph 328 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: 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: Preliminary</p>
<p>SEVENTH REPORTING PERIOD JULY 1, 2022 – DECEMBER 31, 2022 COMPLIANCE PROGRESS: Preliminary</p>	<p>EIGHTH REPORTING PERIOD JANUARY 1, 2023 – JUNE 30, 2023 COMPLIANCE PROGRESS: Preliminary</p>	

Training: ¶329

329. *Officers, including supervisors and command staff, returning to active duty after taking a leave of absence of a year or more must complete all mandatory training content required as part of the In-Service Training Program that was missed during the previous three years, in addition to the mandatory courses required in the current year. a. At a minimum: i. officers must complete training on the content required in Part F of the Use of Force section of this Agreement before returning to assignment; and ii. officers must complete training on all other mandatory content required during the previous three years within the first full year of resumed active duty. b. Where the same mandatory content has been updated or required multiple times during the period of inactivity, officers are only required to take the most recent offering. The training required in this paragraph will count towards the total amount of training required by the In-Service Training Program.*

Compliance Progress

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

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

The City and the CPD maintained Preliminary compliance during this reporting period.

To evaluate Preliminary compliance with ¶329, 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 evaluate Secondary compliance with this paragraph, we will need to review data to determine whether the requirements of this paragraph are written into policy and reflect that specified obligations and trainings align with the requirements of this paragraph. Such data must substantiate that the training processes enumerated in S11-10-03 (*In-Service Training*) and E04-05 (*Returning Service*) have been implemented. The IMT also sought to verify sufficient attendance records (*i.e.*, 95% of relevant personnel), including hours attended.

Progress before the Eighth Reporting Period

During the fifth reporting period, the IMT assessed compliance and determined that the City and the CPD achieved Preliminary compliance for the first time. We

reviewed the finalized S11-10-03 (*In-Service Training*) and finalized E04-05 (*Returning Service*) policy documents as evidence of compliance. No additional data were produced to establish a further level of compliance.

In the seventh reporting period, we stated that S11-10-03 (*In-Service Training*) and E04-05 (*Returning Service*) continue to support Preliminary compliance. The City and the CPD did not submit any data during the previous reporting period to establish Secondary compliance.

Progress in the Eighth Reporting Period

The City and the CPD submitted Special Order S11-10-03 and Employee Resource E04-05 to substantiate compliance during this reporting period.

S11-10-03 (*In-Service Training*) and E04-05 (*Returning Service*) continue to support Preliminary compliance. The City and the CPD did not submit any data this reporting period to establish Secondary compliance.

The City and the CPD maintained Preliminary compliance during this reporting period. Looking forward, Secondary compliance can be achieved by substantiating that the processes enumerated in S11-10-03 (*In-Service Training*) and E04-05 (*Returning Service*) have been implemented.

Paragraph 329 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	

Training: ¶331

331. CPD will require that every newly promoted supervisor, except those promoted to the rank of Commander and above, receives mandatory supervisory, management, leadership, and command accountability training, tailored to each level of supervision and command before assignment to a supervisory rank or assumption of supervisory responsibilities associated with a particular supervisory rank.

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*

The City and the CPD maintained Preliminary compliance with these requirements during this reporting period.

To evaluate Preliminary compliance with ¶331, 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 evaluate Secondary compliance with this paragraph, we reviewed data demonstrating that every newly promoted supervisor received the training required by this paragraph before assignment to a supervisory rank or assumption of supervisory responsibilities associated with a particular supervisory rank.

Progress before the Eighth Reporting Period

During the previous reporting periods, the IMT assessed compliance related to this paragraph and determined that the City and the CPD maintained Preliminary compliance. We reviewed the finalized S11-10-02 (*Pre-Service Training*) as evidence of Preliminary compliance. No documents were produced to demonstrate Secondary compliance in the prior reporting period.

During the seventh reporting period, the City and the CPD submitted the Annotated Pre-Service (Lt. and Sgt.) Curricula. The annotated curricula described each course and specified the number of hours assigned to each course. The IMT also reviewed the draft *2023 Training Plan*, which also addressed pre-service training requirements. The IMT determined that S11-10-02 (*Pre-Service Training*) continued to support Preliminary compliance. No additional documents were submitted to support Secondary compliance during the seventh reporting period, which requires the submission of documents demonstrating that every newly promoted

supervisor received the required training before assignment to a supervisory rank or assumption of supervisory responsibilities.

Progress in the Eighth Reporting Period

The City and the CPD submitted the Annual Training Plan and Pre-Service Training Directive S11-10-02 to demonstrate compliance during this reporting period.

S11-10-02 (*Pre-Service Training*) continues to support Preliminary compliance. No additional documents were submitted to support Secondary compliance this reporting period, which requires the submission of documents demonstrating that every newly promoted supervisor received the required training before assignment to a supervisory rank or assumption of supervisory responsibilities. Training course and attendance records must be provided to substantiate Secondary compliance.

The City and the CPD maintained Preliminary compliance during this reporting period. Looking forward, Secondary compliance requires data and training sources demonstrating that every newly promoted supervisor received the required training before assignment to a supervisory rank or assumption of supervisory responsibilities associated with a particular supervisory rank.

Paragraph 331 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: 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	

Training: ¶332

332. CPD will require that supervisors, upon their first promotion to the rank of Commander or above, receive mandatory supervisory, management, leadership, and command accountability training, tailored to command staff positions within six months of assignment to or assumption of supervisory responsibilities as a member of CPD’s command staff.

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*

The City and the CPD maintained Preliminary compliance with ¶332 during this reporting period.

To evaluate Preliminary compliance with ¶332, 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 evaluate Secondary compliance with this paragraph, we reviewed data to determine if the CPD has taken sufficient steps to deliver the training required by this paragraph according to the conditions specified in this paragraph, including that every newly promoted supervisor received the required training before assignment to a supervisory rank or assumption of supervisory responsibilities associated with a particular supervisory rank.

Progress before the Eighth Reporting Period

During the fifth reporting period, the IMT assessed compliance and found that the City and the CPD maintained Preliminary compliance with this paragraph. We reviewed E05-05 (*Promotional Process for Commander*) (February 2022). E05-05 § IX(B) had the requisite ¶332 language to support Preliminary compliance.

No documents were submitted during the prior reporting periods to demonstrate that the CPD had taken sufficient steps to deliver the training according to the conditions specified in this paragraph to support Secondary compliance.

The IMT determined that E05-05 continued to support Preliminary compliance in the seventh reporting period.

Progress in the Eighth Reporting Period

The City and the CPD submitted the Annual Training Plan and Pre-Service Training Directive S11-10-02 to demonstrate compliance during this reporting period.

S11-10-02 (*Pre-Service Training*) continues to support Preliminary compliance. No additional documents were submitted to support Secondary compliance this reporting period, which requires the submission of documents demonstrating that every newly promoted Commander or above, received the required training tailored to command staff positions within six months of assignment to or assumption of supervisory responsibilities as a member of the CPD’s command staff. Training course and attendance records must be provided to substantiate Secondary compliance.

The City and the CPD maintained Preliminary compliance during this reporting period. Looking forward, Secondary compliance requires data and training sources demonstrating that every newly promoted supervisor received the required training before assignment to a supervisory rank or assumption of supervisory responsibilities associated with a particular supervisory rank.

Paragraph 332 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: 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	

Training: ¶333

333. *The amount of pre-service promotional training may differ according to rank and command, but all pre-service promotional training will be adequate in quality, quantity, type, and scope and will cover topics appropriate to the specific rank and command.*

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 ¶333 during this reporting period.

To evaluate Preliminary compliance with ¶333, 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 evaluate Secondary compliance with this paragraph, we reviewed data to determine whether the CPD’s training is tailored to rank and follows the requirements of this paragraph and that the CPD has taken steps to deliver training in accordance with the requirements of this paragraph, the *2022 Training Plan*, and approved curricula. Such data, including training plans, lesson plans, and attendance records, must demonstrate the CPD’s adherence to ¶333 requirements and also must demonstrate that training has been conducted and that CPD achieved 95% attendance by eligible personnel.

Progress before the Eighth Reporting Period

During the previous reporting periods, the IMT assessed compliance with this paragraph and determined that the City and the CPD achieved Preliminary compliance. We reviewed the finalized S11-10-02 (*Pre-Service Training*) which incorporated the requirements of ¶¶331–34. To demonstrate further compliance with ¶333, in the sixth reporting period the CPD submitted E05-05-04 (*Promotional Process for Captain*) and E05-05 (*Promotional Process for Commander*). Section X of each of these policies outlines training requirements for each promotional rank.

The IMT advised that Secondary compliance would require the CPD to demonstrate that it has taken significant steps to deliver training in accordance with this paragraph and the *2023 Training Plan*, curriculum, and curriculum development process. We further advised that training plans, attendance records, and lesson plans would all have to demonstrate the CPD’s adherence to ¶333 requirements

and that records must demonstrate that training has been conducted and that CPD achieved 95% attendance by eligible candidates.

To demonstrate compliance during the seventh reporting period, the City and the CPD submitted the Annotated Pre-Service (Lt. and Sgt.) Curricula. The annotated curricula described each course and specified the number of hours assigned to each course. The IMT also reviewed the draft *2023 Training Plan*, which also addressed pre-service training requirements.

The requirements established in ¶¶331–34 are contained in S11-10-02 (*Pre-Service Training*) § III(A)(1–5), establishing Preliminary compliance for each paragraph. The CPD previously submitted CPD E05-05-04 (*Promotional Process for Captain*) (February 2022) and E05-05 (*Promotional Process for Commander*) (February 2022) for compliance with ¶333. Section X of each of these policies outlined training requirements for each promotional rank. No additional records were submitted in the seventh reporting period to establish Secondary compliance.

Progress in the Eighth Reporting Period

The City and the CPD submitted the Annual Training Plan and *Pre-Service Training Directive*, S11-10-02 to demonstrate compliance during this reporting period.

S11-10-02 § A(1) (*Pre-Service Training*) continues to support Preliminary compliance. According to the 2023 Annual Training Plan, the CPD requires newly promoted supervisors and Department members assigned to distinct roles (i.e., Field Training Officers, Detectives) to receive mandatory pre-service training. Each promotional rank has specific areas of study tailored to their assignment or level of supervision. The Training Support Group has undertaken a thorough review of the pre-service promotional curricula and is working towards finalizing customized curriculum for each respective rank and role in 2023. Annotated curricula will be submitted for each rank by the end of the fourth quarter.¹³

No additional documents were submitted to support Secondary compliance this reporting period, which requires the submission of documents demonstrating that every newly promoted Commander or above, received the required training tailored to command staff positions within six months of assignment to or assumption of supervisory responsibilities as a member of the CPD's command staff. Training course, schedule, and attendance records must be provided to substantiate Secondary compliance.

¹³ See Pre-Service Areas of Study, page 108.

The City and the CPD maintained Preliminary compliance during this reporting period. Looking forward, Secondary compliance requires CPD to demonstrate that it has taken significant steps to deliver training in accordance with this paragraph and the *2022 Training Plan*, curriculum, and curriculum development process. The training plans, attendance records, and lesson plans will all have to demonstrate the CPD’s adherence to ¶333 requirements. Records must also demonstrate that training has been conducted and that the CPD achieved 95% attendance by eligible candidates.

Paragraph 333 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	

Training: ¶334

334. *By January 1, 2020, as appropriate and tailored to the specific rank and command, pre-service promotional training will include, but not be limited to: a. an overview of CPD’s department-wide crime reduction strategies; b. specific methods for developing district-level crime reduction strategies that are consistent with the principles of community policing, and tools and techniques on how best to communicate with officers on how to incorporate principles of community policing in implementing those crime reduction strategies; c. techniques for effectively guiding and directing officers and promoting effective and ethical police practices, including detecting and addressing bias-based profiling and other forms of discriminatory policing; d. de-escalation strategies and the principles of force mitigation; e. intervening on a subject’s behalf when observing a use of force that is excessive or otherwise in violation of policy; f. evaluating the completeness, correctness, and sufficiency of written reports; g. monitoring, reviewing, and investigating uses of force to ensure consistency with CPD policies; h. understanding the function and proper use of supervisory tools, such as Early Intervention System (“EIS”) and body-worn cameras, at each rank; i. evaluating officer performance, informally and formally as part of CPD’s annual performance evaluation process; j. CPD and COPA’s disciplinary system requirements and available non-punitive corrective action; k. mentoring officers and fostering career development; l. responding to allegations of officer misconduct, including, but not limited to, excessive force and racial discrimination, for purposes of documenting the complaint and reporting it to COPA; m. building community partnerships and guiding officers on how to implement this requirement; and n. CPD policy and legal updates.*

Compliance Progress

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

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

The City and the CPD maintained Preliminary compliance with ¶334 during this reporting period.

To evaluate Preliminary compliance with ¶334, 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 evaluate Secondary compliance with this paragraph, we reviewed data to determine if the CPD has implemented processes to fulfill the pre-service promotional training requirements of this paragraph, including by conducting the pre-service promotional training courses and demonstrating implementation of processes to fulfill the other requirements of this paragraph.

Progress before the Eighth Reporting Period

During the fifth reporting period, the IMT assessed compliance and found that the City and the CPD achieved Preliminary compliance. We reviewed the finalized S11-10-02 (*Pre-Service Training*), which incorporated the requirements of ¶¶331–34. We noted that Secondary compliance could be achieved by conducting the pre-service supervisory training course and achieving 95% or higher attendance by eligible candidates.

To demonstrate compliance during the seventh reporting period, the City and the CPD submitted the Annotated Pre-Service (Lt. and Sgt.) Curricula. The annotated curricula described each course and specified the number of hours assigned to each course. The IMT also reviewed the draft *2023 Training Plan*, which also addressed pre-service training requirements.

The requirements established in ¶¶331–34 are contained in S11-10-02 (*Pre-Service Training*) § III(A)(1–5), maintaining Preliminary compliance for each paragraph. The City and the CPD did not submit any substantive data in the seventh reporting period that established Secondary compliance.

Progress in the Eighth Reporting Period

The City and the CPD submitted the Annual Training Plan and *Pre-Service Training Directive*, S11-10-02 to demonstrate compliance during this reporting period.

S11-10-02 § A(5) (*Pre-Service Training*) continues to support Preliminary compliance. Pre-service Training courses are listed in the Annual Training Plan. According to the 2023 Annual Training Plan, the CPD requires newly promoted supervisors and Department members assigned to distinct roles (i.e., Field Training Officers, Detectives) to receive mandatory pre-service training. Each promotional rank has specific areas of study tailored to their assignment or level of supervision. The Training Support Group has undertaken a thorough review of the pre-service promotional curricula and is working towards finalizing customized curriculum for each respective rank and role in 2023. Annotated curricula will be submitted for each rank by the end of the fourth quarter.¹⁴

¹⁴ See Pre-Service Areas of Study, page 108.

No additional documents were submitted to support Secondary compliance this reporting period, which requires the submission of policy, training records, training schedules, training plans, attendance records, and other data to determine if the CPD has implemented processes to fulfill the pre-service promotional training requirements of this paragraph, including by conducting the pre-service promotional training courses and demonstrating implementation of processes to fulfill the other requirements of this paragraph.

The City and the CPD maintained Preliminary compliance during this reporting period. Looking forward, the CPD may achieve Secondary compliance by conducting the pre-service promotional training courses and demonstrating implementation of processes to fulfill the requirements of this paragraph. Full compliance may be demonstrated when the CPD has fully implemented and has established a full process that aligns with the requirements of this paragraph.

Paragraph 334 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	

Training: ¶335

335. *The pre-service promotional training for new Sergeants and Lieutenants will include a field training component to provide newly promoted supervisors with a better understanding of the requirements of the position to which they have been promoted.*

a. The field training component for new Sergeants will consist of two days of shadowing current Sergeants in districts: one day observing the activities of a District Station Supervisor and one day observing the activities of a Field Sergeant. b. The field training component for new Lieutenants will consist of one day of shadowing a current Lieutenant in a district and observing the activities of a Watch Operations Lieutenant.

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*

The City and the CPD has maintained Preliminary compliance with the requirements of ¶335 during this reporting period.

To evaluate Preliminary compliance with ¶335, 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 evaluate Secondary compliance with this paragraph, we reviewed data to determine if the CPD has developed a formalized structure for the field training component of this paragraph and if the CPD has implemented processes to fulfill the pre-service promotional training requirements of this paragraph.

Progress before the Eighth Reporting Period

During the fifth reporting period, the IMT assessed compliance with this paragraph and determined the City and the CPD maintained Preliminary compliance. We reviewed the finalized S11-10-02 (*Pre-Service Training*), the *2022 Training Plan*, and the Draft Pre-Service Promotional Training Field Observation, and these documents met the requirements of this paragraph. The City and the CPD sought Secondary compliance by producing a curricula and policies meeting the requirements of this paragraph, but the IMT noted that Secondary compliance requires verification that the CPD has begun implementation.

The City and the CPD maintained Preliminary compliance in the sixth and seventh reporting periods. The City and the CPD did not submit any data to establish Secondary compliance during these reporting periods.

Progress in the Eighth Reporting Period

The City and the CPD submitted the Annual Training Plan to demonstrate compliance during this reporting period. The IMT also reviewed S11-10-02. S11-10-02 § A(6) (*Pre-Service Training*) continues to support Preliminary compliance. Additional field training records, training schedules, and attendance records are required to substantiate Secondary compliance.

The City and the CPD has maintained Preliminary compliance during this reporting period. Looking forward, to achieve Secondary compliance the CPD must implement and establish processes to fulfill the pre-service promotional training requirements of this paragraph.

Paragraph 335 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: Under Assessment
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	

Training: ¶336

336. Within 30 days of the Effective Date, CPD will develop a formalized structure for the field training component to ensure consistency across districts. This structure will include a process for selecting which supervisors will be shadowed and guidance materials to ensure that the topics and information regarding supervisor responsibilities covered during the field training component are consistent with CPD policy and this Agreement.

Compliance Progress

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

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

The City and the CPD did not reach any level of compliance with the requirements of ¶336 during this reporting period.

To evaluate Preliminary compliance with ¶336, 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 evaluate Secondary compliance with this paragraph, we reviewed data to ascertain whether the CPD has developed a formalized structure for the field training component to ensure consistency across districts, including a process for selecting which supervisors will be shadowed and creation of guidance materials to ensure that the topics and information regarding supervisor responsibilities covered during the field training component are consistent with CPD policy and Consent Decree requirements. Such data should also demonstrate that training has been delivered in accordance with the requirements of this paragraph.

Progress before the Eighth Reporting Period

During the previous reporting periods, the IMT assessed compliance and determined that the City and the CPD did not submit any data to establish Preliminary compliance, which requires a formalized structure for the field training component to be written into CPD policy. Therefore, no level of compliance was demonstrated. We reviewed the Pre-Service Promotional Training Field Observation training that were going through a ¶641 review process at the conclusion of the fifth reporting period and advised that this would help to substantiate Secondary compliance once Preliminary compliance was met and the CPD submitted documents showing that the training had been implemented and delivered.

Progress in the Eighth Reporting Period

The City and the CPD submitted S11-10-02 to demonstrate compliance during this reporting period. This did not contain the requisite language for Preliminary compliance, which also is a prerequisite for Secondary compliance considerations.

The City and the CPD did not reach any level of compliance during this reporting period. Looking forward, Preliminary compliance requires a formalized structure for the field training component to be written into CPD policy. To achieve Secondary compliance, the CPD must submit data demonstrating that training has been delivered and that the training requirements of this paragraph are met.

Paragraph 336 Compliance Progress History

FIRST REPORTING PERIOD SEPTEMBER 1, 2019 – AUGUST 31, 2019 COMPLIANCE PROGRESS: None	SECOND REPORTING PERIOD SEPTEMBER 1, 2019 – FEBRUARY 29, 2020 COMPLIANCE PROGRESS: None	THIRD REPORTING PERIOD MARCH 1, 2020 – DECEMBER 31, 2020 COMPLIANCE PROGRESS: None
FOURTH REPORTING PERIOD JANUARY 1, 2021 – JUNE 30, 2021 COMPLIANCE PROGRESS: Preliminary	FIFTH REPORTING PERIOD JULY 1, 2021 – DECEMBER 31, 2021 COMPLIANCE PROGRESS: 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	

Training: ¶337

337. CPD will ensure that all supervisors who are active duty and available for assignment also receive in-service training consistent with the requirements of CPD's In-Service Training Program. As part of the In-Service Training Program, supervisors will receive refresher training related to their supervisory duties and training that covers managerial and leadership skills. The in-service training for supervisors may include, but is not limited to, the topics identified above for pre-service promotional training.

Compliance Progress

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

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

The City and the CPD maintained Secondary compliance with the requirements of ¶337 during this reporting period.

To evaluate Preliminary compliance with ¶337, 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 evaluate Secondary compliance with this paragraph, we reviewed data to ascertain whether the CPD has taken steps to ensure that supervisors receive the in-service training, including refresher training, required by this paragraph. Data should include attendance records demonstrating that at least 95% of all eligible personnel received the training required by this paragraph.

Progress before the Eighth Reporting Period

During the fourth reporting period, the IMT assessed compliance and found that the City and the CPD maintained Preliminary compliance with this paragraph. In the sixth reporting period, the IMT reviewed the finalized policy S11-10-03 (*In-Service Training*) materials and a draft of the planned 2022 *In-Service Supervisor Refresher Training* that was still under ¶641 review at the close of the fifth reporting period. The IMT also attended a site visit of Annual In-Service Supervisor Training during the week of April 11, 2022. Attendance records for these trainings were not submitted, therefore Secondary compliance was not achieved.

During the seventh reporting period, the City and the CPD submitted attendance records for the 2022 Annual In-Service Supervisors Training. The Annual In-Service Training Dashboard indicated over 96% of supervisors received the training.

The December 23, 2022, Tableau dashboard indicated approximately 98% of supervisors completed the required training.

The City and the CPD previously attained Preliminary compliance, which was maintained with S11-10-03 (*In-Service Training*). Additionally, the data submitted during the seventh reporting period was sufficient to demonstrate Secondary compliance.

Progress in the Eighth Reporting Period

S11-10-03 § (J) substantiates Preliminary compliance. The City and the CPD substantiated Secondary compliance for training year 2022 during the previous reporting period. A new training year begun during this reporting period. Secondary compliance continues and will be reassessed during IMR-9 and 10.

The City and the CPD maintained Preliminary and Secondary compliance during this reporting period. Looking forward, Full compliance requires the City and the CPD to have fully implemented and established a full process that aligns with ¶337 requirements.

Paragraph 337 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: 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	

Training: ¶338

338. Any training course offered as part of a pre-service promotional training, which is also a mandatory In-Service Training Program course, satisfies that mandatory In-Service Training Program requirement. Any other training course completed during a pre-service promotional training will count towards the total amount of training required by the In-Service Training Program requirement.

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*

The City and the CPD maintained Preliminary compliance with ¶338 during this reporting period.

To evaluate Preliminary compliance with ¶338, 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 evaluate Secondary compliance with this paragraph, we reviewed data to determine if the requirements of this paragraph are written into policy and reflect specified obligations for pre-service promotional training. Such data must include attendance records demonstrating that at least 95% of all eligible personnel received the training required by this paragraph.

Progress before the Eighth Reporting Period

In prior reporting periods, the IMT assessed compliance by reviewing the CPD’s finalized S11-10-02 (*Pre-Service Training*) and determined that it is consistent with the requirements of this paragraph. We noted that Secondary compliance may be achieved by submitting training documents via the CPD’s centralized electronic system that schedules and tracks all CPD trainings so that the IMT may determine if the CPD has taken sufficient steps to deliver training in accordance with this paragraph and others in the Consent Decree.

Progress in the Eighth Reporting Period

The IMT reviewed S11-10-02 to substantiate compliance during this reporting period.

S11-10 § II(C) satisfies Preliminary compliance requirements. No documents were submitted to substantiate Secondary compliance.

The City and the CPD maintained Preliminary compliance during this reporting period. Looking forward, Secondary compliance may be achieved when training has been conducted and the CPD has demonstrated that it achieved 95% attendance by eligible candidates. Full compliance may be achieved after the CPD has fully implemented and established a full process that aligns with the requirements of this paragraph.

Paragraph 338 Compliance Progress History

FIRST REPORTING PERIOD SEPTEMBER 1, 2019 – AUGUST 31, 2019 COMPLIANCE PROGRESS: Not Applicable	SECOND REPORTING PERIOD SEPTEMBER 1, 2019 – FEBRUARY 29, 2020 COMPLIANCE PROGRESS: Not Applicable	THIRD REPORTING PERIOD MARCH 1, 2020 – DECEMBER 31, 2020 COMPLIANCE PROGRESS: Status Update
FOURTH REPORTING PERIOD JANUARY 1, 2021 – JUNE 30, 2021 COMPLIANCE PROGRESS: Preliminary	FIFTH REPORTING PERIOD JULY 1, 2021 – DECEMBER 31, 2021 COMPLIANCE PROGRESS: 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	

Training: ¶339

339. Within 90 days of the Effective Date, CPD will require that all members who are active duty and available for assignment are provided with training on the requirements of this Agreement, together with its goals, implementation process, and timelines.

Compliance Progress

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

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

The City and the CPD did not achieve any level of compliance with the requirements of ¶339 during this reporting period.

To evaluate Preliminary compliance with ¶339, 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 evaluate Secondary compliance with this paragraph, we reviewed data to determine if the requirements of this paragraph are written into policy and reflect specified obligations. Specifically, the IMT needs to review a policy requiring CPD personnel, including new hires, to be trained on Consent Decree requirements, followed by data demonstrating that at least 95% of applicable personnel are trained on this policy, followed by data demonstrating CPD’s systematic adherence to the policy and training requirements of this paragraph.

Progress before the Eighth Reporting Period

During the previous reporting period, the IMT found that the City and the CPD did not attain Preliminary compliance with this paragraph, requiring ¶339 requirements to be written into policy. The City and the CPD did not submit any data to substantiate compliance but indicated that they intended to submit documents establishing Preliminary compliance and demonstrating Secondary compliance during the sixth reporting period. The City and the CPD did not submit any data to establish any level of compliance in the sixth or seventh reporting period.

Progress in the Eighth Reporting Period

During this reporting period, the City and the CPD submitted the Chicago Consent Decree eLearning Dashboard and Chicago Consent Decree eLearning Completion Data to substantiate compliance.

This submitted data would strongly support Secondary compliance, however nothing to establish Preliminary compliance was submitted. IMT reviewed Department Training Special Order S11-10 and In Service Training Special Order S11-10-03 for evidence of Preliminary compliance. Neither policy contains the requisite language to substantiate Preliminary compliance. Preliminary compliance is a prerequisite for Secondary compliance consideration.

The City and the CPD did not achieve any level of compliance during this reporting period. Looking forward, Preliminary compliance may be met when requirements of this paragraph are written into policy and reflect specified obligations. Secondary compliance requires documentation that at least 95% of eligible personnel are provided with training on the requirements of this paragraph. Full compliance may be achieved when the CPD has fully implemented and institutionalized a full process that aligns with ¶339 requirements.

Paragraph 339 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: Secondary	THIRD REPORTING PERIOD MARCH 1, 2020 – DECEMBER 31, 2020 COMPLIANCE PROGRESS: Secondary
FOURTH REPORTING PERIOD JANUARY 1, 2021 – JUNE 30, 2021 COMPLIANCE PROGRESS: Preliminary	FIFTH REPORTING PERIOD JULY 1, 2021 – DECEMBER 31, 2021 COMPLIANCE PROGRESS: None	SIXTH REPORTING PERIOD JANUARY 1, 2022 – JUNE 30, 2022 COMPLIANCE PROGRESS: None
SEVENTH REPORTING PERIOD JULY 1, 2022 – DECEMBER 31, 2022 COMPLIANCE PROGRESS: None	EIGHTH REPORTING PERIOD JANUARY 1, 2023 – JUNE 30, 2023 COMPLIANCE PROGRESS: None	

Training: ¶340

340. *In connection with issuing a policy or procedure pursuant to this Agreement, CPD will ensure that: a. all relevant CPD members review their responsibilities pursuant to the policy or procedure, including the requirements that each member is held accountable for their compliance and is required to report violations of policy; b. supervisors of all ranks are informed that they will be held accountable for identifying and responding to policy or procedure violations by members under their direct command; and c. CPD can document that each relevant CPD officer or other employee has received and reviewed the policy.*

Compliance Progress

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

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

The City and the CPD maintained Secondary compliance with the requirements of ¶340 during this reporting period.

To evaluate Preliminary compliance with ¶340, 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 evaluate Secondary compliance with this paragraph, we reviewed documentation to determine if they demonstrate that the requirements of this paragraph are written into policy and reflect specified obligations. Such data must reflect that at least 95% of all eligible personnel review the monthly policy updates.

Progress before the Eighth Reporting Period

During the previous reporting periods, the IMT assessed compliance and determined that the City and the CPD maintained Preliminary compliance with this paragraph. The City and the CPD did not submit any data but indicated that they intended to submit documents demonstrating Secondary compliance during the sixth reporting period. No such documents were submitted in the sixth reporting period.

In the seventh reporting period, the City and the CPD submitted Evidence of Monthly Directive Training 95% Compliance, including Directives In-Service Dashboard and Directives Rosters from January through July 2022, and Evidence of Monthly Directive Training 95% Compliance, including Directives In-Service Dashboard and Directives Roster from May through October.

The December 20, 2022, Tableau dashboard indicates that each month from May through October 2022, between 97-99% of students completed the policy training. The IMT determined that the City and the CPD achieved Secondary compliance.

Progress in the Eighth Reporting Period

The IMT reviewed Department Directives System General Order G01-03 to affirm Preliminary compliance. G01-03 continues to substantiate Preliminary compliance. The City and the CPD substantiated Secondary compliance for training year 2022 during the previous reporting period. A new training year begun during this reporting period. Secondary compliance continues and will be reassessed during IMR-9 and 10.

The City and the CPD achieved Secondary compliance during this reporting period. Looking forward, continued Secondary compliance requires documentation that at least 95% of eligible personnel review the monthly policy updates. Full compliance may be achieved when the CPD has fully implemented and institutionalized a full process that aligns with ¶340 requirements.

Paragraph 340 Compliance Progress History

<p>FIRST REPORTING PERIOD SEPTEMBER 1, 2019 – AUGUST 31, 2019 COMPLIANCE PROGRESS: None</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: Preliminary</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: 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: Secondary</p>	