

Appendix 7

Supervision

Compliance Assessments by Paragraph

¶1347	¶1355	¶1364	¶1372
¶1348	¶1356	¶1365	¶1373
¶1349	¶1357	¶1366	¶1374
¶1350	¶1359	¶1367	¶1375
¶1351	¶1360	¶1368	¶1376
¶1352	¶1361	¶1369	
¶1353	¶1362	¶1370	
¶1354	¶1363	¶1371	

Supervision: ¶347

347. CPD will require its supervisors, through policy and auditing, to consistently apply CPD policies and procedures from shift to shift, among all geographic areas of the city, and in all units of the Department.

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 ¶347 in the eighth reporting period.

To evaluate Preliminary compliance with ¶347, we reviewed the CPD’s relevant policies and records 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 sought to review the CPD’s corresponding training materials and plan for supervisor audits. We also sought to review data sources relevant to compliance with the requirements of ¶347 and considered available data that is necessary or helpful to identify, verify, and sustain compliance and reform efforts.

Progress before the Eighth Reporting Period

We assessed the requirements of ¶347 for the first time in the sixth reporting period. The City and the CPD previously finalized the *Supervisory Responsibilities* policy (G01-09), on May 10, 2021, which the IMT reviewed. This policy allowed the CPD to reach Preliminary compliance with ¶347 because it sets forth various duties and responsibilities of supervisors. Specifically, the policy directs supervisors to model appropriate conduct, including abiding by the law and CPD policy and displaying high standards of ethical behavior and integrity. Supervisors are expected to effectively supervise the members under their command to conduct their duties consistent with the established principles of procedural justice, sanctity of life, de-escalation, impartial policing, and community policing.

During the seventh reporting period, we conducted focus groups with officers and sergeants in the 6th District. We heard concerns about supervisors transitioning in and out of the 6th District, both at the sergeant and lieutenant levels. The consistent turnover of supervisors, whether actual or perceived, raises concerns to the IMT about whether members are receiving the level of supervision required by the Consent Decree. Members expressed keen interest in the opportunity to

build relationships with supervisors, receive feedback, and have consistency in supervision.

Progress in the Eighth Reporting Period

The IMT conducted a site visit in April 2023, during the eighth reporting period. In focus groups conducted with officers and sergeants in the 6th District, members expressed similar frustrations with resource and staffing issues as the IMT has heard in previous reporting periods. The 6th District continues to experience turnover of officers and supervisors. For example, during a May meeting with the City and the CPD, the IMT was told that the 6th District would be assigned ten new sergeants, but that others would be transferred to other districts, netting an increase of only four. The consistent turnover of supervisors continues to raise concerns about whether members are receiving the level of supervision required by the Consent Decree.

Members again expressed keen interest in the opportunity to build relationships with supervisors, receive feedback, and have consistency in supervision, as we have stated in previous reporting periods. General Order G01-09, *Supervisory Responsibilities*, requires that supervisors complete supervisory logs throughout their shift which contain information such as supervisory activities and interactions, contacts with field units, support activities, and corrective or disciplinary actions. The IMT had hoped that these logs would provide a better understanding of the effectiveness of patrol supervision. However, in the IMT's review, we found them to overwhelmingly be comprised solely of assignment and equipment information. In instances where calls for service were included, the supervisory logs rarely included information about the actions of the supervisors or officers. Additionally, these logs are not electronic so the City and CPD cannot use them to conduct meaningful evaluation of supervisory activities.

The City and the CPD maintained Preliminary compliance in the eighth reporting period but did not reach Secondary compliance. The IMT looks forward to reviewing documentation and conducting further focus groups and individual interviews with officers and supervisors to hear their direct insights. As we move further into determining additional levels of compliance, the City and the CPD will need to provide additional sources of data to show appropriate levels of supervision.

Paragraph 347 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	

Supervision: ¶348

348. *By January 1, 2020, CPD will review and, as necessary, revise its policies for supervision to ensure that such policies set out clear responsibilities for supervisors to comply with the requirements of this Agreement. CPD will inform all supervisors of their specific duties and responsibilities that are required by CPD policies, including this Agreement.*

Compliance Progress

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

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

In the eighth reporting period, the City and the CPD maintained Preliminary compliance with ¶348 but did not reach Secondary compliance.

To evaluate Preliminary compliance with ¶348, we reviewed the CPD’s relevant policies and records following the process described in the Consent Decree (¶¶626–41), which outlines applicable consultation, resolution, workout, and public comment periods. For Secondary compliance with ¶348, we reviewed the CPD’s corresponding training materials and whether the CPD has developed a system for tracking supervisory responsibilities in policies and trainings across all areas of the Consent Decree.

Progress before the Eighth Reporting Period

In previous reporting periods, we reviewed iterations of the CPD’s *Supervisory Responsibilities* (G01-09) policy, corresponding training documents, and other documents related to the requirements of this paragraph, such as training tracking sheets and the *Supervisory Policy Matrix*. The City and the CPD reached Preliminary compliance in the second reporting period. The City and the CPD maintained Preliminary compliance by carefully revising, improving, and finalizing *Supervisory Responsibilities* policy (G01-09) and finalizing the curriculum for the *2022 In-Service Supervisors Training*. Additionally, the IMT was able to review the CPD’s *Performance Evaluation System Pilot Program (PES)* policy (D21-09), and the *Officer Support System (OSS)* policy (D20-04).

We explained in previous reports that, for the CPD to reach subsequent levels of compliance, we would look to see that the CPD has a system for tracking supervisory responsibilities and trainings across all areas of the Consent Decree, and we had hoped to review supervisory logs that capture supervisor’s actions that demonstrate compliance with the policies that outline expectations and responsibilities of supervisors.

In the sixth reporting period, members of the IMT observed the *2022 In-Service Supervisors Training*, both in person and virtually. The training instructed supervisors on the soft skills necessary to have difficult but crucial conversations with members that they supervise and the value of practicing internal procedural justice as a model for practicing procedural justice in the community. The training also included a “Supervisors Toolbox” to provide a brief overview of the available CPD wellness programs, resources, and supports. Additionally, the IMT was able to conduct focus groups with officers, supervisors, and command staff within the 6th District during a site visit in the sixth reporting period. These conversations provided additional insight into the realities of supervision and daily operations in the department.

Further, the IMT reviewed the *Performance Evaluation System (PES) Pilot Training* and submitted a no-objection notice in April 2022. The City and the CPD also submitted a revised and updated the *Officer Support System (OSS) Pilot Training* for IMT review in May 2022. The Performance Evaluation System and Officer Support System were anticipated to be launched in the 6th District during the seventh reporting period.

During the seventh reporting period, we conducted focus groups with officers and sergeants in the 6th District. We heard concerns about supervisors transitioning in and out of the 6th District, both at the sergeant and lieutenant levels. The consistent turnover of supervisors, whether actual or perceived, raises concerns to the IMT about whether members are receiving the level of supervision required by the Consent Decree. Members expressed keen interest in the opportunity to build relationships with supervisors, receive feedback, and have consistency in supervision.

Additionally, on July 21, 2022, the City and CPD produced *Performance Evaluation System Training*. The IMT submitted a no-objection letter on August 4, 2022. The IMT believes that the trainings were well-designed as they included adult learning methods and covered the required material. We observed the human resources portion of this training on November 4, 2022. It was well-received by the members, and the instructors effectively engaged with the participants.

Progress in the Eighth Reporting Period

The IMT conducted a site visit in April 2023, during the eighth reporting period. In focus groups conducted with officers and sergeants in the 6th District, members expressed similar frustrations with resource and staffing issues as the IMT has heard in previous reporting periods. The 6th District continues to experience turnover of officers and supervisors. For example, during a May meeting with the City and the CPD, the IMT was told that the 6th District would be assigned ten new sergeants, but that others would be transferred to other districts, netting an in-

crease of only four. The consistent turnover of supervisors continues to raise concerns whether members are receiving the level of supervision required by the Consent Decree.

Members again expressed keen interest in the opportunity to build relationships with supervisors, receive feedback, and have consistency in supervision. G01-09, *Supervisory Responsibilities*, requires that supervisors complete supervisory logs throughout their shift which contain information such as supervisory activities and interactions, contacts with field units, support activities, and corrective or disciplinary actions. The IMT had hoped that these logs would provide a better understanding of the effectiveness of patrol supervision. However, in the IMT's review, we found them to overwhelmingly be comprised solely of assignment and equipment information. In instances where calls for service were included, the logs rarely included information about the actions of the supervisors or officers. Additionally, these logs are not electronic so the City and the CPD cannot use them to conduct meaningful evaluation of supervisory activities. As we move further into determining compliance, the City and the CPD will need to provide additional sources of data to show appropriate levels of supervision and supervisory adherence to policy as required by ¶1348.

The City and the CPD maintained Preliminary compliance with ¶1348 in the eighth reporting period but did not reach Secondary compliance. The IMT looks forward to reviewing documentation and conducting further focus groups and individual interviews and focus groups with officers and supervisors to hear their direct insights. Additional levels of compliance will also rely upon policies and training for supervision pilot programs being adopted department wide.

Paragraph 348 Compliance Progress History

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

Supervision: ¶349

349. CPD will require that all supervisors perform their specific duties and responsibilities in compliance with CPD policy, including the terms of this Agreement.

Compliance Progress

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

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

The City and the CPD maintained Preliminary compliance with ¶349 in the eighth reporting period.

To evaluate Preliminary compliance with ¶349, we reviewed the CPD’s relevant policies and records following the process described in the Consent Decree (¶¶626–41), which outlines applicable consultation, resolution, workout, and public comment periods. For Secondary compliance with ¶349, we sought to review, among other things, the CPD’s corresponding training materials. We also sought to review data sources relevant to compliance with the requirements of ¶349 and considered available data that is necessary or helpful to identify, verify, and sustain compliance and reform efforts.

Progress before the Eighth Reporting Period

We assessed the requirements of ¶349 for the first time in the sixth reporting period. The City and the CPD previously finalized the *Supervisory Responsibilities* policy (G01-09), on May 10, 2021, which the IMT reviewed. This policy allowed the CPD to reach Preliminary compliance with ¶347 because it sets forth various duties and responsibilities of supervisors. Specifically, the policy directs supervisors to model appropriate conduct, including abiding by the law and CPD policy and displaying high standards of ethical behavior and integrity. Supervisors are expected to effectively supervise the members under their command to conduct their duties consistent with the established principles of procedural justice, sanctity of life, de-escalation, impartial policing, and community policing.

During the seventh reporting period, we conducted focus groups with officer and sergeants in the 6th District. We heard concerns about supervisors transitioning in and out of the 6th District, both at the sergeant and lieutenant levels. The consistent turnover of supervisors, whether actual or perceived, raises concerns to the IMT about whether members are receiving the level of supervision required by the Consent Decree. Members expressed keen interest in the opportunity to build relationships with supervisors, receive feedback, and have consistency in supervision.

Additionally, on July 21, 2022, the City and CPD produced *Performance Evaluation System Training*. The IMT submitted a no-objection notice on August 4, 2022. The IMT believes that the trainings were well-designed as they included adult learning methods and covered the required material. We observed the human resources portion of this training on November 4, 2022. It was well-received by the members and the instructors effectively engaged with the participants.

Progress in the Eighth Reporting Period

The IMT conducted a site visit in April 2023, during the eighth reporting period. In focus groups conducted with officers and sergeants in the 6th District, members expressed similar frustrations with resource and staffing issues as the IMT has heard in previous reporting periods. The 6th District continues to experience turnover of officers and supervisors. For example, during a May meeting with the City and the CPD, the IMT was told that the 6th District would be assigned ten new sergeants, but that others would be transferred to other districts, netting an increase of only four. The consistent turnover of supervisors continues to raise concerns about whether members are receiving the level of supervision required by the Consent Decree.

Supervisors also described resource issues that affected their ability to perform their duties. Specifically, they highlighted a lack of available patrol vehicles during shift change creating calls for service backlogs. In some cases, supervisors shared that they would respond to calls for service to address these backlogs, decreasing the amount of time on shift to conduct their regular supervisory duties.

Members again expressed keen interest in the opportunity to build relationships with supervisors, receive feedback, and have consistency in supervision. G01-09, *Supervisory Responsibilities*, requires that supervisors complete supervisory logs throughout their shift which contain information such as supervisory activities and interactions, contacts with field units, support activities, and corrective or disciplinary actions. The IMT had hoped that these logs would provide a better understanding of the effectiveness of patrol supervision. However, in the IMT's review, we found them to overwhelmingly be comprised solely of assignment and equipment information. In instances where calls for service were included, the supervisory logs rarely included information about the actions of the supervisors or officers. Additionally, these logs are not electronic so the City and the CPD cannot use them to conduct meaningful evaluation of supervisory activities.

The City and the CPD maintained Preliminary compliance with ¶1349 in the eighth reporting period but did not reach Secondary compliance. The IMT looks forward to reviewing documentation and conducting further focus groups and individual interviews with officers and supervisors to hear their direct insights. As we move

further into assessing additional levels of compliance, the City and the CPD will need to provide additional sources of data to show appropriate levels of supervision. In the ninth reporting period, the IMT will closely observe the expansion of the Officer Support System and Performance Evaluation System pilot programs. The IMT also looks forward to conducting further focus groups and individual interviews in the ninth reporting period.

Paragraph 349 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	

Supervision: ¶350

350. CPD will regularly inform its members, including supervisors, of available training, professional development opportunities, and employee assistance resources.

Compliance Progress

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

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

In the eighth reporting period, the City and the CPD maintained Preliminary compliance with ¶350 but did not reach Secondary compliance.

To assess Preliminary compliance with ¶350, we reviewed the CPD’s relevant policies and records following the process described in the Consent Decree (¶¶626–41), which outlines applicable consultation, resolution, workout, and public comment periods.

For Secondary compliance, we expect the CPD to develop an effective channel for informing members of training and professional development opportunities, as well as available employee assistance resources, such as the Professional Counseling Division services. To evaluate Secondary compliance with ¶350, we considered whether (1) the CPD developed an effective channel for communicating these opportunities to members and (2) the CPD demonstrated that the notification system is utilized consistently in line with the various directives that touch on notifying members of training, professional development opportunities, and employee assistance resources.

Progress before the Eighth Reporting Period

The IMT reviewed ¶350 for the first time during the fourth reporting period. In the fourth reporting period, the City and the CPD reached Preliminary compliance with this paragraph by submitting several documents regarding ¶350, including the CPD’s 2020 Annual Report, an updated draft of S11-10-01, *Training Notification and Attendance Responsibilities*, as well as information about the Performance Evaluations System Pilot Program. We noted that at least 95% of CPD officers received 32 hours of in-service training, which evidenced a robust communication and notification system that ensured members were aware of their training requirements and additional opportunities for training.

The City and the CPD maintained Preliminary compliance with ¶350 in the fifth reporting period by finalizing the curriculum for the *2022 In-Service Supervisors*

Training. Additionally, the IMT was able to review the CPD's *Performance Evaluation System Pilot Program (PES)* (D21-09), the *Officer Support System (OSS)* (D20-04), and the *Department Training* (S11-10) policies.

We explained that, in future reporting periods, we hoped to see that notification systems are employed in a manner consistent with the various directives that touch on notifying members of training, professional development opportunities, and employee assistance resources. More specifically, we asked to review data demonstrating how the notification systems work and their effectiveness in disseminating information.

In April 2022, during the sixth reporting period, the IMT conducted a site visit, during which we were able to speak with groups of officers, supervisors, and command staff within the 6th District. Further, members of the IMT observed the *2022 In-Service Supervisors Training*, both in person and virtually. The training instructed supervisors on the soft skills necessary to have difficult but crucial conversations with members that they supervise and the value of practicing internal procedural justice as a model for practicing procedural justice in the community. The training also included a "Supervisors Toolbox" to provide a brief overview of the available CPD wellness programs, resources, and supports.

During the seventh reporting period, members of the IMT observed the *Officer Support System Training*. This training was well-executed, explaining the purpose of the system, the model on which it was developed, and how supervisors should utilize it. Trainees were required to participate in a role-playing exercise where they were able to practice various techniques for the nuanced conversations that they may need to engage in. Further, the training outline available resources and training that supervisors can suggest to officers in need.

Progress in the Eighth Reporting Period

The IMT conducted a site visit in April 2023, during the eighth reporting period. We observed a roll call in the 6th District where supervisors shared information about an upcoming training opportunity. Additionally, the Performance Evaluation System Pilot Program was launched this reporting period in the 6th District. The program requires supervisors to complete goal-setting exercises with their supervisees and share resources and training related to their goals. During focus groups with sergeants, some shared that they felt they were prepared and aware of relevant information for their supervisees and others expressed that they were not. This lack of standardization in knowledge of resources shows a potential shortfall in CPD's ability to conduct notifications as required by ¶1350.

Also, during the eighth reporting period, the City and the CPD hired a Public Relations Coordinator and are working to develop a strategic communications plan. In

a meeting with the IMT, the City and the CPD also shared plans to develop an internal monthly newsletter to communicate department updates. A section within the proposed newsletter will include employee resources. The IMT are very supportive of these efforts and believe they will aid the City and the CPD in gaining further compliance with ¶350.

The City and the CPD maintained Preliminary compliance with ¶350 in the eighth reporting period. The IMT believes that the City and the CPD are demonstrating progress toward Secondary compliance. We look forward to observing the implementation of the strategic communications plan. We also hope to see that other that notification systems are employed in a manner consistent with the various directives that touch on notifying members of training, professional development opportunities, and employee assistance resources. We also look forward to further focus groups with department members to hear their direct insights in the ninth reporting period.

Paragraph 350 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	

Supervision: ¶351

351. Supervisors of all ranks will effectively supervise the members under their command to ensure accountability across the Department.

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 ¶351 in the eighth reporting period.

To evaluate Preliminary compliance with ¶351, we reviewed the CPD’s relevant policies and records following the process described in the Consent Decree (¶¶626–41), which outlines applicable consultation, resolution, workout, and public comment periods. For Secondary compliance, we sought to review, among other things, the CPD’s corresponding training materials. The CPD must also develop a plan for Secondary compliance to ensure supervisors of all ranks will effectively supervise the members under their command to ensure accountability across the CPD, including written guidance, training, tracking, and accountability.

Progress before the Eighth Reporting Period

We assessed the requirements of ¶351 for the first time in the sixth reporting period. Prior to the sixth reporting period, the City and the CPD finalized the *Supervisory Responsibilities* policy (G01-09), on May 10, 2021, which the IMT reviewed. This policy allowed the CPD to reach Preliminary compliance because it sets forth various duties and responsibilities of supervisors. The policy directs supervisors to model appropriate conduct, including abiding by the law and CPD policy and displaying high standards of ethical behavior and integrity. Supervisors are expected to effectively supervise the members under their command to conduct their duties consistent with the established principles of procedural justice, sanctity of life, de-escalation, impartial policing, and community policing.

During the seventh reporting period, we conducted focus groups with officer and sergeants in the 6th District. We heard concerns about supervisors transitioning in and out of the 6th District, both at the sergeant and lieutenant levels. The consistent turnover of supervisors, whether actual or perceived, raises concerns to the IMT about whether members are receiving the level of supervision required by the Consent Decree. Members expressed keen interest in the opportunity to build relationships with supervisors, receive feedback, and have consistency in supervision.

Additionally, on July 21, 2022, the City and CPD produced *Performance Evaluation System Training*. The IMT submitted a no-objection letter on August 4, 2022. The IMT believes that the trainings were well-designed as they included adult learning methods and covered the required material. We observed the human resources portion of this training on November 4, 2022. It was well-received by the members and the instructors effectively engaged with the participants.

Also, during the seventh reporting period, members of the IMT observed the *Officer Support System Training*. This training was well-executed, explaining the purpose of the system, the model on which it was developed, and how supervisors should utilize it. Trainees were required to participate in a role-playing exercise where they were able to practice various techniques for the nuanced conversations that they may need to engage in. Further, the training outline available resources and training that supervisors can suggest to officers in need.

Progress in the Eighth Reporting Period

The IMT conducted a site visit in April 2023, during the eighth reporting period. In focus groups conducted with officers and sergeants in the 6th District, members expressed similar frustrations with resource and staffing issues as the IMT has heard in previous reporting periods. The 6th District continues to experience turnover of officers and supervisors. For example, during a May meeting with the City and the CPD, the IMT was told that the 6th District would be assigned ten new sergeants, but that others would be transferred to other districts, netting an increase of only four. The consistent turnover of supervisors continues to raise concerns about whether members are receiving the level of supervision required by the Consent Decree.

Supervisors also described resource issues that affected their ability to perform their duties. Specifically, they highlighted a lack of available patrol vehicles during shift change creating calls for service backlogs. In some cases, supervisors shared that they would respond to calls for service to address these backlogs, decreasing the amount of time on shift to conduct their regular supervisory duties. While disheartening, the IMT views supervisors' recognition of these challenges as an indication that supervisors are aware of and focused on their duties. Their innovation shows that they care about their jobs and want to perform well.

Members again expressed keen interest in the opportunity to build relationships with supervisors, receive feedback, and have consistency in supervision. General Order, G01-09, *Supervisory Responsibilities*, requires that supervisors complete supervisory logs throughout their shift which contain information such as supervisory activities and interactions, contacts with field units, support activities, and corrective or disciplinary actions. The IMT had hoped that these logs would provide a better understanding of the effectiveness of patrol supervision. However, in

the IMT's review, we found them to overwhelmingly be comprised solely of assignment and equipment information. In instances where calls for service were included, the logs rarely included information about the actions of the supervisors or officers. Additionally, these logs are not electronic so the City and the CPD cannot use them to conduct meaningful evaluation of supervisory activities.

In the eighth reporting period, the Officer Support System Pilot Program was also launched in the 6th District. This early intervention system utilizes an algorithm to identify officers at risk for various adverse behaviors. Supervisors are tasked with sharing this information, called a "work item," with officers and developing a plan to address them on a voluntary basis. During the IMT site visit, sergeants shared that, despite training on having difficult conversations with supervisees, the process of discussing a work item with an officer was still very challenging. They specifically expressed difficulty articulating information about how the Officer Support System was developed. Because the system is designed to identify officers at the highest risk, only about 2-5% of officers will be issued a work item at a time. This means that, while this supervisory responsibility is integral to the accountability of department members, supervisors may conduct this duty irregularly. The gap between training and performing this task is obviously affecting the supervisors' effectiveness and, therefore, the success of the pilot program. It is imperative that the City and the CPD solicit feedback from supervisors while the program is still in pilot phase to better understand these issues.

These efforts have allowed the City and the CPD to maintain Preliminary compliance with §351 in the eighth reporting period. However, they are not sufficient to reach Secondary compliance. In the next reporting period, the IMT will closely observe the Officer Support System and Performance Evaluation System pilot programs. The IMT also looks forward to reviewing documentation and conducting further focus groups and individual interviews with officers and supervisors to hear their direct insights in the ninth reporting period.

Paragraph 351 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	

Supervision: ¶352

352. *Effective supervision requires that all supervisors, at a minimum, will: a. establish and enforce the expectation that members under their command perform their duties in a manner that complies with federal and state law, CPD policy, this Agreement, and that is consistent with the principles of procedural justice, de-escalation, impartial policing, and community policing; b. provide leadership, guidance, mentoring, direction, and support to members under their command to promote improved performance and professional development; and c. lead efforts to ensure that members under their command are working actively to engage the community and promote public trust and safety.*

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 in the eighth reporting period but did not reach Secondary compliance with ¶352.

To determine Preliminary compliance with ¶352, we reviewed the CPD’s relevant policies and records 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 sought to review, among other things, the CPD’s corresponding training materials, and we sought to determine whether the CPD has a plan to track, measure, and show compliance with the requirements of this paragraph. In particular, the IMT focused on the Performance Evaluation System, which identifies many of the requirements in ¶352, including building upon the principles of community policing, de-escalation, procedural justice, and impartial policing.

Progress before the Eighth Reporting Period

We assessed the City’s and the CPD’s compliance with ¶352 for the first time in the fifth reporting period. The City and the CPD reached Preliminary compliance with ¶352 by finalizing the *Supervisory Responsibilities* policy (G01-09). This policy sets forth various duties and responsibilities of supervisors. Supervisors are expected to effectively supervise the members under their command to conduct their duties consistent with the established principles of procedural justice, sanctity of life, de-escalation, impartial policing, and community policing.

During the sixth reporting period, the IMT was able to conduct focus groups with officer, supervisors, and command staff within the 6th District during an in-person site visit. These conversations provided additional insight into the realities of supervision and daily operations in the CPD. While officers we spoke with during these focus groups expressed that supervisors were supportive, they also shared that reduced staffing affected supervisors' ability to engage in proactive coaching on a regular basis. Supervisory mentorship is invaluable to an officer's performance and professional development and is a core component of ¶1352.

In April 2022, members of the IMT observed the *2022 In-Service Supervisors Training*, both in person and virtually. The training instructed supervisors on the soft skills necessary to have difficult but crucial conversations with members that they supervise and the value of practicing internal procedural justice as a model for practicing procedural justice in the community. The training also included a "Supervisors Toolbox" to provide a brief overview of the available CPD wellness programs, resources, and supports.

Also, during the sixth reporting period, the IMT reviewed the Performance Evaluation System (PES) Pilot Training and submitted a no-objection notice in April 2022. The City and the CPD also submitted a revised and updated the Officer Support System (OSS) Pilot Training for IMT review in May 2022. On May 19, 2022, the City and the CPD produced the *OSS Evaluation Plan*, which outlines short, medium, and long-term goals and objectives for the Officer Support System. These steps have allowed the City and the CPD to maintain Preliminary compliance with ¶1352.

During the seventh reporting period, on July 21, 2022, the City and CPD produced *Performance Evaluation System Training*. The IMT submitted a no-objection letter on August 4, 2022. The IMT believes that the trainings were well-designed as they included adult learning methods and covered the required material. We observed the human resources portion of this training on November 4, 2022. It was well-received by the members and the instructors effectively engaged with the participants. IMT members noted that the CPD curriculum contained the components required by the Consent Decree and, in some areas, exceeded our expectations.

On December 7, 2022, also during the seventh reporting period, members of the IMT observed the *Officer Support System Training*. This training was well-executed, explaining the purpose of the system, the model on which it was developed, and how supervisors should utilize it. Trainees were required to participate in a role-playing exercise where they were able to practice various techniques for the nuanced conversations that they may need to engage in. Further, the training outlined available resources and training that supervisors can suggest to officers in need.

Progress in the Eighth Reporting Period

The IMT conducted a site visit in April 2023, during the eighth reporting period. We observed a roll call in the 6th District where supervisors shared information about an upcoming training opportunity. Additionally, the Performance Evaluation System Pilot Program was launched this reporting period in the 6th District. The program requires supervisors to complete goal-setting exercises with their supervisees and share resources and training related to their goals. During focus groups with sergeants, some shared that they felt they were prepared and aware of relevant information for their supervisees and others expressed that they were not. This lack of standardization in knowledge of resources shows a potential shortfall in CPD's ability to perform duties as required by ¶1352(b).

Additionally, the Performance Evaluation System requires that supervisors input progress notes about each officer they supervise on, at minimum, a monthly basis. During the IMT site visit, the IMT learned that tracking of supervisory inputs into the system was being completed manually. We encourage the City and the CPD to explore automated options to ensure that supervisors are meeting the requirements of the program.

Further, in site visit meetings with officers in the 6th District, members shared that enforcement activities, such as arrests and seizures, were rewarded and praised publicly more often than community interactions which can increase public trust. This can send the message that community engagement is less important which is inconsistent with the language of ¶1352(c).

In the eighth reporting period, the City and CPD maintained Preliminary compliance with ¶1352 but did not achieve Secondary compliance. In future reporting periods, the IMT will evaluate whether the CPD has a plan to track, measure, and show compliance with the requirements of this paragraph. In particular, the IMT will be focused on the Performance Evaluation System, which identifies many of the requirements in ¶1352, including building upon the principles of community policing, de-escalation, procedural justice, and impartial policing. The IMT will also focus on assessing unity of command and span of control and monitoring whether supervisors have the time and appropriate span of control to properly meet the requirements of ¶1352. The IMT also looks forward to the updated evaluation plans for the Officer Support System and Performance Evaluation System pilot programs.

Paragraph 352 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

Supervision: ¶353

353. *Additionally, effective supervision requires that immediate supervisors will, for members under their direct command: a. respond to, review, and investigate uses of force and other incidents and conduct as required by CPD policy and this Agreement; b. monitor, manage, and coordinate incident response; c. confirm the correctness, sufficiency, and completeness of written reports submitted for review and approval; d. identify any adverse behavior or misconduct and ensure that it is adequately addressed through corrective action, training, or referral for discipline; e. respond appropriately to each complaint of misconduct received, in accordance with CPD’s complaint and disciplinary policies; f. review and act upon information regarding at-risk behavior by the members under their direct command, as required by the Data Collection, Analysis, and Management section of this Agreement; g. advise members under their direct command of available training, professional development opportunities, and employee assistance resources; h. conduct annual performance evaluations and meet with members under their direct command on an ongoing basis as necessary to provide guidance, mentoring, direction, and support to the members regarding their performance and to identify areas for improvement; and i. document the performance of their supervisory duties as required by CPD policy and this Agreement using the appropriate records management system, the Performance Recognition System (“PRS”), and/or the EIS.*

Compliance Progress

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

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

In the eighth reporting period, the City and the CPD maintained Preliminary compliance with ¶353 but did not reach Secondary compliance.

To assess Preliminary compliance with ¶353, we reviewed the CPD’s relevant policies and records following the process described in the Consent Decree (¶¶626–41), which outlines applicable consultation, resolution, workout, and public comment periods. The CPD’s policies should be realistic and explicit to effectively address supervisory responsibilities across its broad spectrum of administration and operations.

To determine Secondary compliance with ¶353, we reviewed the CPD’s training development, implementation, and evaluation (¶286); reviewed data sources relevant to the requirements of the paragraph; and considered available data that is necessary or helpful to identify, verify, and sustain compliance and reform efforts. We also considered whether the relevant policies are effective in addressing the requirements of ¶353, that supervisors are trained effectively to operate in compliance with policies, and that there are sufficient supervisors to perform the functions. Additionally, we determined whether the CPD has demonstrated a plan to track, measure, and show compliance with this paragraph.

Progress before the Eighth Reporting Period

We provided a status update for ¶353 in the third reporting period and assessed the City and the CPD’s compliance with ¶353 for the first time in the fourth reporting period. The City and the CPD reached Preliminary compliance in the fourth reporting period with the implementation of the *Supervisory Responsibilities* policy (G01-09). During the fifth reporting period, the IMT continued to monitor the CPD’s efforts to conduct in-service training, which supervisors are required to attend. The CPD submitted a *2022 In-Service Training Plan* that includes an *In-Service Supervisors Training* curriculum. We explained that, in future reporting periods, we hoped to see the CPD to acquire and implement technology solutions to help record, collect, and analyze data regarding supervisory responsibilities to achieve further levels of compliance.

In April 2022, members of the IMT observed the 2022 In-Service Supervisors Training, both in person and virtually. The training consisted of topics related to supervisory duties and managerial and leadership skills. In addition, supervisors are provided instructions on the methods and skills to improve *Tactical Response Reports* (TRRs) to correct a variety of errors and with an emphasis on improved report writing. In addition, the training includes developing soft skills necessary to have difficult but crucial conversations with members they supervise and the value of practicing internal procedural justice as a model for procedural justice in the community.

Further, the IMT reviewed the Performance Evaluation System (PES) Pilot Training and submitted a no-objection notice in April 2022. This training will help to support ¶353 by aiding supervisors in recognizing and documenting the job performance of department members under their command, such as exceptional job performance or adverse behavior that can be improved by non-disciplinary options. The City and the CPD also submitted a revised and updated the Officer Support System (OSS) Pilot Training for IMT review in May 2022. This training will help to support ¶353 by assisting supervisors in proactively supporting sworn members of the CPD and to support the well-being of members in a non-disciplinary manner.

The Performance Evaluation System and Officer Support System were projected to be launched in the 6th District during the seventh reporting period.

During the seventh reporting period, on July 21, 2022, the City and CPD produced *Performance Evaluation System Training*. The IMT submitted a no-objection letter on August 4, 2022. The IMT believes that the trainings were well-designed as they included adult learning methods and covered the required material. We observed the human resources portion of this training on November 4, 2022. It was well-received by the members and the instructors effectively engaged with the participants. IMT members noted that the CPD curriculum contained the components required by the Consent Decree and, in some areas, exceeded our expectations.

On December 7, 2022, also during the seventh reporting period, members of the IMT observed the *Officer Support System Training*. This training was well-executed, explaining the purpose of the system, the model on which it was developed, and how supervisors should utilize it. Trainees were required to participate in a role-playing exercise where they were able to practice various techniques for the nuanced conversations that they may need to engage in. Further, the training outlined available resources and training that supervisors can suggest to officers in need.

Progress in the Eighth Reporting Period

The IMT conducted a site visit in April 2023, during the eighth reporting period. In focus groups conducted with officers and sergeants in the 6th District, members expressed similar frustrations with resource and staffing issues as the IMT has heard in previous reporting periods. The 6th District continues to experience turnover of officers and supervisors. For example, during a May meeting with the City and the CPD, the IMT was told that the 6th District would be assigned ten new sergeants, but that others would be transferred to other districts, netting an increase of only four. The consistent turnover of supervisors continues to raise concerns about whether members are receiving the level of supervision required by the Consent Decree.

Supervisors also described resource issues that affected their ability to perform their duties. Specifically, they highlighted a lack of available patrol vehicles during shift change creating calls for service backlogs. In some cases, supervisors shared that they would respond to calls for service to address these backlogs, decreasing the amount of time on shift to conduct their regular supervisory duties. While disheartening, the IMT views supervisors' recognition of these challenges as an indication that supervisors are aware of and focused on their duties. Their innovation shows that they care about their jobs and want to perform well.

Members again expressed keen interest in the opportunity to build relationships with supervisors, receive feedback, and have consistency in supervision. General

Order, G01-09, *Supervisory Responsibilities*, requires that supervisors complete supervisory logs throughout their shift which contain information such as supervisory activities and interactions, contacts with field units, support activities, and corrective or disciplinary actions. The IMT had hoped that these logs would provide a better understanding of the effectiveness of patrol supervision. However, in the IMT's review, we found them to overwhelmingly be comprised solely of assignment and equipment information. In instances where calls for service were included, the logs rarely included information about the actions of the supervisors or officers. For example, the log may indicate that a supervisor responded to a use of force but does not provide understanding of further actions taken pertaining to ¶1353(a), (d), and (i). Additionally, these logs are not electronic so the City and the CPD cannot use them to conduct meaningful evaluation of supervisory activities.

In the eighth reporting period, the Officer Support System Pilot Program was launched in the 6th District. This early intervention system utilizes an algorithm to identify officers at risk for various adverse behaviors. Supervisors are tasked with sharing this information, called a "work item," with officers and developing a plan to address them, on a voluntary basis as required by ¶1353(f). During the IMT site visit, sergeants shared that, despite training on having difficult conversations with supervisees, the process of discussing a work item with an officer was still very challenging. They specifically expressed difficulty articulating information about how the Officer Support System was developed. Because the system is designed to identify officers at the highest risk, only about 2–5% of officers will be issued a work item at a time. This means that, while this supervisory responsibility is integral to the accountability of department members, supervisors may conduct this duty irregularly. The gap between training and performing this task is obviously affecting the supervisors' effectiveness and, therefore, the success of the pilot program. It is imperative that the City and the CPD solicit feedback from supervisors while the program is still in pilot phase to better understand these issues.

We observed a roll call in the 6th District, during this reporting period, where supervisors shared information about an upcoming training opportunity. Additionally, the Performance Evaluation System Pilot Program was launched this reporting period in the 6th District. The program requires supervisors to complete goal-setting exercises with their supervisees and share resources and training related to their goals. During focus groups with sergeants, some shared that they felt they were prepared and aware of relevant information for their supervisees and others expressed that they were not. This lack of standardization in knowledge of resources shows a potential shortfall in CPD's ability to perform duties as required by ¶1353(g).

The Performance Evaluation System program also requires that supervisors input progress notes about each officer they supervise on, at minimum, a monthly basis. During the IMT site visit, the IMT learned that tracking of supervisory inputs into

the system was being completed manually. We encourage the City and the CPD to explore automated options to ensure that supervisors are meeting the requirements of the ¶353(h) and (i).

The City and the CPD maintained Preliminary compliance with ¶353 in the eighth reporting period but did not reach Secondary compliance. The IMT continues to encourage the CPD to acquire and implement technology solutions to help record, collect, and analyze data regarding supervisory responsibilities to achieve Secondary compliance. With a great deal of focus being placed on the pilot district (the 6th District), the IMT will also focus on assessing unity of command and span of control, and monitoring whether supervisors have the time and appropriate span of control to properly meet the requirements of ¶353. The IMT will continue to observe the rollout of the Officer Support System and Performance Evaluation System pilot programs and review supervisory participation and entries.

Paragraph 353 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:
SEVENTH REPORTING PERIOD JULY 1, 2022 – DECEMBER 31, 2022 COMPLIANCE PROGRESS: Preliminary	EIGHTH REPORTING PERIOD JANUARY 1, 2023 – JUNE 30, 2023 COMPLIANCE PROGRESS: Preliminary	

Supervision: ¶354

354. During their tour of duty, immediate supervisors in the Bureau of Patrol will spend time interacting with, observing, and overseeing the members under their direct command, including time in the field, consistent with their duty assignment.

Compliance Progress

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

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

In the eighth reporting period, the City and the CPD maintained Preliminary compliance with ¶354 but did not reach Secondary compliance.

For Preliminary compliance with ¶354, we reviewed the CPD’s relevant policies and records following the process described in the Consent Decree (¶¶626–41), which outlines applicable consultation, resolution, workout, and public comment periods.

To evaluate Secondary compliance, the IMT reviewed data sources relevant to compliance with the requirements of ¶354 and considered available data that is necessary or helpful to identify, verify, and sustain compliance and reform efforts, including written documentation and interviews with supervisors and officers under their command. The IMT also sought to review records that are sufficient to show that the CPD has qualified personnel fulfilling the responsibilities required by ¶354. We also considered whether the CPD has allocated sufficient resources to create, staff, fill, and maintain positions with qualified personnel to fulfill the requirements of ¶354 and the Consent Decree.

Progress before the Eighth Reporting Period

We provided a status update for ¶354 in the third reporting period and assessed the City and the CPD’s compliance with ¶354 for the first time in the fourth reporting period. The City and the CPD reached Preliminary compliance in the fourth reporting period by finalizing the *Supervisory Responsibilities* policy (G01-09). In the fifth reporting period, the City and the CPD maintained Preliminary compliance with ¶354 by issuing G01-09. The CPD also developed and submitted a *2022 In-Service Supervisors Training* plan and curriculum and a revised D20-02, *Unity of Command and Span of Control Schedule – Pilot Program* policy. We noted, in future reporting periods, that we hoped to observe supervisory trainings for supervisors and review logs kept relating to the requirements of this paragraph.

During the sixth reporting period, the IMT was able to conduct focus groups with officers, supervisors, and command staff within the 6th District during an in-person site visit. These conversations provided additional insight into the realities of supervision and daily operations in the department. While officers we spoke with during these focus groups expressed that supervisors were supportive, they shared that high call volumes and low staffing are preventing sergeants from being able to develop and engage with the officers they supervise on a regular basis.

During the seventh reporting period, we conducted more focus groups with officer and sergeants in the 6th District. We heard concerns about supervisors transitioning in and out of the 6th District, both at the sergeant and lieutenant levels. The consistent turnover of supervisors, whether actual or perceived, raises concerns to the IMT about whether members are receiving the level of supervision required by the Consent Decree. Members expressed keen interest in the opportunity to build relationships with supervisors, receive feedback, and have consistency in supervision.

Progress in the Eighth Reporting Period

The IMT conducted a site visit in April 2023. In focus groups conducted with officers and sergeants in the 6th District, members expressed similar frustrations with resource and staffing issues as the IMT has heard in previous reporting periods. The 6th District continues to experience turnover of officers and supervisors. For example, during a May meeting with the City and the CPD, the IMT was told that the 6th District would be assigned ten new sergeants, but that others would be transferred to other districts, netting an increase of only four. The consistent turnover of supervisors continues to raise concerns about whether members are receiving the level of supervision required by the Consent Decree.

Supervisors also described resource issues that affected their ability to perform their duties. Specifically, they highlighted a lack of available patrol vehicles during shift change creating calls for service backlogs. In some cases, supervisors shared that they would respond to calls for service to address these backlogs. This limits the amount of time on shift supervisors can spend interacting with, observing, and overseeing the members under their direct command, as required by ¶1354. While disheartening, the IMT views supervisors' recognition of these challenges as an indication that supervisors are aware of and focused on their duties. Their innovation shows that they care about their jobs and want to perform well.

Members again expressed keen interest in the opportunity to build relationships with supervisors, receive feedback, and have consistency in supervision. G01-09, Supervisory Responsibilities, requires that supervisors complete supervisory logs throughout their shift which contain information such as supervisory activities and interactions, contacts with field units, support activities, and corrective or discipli-

nary actions. The IMT had hoped that these logs would provide a better understanding of the effectiveness of patrol supervision. However, in the IMT’s review, we found them to overwhelmingly be comprised solely of assignment and equipment information. In instances where calls for service were included, the supervisory logs rarely included information about the actions of the supervisors or officers. Additionally, these logs are not electronic so the City and the CPD cannot use them to conduct meaningful evaluation of supervisory activities.

In the eighth reporting period, the City and CPD maintained Preliminary compliance, but did not reach Secondary compliance. The IMT looks forward to the continued review of records and logs kept relating to the requirements of this paragraph. We encourage the CPD to maintain efforts aimed to acquire and implement technology systems that will allow for efficient and accurate capture of this information. Additionally, while the IMT recognizes this prioritization of staffing in the pilot district as a step in the right direction, we would like to see a sufficient amount of sergeants maintained over time. To accurately assess staffing levels, we look forward to receiving additional personnel rosters and transfer orders as the CPD makes updates. These should be provided on a near real-time basis to ensure their usefulness to the IMT.

Paragraph 354 Compliance Progress History

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

Supervision: ¶355

355. Immediate supervisors will be required to document their actions taken with members under their direct command, pursuant to CPD policy, including, but not limited to: a. non-disciplinary or corrective actions, including, but not limited to, those taken pursuant to any internal or external review of the conduct of CPD officers or taken pursuant to the operation of any existing and future automated electronic systems contemplated by Part D of the Data Collection, Analysis, and Management section of this Agreement; b. disciplinary referrals; c. response to incident scenes as required by CPD policy; d. observations of member conduct, as required by CPD policy; and e. reviews and investigations of reportable uses of force and other reports required by CPD policy 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*

In the eighth reporting period, the City and the CPD maintained Preliminary compliance with ¶355 but did not reach Secondary compliance.

To evaluate Preliminary compliance with ¶355, we reviewed the CPD’s relevant policies following the process described in the Consent Decree (¶¶626–41), which outlines applicable consultation, resolution, workout, and public comment periods.

For Secondary compliance, the IMT reviewed the CPD’s training development, implementation, and evaluation (¶286). We also reviewed data sources relevant to compliance with the requirements of ¶355 and considered available data that is necessary or helpful to identify, verify, and sustain compliance and reform efforts. The IMT reviewed records regarding whether the CPD has qualified personnel fulfilling the responsibilities required by ¶355. Additionally, the IMT looked for evidence that the CPD has trained supervisors to comply with relevant portions of G01-09 and reviewed evidence and data sources showing how supervisors will be documenting their engagements with their subordinates, including but not limited to supervisory logs, Performance Evaluation System entries, training materials, and other types of entries and forms the CPD will use to comply with the requirements of ¶355.

Progress before the Eighth Reporting Period

In previous reporting periods, we reviewed draft versions of the *Supervisory Responsibilities* policy. The collaborative process used to review and revise such documents was ongoing at the end of the third reporting period. In the fourth reporting period, after revising, posting for public comment, and finalizing *Supervisory Responsibilities*, G01-09, the City and the CPD reached Preliminary compliance with ¶355. In the fifth reporting period, the City and the CPD maintained Preliminary compliance by finalizing and issuing two other policies supporting ¶355: the *Officer Support System Pilot Program (OSS)* policy (D20-04) and the *Performance Evaluation System Pilot Program (PES)* policy (D21-09). To further support the requirements of ¶355 the CPD developed and submitted a *2022 In-Service Supervisors Training* plan and curriculum.

We explained that, for the CPD to reach subsequent levels of compliance, we will look for evidence that the CPD has trained supervisors to comply with relevant policy, and for data that demonstrates informative engagement with supervisors and those serving under their command. The IMT would also look to review supervisory logs that are used to capture supervisors work during their shifts relating to the requirements of this paragraph.

In the sixth reporting period, the IMT observed the 2022 In-Service Supervisors Training which included learning objectives in support of ¶355, such as the consequences at the supervisory level regarding the failure of initiating a complaint investigation, turning a complaint into a positive community interaction, and requirements for completing a Tactical Response Report (TRR), along with report writing issues and recent changes to the Use of Force and related policies.

Additionally, the IMT reviewed the *Performance Evaluation System (PES) Pilot Training* and submitted a no-objection notice in April 2022. This training will help to support ¶355 by aiding supervisors in recognizing and documenting the job performance and conduct of department members under their command, such as exceptional job performance or adverse behavior that can be improved by non-disciplinary options. The IMT observed the *Officer Support System (OSS) Pilot Training* December 2022. This training helps to support ¶355 by assisting supervisors in proactively supporting sworn members of the CPD and to support the well-being of members in a non-disciplinary manner. The Performance Evaluation System and Officer Support System were projected to be launched in the 6th District during the seventh reporting period.

During the seventh reporting period, on July 21, 2022, the City and CPD produced *Performance Evaluation System Training*. The IMT submitted a no-objection letter on August 4, 2022. The IMT believes that the trainings were well-designed as they included adult learning methods and covered the required material. We observed the human resources portion of this training on November 4, 2022. It was well-

received by the members and the instructors effectively engaged with the participants. IMT members noted that the CPD curriculum contained the components required by the Consent Decree and, in some areas, exceeded our expectations.

On December 7, 2022, also during the seventh reporting period, members of the IMT observed the *Officer Support System Training*. This training was well-executed, explaining the purpose of the system, the model on which it was developed, and how supervisors should utilize it. Trainees were required to participate in a role-playing exercise where they were able to practice various techniques for the nuanced conversations that they may need to engage in. Further, the training outlined available resources and training that supervisors can suggest to officers in need.

Progress in the Sixth Reporting Period

The IMT conducted a site visit in April 2023. Supervisors described resource issues that affected their ability to perform their duties. Specifically, they highlighted a lack of available patrol vehicles during shift change creating calls for service backlogs. In some cases, supervisors shared that they would respond to calls for service to address these backlogs, limiting the amount of time on shift to observe members under their command as required by ¶355. While disheartening, the IMT views supervisors' recognition of these challenges as an indication that supervisors are aware of and focused on their duties. Their innovation shows that they care about their jobs and want to perform well.

Members again expressed keen interest in the opportunity to build relationships with supervisors, receive feedback, and have consistency in supervision. G01-09, *Supervisory Responsibilities*, requires that supervisors complete supervisory logs throughout their shift which contain information such as supervisory activities and interactions, contacts with field units, support activities, and corrective or disciplinary actions as required by ¶355(a). The IMT had hoped that these logs would provide a better understanding of the effectiveness of patrol supervision. However, in the IMT's review, we found them to overwhelmingly be comprised solely of assignment and equipment information. In instances where calls for service were included, the logs rarely included information about the actions of the supervisors or officers. Additionally, these logs are not electronic so the City and the CPD cannot use them to conduct meaningful evaluation of supervisory activities.

In the eighth reporting period, the Officer Support System Pilot Program was launched in the 6th District. This early intervention system utilizes an algorithm to identify officers at risk for various adverse behaviors. Supervisors are tasked with sharing this information, called a "work item," with officers and developing a plan to address them on a voluntary basis. During the IMT site visit, sergeants shared that, despite training on having difficult conversations with supervisees, the pro-

cess of discussing a work item with an officer was still very challenging. They specifically expressed difficulty articulating information about how the Officer Support System was developed. Because the system is designed to identify officers at the highest risk, only about 2–5% of officers will be issued a work item at a time. This means that, while this supervisory responsibility is integral to the accountability of department members, supervisors may conduct this duty irregularly. The gap between training and performing this task is obviously affecting the supervisors’ effectiveness and, therefore, the success of the pilot program. It is imperative that the City and the CPD solicit feedback from supervisors while the program is still in pilot phase to better understand these issues.

In the eighth reporting period, the City and the CPD maintained Preliminary compliance, but did not reach Secondary compliance. We encourage the CPD to maintain efforts aimed to acquire and implement technology systems that will allow for efficient and accurate capture of this information. Additionally, the IMT will review the forthcoming evaluation plans for the Officer Support System and Performance Evaluation System. These plans are integral to the success of the programs and the IMT hopes to see a focus on the data collection necessary to successfully implement the programs.

Paragraph 355 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	

Supervision: ¶356

356. *As otherwise set out in this Agreement, CPD will ensure that it makes staffing and allocation decisions that provide for: a. the number of patrol field supervisors to ensure span of control and unity of command as required in this Part; b. the number of well-trained, qualified FTOs, as required in Part H of the Training section of this Agreement; c. the number of well-trained, qualified staff to train recruits and officers, as required in Part D of the Training section of this Agreement; d. the number of well-trained, qualified staff to conduct timely misconduct investigations, as required in the Accountability and Transparency section of this Agreement; e. the number of certified CIT Officers, as required in Part D of the Crisis Intervention section of this Agreement; and f. the number of officer assistance and wellness staff as required in the Officer Wellness and Support section of this Agreement.*

Compliance Progress

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

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

The City and the CPD have not yet reached Preliminary compliance with ¶356.

To evaluate Preliminary compliance with ¶356, we considered, among other things, whether the CPD developed a plan to ensure that staffing and allocation decisions comply with the staffing requirements of this paragraph and whether the CPD completed a comprehensive staffing study to inform a realistic and effective staffing plan. We also considered the CPD’s relevant policies and materials following the process described in the Consent Decree (¶¶626–41).

Progress before the Eighth Reporting Period

In previous reporting periods, we recognized that the CPD took steps toward compliance with subsections of ¶356. For example, they increased the staffing levels of the Professional Counseling Division to comply with subsection (f). Despite these efforts, the City and the CPD did not reach Preliminary compliance in the fourth reporting period because, by the end of the reporting period, the CPD had not yet demonstrated that it had an actionable plan to meet all staffing requirements set out in ¶356.

Still, in the fourth reporting period, the CPD expanded the Unity of Command and Span of Control Pilot Program to two additional districts. The program was initially

piloted in the 6th District and, in the fourth reporting period, the CPD expanded the pilot program into the 4th and 7th Districts as well. In the fourth reporting period, through virtual site visits conducted with several officers and sergeants from the 4th, 6th, and 7th Districts, we learned that unity of command and span of control efforts had not played out on the ground as D20-02 directs. Many members were supportive of unity of command and span of control concepts that the pilot program intends to achieve. Many of these officers believed that, if properly staffed, the program could benefit the CPD and Chicago's communities. The CPD has since limited the pilot back to the 6th District.

The CPD made notable progress in the fifth reporting period by revising and finalizing D20-02, *Unity of Command and Span of Control Schedule Pilot Program*. Additionally, the IMT noted the formation of the Unity of Command and Span of Control Program Evaluation Committee. The CPD also made progress toward other ¶356 requirements. For example, the *Field Training and Evaluation Program* policy (S11-02), which requires a one-to-one ratio of Field Training Officers to Probationary Police Officers, was finalized and published.

We explained in previous reports that, for the CPD to reach subsequent levels of compliance, the CPD needed to demonstrate an actionable plan to ensure that all staffing and allocation decisions were made in a manner consistent with all the requirements of ¶356. To do this, we explained that the CPD would need to complete a comprehensive staffing study to inform a realistic and effective staffing plan.

In the sixth reporting period, the IMT provided feedback on staffing issues regarding unity of command and span of control, and the CPD made some adjustments accordingly. The CPD also provided updates on the status of their staffing dashboard, which will enable supervisors to better monitor officers' assignments and span of control between sergeants and officers. During meetings with the City, the CPD, and the OAG, the CPD also discussed the staffing dashboard's management tools for making staffing and operational decisions that it believes would enhance unity of command and span of control.

During the seventh reporting period, on October 6, 2022, the City and the CPD produced an updated D20-02, *Unity of Command and Span of Control Schedule Pilot Program*. The IMT provided comments on November 5, 2022. We believed the policy to be well-written and commended the department for their effort to include aspects of the related pilot programs, Performance Evaluation System and Officer Support System, in D20-02. However, we also noted the need for clarity about the intent of CPD to use "an average" of ten officers per sergeant for span of control.

Also, during the seventh reporting period, we conducted more focus groups with officer and sergeants in the 6th District. We heard concerns about supervisors

transitioning in and out of the 6th District, both at the sergeant and lieutenant levels. The consistent turnover of supervisors, whether actual or perceived, raises concerns to the IMT about whether members are receiving the level of supervision required by the Consent Decree. Members expressed keen interest in the opportunity to build relationships with supervisors, receive feedback, and have consistency in supervision.

Progress in the Eighth Reporting Period

The IMT conducted a site visit in April 2023. In focus groups conducted with officers and sergeants in the 6th District, members expressed similar frustrations with resource and staffing issues as the IMT has heard in previous reporting periods. The 6th District continues to experience turnover of officers and supervisors. For example, during a May meeting with the City and the CPD, the IMT was told that the 6th District would be assigned ten new sergeants, but that others would be transferred to other districts, netting an increase of only four. The consistent turnover of supervisors continues to raise concerns about whether members are receiving the level of supervision required by the Consent Decree.

Supervisors also described resource issues that affected their ability to perform their duties. Specifically, they highlighted a lack of available patrol vehicles during shift change creating calls for service backlogs. In some cases, supervisors shared that they would respond to calls for service to address these backlogs, limiting the amount of time on shift to conduct their regular supervisory duties. While disheartening, the IMT views supervisors' recognition of these challenges as an indication that supervisors are aware of and focused on their duties. Their innovation shows that they care about their jobs and want to perform well.

During monthly calls, the City and the CPD have shared information about the progress of the Unity of Command and Span of Control Pilot Program. Since the launch of the new staffing model this reporting period, the 6th District maintained a compliance rate between 68% and 74% for span of control. Between 78% and 83% of officers and 74% to 80% of sergeants worked in their assigned sector. Additionally, officers worked with the sergeant who will complete their performance evaluation about half of the time. The IMT has been provided with updates on the staffing dashboard's management tools for making staffing and operational decisions that it believes would enhance unity of command and span of control. We look forward to these percentages of time increasing and remaining stable over time. In the IMT's opinion, the CPD members in the 6th District and in the patrol chain of command are dedicated to achieving compliance in this area, not only because it is required by the Consent Decree, but because they understand that these requirements are fundamental pieces of the structure and accountability required to be able to effectively and justly police the city.

Staffing issues are not isolated within the Patrol Bureau. The Crisis Intervention and Training units have recently experienced significant cuts. The IMT has shared concerns about the City’s and the CPD’s ability to maintain the required 1:1 ratio of field training officers to probationary officers as required by ¶1356(b). The City and the CPD have shared intentions to conduct a Workforce Allocation Study to develop a staffing model along with recommendations on transfer procedures in multiple past reporting periods. To our knowledge, this is not yet underway.

The City and the CPD did not achieve Preliminary compliance with ¶1356 in the eighth reporting period. To reach Preliminary compliance with ¶1356, the CPD must demonstrate an actionable plan to ensure that all staffing and allocation decisions are made in a manner consistent with the requirements of ¶1356. The CPD will need to complete a comprehensive staffing study to inform a realistic and effective staffing plan. We look forward to receiving this information and continuing to consult with the CPD and the City as they undertake these efforts.

Paragraph 356 Compliance Progress History

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

Supervision: ¶357

357. The City and the CPD will deploy a sufficient amount of qualified supervisors to provide effective supervision, as outlined in this section.

Compliance Progress

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

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

The City and the CPD have not yet reached Preliminary compliance with ¶357.

To evaluate Preliminary compliance with ¶357, we reviewed the CPD’s relevant policies and records following the process described in the Consent Decree (¶¶626–41), which outlines applicable consultation, resolution, workout, and public comment periods.

Progress before the Eighth Reporting Period

We assessed the requirements of ¶357 for the first time in the sixth reporting period. Prior to the sixth reporting period, the CPD finalized D20-02, *Unity of Command and Span of Control Schedule Pilot Program*. The policy defines both unity of command and span of control and explains how they are designed to afford consistency within patrol areas and create manageable officer-to-sergeant ratios. D20-02 also identifies a Tableau Dashboard that provides participating districts visual data verification for the fulfillment of the district’s required operations with unity of command and span of control.

During the sixth reporting period, the CPD shared that they plan to conduct a Workforce Allocation Study to develop a staffing model along with recommendations on transfer procedures in the seventh reporting period. The CPD also shared that they plan to assign additional sergeants to the 6th District during this reporting period, which is the primary pilot district.

During the seventh reporting period, on October 6, 2022, the City and the CPD produced an updated D20-02, *Unity of Command and Span of Control Schedule Pilot Program*. The IMT provided comments on November 5, 2022. We believed the policy to be well-written and commended the department for their effort to include aspects of the related pilot programs, Performance Evaluation System and Officer Support System, in D20-02. However, we also noted the need for clarity about the intent of CPD to use “an average” of ten officers per sergeant for span of control.

Also, during the seventh reporting period, we conducted more focus groups with officer and sergeants in the 6th District. We heard concerns about supervisors transitioning in and out of the 6th District, both at the sergeant and lieutenant levels. The consistent turnover of supervisors, whether actual or perceived, raises concerns to the IMT about whether members are receiving the level of supervision required by the Consent Decree. Members expressed keen interest in the opportunity to build relationships with supervisors, receive feedback, and have consistency in supervision.

Progress in the Eighth Reporting Period

The IMT conducted a site visit in April 2023. In focus groups conducted with officers and sergeants in the 6th District, members expressed similar frustrations with resource and staffing issues as the IMT has heard in previous reporting periods. The 6th District continues to experience turnover of officers and supervisors. For example, during a May meeting with the City and the CPD, the IMT was told that the 6th District would be assigned ten new sergeants, but that others would be transferred to other districts, netting an increase of only four. The consistent turnover of supervisors continues to raise concerns about whether members are receiving the level of supervision required by the Consent Decree.

Supervisors also described resource issues that affected their ability to perform their duties. Specifically, they highlighted a lack of available patrol vehicles during shift change creating calls for service backlogs. In some cases, supervisors shared that they would respond to calls for service to address these backlogs, limiting the amount of time on shift to conduct their regular supervisory duties. While disheartening, the IMT views supervisors' recognition of these challenges as an indication that supervisors are aware of and focused on their duties. Their innovation shows that they care about their jobs and want to perform well.

During monthly calls, the City and the CPD have shared information about the progress of the Unity of Command and Span of Control Pilot Program. Since the launch of the new staffing model this reporting period, the 6th District maintained a compliance rate between 68% and 74% for span of control. Between 78% and 83% of officers and 74% to 80% of sergeants worked in their assigned sector. Additionally, officers worked with the sergeant who will complete their performance evaluation about half of the time. The IMT has been provided with updates on the staffing dashboard's management tools for making staffing and operational decisions that it believes would enhance unity of command and span of control. We look forward to these percentages of time increasing and remaining stable over time. In the IMT's opinion, the CPD members in the 6th District and in the patrol chain of command are dedicated to achieving compliance in this area, not only because it is

required by the Consent Decree, but because they understand that these requirements are fundamental pieces of the structure and accountability required to be able to effectively and justly police the city.

The City and the CPD have also shared intentions to conduct a Workforce Allocation Study to develop a staffing model along with recommendations on transfer procedures in multiple past reporting periods. To our knowledge, this is not yet underway.

The City and the CPD did not achieve Preliminary compliance with ¶357 in the eighth reporting period. To reach Preliminary compliance, the CPD must demonstrate an actionable plan to ensure that all staffing and allocation decisions are made in a manner consistent with the requirements of ¶357. The CPD will need to complete a comprehensive staffing study to inform a realistic and effective staffing plan.

We look forward to receiving this information and continuing to consult with the CPD and the City as they undertake these efforts. We also look forward to reviewing the contents of the CPD staffing dashboard, assignment sheets, and other records, to include transfer orders. These should be provided on a near real-time basis to ensure their usefulness to the IMT. Additionally, we hope to conduct further interviews and focus groups with members of the pilot district in future reporting periods.

Paragraph 357 Compliance Progress History

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

Supervision: ¶359

359. CPD will ensure that the principles of unity of command and span of control are realized for watch personnel assigned to field units within district law enforcement.

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 ¶359 in the eighth reporting period.

To evaluate Preliminary compliance with ¶359, we reviewed the CPD’s relevant policies and records following the process described in the Consent Decree (¶¶626–41), which outlines applicable consultation, resolution, workout, and public comment periods. For Secondary compliance, the IMT sought to review data sources relevant to compliance with the requirements of ¶359 and considered available data that is necessary or helpful to identify, verify, and sustain compliance and reform efforts.

Progress before the Eighth Reporting Period

We assessed the requirements of ¶359 for the first time in the sixth reporting period. In the fifth reporting period, the CPD finalized D20-02, *Unity of Command and Span of Control Schedule Pilot Program*. The policy defines both unity of command and span of control and explains how they are designed to afford consistency within patrol areas and create manageable officer-to-sergeant ratios. D20-02 also identifies a Tableau Dashboard that provides participating districts visual data verification for the fulfilment of the district’s required operations with unity of command and span of control. With this, the City and the CPD reached Preliminary compliance.

During the sixth reporting period, the City and the CPD produced BOP #22-0049 *Unity of Command Span of Control Briefing for Newly Assigned Members*. This is a brief training conducted by a commander with new members and supervisors of the 6th District, which outlines the core principles of unity of command and span of control along with their importance.

During the seventh reporting period, on October 6, 2022, the City and the CPD produced an updated D20-02, *Unity of Command and Span of Control Schedule Pilot Program*. The IMT provided comments on November 5, 2022. We believed the policy to be well-written and commended the department for their effort to

include aspects of the related pilot programs, Performance Evaluation System and Officer Support System, in D20-02. However, we also noted the need for clarity about the intent of CPD to use “an average” of ten officers per sergeant for span of control.

Also, during the seventh reporting period, we met with members of the Office of Constitutional Reform along with Bureau of Patrol to hear further about CPD-conducted focus groups with members of the 6th District, as multiple pilots were set to begin. These pilots, and specifically the Unity of Command and Span of Control Pilot Program, would have required changes to the current partner structure along with scheduling shifts. With school beginning in September 2022 and shift bid changes later in the year, the CPD shared that many focus groups members raised concerns about pilot implementation beginning in the seventh reporting period. The IMT recognized that the support of pilot participants is integral to the success of the pilot, and eventually the expansion of these programs to the entire department, and thus, supported the CPD’s decision to begin implementation in the eighth reporting period.

Progress in the Eighth Reporting Period

In April 2023, the IMT conducted a site visit. During the IMT site visit, officers continued to express frustrations with resource and staffing issues. The 6th District continues to experience turnover of officers and supervisors which limits the levels to which consistent supervision can be achieved. Additionally, officers expressed that, while they believed in the goals of the Unity of Command and Span of Control Pilot Program, they have not been provided ample opportunity to share feedback on operational aspects of the program. The IMT recognizes that CPD conducted a focus group with a sample of officers in the seventh reporting period to solicit feedback. Additionally, the City and CPD have shared plans to conduct a survey of 6th District officers and supervisors about the pilot program in July 2023. We look forward to reviewing the results of these efforts and hope the City and CPD will incorporate feedback meaningfully as they expand to further districts.

During monthly calls, the City and CPD have shared information about the progress of the Unity of Command and Span of Control Pilot Program. Since the launch of the new staffing model this reporting period, the 6th District maintained a compliance rate between 68% and 74% for span of control. Between 78% and 83% of officers and 74% to 80% of sergeants worked in their assigned sector. Additionally, officers worked with the sergeant who will complete their performance evaluation about half of the time. The IMT has been provided with updates on the staffing dashboard’s management tools for making staffing and operational decisions that it believes would enhance unity of command and span of control. We look forward to these percentages of time increasing and remaining stable over time. In the

IMT's opinion, the CPD members in the 6th District and in the patrol chain of command are dedicated to achieving compliance in this area, not only because it is required by the Consent Decree, but because they understand that these requirements are fundamental pieces of the structure and accountability required to be able to effectively and justly police the city.

Further, in June 2023, the CPD produced the *Unity of Command Span of Control Pilot Phase Preliminary Implementation Plan*. Upon review of the plan, the IMT believes that this plan is accurately focused on answering three questions in relation to the interrelated pilots:

1. What is the minimum level of consistent supervision (unity of command and span of control) that must be in place on a routine basis in the 6th District in order for the Officer Support System and the Performance Evaluation System pilot programs to be successful?

Relatedly, how can the attendance data needed to measure consistency of supervision under unity of command and span of control be collected and reported in a manner that is more user-friendly and efficient than the manual processes currently in place in 6th District?

2. What metrics and evaluations will inform when the Officer Support System Pilot Program can be expanded to additional districts?
3. What metrics and evaluations will inform when the Performance Evaluation System Pilot Program can be expanded to additional districts?

The implementation plan indicates that the CPD has a clear understanding of the metrics and data needed for the next phase of the pilots that will expand into two additional districts, and eventually into all 22 districts. The plan is well-written, comprehensive, and indicative of a thoughtful and significant organizational pivot necessary to advance compliance in this important area of the Consent Decree.

In the eighth reporting period, the City and CPD maintained Preliminary compliance, but did not achieve Secondary compliance. In the ninth reporting period, the IMT will closely observe the expansion of the Unity of Command and Span of Control, Officer Support System, and Performance Evaluation System pilot programs. We look forward to reviewing the contents of the CPD dashboard, assignment sheets, transfer orders, and other relevant records. Additionally, we hope to conduct individual interviews and focus groups with members of the pilot district. The IMT anticipates observing training related to the Unity of Command and Span of Control Pilot Program along with evaluations of that training.

Paragraph 359 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	

Supervision: ¶360

360. By January 1, 2020, CPD will develop a staffing model to achieve the principles of unity of command and span of control. CPD's staffing model will identify methods to implement unity of command and a span of control ratio of no more than ten officers to one Sergeant for all field units on each watch in each of CPD's patrol districts. To achieve this objective, CPD will maintain, at a minimum, one Sergeant for each sector.

Compliance Progress

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

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

The City and the CPD maintained Preliminary compliance in the eighth reporting period but did not reach Secondary compliance with ¶360.

To evaluate Preliminary compliance with ¶360, the IMT reviewed 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. The IMT also reviewed data sources relevant to compliance with the requirements of the paragraph and considered available data that is necessary or helpful to identify, verify, and sustain compliance and reform efforts.

For Secondary compliance, we reviewed whether the City and the CPD assessed the Unity of Command and Span of Control Pilot Program, made adjustments to ensure successful implementation of the program's requirements in the pilot districts, and established an evaluation committee to oversee the pilot program. We also reviewed data sources, including systems for tracking and auditing to monitor staffing assignments and levels; training development, implementation, and evaluation (¶286). We also sought to review records that are sufficient to show that the CPD has qualified personnel fulfilling the responsibilities required by ¶360, including the development and implementation of an optimal staffing model to allow for more consistent staffing of the pilot districts.

Progress before the Eighth Reporting Period

The City and the CPD reached Preliminary compliance with ¶360 in the second reporting period by launching the Unity of Command and Span of Control Pilot Program in the 6th District. In the third reporting period, we recognized that the CPD faced unanticipated challenges during the third reporting period—including the COVID-19 pandemic—that limited the CPD's ability to allocate sufficient attention toward the pilot program. We also emphasized that the staffing model would

need to be critically reviewed to appropriately adjust the model to address the unique needs of the districts into which the pilot program had not yet been expanded.

During the fourth reporting period, the CPD expanded the Unity of Command and Span of Control Pilot Program from the 6th District into the 4th and 7th Districts. We noted that, since beginning the pilot in the second reporting period, the CPD had struggled to identify a sustainable path toward full, department-wide compliance with ¶1360 in three critical areas that posed a challenge to the CPD's maintaining Preliminary compliance and achieving Secondary compliance:

- (1) the CPD must continue developing and instituting an optimal staffing model to allow for a more consistent staffing of the pilot districts;
- (2) the CPD must enhance their tracking, data, and auditing systems to monitor staffing assignments and levels; and
- (3) the CPD must establish the evaluation committee, which the IMT believes is central to providing the oversight the Unity of Command and Span of Control pilot program needs to effectively expand.

A variety of factors appeared to be causing this inconsistent staffing, such as a near-weekly detailing of officers and sergeants to other assignments, both within their districts and outside of their districts. Additionally, we noted that these continued staff shortages demonstrated that the Unity of Command and Span of Control Pilot Program was not working as planned, as none of those districts had reached or maintained the staffing levels required by ¶1360. This suggested that the plan or policy was either not realistic or was not being properly supported by necessary resources. We encouraged the CPD to dedicate attention and resources to either ensuring that the pilot districts are properly staffed or adjusting the pilot program so that it is realistic and provides guidance to allow for future compliance with ¶1360 and other related paragraphs. We explained that, if issues identified with the pilot program were not addressed, the City and the CPD could lose Preliminary compliance with this paragraph. The CPD has since limited the pilot to the 6th District.

In the fifth reporting period, the City and the CPD maintained Preliminary compliance with ¶1360 by revising *Unity of Command and Span of Control – Pilot Program* (D20-02). The revised D20-02 directive incorporated feedback from the IMT and the OAG. In the sixth reporting period, the City and the CPD produced BOP #22-0049 *Unity of Command Span of Control Briefing for Newly Assigned Members*. This is a brief training conducted by a commander with new members and supervisors of the 6th District, which outlines the core principles of unity of command and span of control along with their importance.

Also, during the sixth reporting period, the IMT continued to hear a great deal of frustration expressed about inconsistent supervision and staffing shortages, which made it very difficult to achieve unity of command and span of control throughout the ranks. The City and the CPD implemented a new pod supervision structure (primary, secondary, and tertiary role for supervisors). However, during the IMT's conversations with command staff, officers, and supervisors, the results of the pod supervision structure did not consistently result in unity of command. The CPD also convened a Unity of Command and Span of Control Pilot Program Evaluation Committee, which is to meet at least quarterly to discuss implementation progress and share feedback from department members. The IMT observed one evaluation committee meeting on June 2, 2022.

Throughout the seventh reporting period, the IMT provided technical assistance to the CPD regarding the Unity of Command and Span of Control Pilot Program. As a result, the City and the CPD developed a new staffing model to address a number of the shortcomings of the pod model. This new model will focus on three tenets: geographic familiarity, high-quality supervision, and resource flexibility. The CPD anticipated implementing this new model beginning in the first quarter of 2023.

During the seventh reporting period, on October 6, 2022, the City and the CPD produced an updated D20-02, *Unity of Command and Span of Control Schedule Pilot Program*. We believed the policy to be well-written and commended the department for their effort to include aspects of the related pilot programs, Performance Evaluation System and Officer Support System, in D20-02. However, we also noted the need for clarity about the intent of CPD to use "an average" of ten officers per sergeant for span of control.

The City and CPD shared their decision to postpone implementation of the pilot programs to the eighth reporting period due to changes in changes to the current partner structure along with scheduling shifts. The IMT recognized that the support of pilot participants is integral to the success of the pilot, and eventually the expansion of these programs to the entire department, and thus, supported the CPD's decision.

Progress in the Eighth Reporting Period

This reporting period, the City and CPD implemented the Unity of Command and Span of Control Pilot Program based on a new staffing model to address a number of the shortcomings of the previous pod model. This new model focused on three tenets: geographic familiarity, high-quality supervision, and resource flexibility. The City and the CPD also shared intentions to conduct a Workforce Allocation Study to develop a broader, department-wide staffing model along with recommendations on transfer procedures in multiple past reporting periods. To our knowledge, this is not yet underway.

In April 2023, the IMT conducted a site visit. During the IMT site visit, officers continued to express frustrations with resource and staffing issues. The 6th District continues to experience turnover of officers and supervisors which limits the levels to which consistent supervision can be achieved. Additionally, officers expressed that, while they believed in the goals of the unity of command and span of control programs, they have not been provided ample opportunity to share feedback on operational aspects of the program. The IMT recognizes that the CPD conducted a focus group with a sample of officers in the seventh reporting period to solicit feedback. Additionally, the City and the CPD have shared plans to conduct a survey of 6th District officers and supervisors about the pilot program in July 2023. We look forward to reviewing the results of these efforts and hope the City and the CPD will incorporate feedback meaningfully as they expand to further districts.

During monthly calls, the City and the CPD have shared information about the progress of the Unity of Command and Span of Control Pilot Program. Since the launch of the new staffing model this reporting period, the 6th District maintained a compliance rate between 68% and 74% for span of control. Between 78% and 83% of officers and 74% to 80% of sergeants worked in their assigned sector. Additionally, officers worked with the sergeant who will complete their performance evaluation about half of the time. The IMT has been provided with updates on the staffing dashboard's management tools for making staffing and operational decisions that it believes would enhance unity of command and span of control. We look forward to these percentages of time increasing and remaining stable over time. In the IMT's opinion, the CPD members in the 6th District and in the patrol chain of command are dedicated to achieving compliance in this area, not only because it is required by the Consent Decree, but because they understand that these requirements are fundamental pieces of the structure and accountability required to be able to effectively and justly police Chicago.

Further, in June 2023, the CPD produced the *Unity of Command Span of Control Pilot Phase Preliminary Implementation Plan*. Upon review of the plan, the IMT believes that this plan is accurately focused on answering three questions in relation to the interrelated pilots:

1. What is the minimum level of consistent supervision (unity of command and span of control) that must be in place on a routine basis in the 6th District in order for the Officer Support System and the Performance Evaluation System pilot programs to be successful?

Relatedly, how can the attendance data needed to measure consistency of supervision under unity of command and span of control be collected and reported in a manner that is more user-friendly and efficient than the manual processes currently in place in the 6th District?

2. What metrics and evaluations will inform when the Officer Support System Pilot Program can be expanded to additional districts?
3. What metrics and evaluations will inform when the Performance Evaluation System Pilot Program can be expanded to additional districts?

The implementation plan indicates that the CPD has a clear understanding of the metrics and data needed for the next phase of the pilots that will expand into two additional districts, and eventually into all 22 districts. The plan is well-written, comprehensive, and indicative of a thoughtful and significant organizational pivot necessary to advance compliance in this important area of the Consent Decree.

The City and the CPD maintained Preliminary compliance with ¶360 in the eighth reporting period but did not reach Secondary compliance. In the ninth reporting period, the IMT will closely observe the expansion of the Unity of Command and Span of Control, Officer Support System, and Performance Evaluation System pilot programs. We look forward to reviewing the contents of the CPD dashboard, assignment sheets, transfer orders, and other relevant records. Additionally, we hope to conduct individual interviews and focus groups with members of the pilot district in future reporting periods. The IMT anticipates observing training related to the Unity of Command and Span of Control Pilot Program along with evaluations of that training.

Paragraph 360 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: Preliminary</p>	<p>THIRD REPORTING PERIOD MARCH 1, 2020 – DECEMBER 31, 2020</p> <p>COMPLIANCE PROGRESS: Preliminary</p>
<p>FOURTH REPORTING PERIOD JANUARY 1, 2021 – JUNE 30, 2021</p> <p>COMPLIANCE PROGRESS: Preliminary</p>	<p>FIFTH REPORTING PERIOD JULY 1, 2021 – DECEMBER 31, 2021</p> <p>COMPLIANCE PROGRESS: Preliminary</p>	<p>SIXTH REPORTING PERIOD JANUARY 1, 2022 – JUNE 30, 2022</p> <p>COMPLIANCE PROGRESS: Preliminary</p>
<p>SEVENTH REPORTING PERIOD JULY 1, 2022 – DECEMBER 31, 2022</p> <p>COMPLIANCE PROGRESS: Preliminary</p>	<p>EIGHTH REPORTING PERIOD JANUARY 1, 2023 – JUNE 30, 2023</p> <p>COMPLIANCE PROGRESS: Preliminary</p>	

Supervision: ¶361

361. *In order to achieve unity of command and a span of control of no more than ten officers to one Sergeant in the field units on each watch in each patrol district, the staffing model may consider: a. staffing requirements for watch operations, including, but not limited to, watch personnel assigned to field duties and watch administration functions; b. staffing requirements for all other district law enforcement functions, including, but not limited to, district administration, community policing, and tactical teams; c. data-driven resource allocation methods incorporating district-specific factors, including, but not limited to, calls for service, public violence, and property crime; and d. any other considerations CPD deems relevant to achieving unity of command and a span of control ratio of no more than ten officers to one Sergeant in all field units on each watch of the City's patrol districts.*

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 ¶361 in the eighth reporting period but did not reach Secondary compliance.

To evaluate Preliminary compliance with ¶361, the IMT reviewed 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. The IMT reviewed data sources relevant to compliance with the requirements of the paragraph and considered available data that is necessary or helpful to identify, verify, and sustain compliance and reform efforts. The IMT also reviewed records that are sufficient to show that the CPD has qualified personnel fulfilling the responsibilities required by ¶361.

For Secondary compliance, the IMT looked for the development of additional permanent solutions to address staffing, the redeployment of additional resources in patrol districts, and further conversation about a staffing model that will sustain the unity of command and span of control requirements within this paragraph. The CPD should also continue the development of technology, such as staffing dashboards, which can timely track compliance.

Progress before the Eighth Reporting Period

The IMT assessed ¶361 for the first time during the fifth reporting period. In the fifth reporting period, the City and the CPD obtained Preliminary compliance with ¶361 by finalizing the *Unity of Command and Span of Control – Pilot Program* (D20-02). The policy addresses various requirements of ¶361, such as clearly defining unity of command and span of control. The policy also addresses staffing requirements for other district personnel and their role in supporting unity of command and span of control. Further, policy D20-02 identifies a data dashboard that provides participating districts visual data verification for the fulfilment of the district’s required operations with span of control and unity of command.

The IMT also reviewed the Sergeant’s District Deployment Initiative, which was issued via an Administrative Message on August 3, 2021. In addition to the Sergeants Initiative, the CPD produced an Agreement signed in December 2020 between CPD’s Labor Relations Division and the Fraternal Order of Police, which settled a conflict about regular days off with the creation of an overtime initiative for police officers.

We shared that, in future reporting periods, the IMT would look forward to the development of additional permanent solutions to address staffing, the redeployment of additional resources in patrol districts, and further conversation about a staffing model that will sustain the unity of command and span of control requirements within this paragraph.

In the sixth reporting period, the IMT attended several virtual and in-person site visits and conducted focus groups with officers and sergeants. As in the fifth reporting period, we heard a great deal of frustration expressed about inconsistent supervision and staffing shortages, which made it very difficult to achieve unity of command and span of control throughout the ranks. During meetings with the City, the CPD, and the OAG, the CPD also discussed the staffing dashboard’s management tools for making staffing and operational decisions that it believes would enhance unity of command and span of control. The CPD also shared that they plan to assign additional sergeants to the 6th District during this reporting period, which is the primary pilot district.

The City and the CPD implemented a new pod supervision structure (primary, secondary, and tertiary role for supervisors) in the fifth reporting period. However, during the IMT’s conversations with command staff, officers, and supervisors, the results of the pod supervision structure did not consistently result in unity of command. In April 2022, the City and the CPD requested technical assistance from the IMT regarding the Unity of Command and Span of Control Pilot Program. In late June, during the first technical assistance meeting, the City and the CPD shared their plans to develop a new staffing model to address a number of the shortcomings of the pod model.

The IMT recognized that the CPD has convened a Unity of Command and Span of Control Pilot Program Evaluation Committee, which is to meet at least quarterly to discuss implementation progress and share feedback from department members. The IMT observed one evaluation committee meeting on June 2, 2022. It is the hope of the IMT that the committee will be able to anticipate and address some of the possible challenges to ensure a smoother implementation process when expanding into other districts.

Throughout the seventh reporting period, the IMT provided technical assistance to the CPD regarding the Unity of Command and Span of Control Pilot Program. As a result, the City and the CPD developed a new staffing model to address a number of the shortcomings of the pod model. This new model will focus on three tenets: geographic familiarity, high-quality supervision, and resource flexibility. The CPD anticipated implementing this new model beginning in the first quarter of 2023.

During the seventh reporting period, on October 6, 2022, the City and CPD produced an updated D20-02, *Unity of Command and Span of Control Schedule Pilot Program*. The IMT provided comments on November 5, 2022. We believed the policy to be well-written and commended the department for their effort to include aspects of the related pilot programs, Performance Evaluation System and Officer Support System, in D20-02. However, we also noted the need for clarity about the intent of CPD to use “an average” of ten officers per sergeant for span of control.

Also, during the seventh reporting period, we met with members of the Office of Constitutional Reform along with Bureau of Patrol to hear further about CPD-conducted focus groups with members of the 6th District, as multiple pilots were set to begin. These pilots, and specifically the Unity of Command and Span of Control Pilot Program, would have required changes to the current partner structure along with scheduling shifts. With school beginning in September 2022 and shift bid changes later in the year, the CPD shared that many focus groups members raised concerns about pilot implementation beginning in the seventh reporting period. The IMT recognized that the support of pilot participants is integral to the success of the pilot, and eventually the expansion of these programs to the entire department, and thus, supported the CPD’s decision to begin implementation in the eighth reporting period.

Progress in the Eighth Reporting Period

This reporting period, the City and the CPD implemented the Unity of Command and Span of Control Pilot Program based on a new staffing model to address a number of the shortcomings of the previous pod model. This new model focused on three tenets: geographic familiarity, high-quality supervision, and resource flexibility. The City and the CPD have also shared intentions to conduct a Workforce Allocation Study to develop a broader, department-wide staffing model along with

recommendations on transfer procedures in multiple past reporting periods. To our knowledge, this is not yet underway.

In April 2023, the IMT conducted a site visit. During the IMT site visit, officers continued to express frustrations with resource and staffing issues. The 6th District continues to experience turnover of officers and supervisors which limits the levels to which consistent supervision can be achieved. Additionally, officers expressed that, while they believed in the goals of the Unity of Command and Span of Control Pilot Program, they have not been provided ample opportunity to share feedback on operational aspects of the program. The IMT recognizes that the CPD conducted a focus group with a sample of officers in the seventh reporting period to solicit feedback. Additionally, the City and the CPD have shared plans to conduct a survey of 6th District officers and supervisors about the pilot program in July 2023. We look forward to reviewing the results of these efforts and hope the City and the CPD will incorporate them meaningfully as they expand to further districts.

During monthly calls, the City and the CPD have shared information about the progress of the Unity of Command and Span of Control Pilot Program. Since the launch of the new staffing model this reporting period, the 6th District maintained a compliance rate between 68% and 74% for span of control. Between 78% and 83% of officers and 74% to 80% of sergeants worked in their assigned sector. Additionally, officers worked with the sergeant who will complete their performance evaluation about half of the time. The IMT has been provided with updates on the staffing dashboard's management tools for making staffing and operational decisions that it believes would enhance unity of command and span of control. We look forward to these percentages of time increasing and remaining stable over time. In the IMT's opinion, the CPD members in the 6th District and in the patrol chain of command are dedicated to achieving compliance in this area, not only because it is required by the Consent Decree, but because they understand that these requirements are fundamental pieces of the structure and accountability required to be able to effectively and justly police the city.

Further, in June 2023, the CPD produced the *Unity of Command Span of Control Pilot Phase Preliminary Implementation Plan*. Upon review of the plan, the IMT believes that this plan is accurately focused on answering three questions in relation to the interrelated pilots:

1. What is the minimum level of consistent supervision (unity of command and span of control) that must be in place on a routine basis in the 6th District in order for the Officer Support System and the Performance Evaluation System pilot programs to be successful?

Relatedly, how can the attendance data needed to measure consistency of supervision under unity of command and span of control be collected and reported in a manner that is more user-friendly and efficient than the manual processes currently in place in the 6th District?

2. What metrics and evaluations will inform when the Officer Support System Pilot Program can be expanded to additional districts?
3. What metrics and evaluations will inform when the Performance Evaluation System Pilot Program can be expanded to additional districts?

The implementation plan indicates that the CPD has a clear understanding of the metrics and data needed for the next phase of the pilots that will expand into two additional districts, and eventually into all 22 districts. The plan is well-written, comprehensive, and indicative of a thoughtful and significant organizational pivot necessary to advance compliance in this important area of the Consent Decree.

The City and the CPD maintained Preliminary compliance with ¶361 in the eighth reporting period but did not reach Secondary compliance. In the ninth reporting period, the IMT will closely observe the expansion of the Unity of Command and Span of Control, Officer Support System, and Performance Evaluation System pilot programs. We look forward to reviewing the contents of the CPD dashboard, assignment sheets, transfer orders, and other relevant records. Additionally, we hope to conduct individual interviews and focus groups with members of the pilot district in future reporting periods. The IMT anticipates observing training related to the Unity of Command and Span of Control Pilot Program along with evaluations of that training.

Paragraph 361 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: Preliminary</p>	<p>SIXTH REPORTING PERIOD JANUARY 1, 2022 – JUNE 30, 2022</p> <p>COMPLIANCE PROGRESS: Preliminary</p>
<p>SEVENTH REPORTING PERIOD JULY 1, 2022 – DECEMBER 31, 2022</p> <p>COMPLIANCE PROGRESS: Preliminary</p>	<p>EIGHTH REPORTING PERIOD JANUARY 1, 2023 – JUNE 30, 2023</p> <p>COMPLIANCE PROGRESS: Preliminary</p>	

Supervision: ¶362

362. By January 1, 2020, CPD will develop a system and protocols to allow the Department to assess, both long-term and on a day-to-day basis, whether field units on each watch in each patrol district meet the requirements for unity of command and span of control.

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 ¶362 in the eighth reporting period but did not reach Secondary compliance.

To evaluate Preliminary compliance with ¶362, we reviewed the CPD’s relevant policies following the process described in the Consent Decree (¶¶626–41), which outlines applicable consultation, resolution, workout, and public comment periods. We also considered data sources, such as information and insights of officers gathered during virtual site visits and audit results, which was necessary or helpful to identify, verify, and sustain compliance with review. To assess Secondary compliance, the IMT reviewed, among other things, the CPD’s training development, implementation, and evaluation.

Progress before the Eighth Reporting Period

The City and the CPD did not reach any level of compliance with ¶362 until the fifth reporting period. As with ¶360, compliance with ¶362 was likely slowed by unanticipated challenges that the City and the CPD faced during the third reporting period. Despite this, the CPD implemented a dashboard intended to display data regarding compliance with unity of command and span of control requirements. By the end of the third reporting period, more work was still needed to ensure data reliability.

In the fourth reporting period, we conducted virtual site visits with officers in the three districts with the Unity of Command and Span of Control Pilot Program (4th, 6th, and 7th) to hear their thoughts and observations concerning the implementation and management of the pilot program. Officers expressed that the pilot program concepts allowed for building strong teams that work consistently with one another, better support one another, and better leverage each other’s strengths. Many sergeants expressed a belief that the pilot program concepts provide the benefit of working with the same team members on a regular basis, which allow them to better engage, guide, and set expectations for their officers and full team.

However, the pilot program was not being implemented on the ground in accordance with the program policy or its concepts. We noted that the CPD's own audit—along with the feedback we received during site visits—demonstrated that field units on each watch, in each district, were not meeting the requirements for unity of command and span of control.

In the third reporting period, the CPD implemented a dashboard intended to display data regarding compliance with the unity of command and span of control requirements. In the fourth reporting period, however, the CPD did not provide us additional information regarding this dashboard or data coming out of this dashboard. Therefore, the City and the CPD did not reach Preliminary compliance in the fourth reporting period. In the third and fourth reporting periods, we suggested that the CPD should work to ensure that data underlying the dashboard was up to date and reliable.

In the fifth reporting period, the City and the CPD obtained Preliminary compliance with ¶1362 by finalizing the *Unity of Command and Span of Control – Pilot Program* policy (D20-02). Policy D20-02 identifies a data dashboard that provides participating districts visual data verification for the fulfillment of the district's required operations with span of control and unity of command. During monthly meetings and site visit, the CPD provided brief updates on the status of their staffing dashboard, which will enable supervisors to better monitor officers' assignments and span of control between sergeants and officers. However, the IMT has yet to receive comprehensive information about the tracking mechanism.

During the sixth reporting period, the City and the CPD produced BOP #22-0049 *Unity of Command Span of Control Briefing for Newly Assigned Members*. This is a brief training conducted by a commander with new members and supervisors of the 6th District which outlines the core principles of unity of command and span of control along with their importance.

The CPD convened a Unity of Command and Span of Control Pilot Program Evaluation Committee, which is to meet at least quarterly to discuss implementation progress and share feedback from department members. The IMT observed one evaluation committee meeting on June 2, 2022. It is the hope of the IMT that the committee will be able to anticipate and address a number of the possible challenges in order to ensure a smoother implementation process.

Throughout the seventh reporting period, the IMT provided technical assistance to the CPD regarding the Unity of Command and Span of Control Pilot Program. As a result, the City and CPD developed a new staffing model to address a number of the shortcomings of the pod model. This new model will focus on three tenets: geographic familiarity, high-quality supervision, and resource flexibility. The CPD anticipated implementing this new model beginning in the first quarter of 2023.

During the seventh reporting period, on October 6, 2022, the City and the CPD produced an updated D20-02, *Unity of Command and Span of Control Schedule Pilot Program*. The IMT provided comments on November 5, 2022. We believed the policy to be well-written and commended the department for their effort to include aspects of the related pilot programs, Performance Evaluation System and Officer Support System, in D20-02. However, we also noted the need for clarity about the intent of CPD to use “an average” of ten officers per sergeant for span of control.

Also, during the seventh reporting period, we met with members of the Office of Constitutional Reform along with Bureau of Patrol to hear further about CPD-conducted focus groups with members of the 6th District, as multiple pilots were set to begin. These pilots, and specifically the Unity of Command and Span of Control Pilot Program, would have required changes to the current partner structure along with scheduling shifts. With school beginning in September 2022 and shift bid changes later in the year, the CPD shared that many focus groups members raised concerns about pilot implementation beginning in the seventh reporting period. The IMT recognized that the support of pilot participants is integral to the success of the pilot, and eventually the expansion of these programs to the entire department, and thus, supported the CPD’s decision to begin implementation in the eighth reporting period.

Progress in the Eighth Reporting Period

This reporting period, the City and the CPD implemented the Unity of Command and Span of Control Pilot Program based on a new staffing model to address a number of the shortcomings of the previous pod model. This new model focused on three tenets: geographic familiarity, high-quality supervision, and resource flexibility. The City and the CPD have also shared intentions to conduct a Workforce Allocation Study to develop a broader, department-wide staffing model along with recommendations on transfer procedures in multiple past reporting periods. To our knowledge, this is not yet underway.

During monthly calls, the City and the CPD have demonstrated their soon-to-be-implemented Watch Sheet application. This application, which is currently only being used in the 6th District, allows the district to view adherence to unity of command and span of control on daily basis. The application will also be able to anticipate attendance and non-attendance due to furloughs, days off, court appearances, etc. Additionally, the City and the CPD have shared intentions to develop a data tracking database to work in tandem with the Watch Sheet Application to provide additional context about the pilot program. The IMT believes that these tracking mechanisms will aid the CPD in attaining the adaptability needed to maintain unity of command and span of control long term. We look forward to

seeing these applications be implemented in the 6th and then in other pilot districts.

The City and the CPD maintained Preliminary compliance with ¶362 in the eighth reporting period but did not reach Secondary compliance. In the ninth reporting period, we look forward to reviewing data relevant to the program such as the contents of the staffing dashboard, assignment sheets, transfer orders, and other relevant records. Additionally, we hope to conduct individual interviews and focus groups with members of the pilot district in future reporting periods. The IMT will closely observe the continued implementation of the Unity of Command and Span of Control Pilot Program. Further, we plan to observe more evaluation committee meetings and hope to see a shift from a briefing model to more collaborative and conversational structure.

Paragraph 362 Compliance Progress History

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

Supervision: ¶363

363. *When calculating the span of control ratios for field units, CPD may not use department-wide averages or factor in span of control ratios for Bureau of Patrol units or functions that are not included in the definition of field units above.*

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 ¶363 in the eighth reporting period but did not reach Secondary compliance.

To assess Preliminary compliance with ¶363, the IMT reviewed 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. For Secondary compliance, the IMT sought to review data sources necessary or helpful to demonstrate how the CPD is calculating span of control ratios for field units and whether the CPD’s method is consistent with the requirements of this paragraph.

Progress before the Eighth Reporting Period

We assessed the City and the CPD’s compliance with ¶363 for the first time in the fifth reporting period. In the fifth reporting period, the City and the CPD obtained Preliminary compliance with ¶361 by revising the *Unity of Command and Span of Control – Pilot Program* policy (D20-02). The policy was finalized and issued in December 2021. D20-02 delineates between field units versus specialized units and does not calculate span of control based on department-wide averages.

During the sixth reporting period, the IMT conducted site visits and attended monthly meetings where the City and the CPD shared documentation which shows progress about the pilot programs broadly. Such meetings included updates about a pod supervision structure (primary, secondary, and tertiary role for supervisors) implemented in the fifth reporting period. The CPD and City shared that the model was calculated using field units, as directed by the Consent Decree. However, during the IMT’s conversations with command staff, officers, and supervisors, the results of the pod supervision structure did not consistently result in unity of command.

In April 2022, the City and the CPD requested technical assistance from the IMT regarding the Unity of Command and Span of Control Pilot Program. This was provided to the CPD and the City throughout the seventh reporting period. As a result, the City and CPD developed a new staffing model to address a number of the shortcomings of the pod model. This new model will focus on three tenets: geographic familiarity, high-quality supervision, and resource flexibility. The CPD anticipated implementing this new model beginning in the first quarter of 2023.

During the seventh reporting period, on October 6, 2022, the City and the CPD produced an updated D20-02, *Unity of Command and Span of Control Schedule Pilot Program*. The IMT provided comments on November 5, 2022. We believed the policy to be well-written and commended the department for their effort to include aspects of the related pilot programs, Performance Evaluation System and Officer Support System, in D20-02. However, we also noted the need for clarity about the intent of CPD to use “an average” of ten officers per sergeant for span of control.

Also, during the seventh reporting period, we met with members of the Office of Constitutional Reform along with Bureau of Patrol to hear further about CPD-conducted focus groups with members of the 6th District, as multiple pilots were set to begin. These pilots, and specifically the Unity of Command and Span of Control Pilot Program, would have required changes to the current partner structure along with scheduling shifts. With school beginning in September 2022 and shift bid changes later in the year, the CPD shared that many focus groups members raised concerns about pilot implementation beginning in the seventh reporting period. The IMT recognized that the support of pilot participants is integral to the success of the pilot, and eventually the expansion of these programs to the entire department, and thus, supported the CPD’s decision to begin implementation in the eighth reporting period.

Progress in the Eighth Reporting Period

This reporting period, the City and CPD implemented the Unity of Command and Span of Control Pilot Program based on a new staffing model to address a number of the shortcomings of the previous pod model. This new model focused on three tenets: geographic familiarity, high-quality supervision, and resource flexibility. The City and the CPD have also shared intentions to conduct a Workforce Allocation Study to develop a broader, department-wide staffing model along with recommendations on transfer procedures in multiple past reporting periods. To our knowledge, this is not yet underway.

During monthly calls, the City and the CPD shared information about the progress of the Unity of Command and Span of Control Pilot Program. Since the launch of the new staffing model this reporting period, the 6th District maintained a compliance rate between 68% and 74% for span of control. Between 78% and 83% of

officers and 74% to 80% of sergeants worked in their assigned sector. Additionally, officers worked with the sergeant who will complete their performance evaluation about half of the time. The IMT has been provided with updates on the staffing dashboard’s management tools for making staffing and operational decisions that it believes would enhance unity of command and span of control. We look forward to these percentages of time increasing and remaining stable over time. In the IMT’s opinion, the CPD members in the 6th District and in the patrol chain of command are dedicated to achieving compliance in this area, not only because it is required by the Consent Decree, but because they understand that these requirements are fundamental pieces of the structure and accountability required to be able to effectively and justly police the city.

The City and the CPD maintained Preliminary compliance with ¶363 in the eighth reporting period but did not reach Secondary compliance. In the ninth reporting period, we look forward to reviewing data relevant to the program such as the contents of the staffing dashboard, assignment sheets, transfer orders, and other relevant records. Additionally, the IMT looks forward to an updated version of D20-02, *Unity of Command and Span of Control Schedule Pilot Program* which provides clarity about the intent of the CPD to use “an average” of ten officers per sergeant for span of control. We also hope to conduct individual interviews and focus groups with members of the pilot district in future reporting periods. The IMT will closely observe the rollout of the Unity of Command and Span of Control Pilot Program.

Further, we plan to observe evaluation committee meetings and hope to see a shift from a briefing model to more collaborative and conversational structure.

Paragraph 363 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	

Supervision: ¶364

364. Beginning no later than January 31, 2020, CPD will begin to implement a staffing model to achieve unity of command and a span of control ratio of no more than ten officers to one Sergeant assigned to field units on each watch in each patrol district.

Compliance Progress

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

Preliminary: *In Compliance (SECOND REPORTING PERIOD)*

Secondary: *Not in Compliance*

Full: *Not Yet Assessed*

The City and the CPD maintained Preliminary compliance with ¶364 in the eighth reporting period but did not reach Secondary compliance.

To determine Preliminary compliance with ¶364, the IMT reviewed 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. The IMT also assessed the creation and development of the Unity of Command and Span of Control Pilot Program.

To evaluate Secondary compliance with ¶364, we reviewed the CPD’s relevant training development, implementation, expansion, and evaluation of the CPD’s Unity of Command and Span of Control Pilot Program, which the CPD launched in the 6th District in early 2020. As the CPD expands the pilot program into additional districts, we are looking for effective and consistent implementation of the staffing model, ensuring that the staffing levels comport with the 10 to 1 requirements from ¶364.

Progress before the Eighth Reporting Period

In previous reporting periods, we followed the creation and implementation of the Unity of Command and Span of Control Pilot Program, which seeks to achieve a ratio of no more than 10 officers to 1 sergeant. Based on the creation and launch of the pilot program in the 6th District, which occurred during the second reporting period, we granted Preliminary compliance with ¶364. We cautioned in the third reporting period that maintenance of Preliminary compliance required careful monitoring, evaluating, and refining of the staffing model to effectively expand the pilot program in all districts.

During the fourth reporting period, the CPD conducted a survey with the officers and sergeants assigned to the pilot districts. This survey showed limited staffing to be among officers’ top concerns related to the Unity of Command and Span of Control Pilot Program. This was consistent with what we learned during the virtual

site visit we conducted at the time. During that visit, officers expressed major concerns with staffing. Many officers stated they have the same sergeant only about half of the time—which runs contrary to the consistent staffing envisioned by the program.

In the fifth reporting period, the City and the CPD maintained Preliminary compliance by finalizing the *Unity of Command and Span of Control – Pilot Program (D20-02)*. The policy was finalized and issued in December 2021. During a site visit in the fifth reporting period, it was again noted that while both officers and sergeants supported the Unity of Command and Span of Control Pilot Program, they were very discouraged with the lack of personnel commitments.

During the sixth reporting period, the IMT conducted site visits and attended monthly meetings where the City and the CPD shared documentation which shows progress about the pilot programs broadly. Such meetings included updates about a pod supervision structure (primary, secondary, and tertiary role for supervisors) implemented in the fifth reporting period. However, during the IMT’s conversations with command staff, officers, and supervisors, the results of the pod supervision structure did not consistently result in unity of command.

Additionally, the CPD convened a Unity of Command and Span of Control Pilot Program Evaluation Committee, which is to meet at least quarterly to discuss implementation progress and share feedback from CPD personnel. The City and the CPD produced BOP #22-0049 *Unity of Command Span of Control Briefing for Newly Assigned Members*. This is a brief training conducted by a commander with new members and supervisors of the 6th District, which outlines the core principles of unity of command and span of control along with their importance.

In April 2022, the City and the CPD requested technical assistance from the IMT regarding the Unity of Command and Span of Control Pilot Program. This was provided to the CPD and the City throughout the seventh reporting period. As a result, the City and CPD developed a new staffing model to address a number of the shortcomings of the pod model. This new model will focus on three tenets: geographic familiarity, high-quality supervision, and resource flexibility. The CPD anticipated implementing this new model beginning in the first quarter of 2023.

During the seventh reporting period, on October 6, 2022, the City and the CPD produced an updated D20-02, *Unity of Command and Span of Control Schedule Pilot Program*. The IMT provided comments on November 5, 2022. We believed the policy to be well-written and commended the department for their effort to include aspects of the related pilot programs, Performance Evaluation System and Officer Support System, in D20-02. However, we also noted the need for clarity about the intent of CPD to use “an average” of ten officers per sergeant for span of control.

Also, during the seventh reporting period, we met with members of the Office of Constitutional Reform along with Bureau of Patrol to hear further about CPD-conducted focus groups with members of the 6th District, as multiple pilots were set to begin. These pilots, and specifically the Unity of Command and Span of Control Pilot Program, would have required changes to the current partner structure along with scheduling shifts. With school beginning in September 2022 and shift bid changes later in the year, the CPD shared that many focus groups members raised concerns about pilot implementation beginning in the seventh reporting period. The IMT recognized that the support of pilot participants is integral to the success of the pilot, and eventually the expansion of these programs to the entire department, and thus, supported the CPD's decision to begin implementation in the eighth reporting period.

Progress in the Eighth Reporting Period

This reporting period, the City and the CPD implemented the Unity of Command and Span of Control Pilot Program based on a new staffing model to address a number of the shortcomings of the previous pod model. This new model focused on three tenets: geographic familiarity, high-quality supervision, and resource flexibility. The City and the CPD have also shared intentions to conduct a Workforce Allocation Study to develop a broader, department-wide staffing model along with recommendations on transfer procedures in multiple past reporting periods. To our knowledge, this is not yet underway.

In April 2023, the IMT conducted a site visit. During the IMT site visit, officers continued to express frustrations with resource and staffing issues. The 6th District continues to experience turnover of officers and supervisors which limits the levels to which consistent supervision can be achieved. Additionally, officers expressed that, while they believed in the goals of the Unity of Command and Span of Control Pilot Program, they have not been provided ample opportunity to share feedback on operational aspects of the program. The IMT recognizes that the CPD conducted a focus group with a sample of officers in the seventh reporting period to solicit feedback. Additionally, the City and the CPD have shared plans to conduct a survey of 6th District officers and supervisors about the pilot programs in July 2023. We look forward to reviewing the results of these efforts and hope the City and the CPD will incorporate them meaningfully as they expand to further districts.

During monthly calls, the City and the CPD have shared information about the progress of the Unity of Command and Span of Control pilot programs. Since the launch of the new staffing model this reporting period, the 6th District maintained a compliance rate between 68% and 74% for span of control. Between 78% and 83% of officers and 74% to 80% of sergeants worked in their assigned sector. Additionally, officers worked with the sergeant who will complete their performance evaluation about half of the time. The IMT has been provided with updates on the

staffing dashboard's management tools for making staffing and operational decisions that it believes would enhance unity of command and span of control. We look forward to these percentages of time increasing and remaining stable over time. In the IMT's opinion, the CPD members in the 6th District and in the patrol chain of command are dedicated to achieving compliance in this area, not only because it is required by the Consent Decree, but because they understand that these requirements are fundamental pieces of the structure and accountability required to be able to effectively and justly police the city.

Further, in June 2023, the CPD produced the *Unity of Command Span of Control Pilot Phase Preliminary Implementation Plan*. Upon review of the plan, the IMT believes that this plan is accurately focused on answering three questions in relation to the interrelated pilots:

1. What is the minimum level of consistent supervision (unity of command and span of control) that must be in place on a routine basis in the 6th District in order for the Officer Support System and the Performance Evaluation System pilot programs to be successful?

Relatedly, how can the attendance data needed to measure consistency of supervision under unity of command and span of control be collected and reported in a manner that is more user-friendly and efficient than the manual processes currently in place in the 6th District?

2. What metrics and evaluations will inform when the Officer Support System Pilot Program can be expanded to additional districts?
3. What metrics and evaluations will inform when the Performance Evaluation System Pilot Program can be expanded to additional districts?

The plan indicates that the CPD has a clear understanding of the metrics and data needed for the next phase of the pilots that will expand into two additional districts, and eventually into all 22 districts. The plan is well-written, comprehensive, and indicative of a thoughtful and significant organizational pivot necessary to advance compliance in this important area of the Consent Decree.

The City and the CPD maintained Preliminary compliance with ¶1364 in the eighth reporting period but did not reach Secondary compliance. In the ninth reporting period, the IMT will closely observe the expansion of the Unity of Command and Span of Control Pilot Program. We look forward to reviewing the contents of the CPD dashboard, assignment sheets, transfer orders, and other relevant records. Additionally, we hope to conduct individual interviews and focus groups with members of the pilot district in future reporting periods. The IMT anticipates observing training related to the Unity of Command and Span of Control Pilot Pro-

gram along with evaluations of that training. Further, we plan to observe evaluation committee meetings and hope to see a shift from a briefing model to more collaborative and conversational structure.

Paragraph 364 Compliance Progress History

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

Supervision: ¶365

365. By January 31, 2022, CPD will fully implement and maintain a staffing model that achieves unity of command and a span of control ratio of no more than ten officers to one Sergeant for all field units on each watch in each of CPD’s patrol districts. To achieve this objective, CPD will maintain, at a minimum, one Sergeant for each sector.

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 reach Preliminary compliance with ¶365 in the eighth reporting period.

To evaluate Preliminary compliance with ¶365, we reviewed the CPD’s relevant policies and records following the process described in the Consent Decree (¶¶626–41), which outlines applicable consultation, resolution, workout, and public comment periods. We also sought to review relevant data sources necessary or helpful to demonstrate the City and the CPD’s ability to develop and maintain an efficient staffing model consistent with this paragraph.

Progress before the Eighth Reporting Period

We assessed the requirements of ¶365 for the first time in the sixth reporting period. In the sixth reporting period, D20-02, *Unity of Command and Span of Control Schedule Pilot Program*, was produced as proof of compliance with this paragraph. This policy, which received a no-objection by the IMT and the OAG in the fifth reporting period, defines both unity of command and span of control and explains how they are designed to afford consistency within patrol areas and create manageable officer-to-sergeant ratios. However, discussion of a staffing model is limited to section VII-C-2 which states: “The Audit Section will work with the Bureau of Patrol and Field Technology and Innovation Section to develop statistical models that will assist the Bureau of Patrol in expanding this program to all district law enforcement.” This does not sufficiently address the full requirements of this paragraph.

During the sixth reporting period, the IMT conducted site visits and attended monthly meetings where the City and the CPD shared documentation which shows progress about the pilot programs broadly. Such meetings included updates about a pod supervision structure (primary, secondary, and tertiary role for supervisors)

implemented in the fifth reporting period. However, during the IMT's conversations with command staff, officers, and supervisors, the results of the pod supervision structure did not consistently result in unity of command.

In April 2022, the City and the CPD requested technical assistance from the IMT regarding the Unity of Command and Span of Control Pilot Program. This was provided to the CPD and the City throughout the seventh reporting period. As a result, the City and CPD developed a new staffing model to address a number of the shortcomings of the pod model. This new model will focus on three tenets: geographic familiarity, high-quality supervision, and resource flexibility. The CPD anticipated implementing this new model beginning in the first quarter of 2023.

During the seventh reporting period, on October 6, 2022, the City and the CPD produced an updated D20-02, *Unity of Command and Span of Control Schedule Pilot Program*. The IMT provided comments on November 5, 2022. We believed the policy to be well-written and commended the department for their effort to include aspects of the related pilot programs, Performance Evaluation System and Officer Support System, in D20-02. However, we also noted the need for clarity about the intent of CPD to use "an average" of ten officers per sergeant for span of control.

Also, during the seventh reporting period, we met with members of the Office of Constitutional Reform along with Bureau of Patrol to hear further about CPD-conducted focus groups with members of the 6th District, as multiple pilots were set to begin. These pilots, and specifically the Unity of Command and Span of Control Pilot Program, would have required changes to the current partner structure along with scheduling shifts. With school beginning in September 2022 and shift bid changes later in the year, the CPD shared that many focus groups members raised concerns about pilot implementation beginning in the seventh reporting period. The IMT recognized that the support of pilot participants is integral to the success of the pilot, and eventually the expansion of these programs to the entire department, and thus, supported the CPD's decision to begin implementation in the eighth reporting period.

Progress in the Eighth Reporting Period

This reporting period, the City and CPD implemented the Unity of Command and Span of Control Pilot Program based on a new staffing model to address a number of the shortcomings of the previous pod model. This new model focused on three tenets: geographic familiarity, high-quality supervision, and resource flexibility. The City and the CPD have also shared intentions to conduct a Workforce Allocation Study to develop a broader, department-wide staffing model along with recommendations on transfer procedures in multiple past reporting periods. To our knowledge, this is not yet underway. We look forward to receiving this information

and continuing to consult with the CPD and the City as they undertake these efforts. This is particularly important as the CPD works to expand the pilot to further districts in upcoming reporting periods.

In April 2023, the IMT conducted a site visit. During the IMT site visit, officers continued to express frustrations with resource and staffing issues. The 6th District continues to experience turnover of officers and supervisors which limits the levels to which consistent supervision can be achieved. Additionally, officers expressed that, while they believed in the goals of the Unity of Command and Span of Control Pilot Program, they have not been provided ample opportunity to share feedback on operational aspects of the program. The IMT recognizes that the CPD conducted a focus group with a sample of officers in the seventh reporting period to solicit feedback. Additionally, the City and the CPD have shared plans to conduct a survey of 6th District officers and supervisors about the pilot programs in July 2023. We look forward to reviewing the results of these efforts and hope the City and the CPD will incorporate them meaningfully as they expand to further districts.

During monthly calls, the City and the CPD have shared information about the progress of the Unity of Command and Span of Control Pilot Program. Since the launch of the new staffing model this reporting period, the 6th District maintained a compliance rate between 68% and 74% for span of control. Between 78% and 83% of officers and 74% to 80% of sergeants worked in their assigned sector. Additionally, officers worked with the sergeant who will complete their performance evaluation about half of the time. The IMT has been provided with updates on the staffing dashboard's management tools for making staffing and operational decisions that it believes would enhance unity of command and span of control. We look forward to these percentages of time increasing and remaining stable over time. In the IMT's opinion, the CPD members in the 6th District and in the patrol chain of command are dedicated to achieving compliance in this area, not only because it is required by the Consent Decree, but because they understand that these requirements are fundamental pieces of the structure and accountability required to be able to effectively and justly police the city.

Further, in June 2023, the CPD produced the *Unity of Command Span of Control Pilot Phase Preliminary Implementation Plan*. Upon review of the plan, the IMT believes that this plan is accurately focused on answering three questions in relation to the interrelated pilots:

1. What is the minimum level of consistent supervision (unity of command and span of control) that must be in place on a routine basis in the 6th District in order for the Officer Support System and the Performance Evaluation System pilot programs to be successful?

Relatedly, how can the attendance data needed to measure consistency of supervision under unity of command and span of control be collected and reported in a manner that is more user-friendly and efficient than the manual processes currently in place in the 6th District?

2. What metrics and evaluations will inform when the Officer Support System Pilot Program can be expanded to additional districts?
3. What metrics and evaluations will inform when the Performance Evaluation System Pilot Program can be expanded to additional districts?

The implementation plan indicates that the CPD has a clear understanding of the metrics and data needed for the next phase of the pilots that will expand into two additional districts, and eventually into all 22 districts. The plan is well-written, comprehensive, and indicative of a thoughtful and significant organizational pivot necessary to advance compliance in this important area of the Consent Decree.

The City and the CPD did not reach Preliminary compliance with ¶365 in the eighth reporting period. To reach compliance with this paragraph, there is significant work to be done. The IMT looks forward to the City's and the CPD's ability to develop and maintain an efficient staffing model in the pilot district for a sustained period.

In the ninth reporting period, the IMT will closely observe the expansion of the Unity of Command and Span of Control, Officer Support System, and Performance Evaluation System pilot programs. We look forward to reviewing the contents of the CPD dashboard, assignment sheets, transfer orders, and other relevant records. Additionally, we hope to conduct individual interviews and focus groups with members of the pilot district in future reporting periods. The IMT anticipates observing training related to the Unity of Command and Span of Control Pilot Program along with evaluations of that training.

Paragraph 365 Compliance Progress History

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

Supervision: ¶366

366. CPD will continue to maintain unity of command and a span of control ratio of no more than ten officers to one Sergeant for district tactical teams and area saturation teams.

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 reach Preliminary compliance with ¶366 in the eighth reporting period.

To evaluate Preliminary compliance with ¶366, we reviewed the CPD’s relevant policies and records following the process described in the Consent Decree (¶¶626–41), which outlines applicable consultation, resolution, workout, and public comment periods. We also sought to review relevant data sources necessary or helpful to demonstrate the City and the CPD’s ability to develop and maintain an efficient staffing model consistent with this paragraph.

Progress before the Eighth Reporting Period

We assessed the requirements of ¶366 for the first time in the sixth reporting period. During the sixth reporting period, the CPD produced D20-02, Unity of Command and Span of Control Schedule Pilot Program, under this paragraph. This policy, which received a no-objection by the IMT and the OAG in the fifth reporting period, defines both unity of command and span of control and explains how they are designed to afford consistency within patrol areas and create manageable officer-to-sergeant ratios. However, discussion of specialized units is limited to section II-B which states: “The Unity of Command and Span of Control Schedule Pilot Program will not include watch personnel assigned to tactical teams or district administration.” This does not sufficiently address the full requirements of this paragraph.

During the sixth reporting period, the IMT conducted site visits and attended monthly meetings where the City and the CPD shared documentation which shows progress about the pilot programs broadly. Such meetings included updates about a pod supervision structure (primary, secondary, and tertiary role for supervisors) implemented in the fifth reporting period. In April 2022, the City and the CPD requested technical assistance from the IMT regarding the Unity of Command and Span of Control Pilot Program. In late June, during the first technical assistance meeting, the City and the CPD shared their plans to develop a new staffing model to address a number of the shortcomings of the pod model. The CPD also shared

that they plan to conduct a Workforce Allocation Study to aid in the development of an effective staffing model, along with recommendations on transfer procedures in the seventh reporting period.

The City and the CPD have shared that the inherently smaller nature of specialized units, such as tactical teams allowed them to achieve a 10:1 ratio on a more regular basis. It is the belief of the IMT that the City and the CPD are working toward compliance in earnest. However, we noted that we have not yet received additional formal productions or data that would allow us to assess further compliance levels with the requirements of ¶1366.

During the seventh reporting period, on October 6, 2022, the City and the CPD produced an updated D20-02, *Unity of Command and Span of Control Schedule Pilot Program*. The IMT provided comments on November 5, 2022. We believed the policy to be well-written and commended the department for their effort to include aspects of the related pilot programs, Performance Evaluation System and Officer Support System, in D20-02. However, we also noted the need for clarity about the intent of CPD to use “an average” of ten officers per sergeant for span of control.

Also, during the seventh reporting period, we met with members of the Office of Constitutional Reform along with Bureau of Patrol to hear further about CPD-conducted focus groups with members of the 6th District, as multiple pilots were set to begin. These pilots, and specifically the Unity of Command and Span of Control Pilot Program, would have required changes to the current partner structure along with scheduling shifts. With school beginning in September 2022 and shift bid changes later in the year, the CPD shared that many focus groups members raised concerns about pilot implementation beginning in the seventh reporting period. The IMT recognized that the support of pilot participants is integral to the success of the pilot, and eventually the expansion of these programs to the entire department, and thus, supported the CPD’s decision to begin implementation in the eighth reporting period.

Progress in the Eighth Reporting Period

This reporting period, the City and the CPD implemented the Unity of Command and Span of Control Pilot Program based on a new staffing model to address a number of the shortcomings of the previous pod model. This new model focused on three tenets: geographic familiarity, high-quality supervision, and resource flexibility. The City and the CPD have also shared intentions to conduct a Workforce Allocation Study to develop a broader, department-wide staffing model along with recommendations on transfer procedures in multiple past reporting periods. To our knowledge, this is not yet underway. We look forward to receiving this information and continuing to consult with the CPD and the City as they undertake

these efforts. This is particularly important as the CPD works to expand the pilot to further districts in upcoming reporting periods.

In April 2023, the IMT conducted a site visit. During the IMT site visit, officers continued to express frustrations with resource and staffing issues. The 6th District continues to experience turnover of officers and supervisors which limits the levels to which consistent supervision can be achieved. Additionally, officers expressed that, while they believed in the goals of the Unity of Command and Span of Control Pilot Program, they have not been provided ample opportunity to share feedback on operational aspects of the program. The IMT recognizes that the CPD conducted a focus group with a sample of officers in the seventh reporting period to solicit feedback. Additionally, the City and the CPD have shared plans to conduct a survey of 6th District officers and supervisors about the pilot programs in July 2023. We look forward to reviewing the results of these efforts and hope the City and the CPD will incorporate them meaningfully as they expand to further districts.

During monthly calls, the City and the CPD have shared information about the progress of the Unity of Command and Span of Control Pilot Program. Since the launch of the new staffing model this reporting period, the 6th District maintained a compliance rate between 68% and 74% for span of control. Between 78% and 83% of officers and 74% to 80% of sergeants worked in their assigned sector. Additionally, officers worked with the sergeant who will complete their performance evaluation about half of the time. The IMT has been provided with updates on the staffing dashboard's management tools for making staffing and operational decisions that it believes would enhance unity of command and span of control. We look forward to these percentages of time increasing and remaining stable over time. In the IMT's opinion, the CPD members in the 6th District and in the patrol chain of command are dedicated to achieving compliance in this area, not only because it is required by the Consent Decree, but because they understand that these requirements are fundamental pieces of the structure and accountability required to be able to effectively and justly police Chicago.

Further, in June 2023, the CPD produced the *Unity of Command Span of Control Pilot Phase Preliminary Implementation Plan*. Upon review of the plan, the IMT believes that this plan is accurately focused on answering three questions in relation to the interrelated pilots:

1. What is the minimum level of consistent supervision (unity of command and span of control) that must be in place on a routine basis in the 6th District in order for the Officer Support System and the Performance Evaluation System pilot programs to be successful?

Relatedly, how can the attendance data needed to measure consistency of supervision under unity of command and span of control be collected and reported in a manner that is more user-friendly and efficient than the manual processes currently in place in the 6th District?

2. What metrics and evaluations will inform when the Officer Support System Pilot Program can be expanded to additional districts?
3. What metrics and evaluations will inform when the Performance Evaluation System Pilot Program can be expanded to additional districts?

The implementation plan indicates that the CPD has a clear understanding of the metrics and data needed for the next phase of the pilots that will expand into two additional districts, and eventually into all 22 districts. The plan is well-written, comprehensive, and indicative of a thoughtful and significant organizational pivot necessary to advance compliance in this important area of the Consent Decree.

The City and the CPD did not reach Preliminary compliance with ¶366 in the eighth reporting period. To reach compliance with this paragraph, there is significant work to be done. The IMT looks forward to the City's and the CPD's ability to develop and maintain an efficient staffing model in the pilot district for a sustained period.

In the ninth reporting period, the IMT will closely observe the expansion of the Unity of Command and Span of Control, Officer Support System, and Performance Evaluation System pilot programs. We look forward to reviewing the contents of the CPD dashboard, assignment sheets, transfer orders, and other relevant records. Additionally, we hope to conduct individual interviews and focus groups with members of the pilot district in future reporting periods. The IMT anticipates observing training related to the Unity of Command and Span of Control Pilot Program along with evaluations of that training.

Paragraph 366 Compliance Progress History

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

Supervision: ¶367

367. CPD may review and revise its staffing model as necessary to ensure that all field units on each watch in each patrol district achieve unity of command and a span of control ratio of no more than ten officers to one Sergeant.

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 ¶367 in the eighth reporting period but did not reach Secondary compliance.

To evaluate Preliminary compliance with ¶367, we reviewed the CPD’s relevant policies and records following the process described in the Consent Decree (¶¶626–41), which outlines applicable consultation, resolution, workout, and public comment periods. For Secondary compliance, we reviewed relevant data sources necessary or helpful to demonstrate the City and the CPD’s ability to develop and maintain an efficient staffing model consistent with this paragraph.

Progress before the Eighth Reporting Period

We assessed the requirements of ¶367 for the first time in the sixth reporting period. During the sixth reporting period, the CPD produced D20-02, Unity of Command and Span of Control Schedule Pilot Program, under this paragraph. This policy, which received a no-objection by the IMT and the OAG in the fifth reporting period, defines both unity of command and span of control and explains how they are designed to afford consistency within patrol areas and create manageable officer-to-sergeant ratios.

The policy specifically discusses evaluation of the pilot programs such as in section VIII-B-5 which states, “Responsibilities of the Unity of Command and Span of Control Schedule Program Evaluation Committee include assessing the unity of command in the program and determine if it should be modified in any of its operations.” The policy also encourages the participation of the Strategic Initiatives Division and Professional Standards and Compliance Division in assessing the effectiveness of the program. The IMT believes that the flexibility of D20-02 addresses the requirements of ¶367. Further, the City and the CPD have shown their willingness to shift practices when current operations are ineffective.

In April 2022, the City and the CPD requested technical assistance from the IMT regarding the Unity of Command and Span of Control Pilot Program. This was provided to the CPD and the City throughout the seventh reporting period. As a result, the City and CPD developed a new staffing model to address a number of the shortcomings of the pod model. This new model will focus on three tenets: geographic familiarity, high-quality supervision, and resource flexibility. The CPD anticipated implementing this new model beginning in the first quarter of 2023.

During the seventh reporting period, on October 6, 2022, the City and the CPD produced an updated D20-02, *Unity of Command and Span of Control Schedule Pilot Program*. The IMT provided comments on November 5, 2022. We believed the policy to be well-written and commended the department for their effort to include aspects of the related pilot programs, Performance Evaluation System and Officer Support System, in D20-02. However, we also noted the need for clarity about the intent of CPD to use “an average” of ten officers per sergeant for span of control.

Also, during the seventh reporting period, we met with members of the Office of Constitutional Reform along with Bureau of Patrol to hear further about CPD-conducted focus groups with members of the 6th District, as multiple pilots were set to begin. These pilots, and specifically the Unity of Command and Span of Control Pilot Program, would have required changes to the current partner structure along with scheduling shifts. With school beginning in September 2022 and shift bid changes later in the year, the CPD shared that many focus groups members raised concerns about pilot implementation beginning in the seventh reporting period. The IMT recognized that the support of pilot participants is integral to the success of the pilot, and eventually the expansion of these programs to the entire department, and thus, supported the CPD’s decision to begin implementation in the eighth reporting period.

Progress in the Eighth Reporting Period

This reporting period, the City and the CPD implemented the Unity of Command and Span of Control Pilot Program based on a new staffing model to address a number of the shortcomings of the previous pod model. This new model focused on three tenets: geographic familiarity, high-quality supervision, and resource flexibility. The City and the CPD have also shared intentions to conduct a Workforce Allocation Study to develop a broader, department-wide staffing model along with recommendations on transfer procedures in multiple past reporting periods. To our knowledge, this is not yet underway. We look forward to receiving this information and continuing to consult with the CPD and the City as they undertake these efforts. This is particularly important as the CPD works to expand the pilot to further districts in upcoming reporting periods.

In April 2023, the IMT conducted a site visit. During the IMT site visit, officers continued to express frustrations with resource and staffing issues. The 6th District continues to experience turnover of officers and supervisors which limits the levels to which consistent supervision can be achieved. Additionally, officers expressed that, while they believed in the goals of the Unity of Command and Span of Control Pilot Program, they have not been provided ample opportunity to share feedback on operational aspects of the program. The IMT recognizes that the CPD conducted a focus group with a sample of officers in the seventh reporting period to solicit feedback. Additionally, the City and the CPD have shared plans to conduct a survey of 6th District officers and supervisors about the pilot programs in July 2023. We look forward to reviewing the results of these efforts and hope the City and the CPD will incorporate them meaningfully as they expand to further districts.

During monthly calls, the City and the CPD have shared information about the progress of the Unity of Command and Span of Control Pilot Program. Since the launch of the new staffing model this reporting period, the 6th District maintained a compliance rate between 68% and 74% for span of control. Between 78% and 83% of officers and 74% to 80% of sergeants worked in their assigned sector. Additionally, officers worked with the sergeant who will complete their performance evaluation about half of the time. The IMT has been provided with updates on the staffing dashboard's management tools for making staffing and operational decisions that it believes would enhance unity of command and span of control. We look forward to these percentages of time increasing and remaining stable over time. In the IMT's opinion, the CPD members in the 6th District and in the patrol chain of command are dedicated to achieving compliance in this area, not only because it is required by the Consent Decree, but because they understand that these requirements are fundamental pieces of the structure and accountability required to be able to effectively and justly police the city.

Further, in June 2023, the CPD produced the *Unity of Command Span of Control Pilot Phase Preliminary Implementation Plan*. Upon review of the plan, the IMT believes that this plan is accurately focused on answering three questions in relation to the interrelated pilots:

1. What is the minimum level of consistent supervision (unity of command and span of control) that must be in place on a routine basis in the 6th District in order for the Officer Support System and the Performance Evaluation System pilot programs to be successful?

Relatedly, how can the attendance data needed to measure consistency of supervision under unity of command and span of control be collected and reported in a manner that is more user-friendly and efficient than the manual processes currently in place in the 6th District?

2. What metrics and evaluations will inform when the Officer Support System Pilot Program can be expanded to additional districts?
3. What metrics and evaluations will inform when the Performance Evaluation System Pilot Program can be expanded to additional districts?

The implementation plan indicates that the CPD has a clear understanding of the metrics and data needed for the next phase of the pilots that will expand into two additional districts, and eventually into all 22 districts. The plan is well-written, comprehensive, and indicative of a thoughtful and significant organizational pivot necessary to advance compliance in this important area of the Consent Decree.

The City and the CPD maintained Preliminary compliance with ¶367 in the eighth reporting period. To reach additional levels of compliance with this paragraph, there is significant work to be done. The IMT looks forward to the City’s and the CPD’s ability to develop and maintain an efficient staffing model in the pilot district for a sustained period.

In the ninth reporting period, the IMT will closely observe the expansion of the Unity of Command and Span of Control, Officer Support System, and Performance Evaluation System pilot programs. We look forward to reviewing the contents of the CPD dashboard, assignment sheets, transfer orders, and other relevant records. Additionally, we hope to conduct individual interviews and focus groups with members of the pilot district in future reporting periods. The IMT anticipates observing training related to the Unity of Command and Span of Control Pilot Program along with evaluations of that training.

Paragraph 367 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	

Supervision: ¶368

368. Beginning 365 days after the Effective Date, and annually thereafter, the Monitor will review and assess CPD's progress toward achieving unity of command and a span of control ratio of no more than ten officers to one Sergeant.

Compliance Progress

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

Recurring Schedule: May 3, 2023



Met



Missed

Preliminary: *In Compliance (SECOND REPORTING PERIOD)*

Secondary: *Not in Compliance*

Full: *Not Yet Assessed*

The City and the CPD maintained Preliminary compliance with ¶368 in the eighth reporting period but did not reach Secondary compliance.

To assess Preliminary compliance with ¶368, we reviewed data regarding the CPD's efforts to comply with Unity of Command and Span of Control principles outlined in the Consent Decree. To evaluate Secondary compliance with ¶368, we reviewed the CPD's relevant policies, as well as records regarding the expansion of the CPD's Unity of Command and Span of Control pilot program. Also, we considered whether the City and the CPD demonstrated with sufficient data that the unity of command and span of control ratio of ten officers to one sergeant.

Progress before the Eighth Reporting Period

The City and the CPD reached Preliminary compliance with ¶368 in the second reporting period by launching the Unity of Command and Span of Control Pilot Program. In the fourth reporting period, we noted that the information provided demonstrated that the City and the CPD had a long way to go to achieve the unity of command and span of control ratio of no more than 10 officers to one sergeant.

During a site visit in the fourth reporting period, we heard that the staffing ratio called for by these paragraphs was not being met. We noted that there seemed to be a staffing shortage caused by various factors that prevented the CPD from complying with this ratio. As we reported, these shortages were not only causing frustrations among officers in the districts in which the Unity of Command and Span of Control Pilot Program was being piloted (4th, 6th, and 7th), but seemed to have also caused unsafe situations for officers in those districts. The Audit Division's Summary of challenges facing the expanded Unity of Command and Span of Control Pilot Program reiterated the frustrations and concerns we heard from officers. The CPD has since limited the pilot to the 6th District.

In the fifth reporting period, the IMT's virtual site visit again revealed that the staffing ratio called for by these paragraphs is not being met. The staffing shortage continues, preventing the CPD from complying with this ratio. These shortages are causing frustrations among officers and sergeants in the districts in which the Unity of Command and Span of Control Pilot Program is being piloted. The CPD produced a Unity of Command/Span of Control Data Analysis on December 30, 2021, which outlined a staffing pod model for assessing the supervisor to officer ratio. The goal of the model is for a member to be assigned to a primary sergeant 75% of their time, a secondary sergeant 20% of their time, and a tertiary sergeant 5% of their time. The CPD also produced D20-02, *Unity of Command and Span of Control – Pilot Program*, which was finalized and issued in December 2021. The policy specifically identifies in Section III. G. 1-4 that a data dashboard is designed to capture data to support the district's required operations with span of control and unity of command.

During the sixth reporting period, the IMT attended several virtual and in-person site visits and conducted focus groups with officers and sergeants. As in the fifth reporting period, we heard a great deal of frustration expressed about inconsistent supervision and staffing shortages, which made it very difficult to achieve unity of command/span of control throughout the ranks. During meetings with the City, the CPD, and the OAG, the CPD also discussed the staffing dashboard's management tools for making staffing and operational decisions, such as an electronic watch assignment sheet from the 6th District which allows the CPD to (at a glance) give supervisors the ability to see span of control and unity of command alignment. Additionally, the CPD shared that they plan to assign additional sergeants to the 6th District during the sixth reporting period, which is the primary pilot district.

The City and the CPD implemented a new pod supervision structure (primary, secondary, and tertiary role for supervisors) in the fifth reporting period. However, during the IMT's conversations with command staff, officers, and supervisors, the results of the pod supervision structure did not consistently result in unity of command. In April 2022, the City and the CPD requested technical assistance from the IMT regarding the Unity of Command/Span of Control pilot programs. In late June, during the first technical assistance meeting, the City and the CPD shared their plans to develop a new staffing model to address a number of the shortcomings of the pod model. Additionally, the IMT recognized that the CPD convened a Unity of Command and Span of Control Pilot Program Evaluation Committee, which is to meet at least quarterly to discuss implementation progress and share feedback from department members.

Throughout the seventh reporting period, the IMT provided technical assistance regarding the Unity of Command and Span of Control Pilot Program. As a result, the City and CPD developed a new staffing model to address a number of the shortcomings of the pod model. This new model will focus on three tenets: geographic

familiarity, high-quality supervision, and resource flexibility. The CPD anticipated implementing this new model beginning in the first quarter of 2023.

During the seventh reporting period, on October 6, 2022, the City and the CPD produced an updated D20-02, *Unity of Command and Span of Control Schedule Pilot Program*. The IMT provided comments on November 5, 2022. We believed the policy to be well-written and commended the department for their effort to include aspects of the related pilot programs, Performance Evaluation System and Officer Support System, in D20-02. However, we also noted the need for clarity about the intent of CPD to use “an average” of ten officers per sergeant for span of control.

Also, during the seventh reporting period, we met with members of the Office of Constitutional Reform along with Bureau of Patrol to hear further about CPD-conducted focus groups with members of the 6th District, as multiple pilots were set to begin. These pilots, and specifically the Unity of Command and Span of Control Pilot Program, would have required changes to the current partner structure along with scheduling shifts. With school beginning in September 2022 and shift bid changes later in the year, the CPD shared that many focus groups members raised concerns about pilot implementation beginning in the seventh reporting period. The IMT recognized that the support of pilot participants is integral to the success of the pilot, and eventually the expansion of these programs to the entire department, and thus, supported the CPD’s decision to begin implementation in the eighth reporting period.

Progress in the Eighth Reporting Period

This reporting period, the City and the CPD implemented the Unity of Command and Span of Control Pilot Program based on a new staffing model to address a number of the shortcomings of the previous pod model. This new model focused on three tenets: geographic familiarity, high-quality supervision, and resource flexibility. The City and the CPD have also shared intentions to conduct a Workforce Allocation Study to develop a broader, department-wide staffing model along with recommendations on transfer procedures in multiple past reporting periods. To our knowledge, this is not yet underway. We look forward to receiving this information and continuing to consult with the CPD and the City as they undertake these efforts. This is particularly important as the CPD works to expand the pilot to further districts in upcoming reporting periods.

In April 2023, the IMT conducted a site visit. During the IMT site visit, officers continued to express frustrations with resource and staffing issues. The 6th District continues to experience turnover of officers and supervisors which limits the levels to which consistent supervision can be achieved. Additionally, officers expressed that, while they believed in the goals of the Unity of Command and Span of Control Pilot Program, they have not been provided ample opportunity to share feedback

on operational aspects of the program. The IMT recognizes that the CPD conducted a focus group with a sample of officers in the seventh reporting period to solicit feedback. Additionally, the City and CPD have shared plans to conduct a survey of 6th District officers and supervisors about the pilot programs in July 2023. We look forward to reviewing the results of these efforts and hope the City and the CPD will incorporate them meaningfully as they expand to further districts.

During monthly calls, the City and the CPD have shared information about the progress of the Unity of Command and Span of Control Pilot Program. Since the launch of the new staffing model this reporting period, the 6th District maintained a compliance rate between 68% and 74% for span of control. Between 78% and 83% of officers and 74% to 80% of sergeants worked in their assigned sector. Additionally, officers worked with the sergeant who will complete their performance evaluation about half of the time. The IMT has been provided with updates on the staffing dashboard's management tools for making staffing and operational decisions that it believes would enhance unity of command and span of control. We look forward to these percentages of time increasing and remaining stable over time. In the IMT's opinion, the CPD members in the 6th District and in the patrol chain of command are dedicated to achieving compliance in this area, not only because it is required by the Consent Decree, but because they understand that these requirements are fundamental pieces of the structure and accountability required to be able to effectively and justly police the city.

Further, in June 2023, the CPD produced the *Unity of Command Span of Control Pilot Phase Preliminary Implementation Plan*. Upon review of the plan, the IMT believes that this plan is accurately focused on answering three questions in relation to the interrelated pilots:

1. What is the minimum level of consistent supervision (unity of command and span of control) that must be in place on a routine basis in the 6th District in order for the Officer Support System and the Performance Evaluation System pilot programs to be successful?

Relatedly, how can the attendance data needed to measure consistency of supervision under unity of command and span of control be collected and reported in a manner that is more user-friendly and efficient than the manual processes currently in place in the 6th District?

2. What metrics and evaluations will inform when the Officer Support System Pilot Program can be expanded to additional districts?
3. What metrics and evaluations will inform when the Performance Evaluation System Pilot Program can be expanded to additional districts?

The implementation plan indicates that the CPD has a clear understanding of the metrics and data needed for the next phase of the pilots that will expand into two additional districts, and eventually into all 22 districts. The plan is well-written, comprehensive, and indicative of a thoughtful and significant organizational pivot necessary to advance compliance in this important area of the Consent Decree.

The City and the CPD maintained Preliminary compliance with ¶368 in the eighth reporting period. To reach additional levels of compliance with this paragraph, there is significant work to be done. The IMT looks forward to the City’s and the CPD’s ability to develop and maintain an efficient staffing model in the pilot district for a sustained period.

In the ninth reporting period, the IMT will closely observe the expansion of the Unity of Command and Span of Control, Officer Support System, and Performance Evaluation System pilot programs. We look forward to reviewing the contents of the CPD dashboard, assignment sheets, transfer orders, and other relevant records. Additionally, we hope to conduct individual interviews and focus groups with members of the pilot district in future reporting periods. The IMT anticipates observing training related to the Unity of Command and Span of Control Pilot Program along with evaluations of that training.

Paragraph 368 Compliance Progress History

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

Supervision: ¶369

369. A performance evaluation process will enable CPD to identify, support, and recognize members who perform their duties lawfully, safely, and effectively, as well as to identify and respond to members who perform poorly, demonstrate adverse behaviors, or engage in inappropriate conduct or conduct that otherwise undermines member or public safety and community trust.

Compliance Progress

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

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

In the eighth reporting period, the City and the CPD maintained Preliminary compliance with ¶369.

To evaluate Preliminary compliance with ¶369, we reviewed the CPD’s relevant policies and records following the process described in the Consent Decree (¶¶626–41), which outlines applicable consultation, resolution, workout, and public comment periods. For Secondary compliance, we reviewed the CPD’s training development, implementation, and evaluation.

Progress before the Eighth Reporting Period

We assessed the requirements of ¶369 for the first time in the sixth reporting period. The City and the CPD achieved Preliminary compliance by finalizing D21-09, Performance Evaluation System - Pilot Program Policy (PES) in the fifth reporting period, which meets the requirements of this paragraph. Section III-E of the policy assigns supervisors to evaluate members and assist in setting goals under the Performance Evaluation System. Further, supervisors will use the Performance Evaluation System to effectively assess and document job performance of members under their command. Supervisors are also required to record notable observations of members in the Portfolio Notes section of the Performance Evaluation System every police period, as well as provide continual feedback and coaching.

Policy D21-09 identifies five performance dimension categories to evaluate the job performance for all sworn members: Conduct and Professionalism, Respect for People and Public Trust, Adaptability and Situational Skills, Problem Solving, and Job Knowledge and Professional Development. Supervisors will consider various components under each dimension, depending upon the duties and responsibilities of the member being evaluated. It also affords members an opportunity to set personal goals and requires supervisors to support and recognize members who

perform their duties lawfully, safely, and effectively, as well as to identify and respond to members who perform poorly, engage in inappropriate conduct, or in conduct that otherwise undermines member, public safety, or community trust.

However, the IMT acknowledged that D21-09 is only being used in the pilot districts, whereas E05-01, *Performance Evaluations of all Sworn Department Members Below the Rank of Superintendent* policy, is used for all other officers. We shared that, in future reporting periods, the IMT would like to see this program expanded, where D21-09 will ultimately replace E05-01.

During the seventh reporting period, on July 21, 2022, the City and CPD produced *Performance Evaluation System Training*. The IMT submitted a no-objection letter on August 4, 2022. The IMT believes that the trainings were well-designed as they included adult learning methods and covered the required material. We observed the human resources portion of this training on November 4, 2022. It was well-received by the members and the instructors effectively engaged with the participants. IMT members noted that the CPD curriculum contained the components required by the Consent Decree and, in some areas, exceeded our expectations.

Progress in the Eighth Reporting Period

The Performance Evaluation System Pilot Program was launched this reporting period in the 6th District. The Performance Evaluation System program requires supervisors to complete goal-setting exercises with their supervisees and share resources and training related to their goals. It also requires that supervisors input progress notes about each officer they supervise on, at minimum, a monthly basis. During focus groups with sergeants during the April 2023 IMT site visit, some shared that they felt they were prepared and aware of relevant information for their supervisees and others expressed that they were not. This lack of standardization in knowledge of resources shows a potential shortfall in performance evaluation process. Additionally, during the IMT site visit, the IMT learned that tracking of supervisory inputs into the system was being completed manually. We encourage the City and the CPD to explore automated options to ensure that supervisors are meeting the requirements of the program.

During monthly calls, the City and the CPD have shared progress updates indicating that officers in the 6th District worked with the sergeant who will complete their performance evaluation about half of the time. The IMT is encouraged by the manner with which the CPD has developed tools to monitor these levels and the regularity with which they self-assess. Compliance will require growth in the time spent with supervisees and sustainment of that progress. However, the CPD has shown the IMT that they are intentional about achieving this.

In the eighth reporting period, the City and the CPD maintained Preliminary compliance with ¶369. We look forward to future site visits and focus groups to gather direct input regarding the Performance Evaluation System. The IMT will review the forthcoming evaluation plan for the Performance Evaluation System Pilot Program. This plan is integral to the success of the program, and the IMT hopes to see a focus on the data collection necessary to successfully implement the program. Further, we look forward to observing evaluation committee meetings and hope to see a shift from a briefing model to more collaborative and conversational structure.

Paragraph 369 Compliance Progress History

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

Supervision: ¶370

370. CPD’s performance evaluation process will identify, support, and recognize members’ activity, performance, and conduct through an assessment of specific quantitative and qualitative performance dimensions, which will address, among other things, constitutional policing, community policing, problem-solving, and the effective use of de-escalation or specialized training. Although CPD may use quantitative measures in evaluating members to ensure that members are performing their required duties, CPD will not require members to achieve specific numerical thresholds, such as the number of arrests, investigatory stops, or citations. CPD will ensure that its performance evaluation process is consistent with the law and best practices. Within 18 months of the Effective Date, CPD will revise its performance evaluation policies and practices as necessary to meet the requirements 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 ¶370 in the eighth reporting period but did not reach Secondary compliance.

To assess Preliminary compliance with ¶370, we reviewed the CPD’s relevant policies (D21-09) and records following the process described in the Consent Decree (¶¶626–41), which outlines applicable consultation, resolution, workout, and public comment periods. For Secondary compliance, we reviewed the CPD’s training development, implementation, and evaluation.

Progress before the Eighth Reporting Period

We assessed compliance with ¶370 for the first time during the fifth reporting period. In the fifth reporting period, the City and the CPD achieved Preliminary compliance with ¶370 by finalizing the updated *Performance Evaluations System - Pilot Program Policy*, D21-09. D21-09 incorporates specific quantitative and qualitative performance dimensions, allowing for the capture of members’ activities associated with constitutional policing, community policing, problem-solving, and the effective use of de-escalation. However, the IMT acknowledged that D21-09 is only being used in the pilot districts, whereas E05-01, *Performance Evaluations of all Sworn Department Members Below the Rank of Superintendent* policy, is used for

all other officers. We shared that, in future reporting periods, the IMT would like to see this program expanded, where D21-09 will ultimately replace E05-01.

The CPD also finalized and issued the *Performance Recognition System Policy* (E05-02) during the fifth reporting period. This policy helps to support ¶1370 by aiding supervisors in recognizing and documenting the job performance of department members under their command, such as exceptional job performance or adverse behavior that can be improved by non-disciplinary options. During this reporting period, the City and the CPD also produced several *Performance Evaluation* training materials for sworn members.

During the sixth reporting period, the IMT reviewed training materials for sworn members associated with the Performance Evaluation System (PES) Pilot Program, consisting of the Performance Evaluation System Handbook, Guidebook, Evaluation Survey, Test, Training Video, and Instructors Guide. The training materials capture specific quantitative and qualitative performance dimensions which address constitutional policing, community policing, problem-solving, and the effective use of de-escalation or specialized training.

During the seventh reporting period, on July 21, 2022, the City and CPD produced *Performance Evaluation System Training*. The IMT submitted a no-objection letter on August 4, 2022. The IMT believes that the trainings were well-designed as they included adult learning methods and covered the required material. We observed the human resources portion of this training on November 4, 2022. It was well-received by the members and the instructors effectively engaged with the participants. IMT members noted that the CPD curriculum contained the components required by the Consent Decree and, in some areas, exceeded our expectations.

Progress in the Eighth Reporting Period

The Performance Evaluation System Pilot Program was launched this reporting period in the 6th District. The Performance Evaluation System program requires supervisors to complete goal-setting exercises with their supervisees and share resources and training related to their goals. It also requires that supervisors input progress notes about each officer they supervise on, at minimum, a monthly basis. During focus groups with sergeants during the April 2023 IMT site visit, some shared that they felt they were prepared and aware of relevant information for their supervisees and others expressed that they were not. This lack of standardization in knowledge of resources shows a potential shortfall in performance evaluation process. Additionally, during the IMT site visit, the IMT learned that tracking of supervisory inputs into the system was being completed manually. We encourage the City and the CPD to explore automated options to ensure that supervisors are meeting the requirements of the program.

Further, in site visit meetings with officers in the 6th District, members shared that enforcement activities, such as arrests and seizures, were recognized more often than community interactions which can increase public trust. This can send the message that community engagement is less important, which is inconsistent with the spirit of the Consent Decree. The IMT hopes that the supervisory inputs into the Performance Evaluation System will include both technical and interpersonal skills.

During monthly calls, the City and the CPD have shared progress updates indicating that officers in the 6th District worked with the sergeant who will complete their performance evaluation about half of the time. The IMT is encouraged by the manner with which the CPD has developed tools to monitor these levels and the regularity with which they self-assess. Compliance will require growth in the time spent with supervisees and sustainment of that progress. However, the CPD has shown the IMT that they are intentional about achieving this.

In the eighth reporting period, the City and the CPD maintained Preliminary compliance with ¶370. We look forward to future site visits and focus groups to gather direct input regarding the Performance Evaluation System. The IMT will review the forthcoming evaluation plan for the Performance Evaluation System Pilot Program. This plan is integral to the success of the program, and the IMT hopes to see a focus on the data collection necessary to successfully implement the program. Further, we look forward to observing evaluation committee meetings and hope to see a shift from a briefing model to more collaborative and conversational structure.

Paragraph 370 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	

Supervision: ¶371

371. Annual performance evaluations for members of all ranks, excluding the Superintendent, will be based upon work performance completed during a specific rating period and will include a written description of performance dimension expectations; the member’s proficiency in fulfilling the specific duties and responsibilities of the assigned position, unit, or team; any areas of particular growth and achievement; and areas where the member requires further support and/or supervision. The evaluation process will provide for support, feedback, communication of expectations, and, when appropriate, corrective actions.

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

Recurring Schedule: December 31, 2023 **Not Yet Applicable**

Preliminary: *In Compliance (FIFTH REPORTING PERIOD)*

Secondary: *Not in Compliance*

Full: *Not Yet Assessed*

The City and the CPD maintained Preliminary compliance with ¶371 in the eighth reporting period but did not reach Secondary compliance.

To assess Preliminary compliance with ¶371, we reviewed, among other things, the CPD’s relevant policies and records following the process described in the Consent Decree (¶¶626–41), which outlines applicable consultation, resolution, workout, and public comment periods. For Secondary compliance, we reviewed the CPD’s training development, implementation, and evaluation.

Progress before the Eighth Reporting Period

We assessed compliance with ¶371 for the first time during the fifth reporting period. In the fifth reporting period, the City and the CPD achieved Preliminary compliance with ¶371 by finalizing the updated *Performance Evaluation System - Pilot Program Policy (PES)* (D21-09). Section III-E of the policy assigns supervisors to evaluate members and assist in setting goals under the Performance Evaluation System. Further, supervisors will use the Performance Evaluation System to effectively assess and document job performance of members under their command. Supervisors are also required to record notable observations of members in the Portfolio Notes section of the Performance Evaluation System every police period, as well as provide continual feedback and coaching.

Policy D21-09 identifies five performance dimension categories to evaluate the job performance for all sworn members: Conduct and Professionalism, Respect for

People and Public Trust, Adaptability and Situational Skills, Problem Solving, and Job Knowledge and Professional Development. Supervisors will consider various components under each dimension, depending upon the duties and responsibilities of the member being evaluated. It also affords members an opportunity to set personal goals and requires supervisors to support and recognize members who perform their duties lawfully, safely, and effectively, as well as to identify and respond to members who perform poorly, engage in inappropriate conduct, or in conduct that otherwise undermines member, public safety, or community trust. However, the IMT acknowledged that D21-09 is only being used in the pilot districts, whereas E05-01, *Performance Evaluations of all Sworn Department Members Below the Rank of Superintendent* policy, is used for all other officers. We shared that, in future reporting periods, the IMT would like to see this program expanded, where D21-09 will ultimately replace E05-01.

During the sixth reporting period, the IMT reviewed training materials for sworn members associated with the Performance Evaluation System (PES) Pilot Program, consisting of the Performance Evaluation System Handbook, Guidebook, Evaluation Survey, Test, Training Video, and Instructors Guide. The training materials capture specific quantitative and qualitative performance dimensions which address constitutional policing, community policing, problem-solving, and the effective use of de-escalation or specialized training. The training materials also clearly set forth examples of how members and supervisors set performance expectations and professional goals for members. Further, they include an “Officer Transfer Procedure” for when members transfer into a Performance Evaluation System pilot district during the course of a rating year.

During the seventh reporting period, on July 21, 2022, the City and CPD produced *Performance Evaluation System Training*. The IMT submitted a no-objection letter on August 4, 2022. The IMT believes that the trainings were well-designed as they included adult learning methods and covered the required material. We observed the human resources portion of this training on November 4, 2022. It was well-received by the members and the instructors effectively engaged with the participants. IMT members noted that the CPD curriculum contained the components required by the Consent Decree and, in some areas, exceeded our expectations.

Progress in the Eighth Reporting Period

The Performance Evaluation System pilot program was launched this reporting period in the 6th District. The Performance Evaluation System program requires supervisors to complete goal-setting exercises with their supervisees and share resources and training related to their goals. It also requires that supervisors input progress notes about each officer they supervise on, at minimum, a monthly basis. During focus groups with sergeants during the April 2023 IMT site visit, some shared that they felt they were prepared and aware of relevant information for

their supervisees and others expressed that they were not. This lack of standardization in knowledge of resources shows a potential shortfall in performance evaluation process. Additionally, during the IMT site visit, the IMT learned that tracking of supervisory inputs into the system was being completed manually. We encourage the City and the CPD to explore automated options to ensure that supervisors are meeting the requirements of the program.

Further, in site visit meetings with officers in the 6th District, members shared that enforcement activities, such as arrests and seizures, were recognized more often than community interactions which can increase public trust. This can send the message that community engagement is less important which is inconsistent with the spirit of the consent decree. The IMT hopes that the supervisory inputs into the Performance Evaluation System will include both technical and interpersonal skills.

During monthly calls, the City and the CPD have shared progress updates indicating that officers in the 6th District worked with the sergeant who will complete their performance evaluation about half of the time. The IMT is encouraged by the manner with which the CPD has developed tools to monitor these levels and the regularity with which they self-assess. Compliance will require growth in the time spent with supervisees and sustainment of that progress. However, the CPD has shown the IMT that they are intentional about achieving this.

In the eighth reporting period, the City and the CPD maintained Preliminary compliance with ¶371. We look forward to future site visits and focus groups to gather direct input regarding the Performance Evaluation System. The IMT will review the forthcoming evaluation plan for the Performance Evaluation System Pilot Program. This plan is integral to the success of the program, and the IMT hopes to see a focus on the data collection necessary to successfully implement the program. Further, we look forward to observing evaluation committee meetings and hope to see a shift from a briefing model to more collaborative and conversational structure.

Paragraph 371 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	

Supervision: ¶372

372. CPD will require supervisors of all ranks to conduct timely, accurate, and complete performance evaluations.

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 ¶372 in the eighth reporting period but did not reach Secondary compliance.

To evaluate Preliminary compliance with ¶372, we reviewed among other things, the CPD’s relevant policies and records following the process described in the Consent Decree (¶¶626–41), which outlines applicable consultation, resolution, workout, and public comment periods. For Secondary compliance, we reviewed the CPD’s training development, implementation, and evaluation. We also considered relevant data sources that demonstrate completion of performance evaluations, and the frequency and quality of those evaluations.

Progress before the Eighth Reporting Period

We assessed compliance with ¶372 for the first time during the fifth reporting period. In the fifth reporting period, the City and the CPD achieved Preliminary compliance with ¶372 by finalizing the updated *Performance Evaluation System - Pilot Program Policy*, D21-09. The policy incorporates specific quantitative and qualitative performance dimensions allowing for the capture of members’ activities associated with constitutional policing, community policing, problem-solving, and the effective use of de-escalation. The policy clearly outlines the timeline for the completion of the performance evaluation on an annual basis. In addition, the policy sets out requirements for when a member must be assigned to an evaluating supervisor. All performance evaluations for members will be documented on the Performance Evaluation System, located within the Talent Management System. However, the IMT acknowledged that D21-09 is only being used in the pilot districts, whereas E05-01, *Performance Evaluations of all Sworn Department Members Below the Rank of Superintendent* policy, is used for all other officers. We shared that, in future reporting periods, the IMT would like to see this program expanded, where D21-09 will ultimately replace E05-01.

We shared that, in future reporting periods, and to obtain Secondary compliance, the IMT looks forward to reviewing the data sources which demonstrate performance evaluations that have occurred and the frequency and quality of those evaluations. In addition, the IMT will be monitoring the training for both supervisors

and members as the Performance Evaluation System Pilot Program rolls out during the sixth reporting period.

During the sixth reporting period, the IMT reviewed training materials for sworn members associated with the Performance Evaluation System (PES) Pilot Program, consisting of the Performance Evaluation System Handbook, Guidebook, Evaluation Survey, Test, Training Video, and Instructors Guide. The training materials capture specific quantitative and qualitative performance dimensions which address constitutional policing, community policing, problem-solving, and the effective use of de-escalation or specialized training.

During the seventh reporting period, on July 21, 2022, the City and CPD produced *Performance Evaluation System Training*. The IMT submitted a no-objection letter on August 4, 2022. The IMT believes that the trainings were well-designed as they included adult learning methods and covered the required material. We observed the human resources portion of this training on November 4, 2022. It was well-received by the members and the instructors effectively engaged with the participants. IMT members noted that the CPD curriculum contained the components required by the Consent Decree and, in some areas, exceeded our expectations.

Progress in the Eighth Reporting Period

The Performance Evaluation System Pilot Program was launched this reporting period in the 6th District. The Performance Evaluation System program requires supervisors to complete goal-setting exercises with their supervisees and share resources and training related to their goals. It also requires that supervisors input progress notes about each officer they supervise on, at minimum, a monthly basis. During focus groups with sergeants during the April 2023 IMT site visit, some shared that they felt they were prepared and aware of relevant information for their supervisees and others expressed that they were not. This lack of standardization in knowledge of resources shows a potential shortfall in performance evaluation process. Additionally, during the IMT site visit, the IMT learned that tracking of supervisory inputs into the system was being completed manually. We encourage the City and the CPD to explore automated options to ensure that supervisors are meeting the requirements of the program.

During monthly calls, the City and the CPD have shared progress updates indicating that officers in the 6th District worked with the sergeant who will complete their performance evaluation about half of the time. The IMT is encouraged by the manner with which the CPD has developed tools to monitor these levels and the regularity with which they self-assess. Compliance will require growth in the time spent with supervisees and sustainment of that progress. However, the CPD has shown the IMT that they are intentional about achieving this.

In the eighth reporting period, the City and the CPD maintained Preliminary compliance with ¶372. We look forward to future site visits and focus groups to gather direct input regarding the Performance Evaluation System. The IMT will review the forthcoming evaluation plan for the Performance Evaluation System Pilot Program. This plan is integral to the success of the program, and the IMT hopes to see a focus on the data collection necessary to successfully implement the program. Further, we look forward to observing evaluation committee meetings and hope to see a shift from a briefing model to more collaborative and conversational structure.

Paragraph 372 Compliance Progress History

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

Supervision: ¶373

373. Supervisors may only conduct a performance evaluation of members they have directly supervised and observed during the specific rating period.

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 ¶373 in the eighth reporting period but did not reach Secondary compliance.

To evaluate Preliminary compliance with ¶373, we reviewed among other things, the CPD’s relevant policies and materials following the process described in the Consent Decree (¶¶626–41). For Secondary compliance, we reviewed the Performance Evaluation System training for supervisors in addition to data sources which demonstrate methods for ensuring that evaluations are completed by supervisors who have observed and actively supervised the members being evaluated.

Progress before the Eighth Reporting Period

We assessed compliance with ¶373 for the first time during the third reporting period. The CPD’s Performance Evaluation System Pilot Program and materials remained under review at the close of the period. Therefore, the CPD did not reach Preliminary compliance. We emphasized that the integrity of the Performance Evaluations System depended upon the successful implementation of the Unity of Command and Span of Control staffing structure, as ¶373 requires that Supervisors completing performance evaluations have first-hand knowledge of the members being evaluated.

In the fourth reporting period, the CPD submitted a revised *Performance Evaluation System – Pilot Program Policy* (D21-09), and we submitted a no-objection notice to this revised draft policy. We noted that this policy clearly requires that supervisors limit their review to sworn members who have been assigned under their command for at least 30 days before the evaluation, which differed from the current E05-01 policy. For example, under Section IV.J of E05-01, where a unit member has been supervised by several different supervisors, the supervisors are able to confer with each other in evaluating that member, and there is no specified length of time for which supervisors must have overseen the officer they are evaluating.

In the fifth reporting period, the City and the CPD achieved Preliminary compliance with ¶373 by finalizing the updated *Performance Evaluation System - Pilot Program Policy* (D21-09). Section III-D4 of the policy requires supervisors to complete evaluations only for members who have been assigned under their command for at least thirty days prior to the evaluation. However, the IMT acknowledged that D21-09 is only being used in the pilot districts, whereas E05-01, *Performance Evaluations of all Sworn Department Members Below the Rank of Superintendent* policy, is used for all other officers. We shared that, in future reporting periods, the IMT would like to see this program expanded, where D21-09 will ultimately replace E05-01.

During the sixth reporting period, the IMT reviewed training materials for sworn members associated with the Performance Evaluation System (PES) Pilot Program, consisting of the Performance Evaluation System Handbook, Guidebook, Evaluation Survey, Test, Training Video, and Instructors Guide. The training materials capture specific quantitative and qualitative performance dimensions which address constitutional policing, community policing, problem-solving, and the effective use of de-escalation or specialized training. The Performance Evaluation System Handbook and Guidebook provide clear directions that supervisors may only conduct a performance evaluation of members they have directly supervised and observed during the specific rating period.

During the seventh reporting period, on July 21, 2022, the City and CPD produced *Performance Evaluation System Training*. The IMT submitted a no-objection letter on August 4, 2022. The IMT believes that the trainings were well-designed as they included adult learning methods and covered the required material. We observed the human resources portion of this training on November 4, 2022. It was well-received by the members and the instructors effectively engaged with the participants. IMT members noted that the CPD curriculum contained the components required by the Consent Decree and, in some areas, exceeded our expectations.

Progress in the Eighth Reporting Period

The Performance Evaluation System Pilot Program was launched this reporting period in the 6th District. During monthly calls, the City and the CPD have shared progress updates indicating that officers in the 6th District worked with the sergeant who will complete their performance evaluation about half of the time. However, the 6th District continues to experience turnover of officers and supervisors. For example, during a May meeting with the City and the CPD, the IMT was told that the 6th District would be assigned ten new sergeants, but that six others would be transferred to other districts. The consistent turnover of supervisors continues to raise concerns about whether members will receive performance evaluations from supervisors who have sufficient familiarity with them as required by ¶373.

In the eighth reporting period, the City and the CPD maintained Preliminary compliance with ¶373. We look forward to future site visits and focus groups to gather direct input regarding the Performance Evaluation System. The IMT will review the forthcoming evaluation plan for the and Performance Evaluation System Pilot Program. This plan is integral to the success of the program, and the IMT hopes to see a focus on the data collection necessary to successfully implement the program. Further, we look forward to observing evaluation committee meetings and hope to see a shift from a briefing model to more collaborative and conversational structure.

Paragraph 373 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	

Supervision: ¶374

374. *In addition to the formal annual performance evaluation, supervisors will meet with members under their direct command on an ongoing basis as necessary to provide guidance, mentoring, direction, and support to the members regarding their performance and to identify opportunities for improvement.*

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 ¶374 in the eighth reporting period but did not reach Secondary compliance.

To assess Preliminary compliance with ¶374, we reviewed, among other things, the CPD’s relevant policies and records following the process described in the Consent Decree (¶¶626–41), which outlines applicable consultation, resolution, workout, and public comment periods. For Secondary compliance, we reviewed the CPD’s training development, implementation, and evaluation. We sought to review the Performance Evaluation System training in addition to data sources, including written documentation and interviews with supervisors and those under their command.

Progress before the Eighth Reporting Period

In previous reporting periods, we reviewed drafts of the *Unity of Command and Span of Control—Pilot Program Policy* (D20-02), and the *Performance Evaluation System Directive and Handbook*. These materials marked progress toward compliance with ¶374. However, because the materials remained in the collaborative revision process and had not been finalized or implemented, the City and the CPD did not reach Preliminary compliance with this paragraph.

We noted in the fourth reporting period that the previous policies provided by the CPD demonstrated that D21-09 would be a great improvement. For example, we explained that *Performance Evaluations of all Sworn Department Members Below the Rank of Superintendent* (E05-01) only required the evaluator to provide job-performance feedback to members at the conclusion of an evaluation period. We commended the CPD’s efforts to codify the requirement that supervisors provide informal and ongoing feedback to members under their command.

In the fifth reporting period, the City and the CPD achieved Preliminary compliance with ¶374 by finalizing the updated *Performance Evaluation System - Pilot Program Policy* (D21-09). Section V-B of this policy states that supervisors are responsible for ongoing job performance evaluation of the department members they supervise, beyond the annual performance evaluations. However, the IMT acknowledged that D21-09 is only being used in the pilot districts, whereas E05-01, *Performance Evaluations of all Sworn Department Members Below the Rank of Superintendent* policy, is used for all other officers. We shared that, in future reporting periods, the IMT would like to see this program expanded, where D21-09 will ultimately replace E05-01.

During the sixth reporting period, the IMT reviewed training materials for sworn members associated with the Performance Evaluation System (PES) Pilot Program, consisting of the Performance Evaluation System Handbook, Guidebook, Evaluation Survey, Test, Training Video, and Instructors Guide. The training materials provide guidance to supervisors on how to assist in setting professional goals for members and their responsibility to provide ongoing mentoring and coaching.

Additionally, in April 2022, the IMT conducted an in-person site visit, during which we were able to speak with groups of officers, supervisors, and command staff within the 6th District. These conversations provided additional insight into the realities of supervision and daily operations in the department. During this site visit, we also had the opportunity to observe a productive rollcall where sergeants and lieutenants debriefed situations that occurred on previous shifts with a focus on officer safety, community service, and policy clarifications. This was an effective example of guidance, mentoring, and direction outside of formal performance evaluations as required by the Consent Decree. The IMT notes that these observations are an important step toward assessing further levels of compliance.

During the seventh reporting period, on July 21, 2022, the City and CPD produced *Performance Evaluation System Training*. The IMT submitted a no-objection letter on August 4, 2022. The IMT believes that the trainings were well-designed as they included adult learning methods and covered the required material. We observed the human resources portion of this training on November 4, 2022. It was well-received by the members and the instructors effectively engaged with the participants. IMT members noted that the CPD curriculum contained the components required by the Consent Decree and, in some areas, exceeded our expectations.

Progress in the Eighth Reporting Period

The Performance Evaluation System Pilot Program was launched this reporting period in the 6th District. The Performance Evaluation System Pilot Program requires supervisors to complete goal-setting exercises with their supervisees and share resources and training related to their goals. It also requires that supervisors input progress notes about each officer they supervise on, at minimum, a monthly basis.

During focus groups with sergeants during the April 2023 IMT site visit, some shared that they felt they were prepared and aware of relevant information for their supervisees and others expressed that they were not. This lack of standardization in knowledge of resources shows a potential shortfall in performance evaluation process. Additionally, during the IMT site visit, the IMT learned that tracking of supervisory inputs into the system was being completed manually. We encourage the City and the CPD to explore automated options to ensure that supervisors are meeting the requirements of the program.

Supervisors also described resource issues that affected their ability to perform their duties. Specifically, they highlighted a lack of available patrol vehicles during shift change creating calls for service backlogs. In some cases, supervisors shared that they would respond to calls for service to address these backlogs. This limits the amount of time on shift to conduct supervisory duties, such as meeting with members to provide guidance, mentoring, direction and a support as required by ¶1374. While disheartening, the IMT views supervisors' recognition of these challenges as an indication that supervisors are aware of and focused on their duties. Their innovation shows that they care about their jobs and want to perform well.

Further, in site visit meetings with officers in the 6th District, members shared that enforcement activities, such as arrests and seizures, were recognized more often than community interactions which can increase public trust. This can send the message that community engagement is less important which is inconsistent with the spirit of the Consent Decree. The IMT hopes that the supervisory inputs into the Performance Evaluation System will include both technical and interpersonal skills.

During monthly calls, the City and the CPD have shared progress updates indicating that officers in the 6th District worked with the sergeant who will complete their performance evaluation about half of the time. The IMT is encouraged by the manner with which the CPD has developed tools to monitor these levels and the regularity with which they self-assess. Compliance will require growth in the time spent with supervisees and sustainment of that progress. However, the CPD has shown the IMT that they are intentional about achieving this.

In the eighth reporting period, the City and the CPD maintained Preliminary compliance with ¶1374. We look forward to future site visits and focus groups to gather direct input regarding the Performance Evaluation System. The IMT will review the forthcoming evaluation plan for the and Performance Evaluation System Pilot Program. This plan is integral to the success of the program, and the IMT hopes to see a focus on the data collection necessary to successfully implement the program. Further, we look forward to observing evaluation committee meetings and hope

to see a shift from a briefing model to more collaborative and conversational structure.

Paragraph 374 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	

Supervision: ¶375

375. Supervisors will recognize, when appropriate, formally (e.g., recommendation for commendation) and/or informally (e.g., public and private praise) subordinate members who demonstrate a commitment to procedural justice, de-escalation, impartial policing, and/or community policing.

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 ¶375 in the eighth reporting period but did not reach Secondary compliance.

To evaluate Preliminary compliance with ¶375, we reviewed, among other things, the CPD’s relevant policies and records following the process described in the Consent Decree (¶¶626–41). For Secondary compliance, we reviewed the CPD’s training development, implementation, and evaluation. We considered the Performance Evaluation System and Performance Recognition System trainings along with qualitative and quantitative data from both systems to support compliance with ¶375.

Progress before the Eighth Reporting Period

In prior reporting periods, the CPD revised and produced the *Performance Evaluations System – Pilot Program* (D21-09) and the *Performance Evaluations of All Sworn Department Members Below the Rank of Superintendent* (E05-01). E05-01 remained in place for members who are not in the Performance Evaluation System Pilot Program, which was and is being piloted in the 4th, 6th, and 7th Districts only.

We noted in the fourth reporting period that D21-09 demonstrated a marked improvement over E05-01 regarding the requirement in ¶375: supervisors recognizing subordinate members who demonstrate a commitment to procedural justice, de-escalation, impartial policing, or community policing. We noted that while E05-01 referenced recognizing exceptional performance by members and rewarding the same with commendations and other forms of recognition, D21-09 specifically outlined the requisite dimensions on which officers will be assessed, one of which was “Respect for People and Public Trust,” which included such core competencies as respect, community policing, procedural justice, and impartial policing. We noted that these specified dimensions not only provided guidance to supervisors conducting evaluations but also helped solidify that the CPD valued these various dimensions.

In the fifth reporting period, the City and the CPD achieved Preliminary compliance with ¶375 by finalizing the updated *Performance Evaluation System - Pilot Program Policy*, D21-09 and the *Performance Recognition System Policy*, E05-02. Section III-B of D21-09 and Section IV-C of E05-02 outline the responsibility of supervisors to recognize the achievements of department members under their command. We shared that, in the next reporting period, and to achieve Secondary compliance, the IMT looks forward to reviewing the Performance Evaluation System and Performance Recognition System training along with qualitative and quantitative data from both systems to support ¶375.

During the sixth reporting period, the IMT reviewed training materials for sworn members associated with the Performance Evaluation System (PES) Pilot Program, consisting of the Performance Evaluation System Handbook, Guidebook, Evaluation Survey, Test, Training Video, and Instructors Guide. The training materials provide guidance to supervisors on how to assist in setting professional goals for members and their responsibility to provide ongoing mentoring and coaching.

Additionally, in April 2022, the IMT conducted an in-person site visit, during which we were able to speak with groups of officers, supervisors, and command staff within the 6th District. These conversations provided additional insight into the realities of supervision and daily operations in the department. During this site visit, we also had the opportunity to observe a productive rollcall where sergeants and lieutenants debriefed situations that occurred on previous shifts and shared general praise and appreciation for how officers were effectively handling high call volumes. The IMT notes that these observations are an important step toward assessing further levels of compliance.

During the seventh reporting period, on July 21, 2022, the City and CPD produced *Performance Evaluation System Training*. The IMT submitted a no-objection letter on August 4, 2022. The IMT believes that the trainings were well-designed as they included adult learning methods and covered the required material. We observed the human resources portion of this training on November 4, 2022. It was well-received by the members and the instructors effectively engaged with the participants. IMT members noted that the CPD curriculum contained the components required by the Consent Decree and, in some areas, exceeded our expectations.

Progress in the Eighth Reporting Period

The Performance Evaluation System Pilot Program was launched this reporting period in the 6th District. The Performance Evaluation System program requires supervisors to complete goal-setting exercises with their supervisees and share resources and training related to their goals. It also requires that supervisors input progress notes about each officer they supervise on, at minimum, a monthly basis. During focus groups with sergeants during the April 2023 IMT site visit, some shared that they felt they were prepared and aware of relevant information for

their supervisees and others expressed that they were not. This lack of standardization in knowledge of resources shows a potential shortfall in performance evaluation process. Additionally, during the IMT site visit, the IMT learned that tracking of supervisory inputs into the system was being completed manually. We encourage the City and the CPD to explore automated options to ensure that supervisors are meeting the requirements of the program.

Further, in site visit meetings with officers in the 6th District, members shared that enforcement activities, such as arrests and seizures, were recognized more often than community interactions which can increase public trust. This can send the message that community engagement is less important, which is inconsistent with the spirit of the Consent Decree. The IMT hopes that the supervisory inputs into the Performance Evaluation System will include both technical and interpersonal skills.

During monthly calls, the City and the CPD have shared progress updates indicating that officers in the 6th District worked with the sergeant who will complete their performance evaluation about half of the time. The IMT is encouraged by the manner with which the CPD has developed tools to monitor these levels and the regularity with which they self-assess. Compliance will require growth in the time spent with supervisees and sustainment of that progress. However, the CPD has shown the IMT that they are intentional about achieving this.

In the eighth reporting period, the City and the CPD maintained Preliminary compliance with ¶375. We look forward to future site visits and focus groups to gather direct input regarding the Performance Evaluation System. The IMT will review the forthcoming evaluation plan for the Performance Evaluation System Pilot Programs. This plan is integral to the success of the program, and the IMT hopes to see a focus on the data collection necessary to successfully implement the program. Further, we look forward to observing evaluation committee meetings and hope to see a shift from a briefing model to more collaborative and conversational structure.

Paragraph 375 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	

Supervision: ¶376

376. CPD will maintain records of performance evaluations in the appropriate electronic data tracking system.

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 ¶376 in the eighth reporting period but did not reach Secondary compliance.

To evaluate Preliminary compliance with ¶376, we reviewed, among other things, the CPD’s relevant records and submitted information to determine whether the CPD had acquired and implemented an appropriate computer system to track data required by the paragraph. We also looked to review any related policies, following the process described in the Consent Decree (¶¶626–41). To assess Secondary compliance, the IMT relevant data sources to determine whether the CPD sufficiently maintains records in the electronic tracking system that reflect data integrity, efficiency, and analytical sophistication.

Progress before the Eighth Reporting Period

The IMT assessed compliance with ¶376 for the first time during the third reporting period. In the third reporting period, the City and the CPD made steps toward compliance with ¶376 requirements. The CPD’s Performance Evaluation System—a program that remained in the review and revision process at the close of the third reporting period—addressed the requirements set out in this paragraph. However, we noted that beyond the development and implementation of the Performance Evaluation System, the CPD must also focus on the acquisition or implementation of appropriate technology for compliance with ¶376’s record-maintenance requirements.

During the fourth reporting period, the CPD provided the IMT and the OAG with live demonstrations of the Performance Evaluations Electronic System, which is used to create and store performance evaluations. Because the Performance Evaluation Electronic System was not yet fully implemented by the end of the reporting period, the CPD did not reach Preliminary compliance with ¶376 in the fourth reporting period.

In the fifth reporting period, the City and the CPD achieved Preliminary compliance with ¶376 by finalizing the updated *Performance Evaluation System - Pilot Pro-*

gram Policy (D21-09). The IMT had observed live demonstrations of the Performance Evaluation Electronic System during previous reporting periods. However, the IMT acknowledged that D21-09 is only being used in the pilot districts, whereas E05-01, *Performance Evaluations of all Sworn Department Members Below the Rank of Superintendent* policy, is used for all other officers. We shared that, in future reporting periods, the IMT would like to see this program expanded, where D21-09 will ultimately replace E05-01. We also shared that, in future reporting periods, the IMT looks forward to receiving actual demonstrations of the live Performance Evaluation System platform being utilized in the Performance Evaluation System Pilot Program, in addition to the training on the system with pilot district supervisors.

During the sixth reporting period, the IMT reviewed training materials for sworn members associated with the Performance Evaluation System (PES) Pilot Program, consisting of the Performance Evaluation System Handbook, Guidebook, Evaluation Survey, Test, Training Video, and Instructors Guide. The training materials clearly outline how department supervisors will maintain records of performance evaluations in the appropriate electronic data tracking system.

During the seventh reporting period, on July 21, 2022, the City and CPD produced *Performance Evaluation System Training*. The IMT submitted a no-objection letter on August 4, 2022. The IMT believes that the trainings were well-designed as they included adult learning methods and covered the required material. We observed the human resources portion of this training on November 4, 2022. It was well-received by the members and the instructors effectively engaged with the participants. IMT members noted that the CPD curriculum contained the components required by the Consent Decree and, in some areas, exceeded our expectations.

Progress in the Eighth Reporting Period

The Performance Evaluation System Pilot Program was launched this reporting period in the 6th District. During monthly calls, the City and the CPD have shared progress updates indicating that officers in the 6th District worked with the sergeant who will complete their performance evaluation about half of the time. The Performance Evaluation System Pilot Program requires supervisors to complete goal-setting exercises with their supervisees and share resources and training related to their goals. It also requires that supervisors input progress notes about each officer they supervise on, at minimum, a monthly basis. During the IMT site visit, the IMT learned that tracking of supervisory inputs into the system was being completed manually. We encourage the City and the CPD to explore automated options to ensure that supervisors are meeting the requirements of the program.

In the eighth reporting period, the City and the CPD maintained Preliminary compliance with ¶374. We look forward to future site visits and focus groups to gather direct input regarding the Performance Evaluation System. The IMT will review the forthcoming evaluation plan for the Performance Evaluation System Pilot Program. This plan is integral to the success of the program, and the IMT hopes to see a focus on the data collection necessary to successfully implement the program. Further, we look forward to observing evaluation committee meetings and hope to see a shift from a briefing model to more collaborative and conversational structure.

Paragraph 376 Compliance Progress History

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