

*Independent Monitoring Report 9*

Appendix 8:

Officer Wellness and Support

Compliance Assessments

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## Officer Wellness and Support: ¶385

*385. As a component of CPD's Officer Support Systems Plan, CPD will develop and implement a communications strategy. The objectives of this communications strategy will be: a. to inform CPD members of the support services available to them; b. to address stigmas, misinformation, or other potential barriers to members using these services; and c. to emphasize that supporting officer wellness is an integral part of CPD's operations.*

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### Compliance Progress

(Reporting Period: July 1, 2023, through December 31, 2023)

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

In the ninth reporting period, the City and the CPD maintained Secondary compliance and are Under Assessment for Full compliance with ¶385.

In the ninth reporting period, the CPD developed the *2023 Officer Needs Assessment* and the *2023 Officer Wellness Support Plan*. Additionally, in previous reporting periods, the CPD developed a Communication Strategy. The IMT sees enhancements from the strategy produced in previous reporting periods. With the multiple components of the Communication Strategy, the City and the CPD should ensure that concise, clear communication occurs with the expansive attempt to deliver information ranging from executive support to messaging future needs assessments. The City and CPD have been open to enhancing their communications model and strategy to ensure that messaging is clear and concise, regardless of the format. The CPD should also ensure that the PCD training unit, the CPD communication specialist, and other departments and units within the CPD are working together to deliver the most accurate and timely information possible to maintain credibility, trust, and a continuity of support for organizational wellness.

The CPD's presentations, discussions, productions, policies, and demonstrated actions reflect significant emphasis on Employee Wellness as an integral part of the CPD's operations, and the IMT looks forward to the full implementation of the Communications Strategy.

To continue evaluating Full compliance with ¶385, the IMT will consider whether the CPD has implemented and sustained implementation of a communications strategy to effectively disseminate information, dispel misinformation, and emphasize the CPD's commitment to wellness for both sworn and non-sworn personnel. We will also consider the extent to which the CPD is continuously assessing its communications strategy and making appropriate adjustments.

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A fuller description of the history of compliance efforts, methodologies, compliance determinations for this paragraph—and each original monitorable paragraphs in the Officer Wellness and Support section—is available in [Comprehensive Assessment Part I](https://cpd-monitoringteam.com/wp-content/uploads/2023/11/IMR8-Appendix-8-Officer-Wellness-and-Support-2023.11.01.pdf) (which included *Independent Monitoring Report 8*): <https://cpd-monitoringteam.com/wp-content/uploads/2023/11/IMR8-Appendix-8-Officer-Wellness-and-Support-2023.11.01.pdf>.

### Paragraph 385 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: Secondary
FOURTH REPORTING PERIOD JANUARY 1, 2021 – JUNE 30, 2021 COMPLIANCE PROGRESS: Secondary	FIFTH REPORTING PERIOD JULY 1, 2021 – DECEMBER 31, 2021 COMPLIANCE PROGRESS: Secondary	SIXTH REPORTING PERIOD JANUARY 1, 2022 – JUNE 30, 2022 COMPLIANCE PROGRESS: Secondary
SEVENTH REPORTING PERIOD JULY 1, 2022 – DECEMBER 31, 2022 COMPLIANCE PROGRESS: Secondary	EIGHTH REPORTING PERIOD JANUARY 1, 2023 – JUNE 30, 2023 COMPLIANCE PROGRESS: Secondary	NINTH REPORTING PERIOD JULY 1, 2023 – DECEMBER 31, 2023 COMPLIANCE PROGRESS: Secondary

## Officer Wellness and Support: ¶389

**389.** At least annually, the Director of the Professional Counseling Division will provide a written report to the Superintendent, through his or her chain of command, that includes anonymized data regarding support services provided to CPD members, how long it takes CPD members requesting counseling services to receive them, and other metrics related to the quality and availability of these services. This report will also contain resource, training, and policy recommendations necessary to ensure that the support services available to CPD members reasonably address their identified needs and comply with the Officer Support Systems Plan.

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### Compliance Progress

(Reporting Period: July 1, 2023, through December 31, 2023)

**Recurring Schedule:** At Least Annually  Met  Missed

**Preliminary:** *Under Assessment*

**Secondary:** *Not Yet Assessed*

**Full:** *Not Yet Assessed*

During the ninth reporting period, the City and the CPD came Under Assessment for Preliminary compliance with ¶389.

In the ninth reporting period, the CPD produced Directive E06-01, *Professional Counseling Division (PCD)*. Item XI-A of E06-01 directs the completion of the annual written report to the Superintendent, complying with the requirements of ¶389. However, the policy alone is insufficient to meet Preliminary compliance with this paragraph. Preliminary compliance additionally requires that the CPD produce an annual report to the superintendent that meets the requirements listed in ¶389.

The CPD produced a combined *2023 and 2024 Annual Report to the Superintendent* in the first quarter of 2024 (the tenth reporting period). This production will be assessed for further compliance with ¶389 during the tenth reporting period.<sup>1</sup>

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The City and the CPD are Under Assessment for Preliminary compliance because (1) they produced a compliant version of Directive E06-01, *Professional Counseling Division (PCD)* and (2) they informed the IMT of their intent to produce an annual report to the Superintendent during the tenth reporting period.

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<sup>1</sup> In the City's comments to an earlier draft of this report, the CPD notes in its comments that it believes it should be in Preliminary compliance "based on Item XI-A of E06-01; Professional Counseling Division." However, the methodologies for Preliminary compliance with ¶389 continue to require the CPD to produce a written report to the Superintendent. A policy alone is insufficient to meet Preliminary compliance with ¶389. As referenced above, the CPD did not produce a written report by the end of the ninth reporting period.

To evaluate Secondary compliance, the IMT will assess whether the CPD produced a report to the Superintendent that complies with the requirements of ¶389. To maintain Secondary compliance, the CPD must continue to produce such a report annually. To evaluate Full compliance, the IMT will assess whether the CPD is reviewing and addressing recommendations from the report to ensure that the support services available to CPD members—sworn and civilian—are sufficient to meet wellness needs.

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A fuller description of the history of compliance efforts, methodologies, compliance determinations for this paragraph—and each original monitorable paragraphs in the Officer Wellness and Support section—is available in *Comprehensive Assessment Part I* (which included *Independent Monitoring Report 8*): <https://cpd-monitoringteam.com/wp-content/uploads/2023/11/IMR8-Appendix-8-Officer-Wellness-and-Support-2023.11.01.pdf>

### Paragraph 389 Compliance Progress History

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

## Officer Wellness and Support: ¶391

*391. CPD will initially increase the staffing level in its Professional Counseling Division to at least ten full-time licensed mental health professionals (or a combination of full- and part-time licensed mental health professionals capable of providing an equivalent amount of weekly clinical therapy hours) by January 1, 2020. CPD may contract with licensed mental health professionals external to CPD on an interim basis while CPD completes the process for creating these new positions and hiring individuals to fill them. Additional changes to staffing levels will be made consistent with the results of the needs assessment and Officer Support Systems Plan.*

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### Compliance Progress

(Reporting Period: July 1, 2023, through December 31, 2023)

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

The City and the CPD maintained Preliminary and Secondary compliance with ¶391 during the ninth reporting period but did not achieve Full compliance.

In the ninth reporting period, the PCD faced challenges in hiring additional mental health clinicians. While the PCD hired some new clinicians, some positions remain vacant.

To maintain Secondary compliance with ¶391, the CPD must show that the PCD has sufficient staffing levels to meet wellness needs without the use of contractors. At present, the CPD has not provided data sources that would allow the IMT to determine (1) the extent to which the CPD uses outside contractors to supplement the PCD and (2) whether the PCD has sufficient staffing levels without the use of outside contractors. The CPD will not be able to maintain Secondary compliance with ¶391 in future reporting periods unless it provides the IMT with such data. Furthermore, the needs assessment and Officer Wellness Support Plan were fundamentally challenged in their production, and until sound reports are produced, they cannot be used to determine appropriate staffing levels.

The City and the CPD have indicated plans to show data that will provide a more comprehensive picture of their counseling service provision. The IMT looks forward to reviewing this data and hopes that it will help the City and the CPD maintain Secondary compliance with ¶391. Additionally, after conferring with the IMT and OAG, the City, and the CPD have indicated plans to produce a comprehensive Officer Wellness Support Plan informed by a Needs Assessment intended to meet

the requirements of ¶¶382–83 in June 2025. Upon production of the Officer Wellness Support Plan, the City and CPD will be able to determine if they need to make additional changes to staffing levels.<sup>2</sup>

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A fuller description of the history of compliance efforts, methodologies, compliance determinations for this paragraph—and each original monitorable paragraphs in the Officer Wellness and Support section—is available in *Comprehensive Assessment Part I* (which included *Independent Monitoring Report 8*): <https://cpd-monitoringteam.com/wp-content/uploads/2023/11/IMR8-Appendix-8-Officer-Wellness-and-Support-2023.11.01.pdf>

### Paragraph 391 Compliance Progress History

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

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<sup>2</sup> In the City’s comments to an earlier draft of this report, the CPD notes that it believes it should gain Full compliance with ¶391 during the ninth reporting period because it produced licensing renewal information for EAP clinicians. However, the methodology for Full compliance with ¶391 requires that the CPD (1) “ma[k]e changes relating to staffing levels consistent with results of the needs assessment and Officer Support Systems Plan;” and (2) maintain and track staffing levels through a “fully implemented software solution” to “determine if staffing and other resources meet demand for services.” The CPD has not yet created or produced a needs assessment or an Officer Support Systems Plan that meet the requirements of ¶¶382–85 and, therefore, has not yet discussed making changes to staffing levels consistent with the results of a such reports. The CPD has also not yet implemented a software solution allowing it to track staffing levels according to the needs of the CPD. Therefore, the CPD has not yet reached Full compliance with ¶391. Finally, it is important to note that the CPD will not be able to maintain Secondary compliance with ¶391 unless it provides the data sources described above.

## Officer Wellness and Support: ¶394

*394. CPD will offer members referrals for counseling services by external clinical service providers, including, but not limited to, private therapists, specialists, outside agencies, or hospitals, when a member requires specialized counseling that is beyond the training and expertise of CPD’s licensed mental health professionals or certified counselors.*

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### Compliance Progress

(Reporting Period: July 1, 2023, through December 31, 2023)

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

**Secondary:** *Not in Compliance*

**Full:** *Not Yet Assessed*

In the ninth reporting period, the City and the CPD maintained Preliminary compliance with ¶394 but did not reach Secondary compliance.

While the PCD has orally described the referral process to the IMT, neither the City nor the CPD have provided data measuring the frequency and efficacy of external referrals as required by the methodology for Secondary compliance for ¶394.

While the City and the CPD have indicated they will begin sharing external referral data, the City and the CPD will not obtain Secondary compliance until they provide anonymized data regarding referrals to private therapists, specialists, outside agencies or hospitals, and counseling beyond the expertise of the PCD’s licensed mental health professionals.<sup>3</sup>

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A fuller description of the history of compliance efforts, methodologies, compliance determinations for this paragraph—and each original monitorable paragraphs in the Officer Wellness and Support section—is available in *Comprehensive Assessment Part I* (which included *Independent Monitoring Report 8*): <https://cpd-monitoringteam.com/wp-content/uploads/2023/11/IMR8-Appendix-8-Officer-Wellness-and-Support-2023.11.01.pdf>.

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<sup>3</sup> In the City’s comments to an earlier draft of this report, the CPD notes that it believes that it should gain Secondary compliance with ¶394 in the ninth reporting period because it produced the Weekly PCD Tracking Report for all PCD services. For the reasons stated above, the CPD has not yet met the requirements necessary to gain Secondary compliance with ¶394.



## Paragraph 394 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	NINTH REPORTING PERIOD JULY 1, 2023 – DECEMBER 31, 2023 COMPLIANCE PROGRESS: Preliminary

## Officer Wellness and Support: ¶396

*396. CPD will continue to ensure that any mental health counseling services provided to CPD members remain confidential in accordance with state law, federal law, and current CPD policy.*

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### Compliance Progress

(Reporting Period: July 1, 2023, through December 31, 2023)

**Preliminary:** *In Compliance (FOURTH REPORTING PERIOD)*  
**Secondary:** *In Compliance (NEW)*  
**Full:** *Under Assessment*

During the ninth reporting period, the City and the CPD maintained Preliminary compliance, reached Secondary compliance, and came Under Assessment for Full compliance with ¶396.

During the ninth reporting period, the City and the CPD submitted the Directive E06-01, *Professional Counseling Division (PCD)*, which articulates the required confidentiality responsibilities. The CPD also produced the *Peer Support Program Suite*, which included training, meetings, and several signed forms denoting the Peer Support members' commitment to maintaining confidentiality. Additionally, the City and CPD produced (1) attendance records for the *40 Hour Peer Support Training* and (2) biennial license renewal for three of its clinicians.

With these productions, the City and the CPD have reached Secondary compliance with ¶396.

To evaluate Full compliance, the IMT will review data sources and community sources to assess whether the CPD, in practice, ensures confidentiality regarding mental health counseling services provide to members in a manner consistently with applicable laws and policies.

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A fuller description of the history of compliance efforts, methodologies, compliance determinations for this paragraph—and each original monitorable paragraphs in the Officer Wellness and Support section—is available in *Comprehensive Assessment Part I* (which included *Independent Monitoring Report 8*): <https://cpd-monitoringteam.com/wp-content/uploads/2023/11/IMR8-Appendix-8-Officer-Wellness-and-Support-2023.11.01.pdf>.

## Paragraph 396 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	NINTH REPORTING PERIOD JULY 1, 2023 – DECEMBER 31, 2023 COMPLIANCE PROGRESS: Secondary

## Officer Wellness and Support: ¶397

*397. CPD will continue to ensure that licensed mental health professionals employed by the Professional Counseling Division do not participate in fitness for duty evaluations, which will be conducted exclusively by third-party licensed mental health professionals.*

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### Compliance Progress

(Reporting Period: July 1, 2023, through December 31, 2023)

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

The City and the CPD reached Secondary compliance with ¶397 in the ninth reporting period.

During the ninth reporting period, the IMT visited with the Office of Public Safety Administration (OPSA), to better understand the fitness for duty process within the City for CPD members and its relationship with the City of Chicago Department of Human Resources. The CPD demonstrated that it is not involved with the fitness for duty process.

However, the fitness for duty process is complex. The IMT became aware of members' misunderstandings and misperceptions during the focus group discussions. There were members of the CPD who had limited knowledge of the fitness for duty process, causing some to not trust the process. During the site visit, the OPSA led an informative meeting and robust presentation of the process. At the conclusion of the meeting, the IMT requested the OPSA to consider designing a flow chart that could visually demonstrate the evaluation process with the various steps that specifically demonstrated how an individual moves through the process for determining fitness for duty, while showing what stages involve the third-party service providers contracted to conduct the appropriate evaluations. The flow chart was produced to show where in the process a revoked FOID eligibility is reinstated or permanently revoked while also showing the re-evaluation steps as well. Further, the IMT received a letter from OPSA outlining the process and firmly stating the PCD clinicians are not involved in the fitness for duty process. With this, the City and the CPD reached Secondary compliance with ¶397.

The IMT encourages the OPSA to share the above information with CPD personnel to minimize the misunderstandings and to promote transparency and trust in the fitness for duty process. Moving forward, the IMT will review data and community sources to assess the City and the CPD's continued progress with ¶397.

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A fuller description of the history of compliance efforts, methodologies, compliance determinations for this paragraph—and each original monitorable paragraphs in the Officer Wellness and Support section—is available in [Comprehensive Assessment Part I](https://cpd-monitoringteam.com/wp-content/uploads/2023/11/IMR8-Appendix-8-Officer-Wellness-and-Support-2023.11.01.pdf) (which included *Independent Monitoring Report 8*): <https://cpd-monitoringteam.com/wp-content/uploads/2023/11/IMR8-Appendix-8-Officer-Wellness-and-Support-2023.11.01.pdf>.

### Paragraph 397 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	NINTH REPORTING PERIOD JULY 1, 2023 – DECEMBER 31, 2023 COMPLIANCE PROGRESS: Secondary

## Officer Wellness and Support: ¶404

**404.** CPD will maintain a peer support program, ensuring that: a. a licensed mental health professional assigned to the Professional Counseling Division oversees and adequately manages the program; b. Peer Support Officers receive initial training in stress management, grief management, officer wellness, obligations and limitations regarding confidentiality and privacy, communication skills, common psychological symptoms and conditions, suicide assessment and prevention, dependency and abuse, and support services available to CPD members; c. Peer Support Officers are trained to recommend the services offered by the Professional Counseling Division in situations that are beyond the scope of their training; d. CPD offers Peer Support Officers the opportunity to meet at least annually to share successful strategies and identify ways to enhance the program; e. Peer Support Officers receive and comply with a written procedures manual approved by a licensed mental health professional assigned to the Professional Counseling Division; f. Peer Support Officers are offered sufficient non-monetary incentives and recognition to ensure broad recruitment of volunteers and widespread access to peer support services; and g. the scope and quantity of peer support services provided to CPD members are identified in a manner that facilitates effective management of the program and that preserves the anonymity and confidentiality of members receiving peer support services.

**Compliance Progress** (Reporting Period: July 1, 2023, through December 31, 2023)

**Recurring Schedule:** May 3, 2023  Met  Missed

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

**Secondary:** In Compliance (NEW)

**Full:** Not Yet Assessed

The City and the CPD maintained Preliminary compliance and reached Secondary compliance with ¶404.

During the ninth reporting period, the City and the CPD submitted *Peer Support Program Suite*. The *Peer Support Program Suite* provided proof of several items required by ¶404 subparagraphs, including the following:

- the CV of the Director of the Professional Counseling Division, identifying credentials, academic and current service work, and staff oversight at the CPD, relevant to the requirements of ¶404(a);
- the *Peer Support Program Refresher* (8 hours) curriculum, relevant to the requirements of ¶404(b)–(c);
- records of the “All in Peer Support Meetings,” available for both retired and active Peer Support members, relevant to the requirements of ¶404(d);

- a record of members receiving the Peer Support Manual, relevant to the requirements of ¶404(e);
- a sample packet of the Peer Support Awards given from 2021 to 2023, which recognize Peer Support members for outstanding support of peers during the COVID-19 pandemic, following officer deaths, and following other traumatic incidents, relevant to the requirements of ¶404(f); and
- PCD Peer Support member tracking, relevant to the requirements of ¶404(g).

The IMT recognized the CPD’s tremendous effort in meeting the many stipulations in subparagraphs (a-g) of ¶404. To reach Full compliance, the IMT will assess whether the CPD has fully implemented the requirements of the peer support program under ¶404 and whether the CPD has allocated sufficient resources to make that implementation sustainable.

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A fuller description of the history of compliance efforts, methodologies, compliance determinations for this paragraph—and each original monitorable paragraphs in the Officer Wellness and Support section—is available in [Comprehensive Assessment Part I](https://cpd-monitoringteam.com/wp-content/uploads/2023/11/IMR8-Appendix-8-Officer-Wellness-and-Support-2023.11.01.pdf) (which included *Independent Monitoring Report 8*): <https://cpd-monitoringteam.com/wp-content/uploads/2023/11/IMR8-Appendix-8-Officer-Wellness-and-Support-2023.11.01.pdf>.

### Paragraph 404 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	NINTH REPORTING PERIOD JULY 1, 2023 – DECEMBER 31, 2023 COMPLIANCE PROGRESS: Secondary

## Officer Wellness and Support: ¶406

**406.** By January 1, 2020, CPD will develop and adopt a standard operating procedure (“SOP”) outlining the roles and responsibilities of the Chaplains Unit. The Chaplains Unit SOP will identify that: a. the purpose of the Chaplains Unit is to: i. support the wellness of CPD members who voluntarily seek consultation with representatives of the Chaplains Unit; ii. make referrals to licensed mental health professionals and other service providers, when appropriate; iii. provide pastoral care to CPD members who voluntarily seek such services; iv. offer voluntary preventive programs for the purposes of supporting, encouraging, and affirming CPD members in their professional and family lives; and v. provide support in moments of crisis as requested by CPD members. b. when acting in the official capacity of a CPD Chaplain, representatives of the Chaplains Unit will refrain from actions or statements that are inconsistent with CPD policy. c. representatives of the Chaplains Unit, including CPD members and non-CPD members, will receive training regarding the roles and responsibilities of the Chaplains Unit.

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### Compliance Progress

(Reporting Period: July 1, 2023, through December 31, 2023)

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

The City and the CPD maintained Preliminary and Secondary compliance and came Under Assessment for Full compliance with ¶406 during the ninth reporting period.

In the ninth reporting period, the City and the CPD submitted the PCD Weekly Statistics Overview, which includes the total number of family and CPD members served by week and year to date for the weeks of September 4, September 11, October 2, and October 9.

To evaluate Full compliance, the IMT will assess community sources and data sources to determine whether the CPD has sufficiently implemented its policy and training, whether the Chaplains Unit is operating in a manner consistent with the policy and its training, and whether the CPD has mechanisms in place to regularly assess whether the Chaplains Unit is operating in accordance with the standard operating procedure as required by ¶406.<sup>4</sup>

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<sup>4</sup> In the City’s comments to an earlier draft of this report, the CPD notes that it believes that it has gained Full compliance with ¶406 during the ninth reporting period because it produced the *Weekly Chaplains Tracking Report*. For the reasons stated above, the CPD has not yet met all of the requirements stated in the methodologies for Full compliance with ¶406 and, therefore, has not achieved Full compliance with this paragraph.



A fuller description of the history of compliance efforts, methodologies, compliance determinations for this paragraph—and each original monitorable paragraphs in the Officer Wellness and Support section—is available in [Comprehensive Assessment Part I](https://cpd-monitoringteam.com/wp-content/uploads/2023/11/IMR8-Appendix-8-Officer-Wellness-and-Support-2023.11.01.pdf) (which included *Independent Monitoring Report 8*): <https://cpd-monitoringteam.com/wp-content/uploads/2023/11/IMR8-Appendix-8-Officer-Wellness-and-Support-2023.11.01.pdf>.

### Paragraph 406 Compliance Progress History

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

## Officer Wellness and Support: ¶407

*407. CPD will continue to require that whenever a CPD member has experienced a duty-related traumatic incident, the member must attend counseling with a licensed mental health professional. The Director of the Professional Counseling Division or his or her designee will be responsible for documenting that a CPD member has attended the mandatory counseling and has completed the requirements of the Traumatic Incident Stress Management Program prior to the member returning to regular duty assignment. CPD will require any CPD member who has experienced a duty-related traumatic incident, unless medically unable to do so, to meet with a licensed mental health professional within seven days of the incident, and will ensure that it has an adequate staff of licensed mental health professionals who can accommodate this timing requirement.*

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### Compliance Progress

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

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

In the ninth reporting period, the City and the CPD maintained Preliminary compliance with ¶407.

During the seventh reporting period, the CPD conducted an audit of the Traumatic Incident Stress Management Program (TISMP) to assess the CPD’s compliance with requirements outlined in ¶¶407–408. The audit covered the period from March 1, 2021, through December 31, 2021. The Audit Division determined that they were unable to identify the total number of CPD officers who should have been required to participate in the TISMP and noted that the CPD lacks a mechanism that systematically identifies officers involved in traumatic accidents. The Audit Division further noted that many types of potentially traumatizing incidents that members experience may not be captured in the existing forms and data.

These data issues pertaining to the identification of members who have been involved in traumatic incidents and should be required to participate in the TISMP have not been resolved. The 2023 TISMP Audit found that several individuals who should have met the TISMP requirements had not been identified and, therefore, had not been provided with access to the Program. The 2023 TISMP Audit identified reasons this could have occurred:

- (1) Potentially traumatic events are complex and, therefore, may not always fall neatly within a particular referral category noted in

Section III.B of Directive E06-03, *Traumatic Incident Stress Management Program*.<sup>5</sup>

(2) Supervisors may not be familiar with the categories of incidents that warrant TISMP referrals.<sup>6</sup>

While some data was available, it was limited because the Department lacks a mechanism that systematically identifies members involved in traumatic incidents. Failing to identify members involved in traumatic incidents harms members, the CPD, and the public by depriving potentially traumatized members of proper support and releasing them into the community, where they may be exposed to further trauma.

As recommended in the 2023 TISMP Audit, the City and the CPD should prioritize teaching all members—sworn *and* civilian<sup>7</sup>—and supervisors about the TISMP, particularly emphasizing the following:

- (1) The expansive nature of the categories of qualifying incidents, particularly under Section III.C;
- (2) Referral procedures; and
- (3) The responsibilities of the watch operations lieutenant or unit commanding officer once the member is referred to the Program.

While Directive E06-03, *Traumatic Incident Stress Management Program* is sufficient for Preliminary compliance, the IMT recommends that CPD consider the following revisions to the policy to enhance its efficacy:

- (1) Add additional categories of potentially traumatic incidents that warrant referral;

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<sup>5</sup> It should be noted, however, that Section III.C solves for this problem, providing that watch operations lieutenants must still refer members to the Program for any other on-duty traumatic incident not included in the categories listed in Section III.B if the incident falls within Section III.A. Therefore, it should be clear to supervisors that they are not limited to the discrete categories listed in Section III.B.

<sup>6</sup> During the scope of the 2023 TISMP Audit, seven watch operation lieutenants were interviewed to further assess their understanding of serious injuries and what warranted a TISMP referral. According to the Audit, three of the seven were unable to confirm the circumstances when the referrals were required. Additionally, tact lieutenants did not see the PCD at their roll calls to address TISMP or other wellness issues. This issue has been discussed and recorded in previous reporting periods.

<sup>7</sup> Any member at any time could be exposed to a potentially traumatic incident. It is crucial that all members, whether sworn or civilian, understand the TISMP.

(2) Add examples of qualifying incidents in each category to help guide referrals.

While the 2023 TISMP Audit showed that the City and CPD face significant challenges in systematically identifying members who qualify for TISMP, they maintained Preliminary compliance with ¶407 due to Directive E06-03, *Traumatic Incident Stress Management Program*.

To evaluate Secondary compliance, the IMT will assess training and data sources to determine whether CPD members and supervisors have received sufficient training related to the TISMP. The IMT will also assess whether the CPD has a mechanism that systematically identifies members involved in traumatic incidents. To evaluate Full compliance, the IMT will assess whether (1) members involved in traumatic incidents are being referred to the TISMP at sufficient, reliable rates and in accordance with policy; and (2) supervisors and PCD are carrying out their responsibilities relating to the TISMP and applicable policy.

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A fuller description of the history of compliance efforts, methodologies, compliance determinations for this paragraph—and each original monitorable paragraphs in the Officer Wellness and Support section—is available in [Comprehensive Assessment Part I](https://cpd-monitoringteam.com/wp-content/uploads/2023/11/IMR8-Appendix-8-Officer-Wellness-and-Support-2023.11.01.pdf) (which included *Independent Monitoring Report 8*): <https://cpd-monitoringteam.com/wp-content/uploads/2023/11/IMR8-Appendix-8-Officer-Wellness-and-Support-2023.11.01.pdf>.

### Paragraph 407 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	NINTH REPORTING PERIOD JULY 1, 2023 – DECEMBER 31, 2023 COMPLIANCE PROGRESS: Preliminary

## Officer Wellness and Support: ¶410

**410.** CPD will continue to place any CPD member who has discharged a firearm, excluding training discharges, unintentional discharges, or discharges for the destruction of an animal where no person was injured, on mandatory administrative duty assignment for a minimum period of 30 days. Prior to permitting the member to return to regular field duties, CPD will require the member to (a) complete the Traumatic Incident Stress Management Program and any training determined by CPD to be appropriate; and (b) receive authorization from the First Deputy Superintendent. Authorization to return to regular field duties may be withheld pending the outcome of any administrative or criminal investigation.

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### 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*

During the ninth reporting period, the City and the CPD maintained Preliminary compliance with ¶410 but did not achieve Secondary compliance.

The 2023 TISMP Audit found that “members who have discharged the firearm under the current qualifying circumstance have been permitted to return to the field prior to completing any and all additional required training, including opportunities, identified by the FRB.” This finding is concerning. As the 2023 TISMP Audit stated, this practice may put both CPD members and members of the public at risk. The practice impedes the CPD from gaining further compliance with ¶410.

To evaluate Secondary compliance, the IMT will assess whether CPD members and supervisors have received sufficient training related to both the TISMP and the requirements of ¶410. The IMT will also assess whether the CPD has a mechanism that systematically identifies all members involved in the discharge of a firearm. To evaluate Full compliance, the IMT will assess whether the CPD, in practice, fulfills the procedures required by ¶410.

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A fuller description of the history of compliance efforts, methodologies, compliance determinations for this paragraph—and each original monitorable paragraphs in the Officer Wellness and Support section—is available in *Comprehensive Assessment Part I* (which included *Independent Monitoring Report 8*): <https://cpd-monitoringteam.com/wp-content/uploads/2023/11/IMR8-Appendix-8-Officer-Wellness-and-Support-2023.11.01.pdf>.

## Paragraph 410 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	NINTH REPORTING PERIOD JULY 1, 2023 – DECEMBER 31, 2023 COMPLIANCE PROGRESS: Preliminary

## Officer Wellness and Support: ¶411

*411. At least annually, CPD will determine whether members who have experienced a duty-related traumatic incident have attended the mandatory counseling sessions and have completed the Traumatic Incident Stress Management Program.*

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### Compliance Progress

(Reporting Period: July 1, 2023, through December 31, 2023)

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

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

**Secondary:** *Under Assessment*

**Full:** *Not Yet Assessed*

In the ninth reporting period, the City and the CPD maintained Preliminary compliance and came Under Assessment for Secondary compliance with ¶411.

In the ninth reporting period, the Audit Division produced the 2023 TISMP Audit. The IMT recognizes the Audit was the City and the CPD’s second annual submission. The Audit Division presented a report that offered recommendations, as well as prioritization of urgency, which was color-coded in Red (high priority), Yellow (medium), and Green (low priority). It is important to note that the Audit captured areas of significance – highlighted best practices, and opportunities for improvement. It is important for the CPD to adhere to these recommendations and establish plans, timelines, and corrective measures. The Audit Division also identified some systemic concerns that were recurring from the first audit, and some additional issues that were found during this particular audit.

During ninth reporting period, the Audit Division amended the report for factual and grammatical errors. The IMT acknowledges that the Audit Division has taken some immediate steps to improve its ability to identify factual errors before the reports are finalized in the future. This self-auditing is recognized and appreciated.

We look forward to assessing the City and the CPD’s continued progress with ¶411 in the next reporting period.

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A fuller description of the history of compliance efforts, methodologies, compliance determinations for this paragraph—and each original monitorable paragraphs in the Officer Wellness and Support section—is available in [Comprehensive Assessment Part I](https://cpd-monitoringteam.com/wp-content/uploads/2023/11/IMR8-Appendix-8-Officer-Wellness-and-Support-2023.11.01.pdf) (which included *Independent Monitoring Report 8*): <https://cpd-monitoringteam.com/wp-content/uploads/2023/11/IMR8-Appendix-8-Officer-Wellness-and-Support-2023.11.01.pdf>.

## Paragraph 411 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: 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	NINTH REPORTING PERIOD JULY 1, 2023 – DECEMBER 31, 2023 COMPLIANCE PROGRESS: Preliminary



## Officer Wellness and Support: ¶412

*412. Where it would add to the quality or effectiveness of the training, CPD will involve mental health professionals, as feasible, practical, and appropriate, in developing and reviewing recruit and in-service training on stress management, alcohol and substance abuse, officer wellness, and the support services available to CPD members.*

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### Compliance Progress

(Reporting Period: July 1, 2023, through December 31, 2023)

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

In the ninth reporting period, the City and the CPD maintained Preliminary compliance and came Under Assessment for Secondary compliance with ¶412.

In the ninth reporting period, the City and the CPD produced several quality trainings that incorporated the support services available to CPD members and utilized the expertise of mental health professionals, including *LEMART* (Law Enforcement Medical and Rescue Training/Officer Wellness and Resilience)<sup>8</sup> and the *ABLE 2023 Reinforcement Module: Focus on Early Intervention Training*.<sup>9</sup>

During the site visit in the ninth reporting period, the IMT and OAG observed the Officer Wellness, Nutrition, and Resiliency classroom training. The course heavily drew on outside expertise and introduced students to the wellness app. The instructor explained the features of the app and demonstrated its ease of use.

The IMT acknowledges this quality training and recognizes the level of development by the City and the CPD.

Moving forward, to evaluate Secondary compliance, the IMT will assess data and community sources to determine whether the CPD adequately involves mental health professionals in developing and reviewing training on mental health related topics and the support services available to members. To evaluate Full compliance, the IMT will assess training sources to determine how the CPD is seeking input from mental health professionals in developing and reviewing the training on mental-health related topics, what feedback the professionals provide, and how the CPD utilizes such feedback. Furthermore, in line with Directive S11-10, *Department Training*, the IMT's methodologies for ¶412, and the IMT's recurring request

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<sup>8</sup> The LEMART training is a component of the field force operations training developed in preparation for the Democratic National Convention (DNC) to be hosted in the City of Chicago in August 2024.

<sup>9</sup> The ABLE training will also be taught in 2024. The lesson materials now include a QR code that allows the student to download various wellness exercises and other wellness-related information.

for information regarding the production of all evaluations associated with trainings, the City and the CPD must provide evaluations for completed training.<sup>10</sup>

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A fuller description of the history of compliance efforts, methodologies, compliance determinations for this paragraph—and each original monitorable paragraphs in the Officer Wellness and Support section—is available in *Comprehensive Assessment Part I* (which included *Independent Monitoring Report 8*): <https://cpd-monitoringteam.com/wp-content/uploads/2023/11/IMR8-Appendix-8-Officer-Wellness-and-Support-2023.11.01.pdf>

### Paragraph 412 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: Under Assessment	FIFTH REPORTING PERIOD JULY 1, 2021 – DECEMBER 31, 2021 COMPLIANCE PROGRESS: Preliminary	SIXTH REPORTING PERIOD JANUARY 1, 2022 – JUNE 30, 2022 COMPLIANCE PROGRESS: Preliminary
SEVENTH REPORTING PERIOD JULY 1, 2022 – DECEMBER 31, 2022 COMPLIANCE PROGRESS: Preliminary	EIGHTH REPORTING PERIOD JANUARY 1, 2023 – JUNE 30, 2023 COMPLIANCE PROGRESS: Preliminary	NINTH REPORTING PERIOD JULY 1, 2023 – DECEMBER 31, 2023 COMPLIANCE PROGRESS: Preliminary

<sup>10</sup> In the City’s comments to an earlier draft of this report, the CPD notes that it believes that it has achieved Secondary compliance with ¶412 because it produced the 2023 Wellness In-Service Curriculum and 95% completion rates. The CPD produced these materials during the tenth reporting period and, therefore, the materials are not eligible to be considered as a component of compliance for the ninth reporting period.

## Officer Wellness and Support: ¶413

*413. CPD will involve experts, such as psychologists and cognitive and behavioral scientists, in developing training on use of force where their expertise would enhance the effectiveness of the training. The training topics that may benefit from such expertise could include: a. peer intervention by fellow officers to stop the use of excessive force; b. the interaction of human perception and threat assessment; and c. de-escalation and defusing techniques, including psychological methods of situation control, verbal control and communication, conflict resolution, and anger management.*

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### Compliance Progress

(Reporting Period: July 1, 2023, through December 31, 2023)

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

In the ninth reporting period, the City and the CPD maintained Preliminary compliance and came Under Assessment for Secondary compliance with ¶413.

During the ninth reporting period, the IMT reviewed several training productions that reflect collaborative curriculum development with various Subject Matter Experts (SMEs). Such topics include ABLE, ICIOT, and de-escalation and use of force. Several of the co-developers of the curriculum are external professionals who bring the topical aspects of training that support employee wellness.

Similar to ¶412, the IMT looks forward to the City and the CPD completing evaluations on the listed training. The IMT requested the training evaluations for the Individualized Critical Incident Overview Training (ICIOT) on November 17, 2023, after the production of the ICIOT training records, and has not received them to date. The IMT recognizes the CPD's emphasis on these critical topics of training, all of which will benefit the CPD staff should they need to apply those learned training experiences before, during the Democratic national convention, or after. Moving forward, the City and the CPD must provide the IMT with training evaluations for all completed trainings.

Moving forward, to evaluate Secondary compliance, the IMT will assess data and community sources to determine whether CPD adequately involves experts in the development of training on use of force. To assess Full compliance, the IMT will assess training sources to determine how the CPD is identifying the means and methods by which input is sought from experts in developing training on use of force where their expertise would enhance the effectiveness of the training, how the CPD is seeking input from experts in the development of these trainings, what feedback the experts provide, and how the CPD utilizes such feedback. Furthermore, in line with Directive S11-10, *Department Training*, the IMT's methodologies for ¶413, and the IMT's recurring request for information regarding the production

of all evaluations associated with trainings (see IMT340), the City and the CPD must provide evaluations for completed training.<sup>11</sup>

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A fuller description of the history of compliance efforts, methodologies, compliance determinations for this paragraph—and each original monitorable paragraphs in the Officer Wellness and Support section—is available in *Comprehensive Assessment Part I* (which included *Independent Monitoring Report 8*): <https://cpd-monitoringteam.com/wp-content/uploads/2023/11/IMR8-Appendix-8-Officer-Wellness-and-Support-2023.11.01.pdf>.

### Paragraph 413 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: Under Assessment	FIFTH REPORTING PERIOD JULY 1, 2021 – DECEMBER 31, 2021 COMPLIANCE PROGRESS: Preliminary	SIXTH REPORTING PERIOD JANUARY 1, 2022 – JUNE 30, 2022 COMPLIANCE PROGRESS: Preliminary
SEVENTH REPORTING PERIOD JULY 1, 2022 – DECEMBER 31, 2022 COMPLIANCE PROGRESS: Preliminary	EIGHTH REPORTING PERIOD JANUARY 1, 2023 – JUNE 30, 2023 COMPLIANCE PROGRESS: Preliminary	NINTH REPORTING PERIOD JULY 1, 2023 – DECEMBER 31, 2023 COMPLIANCE PROGRESS: Preliminary

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<sup>11</sup> In City’s comments to an earlier draft of this report, the CPD notes that it believes that it has achieved Secondary compliance with ¶413 because it produced the 2023 Wellness In-Service Curriculum and 95% completion rates. The CPD produced these materials during the tenth reporting period, and therefore, the materials are not eligible to be considered as a component of compliance for the ninth reporting period.

## Officer Wellness and Support: ¶414

*414. CPD will ensure that all CPD members are provided in-service training on stress management, alcohol and substance abuse, and officer wellness at least every three years. CPD will include training regarding stress management, alcohol and substance abuse, officer wellness, and support services in the recruit training program.*

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### Compliance Progress

(Reporting Period: July 1, 2023, through December 31, 2023)

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

**Secondary:** *Not in Compliance*

**Full:** *Not Yet Assessed*

In the ninth reporting period, the City and the CPD maintained Preliminary compliance with ¶414 but did not achieve Secondary compliance.

While the 2023 Wellness In-Service Curriculum, which includes stress management, alcohol or substance use, and wellness, was underway for all members during IMR-9, the training records had not been produced by the end of IMR-9, as required to achieve Secondary compliance with ¶414.<sup>12</sup>

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A fuller description of the history of compliance efforts, methodologies, compliance determinations for this paragraph—and each original monitorable paragraphs in the Officer Wellness and Support section—is available in *Comprehensive Assessment Part I* (which included *Independent Monitoring Report 8*): <https://cpd-monitoringteam.com/wp-content/uploads/2023/11/IMR8-Appendix-8-Officer-Wellness-and-Support-2023.11.01.pdf>

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<sup>12</sup> In the City’s comments to an earlier draft of this report, the CPD notes that it believes that it has achieved Secondary compliance with ¶414 because it produced the 2023 Wellness In-Service Curriculum and 95% completion rates. As stated above, the CPD produced these materials during the tenth reporting period and, therefore, the materials are not eligible to be considered as a component of compliance for the ninth reporting period.

## Paragraph 414 Compliance Progress History

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

## Officer Wellness and Support: ¶415

*415. By July 1, 2020, and periodically thereafter, CPD will conduct a department-wide equipment and technology audit to determine what equipment is outdated, broken, or otherwise in need of repair or replacement. During each audit, CPD will solicit feedback from representatives of the collective bargaining units representing CPD members.*

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### Compliance Progress

(Reporting Period: July 1, 2023, through December 31, 2023)

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

**Preliminary:** *In Compliance (NEW)*

**Secondary:** *Not Yet Assessed*

**Full:** *Not Yet Assessed*

The City and the CPD reached Preliminary compliance with ¶415 in the ninth reporting period.

During the ninth reporting period, the City and the CPD produced a draft of policy U05-02, *Department Equipment and Property Control System*. The IMT and OAG both provided a no-objection notice, thereby achieving Preliminary compliance with ¶415.

While the IMT appreciated the summary statement of the property control report and can see an improvement from the previous audit, in review of the production, it is apparent that there is a significant volume of equipment. The IMT was unable to determine the condition and status of the items on the list. The summary indicated that there would be additional items replaced in 2024, but the list did not identify which items they were. The IMT looks forward to the evolving inventory process.

As mentioned in the IMT feedback to the City and the CPD, to reach Secondary compliance, we will need to see evidence to show that the CPD solicited feedback from all of the applicable collective bargaining units for each audit. Additionally, the audit must indicate which pieces of equipment are “outdated, broken, or otherwise in need of repair or replacement.”

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A fuller description of the history of compliance efforts, methodologies, compliance determinations for this paragraph—and each original monitorable paragraphs in the Officer Wellness and Support section—is available in [Comprehensive Assessment Part I](https://cpd-monitoringteam.com/wp-content/uploads/2023/11/IMR8-Appendix-8-Officer-Wellness-and-Support-2023.11.01.pdf) (which included *Independent Monitoring Report 8*): <https://cpd-monitoringteam.com/wp-content/uploads/2023/11/IMR8-Appendix-8-Officer-Wellness-and-Support-2023.11.01.pdf>.

## Paragraph 415 Compliance Progress History

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



## Officer Wellness and Support: ¶416

**416.** *Within 90 days of the completion of the initial audit, CPD will develop a plan, including a timeline for implementation, to prioritize and address the needs for repair or replacement of equipment and technology as identified through the needs assessment (“Equipment and Technology Audit Response Plan”). CPD will implement the Equipment and Technology Audit Response Plan in accordance with the specified timeline for implementation.*

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### Compliance Progress

(Reporting Period: July 1, 2023, through December 31, 2023)

<b>Deadline:</b>	Moving	<input checked="" type="checkbox"/> <b>Not Yet Applicable</b>
<b>Preliminary:</b>	<i>In Compliance (NEW)</i>	
<b>Secondary:</b>	<i>Not Yet Assessed</i>	
<b>Full:</b>	<i>Not Yet Assessed</i>	

The City and the CPD reached Preliminary compliance with ¶416 in the ninth reporting period.

During the ninth reporting period, the City and the CPD produced the Equipment and Technology Asset Audit and a draft of policy U05-02, *Department Equipment and Property Control System*, which directs the CPD to complete the requirements of this paragraph. The IMT and OAG both provided a no-objection notice, thereby achieving Preliminary compliance with ¶416.

To reach further levels of compliance, the CPD must develop an *Equipment and Technology Audit Response Plan* and provide it within ninety days of completion of the relevant audit. We look forward to reviewing an adequate plan within the ninety-day time period in future reporting periods.

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A fuller description of the history of compliance efforts, methodologies, compliance determinations for this paragraph—and each original monitorable paragraphs in the Officer Wellness and Support section—is available in [Comprehensive Assessment Part I](https://cpd-monitoringteam.com/wp-content/uploads/2023/11/IMR8-Appendix-8-Officer-Wellness-and-Support-2023.11.01.pdf) (which included *Independent Monitoring Report 8*): <https://cpd-monitoringteam.com/wp-content/uploads/2023/11/IMR8-Appendix-8-Officer-Wellness-and-Support-2023.11.01.pdf>.

## Paragraph 416 Compliance Progress History

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

## Officer Wellness and Support: ¶417

*417. As a component of the Equipment and Technology Audit Response Plan, CPD will develop a schedule for future periodic audits. The schedule will specify the time period within which future periodic audits will occur. The time period may vary for different equipment types to account for differences in the expected useful life of different equipment types. CPD will perform the periodic audits in accordance with the schedule.*

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### Compliance Progress

(Reporting Period: July 1, 2023, through December 31, 2023)

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

The City and the CPD reached Preliminary compliance with ¶417 in the ninth reporting period.

During the ninth reporting period, the City and the CPD produced the Equipment and Technology Asset Audit and a draft of the policy U05-02, *Department Equipment and Property Control System*, which directs the OPSA to complete annual Equipment and Technology audits. Further, the policy states that OPSA will develop a schedule for future audits of various equipment held by the Department. The IMT and OAG both provided a no-objection notice, thereby achieving Preliminary compliance with ¶417.

To reach further levels of compliance, the CPD must conduct and produce the *Equipment and Technology Audit Response Plan* annually as set forth in U05-02, *Department Equipment and Property Control System*.

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A fuller description of the history of compliance efforts, methodologies, compliance determinations for this paragraph—and each original monitorable paragraphs in the Officer Wellness and Support section—is available in [Comprehensive Assessment Part I](https://cpd-monitoringteam.com/wp-content/uploads/2023/11/IMR8-Appendix-8-Officer-Wellness-and-Support-2023.11.01.pdf) (which included *Independent Monitoring Report 8*): <https://cpd-monitoringteam.com/wp-content/uploads/2023/11/IMR8-Appendix-8-Officer-Wellness-and-Support-2023.11.01.pdf>.

## Paragraph 417 Compliance Progress History

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