

Independent Monitoring Report 9

Appendix 9:

Accountability and Transparency

Compliance Assessments

Accountability and Transparency: ¶424

424. When members of the public submit complaints to the City (“complainants”), those complaints must be courteously received, properly classified, and efficiently investigated. Throughout a non-criminal investigation of the actions of a member (an “administrative investigation”), complainants should be able to track the status of their complaints and receive current, accurate information.

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

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

In the ninth reporting period, COPA regained Full compliance with ¶424 and the CPD reached Secondary compliance with the requirements of this paragraph. Because all relevant City entities must reach levels of compliance to bring the City, as a whole, into compliance, the City has not yet reached Full compliance.

With regard to Secondary compliance, the CPD produced a draft of its five-day BIA Onboard Training on December 1, 2022, for review with numerous paragraphs, including ¶424. The IMT provided extensive feedback on these training materials on February 13, 2023, and explained that the training was an improvement from the previous version, but still required significant revisions to provide adequate instruction and to address the designated Consent Decree paragraphs. After extensive discussions about the format of the training (one all-encompassing training rather than individual blocks of instruction), the Parties decided that BIA would move forward with producing individual blocks of instruction. During the ninth reporting period, the CPD produced eight modules of instruction for review with multiple paragraphs. Specifically, Module 2, *Complaint Initiation and Affidavit Overrides*, was produced for review with ¶424. The IMT provided a no-objection notice on September 27, 2023 and November 10, 2023, and the CPD delivered the training to 95% of the required BIA personnel. Due to training at least 95% of the required personnel on the BIA onboarding training materials, the CPD reached Secondary compliance with ¶424.

Although the CPD reached Secondary compliance this reporting period with ¶424, the CPD must ensure that future training records are provided through clear documentation that includes who attended the training, as well as who was required

to attend. The IMT received clarifications on the training records in January 2024, and we expect these records to be produced formally early in the tenth reporting period.

This reporting period, COPA provided Final Summary Reports that included screenshots of the electronic Case Management System that stores records and transactions related to complaints and investigations. The documentation addressed the requirements of ¶424. COPA regained Full compliance this reporting period.

Moving forward, we look forward to continuing our collaboration with BIA as it works to develop and revise additional individual blocks of instruction for the BIA initial in-service, initial onboard, and refresher trainings. Additionally, we will look for evidence of Full compliance with ¶424’s mandates to determine whether the CPD has sufficiently implemented its policy and training such that complaints are courteously received, properly classified, and efficiently investigated, and community members are able to track the status of investigations into their complaint.

For COPA, we will continue to look for evidence demonstrating that COPA continues to follow policies and trainings such that community members’ complaints are being courteously received and that complainants are able to track the status of investigations into their complaint. To maintain Full compliance, COPA must provide such materials in each future reporting period.

A fuller description of the history of compliance efforts, methodologies, compliance determinations for this paragraph—and each original monitorable paragraphs in the Accountability and Transparency section—is available in *Comprehensive Assessment Part I* (which included *Independent Monitoring Report 8*): <https://cpdmonitoringteam.com/wp-content/uploads/2023/11/IMR8-Appendix-9-Accountability-and-Transparency-2023.11.01.pdf>.

Paragraph 424 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	NINTH REPORTING PERIOD JULY 1, 2023 – DECEMBER 31, 2023 COMPLIANCE PROGRESS: Secondary

Accountability and Transparency: ¶¶425–26

425. *The City, CPD, and COPA will ensure individuals are allowed to submit complaints in multiple ways, including: in person to COPA or at a CPD district station, by telephone, online, anonymously, and through third party representatives. To ensure broad and easy access to its complaint system, within 90 days of the Effective Date: a. the City, CPD, and COPA will make the process for filing a complaint widely available to the public, including in-person, by telephone, and online; b. the City, CPD, and COPA will make the process for filing a complaint available electronically; c. the City, CPD, and COPA will make information on filing a complaint and accompanying instructions accessible to people who speak languages other than English and will provide telephonic language interpretation services consistent with the City's and CPD's existing limited English proficiency policies and this Agreement; d. the City, CPD, and COPA will ensure individuals may submit allegations of misconduct, regardless of whether the individual is a member or perceived member of an identifiable group, based upon, but not limited to: race, ethnicity, color, national origin, ancestry, religion, disability status, gender, gender identity, sexual orientation, marital status, parental status, military discharge status, financial status, or lawful source of income; e. the City, CPD, and COPA will continue to ensure that members of the public may make complaints via telephone using free 24-hour services, including by calling 311 and being given the option to leave a voicemail for COPA or speak to a CPD supervisor, and will clearly display this information on their respective websites and other appropriate City and CPD printed materials; f. the City, CPD, and COPA will ensure that instructions for submitting complaints are available via telephone, on-line, and in-person; and g. the City and CPD will ensure that complaint filing information is prominently displayed on CPD website's homepage, including by linking to COPA's online complaint form.*

426. *As part of the COPA's system for processing non-confidential complaints and administrative notifications (the "intake process"), each complaint and administrative notification will be assigned a unique tracking number. This unique tracking number will be linked with all phases of the investigation and disciplinary process, through the final disposition.*

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

	¶425	¶426
Preliminary:	<i>In Compliance</i> (FIFTH REPORTING PERIOD)	<i>In Compliance</i> (FIFTH REPORTING PERIOD)
CPD	<i>In Compliance</i> (FIFTH REPORTING PERIOD)	<i>In Compliance</i> (FIFTH REPORTING PERIOD)
COPA	<i>In Compliance</i> (FOURTH REPORTING PERIOD)	<i>In Compliance</i> (FOURTH REPORTING PERIOD)
Secondary:	<i>In Compliance (NEW)</i>	<i>In Compliance</i> (EIGHTH REPORTING PERIOD)
CPD	<i>In Compliance (NEW)</i>	<i>In Compliance</i> (EIGHTH REPORTING PERIOD)
COPA	<i>In Compliance</i> (FIFTH REPORTING PERIOD)	<i>In Compliance</i> (FIFTH REPORTING PERIOD)
Full:	<i>Not in Compliance</i>	<i>Not in Compliance</i>
CPD	<i>Not Yet Assessed</i>	<i>Not Yet Assessed</i>
COPA	<i>In Compliance (NEW)</i>	<i>In Compliance (NEW)</i>

In the ninth reporting period, the City and the CPD reached Secondary compliance with ¶425 and maintained Secondary compliance with ¶426. COPA regained Full compliance with ¶¶425-26. Because all relevant City entities must reach levels of compliance to bring the City, as a whole, into compliance, the City has not yet reached Full compliance with ¶425-26.

This reporting period, the CPD maintained Preliminary compliance by providing a revised G08-01, *Complaint and Disciplinary System*, for review, which addressed the requirements of ¶426. The IMT provided a no-objection notice on December 9, 2023.

With regard to Secondary compliance, the CPD produced a draft of its five-day BIA Onboard Training on December 1, 2022, for review with numerous paragraphs, including ¶425 but not ¶426. The IMT provided extensive feedback on these training materials on February 13, 2023, and explained that the training was an improvement from the previous version, but still required significant revisions to provide adequate instruction and to address the designated Consent Decree paragraphs. After extensive discussions about the format of the training (one all-encompassing training rather than individual blocks of instruction), the Parties decided that BIA would move forward with producing individual blocks of instruction. During the ninth reporting period, the CPD produced eight modules of instruction for review with multiple paragraphs. Specifically, Module 2, *Complaint Initiation and Affidavit Overrides*, was produced for review with ¶425–26. The IMT provided a no-objection notice on September 27, 2023 and November 10, 2023, and the CPD delivered the training to 95% of the required BIA personnel. The CPD reached

Secondary compliance with ¶425 and maintained Secondary compliance with ¶426.

Although the CPD reached Secondary compliance this reporting period with ¶425 and maintained Secondary compliance with ¶426, the CPD must ensure that future training records are provided through clear documentation that includes who attended the training, as well as who was required to attend. The IMT received clarification on the training records in January 2024, and we expect these records to be produced formally early in the tenth reporting period.

To assess Full compliance, the IMT reviewed COPA’s Final Summary Reports that included screenshots of the electronic Case Management System that stores records and transactions related to complaints and investigations. The documentation addressed the requirements of ¶425–26.

Moving forward, we look forward to continuing our collaboration with BIA as it works to develop and revise additional individual blocks of instruction for the BIA initial in-service, initial onboard, and refresher trainings. To assess Full compliance for ¶425–26, we urge the CPD to ensure that the representation of members who have successfully completed the eLearning course noted in the eighth reporting period includes 95% of civilians, and to strive for achieving 95% successful completion of the eLearning course across position and rank. Additionally, we will look for documentation that the CPD and its employees are acting in accordance with ¶425–26’s mandates.

For COPA, we will continue to look for evidence demonstrating that COPA continues to act in accordance with ¶425–26’s mandates. To maintain Full compliance, COPA must provide such materials in each future reporting period.

A fuller description of the history of compliance efforts, methodologies, compliance determinations for this paragraph—and each original monitorable paragraphs in the Accountability and Transparency section—is available in *Comprehensive Assessment Part I* (which included *Independent Monitoring Report 8*): <https://cpdmonitoringteam.com/wp-content/uploads/2023/11/IMR8-Appendix-9-Accountability-and-Transparency-2023.11.01.pdf>.

Paragraph 425 Compliance Progress History

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

Paragraph 426 Compliance Progress History

FIRST REPORTING PERIOD SEPTEMBER 1, 2019 – AUGUST 31, 2019 COMPLIANCE PROGRESS: None	SECOND REPORTING PERIOD SEPTEMBER 1, 2019 – FEBRUARY 29, 2020 COMPLIANCE PROGRESS: None	THIRD REPORTING PERIOD MARCH 1, 2020 – DECEMBER 31, 2020 COMPLIANCE PROGRESS: None
FOURTH REPORTING PERIOD JANUARY 1, 2021 – JUNE 30, 2021 COMPLIANCE PROGRESS: None	FIFTH REPORTING PERIOD JULY 1, 2021 – DECEMBER 31, 2021 COMPLIANCE PROGRESS: Preliminary	SIXTH REPORTING PERIOD JANUARY 1, 2022 – JUNE 30, 2022 COMPLIANCE PROGRESS: Preliminary
SEVENTH REPORTING PERIOD JULY 1, 2022 – DECEMBER 31, 2022 COMPLIANCE PROGRESS: Preliminary	EIGHTH REPORTING PERIOD JANUARY 1, 2023 – JUNE 30, 2023 COMPLIANCE PROGRESS: Secondary	NINTH REPORTING PERIOD JULY 1, 2023 – DECEMBER 31, 2023 COMPLIANCE PROGRESS: Secondary

Accountability and Transparency: ¶430

430. COPA will ensure that individuals who submit electronic complaints receive a copy of the information contained in the complaint via electronic mail, if an electronic mail address is provided, upon submission.

Compliance Progress

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

Preliminary: In Compliance (FOURTH REPORTING PERIOD)
Secondary: In Compliance (FIFTH REPORTING PERIOD)
Full: In Compliance (NEW: REGAINED COMPLIANCE)

In the ninth reporting period, COPA regained Full compliance with ¶430.

To assess compliance, the IMT reviewed COPA’s Final Summary Reports that included screenshots of the electronic Case Management System that stores records and transactions related to complaints and investigations. The documentation addressed the requirements of ¶430 for Full compliance.

We will continue to look for evidence demonstrating that COPA continues to act in accordance with ¶430’s mandates. To maintain Full compliance, COPA must provide such materials in each future reporting period.

A fuller description of the history of compliance efforts, methodologies, compliance determinations for this paragraph—and each original monitorable paragraphs in the Accountability and Transparency section—is available in [Comprehensive Assessment Part I](https://cpdmonitoringteam.com/wp-content/uploads/2023/11/IMR8-Appendix-9-Accountability-and-Transparency-2023.11.01.pdf) (which included *Independent Monitoring Report 8*): <https://cpdmonitoringteam.com/wp-content/uploads/2023/11/IMR8-Appendix-9-Accountability-and-Transparency-2023.11.01.pdf>.

Paragraph 430 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: Status Update</p>	<p>THIRD REPORTING PERIOD MARCH 1, 2020 – DECEMBER 31, 2020</p> <p>COMPLIANCE PROGRESS: Status Update</p>
<p>FOURTH REPORTING PERIOD JANUARY 1, 2021 – JUNE 30, 2021</p> <p>COMPLIANCE PROGRESS: Preliminary</p>	<p>FIFTH REPORTING PERIOD JULY 1, 2021 – DECEMBER 31, 2021</p> <p>COMPLIANCE PROGRESS: Secondary</p>	<p>SIXTH REPORTING PERIOD JANUARY 1, 2022 – JUNE 30, 2022</p> <p>COMPLIANCE PROGRESS: Full</p>
<p>SEVENTH REPORTING PERIOD JULY 1, 2022 – DECEMBER 31, 2022</p> <p>COMPLIANCE PROGRESS: Full</p>	<p>EIGHTH REPORTING PERIOD JANUARY 1, 2023 – JUNE 30, 2023</p> <p>COMPLIANCE PROGRESS: Secondary</p>	<p>NINTH REPORTING PERIOD JULY 1, 2023 – DECEMBER 31, 2023</p> <p>COMPLIANCE PROGRESS: Full</p>

Accountability and Transparency: ¶431

431. *The City and CPD will undertake best efforts to ensure that the absence of a signed complainant affidavit alone will not preclude an administrative investigation.*

Compliance Progress

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

Preliminary:	<i>In Compliance</i> (FOURTH REPORTING PERIOD)
CPD	<i>In Compliance</i> (FOURTH REPORTING PERIOD)
COPA	<i>In Compliance</i> (FOURTH REPORTING PERIOD)
Secondary:	<i>In Compliance</i> (NEW)
CPD	<i>In Compliance</i> (NEW)
COPA	<i>In Compliance</i> (FIFTH REPORTING PERIOD)
Full:	<i>Not in Compliance</i>
CPD	<i>Not Yet Assessed</i>
COPA	<i>In Compliance</i> (SEVENTH REPORTING PERIOD)

This reporting period, the City and the CPD reached Secondary compliance and COPA maintained Full compliance with ¶431. Because all relevant City entities must reach levels of compliance to bring the City, as a whole, into compliance, the City has not yet reached Full compliance.

To assess Preliminary compliance, the IMT reviewed the CPD’s revised G08-01, *Complaint and Disciplinary System*, which addressed the requirements of ¶431. The IMT provided a no-objection notice on December 9, 2023.

With regard to Secondary compliance, the CPD produced a draft of its five-day BIA Onboard Training on December 1, 2022, for review with numerous paragraphs, including ¶431. The IMT provided extensive feedback on these training materials on February 13, 2023, and explained that the training was an improvement from the previous version, but still required significant revisions to provide adequate instruction and to address the designated Consent Decree paragraphs. After extensive discussions about the format of the training (one all-encompassing training rather than individual blocks of instruction), the Parties decided that BIA would move forward with producing individual blocks of instruction. During the ninth reporting period, the CPD produced eight modules of instruction for review with multiple paragraphs. Specifically, Module 2, *Complaint Initiation and Affidavit Overrides*, was produced for review with ¶431. The IMT provided a no-objection notice on September 27, 2023 and November 10, 2023, and the CPD delivered the training to 95% of the required BIA personnel. The CPD reached Secondary compliance with ¶431.

Although the CPD reached Secondary compliance with ¶431, the CPD must ensure that future training records are provided through clear documentation that includes who attended the training, as well as who was required to attend. The IMT

received clarification on the training records in January 2024, and we expect these records to be produced formally early in the tenth reporting period.

This reporting period, COPA maintained Full compliance by providing a memorandum with supporting documentation to demonstrate that it undertakes best efforts to ensure that the absence of a signed complainant affidavit alone will not preclude an administrative investigation. Information regarding affidavit overrides and override requests are within COPA’s quarterly and annual reports.

Moving forward, we look forward to continuing our collaboration with BIA as it works to develop and revise additional individual blocks of instruction for the BIA initial in-service, initial onboard, and refresher trainings. To assess Full compliance for ¶431, we will look for documentation that the CPD and its employees have implemented its policies and trainings and are acting in accordance with ¶431’s mandates.

For COPA, we will continue to look for evidence that COPA and its employees are acting in accordance with ¶431’s mandates. We expect to receive documentation of efforts towards maintaining Full compliance every reporting period.

A fuller description of the history of compliance efforts, methodologies, compliance determinations for this paragraph—and each original monitorable paragraphs in the Accountability and Transparency section—is available in [Comprehensive Assessment Part I](https://cpdmonitoringteam.com/wp-content/uploads/2023/11/IMR8-Appendix-9-Accountability-and-Transparency-2023.11.01.pdf) (which included *Independent Monitoring Report 8*): <https://cpdmonitoringteam.com/wp-content/uploads/2023/11/IMR8-Appendix-9-Accountability-and-Transparency-2023.11.01.pdf>.

Paragraph 431 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: Status Update	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: Secondary

Accountability and Transparency: ¶432

432. The City and CPD will require that complaints about any CPD member are accepted, documented, submitted to COPA, and investigated even if the complainant could not identify the CPD member’s name or other employee-identifying number, including star or badge number.

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

Preliminary:		<i>In Compliance (FIFTH REPORTING PERIOD)</i>
	CPD	<i>In Compliance (FIFTH REPORTING PERIOD)</i>
	COPA	<i>In Compliance (FOURTH REPORTING PERIOD)</i>
Secondary:		<i>In Compliance (EIGHTH REPORTING PERIOD)</i>
	CPD	<i>In Compliance (EIGHTH REPORTING PERIOD)</i>
	COPA	<i>In Compliance (FIFTH REPORTING PERIOD)</i>
Full:		<i>Not in Compliance</i>
	CPD	<i>Not Yet Assessed</i>
	COPA	<i>In Compliance (NEW)</i>

In the ninth reporting period, the City and the CPD maintained Secondary compliance with this paragraph. COPA regained Full compliance with ¶432. Because all relevant City entities must reach levels of compliance to bring the City, as a whole, into compliance, the City has not yet reached Full compliance.

With regard to maintaining Secondary compliance, the CPD produced a draft of its five-day BIA Onboard Training on December 1, 2022, for review with numerous paragraphs, including ¶432. The IMT provided extensive feedback on these training materials on February 13, 2023, and explained that the training was an improvement from the previous version, but still required significant revisions to provide adequate instruction and to address the designated Consent Decree paragraphs. After extensive discussions about the format of the training (one all-encompassing training rather than individual blocks of instruction), the Parties decided that BIA would move forward with producing individual blocks of instruction. During the ninth reporting period, the CPD produced eight modules of instruction for review with multiple paragraphs. Specifically, Module 2, *Complaint Initiation and Affidavit Overrides*, was produced for review with ¶432. The IMT provided a no-objection notice on September 27, 2023, and November 10, 2023, and the CPD delivered the training to 95% of the required BIA personnel.

Although the CPD maintained Secondary compliance this reporting period with ¶432, the CPD must ensure that future training records are provided through clear documentation that includes who attended the training, as well as who was required to attend. The IMT received clarification on the training records in January 2024, and we expect these records to be produced formally early in the tenth reporting period.

Additionally, the CPD produced *BIA's New Intake Personnel Orientation and Training* for review with ¶432. The IMT provided comments on October 13, 2023. Overall, we did not think the quality, content, and structure of the training was to the same standard as other approved BIA modules of instruction. For example, the Lesson Plan provides limited direction and information to the instructor regarding how to present the material and what material they must ensure the students understand. Within the Lesson Plan and PowerPoint, the CPD should discuss what the requirements of the intended paragraphs for compliance mean to BIA Investigators and Accountability Sergeants. Additionally, the training should discuss how BIA Investigators and Accountability Sergeants can accomplish the requirements of ¶432. At the end of the reporting period, the training remained in the collaborative review and revision process.

To assess Full compliance, the IMT reviewed COPA's memorandum with supporting documentation to show that it performs full investigations of all complaints regardless of whether the identity of the officer is known. COPA regained Full compliance with ¶432 this reporting period.

Moving forward, we look forward to continuing our collaboration with BIA as it works to develop and revise additional individual blocks of instruction for the BIA initial in-service, initial onboard, and refresher trainings, as well as *BIA's New Intake Personnel Orientation and Training*. To assess Full compliance for ¶432, we urge the CPD to ensure that the representation of members who have successfully completed the eLearning course noted in the eighth reporting period includes 95% of civilians, and to strive for achieving 95% successful completion of the eLearning course across position and rank. Additionally, we will look for documentation that the CPD and its employees are acting in accordance with ¶432's mandates.

For COPA, we will look for evidence that COPA and its employees continue to act in accordance with ¶432's mandates. For COPA, we expect to receive evidence of continued compliance in each reporting period to maintain Full compliance.

A fuller description of the history of compliance efforts, methodologies, compliance determinations for this paragraph—and each original monitorable paragraphs in the Accountability and Transparency section—is available in *Comprehensive Assessment Part I* (which included *Independent Monitoring Report 8*): <https://cpdmonitoringteam.com/wp-content/uploads/2023/11/IMR8-Appendix-9-Accountability-and-Transparency-2023.11.01.pdf>.

Paragraph 432 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: Secondary	NINTH REPORTING PERIOD JULY 1, 2023 – DECEMBER 31, 2023 COMPLIANCE PROGRESS: Secondary

Accountability and Transparency: ¶436

436. *Within 90 days of the Effective Date, CPD will ensure that there are adequate policies and practices in place to encourage and protect CPD members who report potential misconduct by other CPD members. Such policies will provide, at a minimum: a. that CPD members promptly report any misconduct of which they are aware to a supervisor; b. that the supervisor document such alleged misconduct and promptly report it to COPA; and c. that all forms of retaliation, interference, intimidation, and coercion against a CPD member who reports misconduct or cooperates with an investigation of misconduct, are strictly prohibited.*

Compliance Progress

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

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

The CPD reached Secondary compliance with ¶436 in the ninth reporting period.

To maintain Preliminary compliance, the IMT reviewed the CPD’s revised G08-01, *Complaint and Disciplinary System*, which addressed the requirements of ¶436. The IMT provided a no-objection notice on December 9, 2023.

Regarding Secondary compliance, the CPD provided a revised draft of its *Prohibition on Retaliation* eLearning, which addresses the requirements of ¶436. The IMT submitted a no-objection notice on July 13, 2023, with feedback for the CPD to consider regarding numbering slides, estimating time for completion of the training, using human narration, and ensuring members know they are responsible for reading and understanding the corresponding policy, among others. However, after receiving the training records for the eLearning, the IMT raised a process concern because it appeared that the CPD began the training before receiving a no-objection notice from the OAG, as required by ¶641. The CPD provided a written explanation for the error, and although the eLearning began before the OAG provided a no-objection notice—contrary to ¶641—the City and the CPD achieved Secondary compliance for this training for ¶436 in the ninth reporting period. We hope, to avoid this issue in the future, the City and the CPD will ensure they receive no-objection notices from both the IMT and the OAG *before* beginning training.

Also this reporting period, the CPD produced a draft of its five-day BIA Onboard Training on December 1, 2022, for review with numerous paragraphs, including ¶436. The IMT provided extensive feedback on these training materials on February 13, 2023, and explained that the training was an improvement from the previous version, but still required significant revisions to provide adequate instruction and to address the designated Consent Decree paragraphs. After extensive discussions about the format of the training (one all-encompassing training rather than individual blocks of instruction), the Parties decided that BIA would move forward

with producing individual blocks of instruction. During the ninth reporting period, the CPD produced eight modules of instruction for review with multiple paragraphs. Specifically, Module 2, *Complaint Initiation and Affidavit Overrides*, was produced for review with ¶436. The IMT provided a no-objection notice on September 27, 2023, and November 10, 2023, and the CPD delivered the training to 95% of the required BIA personnel. However, the CPD must ensure that future training records are provided through clear documentation that includes who attended the training, as well as who was required to attend. The IMT received clarifications on the training records in January 2024, and we expect these records to be produced formally early in the tenth reporting period.

We look forward to continuing our collaboration with BIA as it works to develop and revise additional individual blocks of instruction for the BIA initial in-service, initial onboard, and refresher trainings.

To assess Full compliance for ¶436, we urge the CPD to ensure that the representation of members who have successfully completed the eLearning course noted in the eighth reporting period includes more civilians and to strive for achieving 95% successful completion of the eLearning course across position and rank. The IMT also looks forward to evaluating CPDs training evaluation records (¶286) for Full compliance. Lastly, we will look for documentation that the CPD and its employees are acting in accordance with ¶436’s mandates.

A fuller description of the history of compliance efforts, methodologies, compliance determinations for this paragraph—and each original monitorable paragraphs in the Accountability and Transparency section—is available in *Comprehensive Assessment Part I* (which included *Independent Monitoring Report 8*): <https://cpdmonitoringteam.com/wp-content/uploads/2023/11/IMR8-Appendix-9-Accountability-and-Transparency-2023.11.01.pdf>.

Paragraph 436 Compliance Progress History

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

Accountability and Transparency: ¶437

437. CPD will expressly prohibit all forms of retaliation, intimidation, coercion, or adverse action against any person who reports misconduct or cooperates with an administrative investigation.

Compliance Progress

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

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

The CPD reached Secondary compliance with ¶437 in the ninth reporting period.

Regarding Secondary compliance, the CPD provided a revised draft of its *Prohibition on Retaliation* eLearning, which addresses the requirements of ¶436. The IMT submitted a no-objection notice on July 13, 2023, with feedback for the CPD to consider regarding numbering slides, estimating time for completion of the training, using human narration, and ensuring members know they are responsible for reading and understanding the corresponding policy, among others. However, after receiving the training records for the eLearning, the IMT raised a process concern because it appeared that the CPD began the training before receiving a no-objection notice from the OAG, as required by ¶641. The CPD provided a written explanation for the error. Although the eLearning began before the OAG provided a no-objection notice—contrary to ¶641—the City and the CPD achieved Secondary compliance for this training for ¶436 in the ninth reporting period. We hope, to avoid this issue in the future, the City and the CPD will ensure they receive no-objection notices from both the IMT and the OAG before enrolling participants in training.

Also this reporting period, the CPD produced a draft of its five-day BIA Onboard Training on December 1, 2022, for review with numerous paragraphs, including ¶437. The IMT provided extensive feedback on these training materials on February 13, 2023, and explained that the training was an improvement from the previous version, but still required significant revisions to provide adequate instruction and to address the designated Consent Decree paragraphs. After extensive discussions about the format of the training (one all-encompassing training rather than individual blocks of instruction), the Parties decided that BIA would move forward with producing individual blocks of instruction. During the ninth reporting period, the CPD produced eight modules of instruction for review with multiple paragraphs. Specifically, Module 2, *Complaint Initiation and Affidavit Overrides*, was produced for review with ¶437. The IMT provided a no-objection notice on September 27, 2023 and November 10, 2023, and the CPD delivered the training to 95% of the required BIA personnel. However, the CPD must ensure that future

training records are provided through clear documentation that includes who attended the training, as well as who was required to attend. The IMT received clarifications on the training records in January 2024, and we expect these records to be produced formally early in the tenth reporting period.

The CPD also provided a draft *2024 De-Escalation, Response to Resistance, Use of Force, and Coordinated Multiple Arrests Training* for review with a number of paragraphs, including ¶437. The materials appear to address the requirements of ¶437. The IMT provided comments on December 8, 2023, and by the end of the reporting period, the training remained in the collaborative review and revision process.

Moving forward, we look forward to continuing our collaboration with BIA as it works to develop and revise additional individual blocks of instruction for the BIA initial in-service, initial onboard, and refresher trainings.

To assess Full compliance for ¶437, we urge the CPD to ensure that the representation of members who have successfully completed the eLearning course noted in the eighth reporting period includes more civilians and to strive for achieving 95% successful completion of the eLearning course across position and rank. The IMT also looks forward to evaluating CPDs training evaluation records (¶286) for Full compliance. Lastly, we will look for documentation that the CPD and its employees are acting in accordance with ¶437’s mandates.

A fuller description of the history of compliance efforts, methodologies, compliance determinations for this paragraph—and each original monitorable paragraphs in the Accountability and Transparency section—is available in *Comprehensive Assessment Part I* (which included *Independent Monitoring Report 8*): <https://cpdmonitoringteam.com/wp-content/uploads/2023/11/IMR8-Appendix-9-Accountability-and-Transparency-2023.11.01.pdf>.

Paragraph 437 Compliance Progress History

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

Accountability and Transparency: ¶438

438. OAG acknowledges that the City, CPD, and COPA are working to create an electronic Case Management System (“CMS”). The City, CPD, and COPA will ensure that the CMS maintains accurate data regarding the number, classification, and status of all administrative investigations, from the intake process through the final disciplinary decision, if any, and through any grievance process, arbitration, Police Board proceeding, or appeal relating to the final disciplinary decision (the “final disposition”). CMS will be maintained by appropriate personnel from the City, CPD, and COPA. The CMS will be fully operational by June 30, 2020.

Compliance Progress	(Reporting Period: July 1, 2023, through December 31, 2023)
Preliminary:	<i>In Compliance</i> (SEVENTH REPORTING PERIOD)
CPD	<i>In Compliance</i> (SEVENTH REPORTING PERIOD)
COPA	<i>In Compliance</i> (FOURTH REPORTING PERIOD)
Secondary:	<i>In Compliance</i> (NEW)
CPD	<i>In Compliance</i> (NEW)
COPA	<i>In Compliance</i> (SEVENTH REPORTING PERIOD)
Full:	<i>Not in Compliance</i>
CPD	<i>Not Yet Assessed</i>
COPA	<i>In Compliance</i> (NEW)

The City and the CPD reached Secondary compliance with ¶438 in the ninth reporting period and COPA regained Full compliance. Because all relevant City entities must reach levels of compliance to bring the City, as a whole, into compliance, the City has not yet reached Full compliance.

To maintain Preliminary compliance, the IMT reviewed the CPD’s revised S08-01, *Complaint and Investigators and Investigations*, which addressed the requirements of ¶438. The IMT provided a no-objection notice on December 2, 2023.

With regard to Secondary compliance, the CPD produced a draft of its five-day BIA Onboard Training on December 1, 2022, for review with numerous paragraphs, not including ¶438. The IMT provided extensive feedback on these training materials on February 13, 2023, and explained that the training was an improvement from the previous version, but still required significant revisions to provide adequate instruction and to address the designated Consent Decree paragraphs. After extensive discussions about the format of the training (one all-encompassing training rather than individual blocks of instruction), the Parties decided that BIA would move forward with producing individual blocks of instruction. During the ninth reporting period, the CPD produced eight modules of instruction for review with multiple paragraphs. Specifically, Module 1, *Complaint Management System and Complete Investigatory Files*, was produced for review with ¶438. The IMT provided a no-objection notice on September 27, 2023, and the CPD delivered the

training to 95% of the required BIA personnel. The CPD reached Secondary compliance with ¶438.

Although the CPD reached Secondary compliance this reporting period with ¶438, the CPD must ensure that future training records are provided through clear documentation that includes who attended the training, as well as who was required to attend. The IMT received clarifications on the training records in January 2024, and we expect these records to be produced formally early in the tenth reporting period.

This reporting period, COPA provided documentation with screenshots of cases assigned to COPA through the City's Public Data Portal. The Public Data Portal provides the accused member, the complainant, and all members of the public the ability to search for any Long Number and learn the complaint's status. COPA therefore showed that they have implemented their policies, training, and a Case Management System that fulfills the requirements of ¶438. COPA regained Full compliance with this paragraph in the ninth reporting period.

The City and the CPD reached Secondary compliance and COPA regained Full compliance. Moving forward, we look forward to continuing our collaboration with BIA as it works to develop and revise additional individual blocks of instruction for the BIA initial in-service, initial onboard, and refresher trainings.

For COPA, we will look for evidence that COPA and its employees continue to act in accordance with ¶438's mandates. For COPA, we expect to receive evidence of continued compliance in each reporting period to maintain Full compliance.

A fuller description of the history of compliance efforts, methodologies, compliance determinations for this paragraph—and each original monitorable paragraphs in the Accountability and Transparency section—is available in *Comprehensive Assessment Part I* (which included *Independent Monitoring Report 8*): <https://cpdmonitoringteam.com/wp-content/uploads/2023/11/IMR8-Appendix-9-Accountability-and-Transparency-2023.11.01.pdf>.

Paragraph 438 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:
Under Assessment

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

COMPLIANCE PROGRESS:
None

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

COMPLIANCE PROGRESS:
None

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

COMPLIANCE PROGRESS:
None

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

COMPLIANCE PROGRESS:
Preliminary

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

COMPLIANCE PROGRESS:
Preliminary

NINTH REPORTING PERIOD
JULY 1, 2023 – DECEMBER 31, 2023

COMPLIANCE PROGRESS:
Secondary

Accountability and Transparency: ¶439

439. The City and CPD will ensure that complainants and their representatives are able to track non-confidential unique tracking numbers from the intake process through final disposition via telephone and in person. By June 30, 2020, the City will also ensure complainants and their representatives are able to track the status of non-confidential unique tracking numbers from the intake process through final disposition online.

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

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

In the ninth reporting period, the City and the CPD maintained Preliminary compliance And COPA regained Full compliance with ¶439. Because all relevant City entities must reach levels of compliance to bring the City, as a whole, into compliance, the City has not yet reached Full compliance.

This reporting period, the CPD did not produce any documentation that demonstrated efforts related to ¶439.

This reporting period, COPA provided documentation with screenshots of cases assigned to COPA through the City’s Public Data Portal. The Public Data Portal provides the accused member, the complainant, and all members of the public the ability to search for any Long Number and learn the complaint’s status. COPA therefore showed that they have implemented their policies, training, and a Case Management System that fulfills the requirements of ¶439. COPA demonstrated that complainants and their representatives are able to track non-confidential unique tracking numbers from the intake process through final disposition via telephone and in person, in addition to online. COPA regained Full compliance with this paragraph in the ninth reporting period.

The City and the CPD maintained Preliminary compliance and COPA re-gained Full compliance. Moving forward, we will continue to look for the CPD to develop training instructing compliance with its policies and ¶439.

For COPA, we will look for evidence that COPA and its employees continue to act in accordance with ¶439’s mandates. For COPA, we expect to receive evidence of continued compliance in each reporting period to maintain Full compliance.

A fuller description of the history of compliance efforts, methodologies, compliance determinations for this paragraph—and each original monitorable paragraphs in the Accountability and Transparency section—is available in [Comprehensive Assessment Part I](https://cpdmonitoringteam.com/wp-content/uploads/2023/11/IMR8-Appendix-9-Accountability-and-Transparency-2023.11.01.pdf) (which included *Independent Monitoring Report 8*): <https://cpdmonitoringteam.com/wp-content/uploads/2023/11/IMR8-Appendix-9-Accountability-and-Transparency-2023.11.01.pdf>.

Paragraph 439 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	NINTH REPORTING PERIOD JULY 1, 2023 – DECEMBER 31, 2023 COMPLIANCE PROGRESS: Preliminary

Accountability and Transparency: ¶440

440. *The City, CPD, and COPA will ensure that all non-confidential complaints are processed by COPA as follows: a. all non-confidential complaints of alleged misconduct received by CPD, including BIA and CPD supervisors, are documented and submitted to COPA within 24 hours of receipt; b. all complaints of alleged misconduct submitted to the anonymous reporting website and all non-confidential complaints of alleged misconduct received by the OIG will be submitted to COPA by the end of the next business day after the complaint was received; c. upon receipt of a complaint, COPA will promptly assign the complaint a unique tracking number, make an initial determination of the classification(s) of the alleged misconduct, and will either retain the complaint for investigation or transfer the complaint to BIA for investigation; d. COPA, pursuant to its ordinance and this Agreement, will have the jurisdiction to conduct administrative investigations of all allegations of misconduct that involve: i. excessive force; ii. Domestic violence; iii. Improper search or seizure of individuals or property; iv. Coercion; v. verbal abuse as defined under Municipal Code of Chicago, § 2-78-100, including any unwelcome sexual advances or requests for sexual favors; or vi. Unlawful denial of access to counsel. E. COPA, pursuant to its ordinance and this Agreement, will receive immediate administrative notification of and have jurisdiction to conduct administrative investigations of all incidents, including those in which no allegation of misconduct has been made, involving: i. firearm discharges by CPD officers that could potentially strike an individual (“officer-involved shooting”); ii. Taser or stun gun discharges by CPD officers that result in death or serious bodily injury; iii. Any person who dies or sustains serious bodily injury while in CPD custody, or as a result of CPD actions; iv. “officer-involved deaths,” as that term is defined in 50 ILCS 727/1-5; and v. other weapons discharges and other uses of CPD-issued equipment as a weapon that results in death or serious bodily injury, at the COPA Chief Administrator’s discretion; f. the City, CPD, and COPA will ensure that all allegations are recorded and classified appropriately, even if the complainant does not accurately characterize the alleged misconduct; g. if BIA or district personnel conducting investigations into misconduct identify allegations of misconduct that are within COPA’s administrative investigative jurisdiction as defined herein, the investigator will promptly notify COPA; and h. if a complaint contains multiple allegations of misconduct, one or more of which falls within COPA’s administrative investigation jurisdiction as defined herein, COPA will have the right of first refusal to conduct an administrative investigation of the entire complaint.*

Compliance Progress

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

Preliminary:	<i>In Compliance</i> (SEVENTH REPORTING PERIOD)
CPD	<i>In Compliance</i> (SEVENTH REPORTING PERIOD)
COPA	<i>In Compliance</i> (FOURTH REPORTING PERIOD)
Deputy PSIG	<i>In Compliance</i> (FOURTH REPORTING PERIOD)
Secondary:	<i>In Compliance</i> (NEW)
CPD	<i>In Compliance</i> (NEW)
COPA	<i>In Compliance</i> (FIFTH REPORTING PERIOD)
Deputy PSIG	<i>In Compliance</i> (FOURTH REPORTING PERIOD)
Full:	<i>Not in Compliance</i>
CPD	<i>Not Yet Assessed</i>
COPA	<i>In Compliance</i> (NEW)
Deputy PSIG	<i>In Compliance</i> (FOURTH REPORTING PERIOD)

The City and the CPD reached Secondary compliance and COPA reached Full compliance with ¶1440 in the ninth reporting period. Because all relevant City entities must reach levels of compliance to bring the City, as a whole, into compliance, the City has not yet reached Full compliance. In the previous reporting period, the Deputy PSIG successfully completed its Sustainment Period, marking two full years that it had maintained Full compliance with all requirements pertaining to its office. Therefore, in the ninth reporting period, the Parties moved to release OIG and PSIG from its Consent Decree requirements because it successfully completed the required two-year sustainment period, which was granted by the Court.

With regard to Secondary compliance, the CPD produced a draft of its five-day BIA Onboard Training on December 1, 2022, for review with numerous paragraphs, including ¶1440. The IMT provided extensive feedback on these training materials on February 13, 2023, and explained that the training was an improvement from the previous version, but still required significant revisions to provide adequate instruction and to address the designated Consent Decree paragraphs. After extensive discussions about the format of the training (one all-encompassing training rather than individual blocks of instruction), the Parties decided that BIA would move forward with producing individual blocks of instruction. During the ninth reporting period, the CPD produced eight modules of instruction for review with multiple paragraphs. Specifically, Module 2, *Complaint Initiation and Affidavit Overrides*, was produced for review with ¶1440. The IMT provided a no-objection notice on September 27, 2023 and November 10, 2023, and the CPD delivered the training to 95% of the required BIA personnel. The CPD reached Secondary compliance with ¶1440.

Although the CPD reached Secondary compliance this reporting period with ¶1440, the CPD must ensure that future training records are provided through clear documentation that includes who attended the training, as well as who was required to attend. The IMT received clarifications on the training records in January 2024,

and we expect these records to be produced formally early in the tenth reporting period.

To assess Full compliance, the IMT reviewed COPA’s documentation of all complaints, examples of cases in which COPA investigation allegations are not in the original complaints, and examples of Final Summary Reports. The documentation addressed the requirements of ¶440.

Moving forward, we look forward to continuing our collaboration with BIA as it works to develop and revise additional individual blocks of instruction for the BIA initial in-service, initial onboard, and refresher trainings. We also look forward to the CPD ensuring that 95% of the required personnel complete the approved BIA *Prohibition on Retaliation* eLearning. Additionally, we will look for documentation that the CPD and its employees are acting in accordance with ¶440’s mandates.

For COPA, we will continue to look for evidence demonstrating that COPA and its employees are acting in accordance with ¶440’s mandates. To maintain Full compliance, COPA must provide such materials in each future reporting period.

A fuller description of the history of compliance efforts, methodologies, compliance determinations for this paragraph—and each original monitorable paragraphs in the Accountability and Transparency section—is available in [Comprehensive Assessment Part I](https://cpdmonitoringteam.com/wp-content/uploads/2023/11/IMR8-Appendix-9-Accountability-and-Transparency-2023.11.01.pdf) (which included *Independent Monitoring Report 8*): <https://cpdmonitoringteam.com/wp-content/uploads/2023/11/IMR8-Appendix-9-Accountability-and-Transparency-2023.11.01.pdf>.

Paragraph 440 Compliance Progress History

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

Accountability and Transparency: ¶443

443. Consistent with COPA’s jurisdiction, after conferring about the details of a particular criminal sexual misconduct investigation involving a CPD member, COPA and BIA may jointly agree that BIA may conduct the administrative investigation into allegations of sexual misconduct when they jointly determine that doing so avoids unnecessary disruption to the complainant.

Compliance Progress	(Reporting Period: July 1, 2023, through December 31, 2023)
Preliminary:	<i>In Compliance (SEVENTH REPORTING PERIOD)</i>
CPD	<i>In Compliance (SEVENTH REPORTING PERIOD)</i>
COPA	<i>In Compliance (FIFTH REPORTING PERIOD)</i>
Secondary:	<i>In Compliance (NEW)</i>
CPD	<i>In Compliance (NEW)</i>
COPA	<i>In Compliance (SIXTH REPORTING PERIOD)</i>
Full:	<i>Not in Compliance</i>
CPD	<i>Not Yet Assessed</i>
COPA	<i>In Compliance (SIXTH REPORTING PERIOD)</i>

The City and the CPD reached Secondary compliance and COPA maintained Full compliance with ¶443 in the ninth reporting period. Because all relevant City entities must reach levels of compliance to bring the City, as a whole, into compliance, the City has not yet reached Full compliance.

In the previous reporting period, the City and the CPD finalized and implemented G08-06, *Prohibition of Sexual Misconduct*, which addressed ¶443. In the ninth reporting period, to maintain Preliminary compliance, the IMT reviewed the CPD’s final version of G08-06 with the accompanying public comments for ¶443. The IMT provided a no-objection notice with feedback on September 1, 2023.

With regard to Secondary compliance, the CPD produced a draft of its five-day BIA Onboard Training on December 1, 2022, for review with numerous paragraphs, including ¶443. The IMT provided extensive feedback on these training materials on February 13, 2023, and explained that the training was an improvement from the previous version, but still required significant revisions to provide adequate instruction and to address the designated Consent Decree paragraphs. After extensive discussions about the format of the training (one all-encompassing training rather than individual blocks of instruction), the Parties decided that BIA would move forward with producing individual blocks of instruction. During the ninth reporting period, the CPD produced eight modules of instruction for review with multiple paragraphs. Specifically, Module 4, *Sexual Misconduct Initiation*, was produced for review with ¶443. The IMT provided a no-objection notice on September 27, 2023, and the CPD delivered the training to 95% of the required BIA personnel. The CPD reached Secondary compliance with ¶443.

Although the CPD reached Secondary compliance this reporting period with ¶443, the CPD must ensure that future training records are provided through clear documentation that includes who attended the training, as well as who was required to attend. The IMT received clarification on the training records in January 2024, and we expect these records to be produced formally early in the tenth reporting period.

This reporting period, COPA maintained Full compliance with ¶443. COPA provided a revised version of its *Sexual Misconduct and Domestic Violence* Training for review, which addresses ¶443. COPA provided documentation showing that 97% of its employees completed the training. The IMT virtually observed the training. The instructor's experience and enthusiasm provided an excellent delivery of the Lesson Plan and fully addressed the requirements of ¶443. COPA also provided documentation of emails between COPA Investigators and BIA Investigators demonstrating that COPA and BIA are adhering to the requirements of ¶443 and the Memorandum of Understanding to jointly investigate Sexual Misconduct cases. Additionally, during a Police Board meeting on November 16, 2023, the BIA Deputy Chief and COPA Chief commented on a particularly egregious case that was jointly investigated.

Moving forward, we look forward to continuing our collaboration with BIA as it works to develop and revise additional individual blocks of instruction for the BIA initial in-service, initial onboard, and refresher trainings. Additionally, we will look for documentation that the CPD and its employees are acting in accordance with ¶443's mandates.

For COPA, we will continue to look for documentation evidencing its willingness to cooperate with BIA regarding sexual misconduct cases. For COPA, we expect to receive evidence of continued compliance in each reporting period to maintain Full compliance.

A fuller description of the history of compliance efforts, methodologies, compliance determinations for this paragraph—and each original monitorable paragraphs in the Accountability and Transparency section—is available in [Comprehensive Assessment Part I](https://cpdmonitoringteam.com/wp-content/uploads/2023/11/IMR8-Appendix-9-Accountability-and-Transparency-2023.11.01.pdf) (which included *Independent Monitoring Report 8*): <https://cpdmonitoringteam.com/wp-content/uploads/2023/11/IMR8-Appendix-9-Accountability-and-Transparency-2023.11.01.pdf>.

Paragraph 443 Compliance Progress History

FIRST REPORTING PERIOD SEPTEMBER 1, 2019 – AUGUST 31, 2019 COMPLIANCE PROGRESS: Status Update	SECOND REPORTING PERIOD SEPTEMBER 1, 2019 – FEBRUARY 29, 2020 COMPLIANCE PROGRESS: Status Update	THIRD REPORTING PERIOD MARCH 1, 2020 – DECEMBER 31, 2020 COMPLIANCE PROGRESS: None
FOURTH REPORTING PERIOD JANUARY 1, 2021 – JUNE 30, 2021 COMPLIANCE PROGRESS: None	FIFTH REPORTING PERIOD JULY 1, 2021 – DECEMBER 31, 2021 COMPLIANCE PROGRESS: None	SIXTH REPORTING PERIOD JANUARY 1, 2022 – JUNE 30, 2022 COMPLIANCE PROGRESS: None
SEVENTH REPORTING PERIOD JULY 1, 2022 – DECEMBER 31, 2022 COMPLIANCE PROGRESS: Preliminary	EIGHTH REPORTING PERIOD JANUARY 1, 2023 – JUNE 30, 2023 COMPLIANCE PROGRESS: Preliminary	NINTH REPORTING PERIOD JULY 1, 2023 – DECEMBER 31, 2023 COMPLIANCE PROGRESS: Secondary

Accountability and Transparency: ¶1444

444. *Within ten days of the final disciplinary decision of each complaint of sexual misconduct against a CPD member alleging conduct against a non-CPD member, the City will provide the Deputy PSIG with the complete administrative investigative file, subject to applicable law. The Deputy PSIG will review and analyze each administrative investigative file and, on an annual basis, the Deputy PSIG will publish a report: a. assessing the quality of the sexual misconduct administrative investigations reviewed; b. recommending changes in policies and practices to better prevent, detect, or investigate sexual misconduct; and c. providing aggregate data on the administrative investigations reviewed, including: i. the volume and nature of allegations investigated, broken down by investigating agency; ii. The percentage of investigations referred to the Cook County State’s Attorney’s Office (“CCSAO”) for criminal review; iii. The percentage of investigations criminally prosecuted; iv. The percentage of investigations closed after the preliminary investigation; v. the percentage of investigations closed for lack of a signed complainant affidavit; and vi. The investigative findings and recommendations, including a summary breakdown of discipline recommended for investigations with sustained findings.*

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

Recurring Schedule: Annually **Not Yet Applicable**

Preliminary:		<i>In Compliance (EIGHTH REPORTING PERIOD)</i>
	CPD	<i>In Compliance (EIGHTH REPORTING PERIOD)</i>
	COPA	<i>In Compliance (FIFTH REPORTING PERIOD)</i>
	Deputy PSIG	<i>In Compliance (THIRD REPORTING PERIOD)</i>
Secondary:		<i>Not in Compliance</i>
	CPD	<i>Not in Compliance</i>
	COPA	<i>In Compliance (NEW)</i>
	Deputy PSIG	<i>In Compliance (FOURTH REPORTING PERIOD)</i>
Full:		<i>Not in Compliance</i>
	CPD	<i>Not in Compliance</i>
	COPA	<i>In Compliance (NEW)</i>
	Deputy PSIG	<i>In Compliance (FOURTH REPORTING PERIOD)</i>

In the ninth reporting period, the City and the CPD maintained Preliminary compliance while COPA reached Secondary and Full compliance with ¶1444. Because all relevant City entities must reach levels of compliance to bring the City, as a whole, into compliance, the City has not yet reached Secondary compliance. In the previous reporting period, the Deputy PSIG successfully completed its Sustainment Period, marking two full years that it had maintained Full compliance with all requirements pertaining to its office. Therefore, in the ninth reporting period, the Parties moved to release OIG and PSIG from its Consent Decree requirements because it

successfully completed the required two-year sustainment period, which was granted by the Court.

In the previous reporting period, the City and the CPD finalized and implemented G08-06, *Prohibition of Sexual Misconduct*, which addressed ¶1444. In the ninth reporting period, the City and the CPD provided the final version of G08-06 with the accompanying public comments for review with ¶1444. The IMT provided a no-objection notice with feedback on September 1, 2023. However, the City and the CPD did not produce materials toward Secondary compliance with ¶1444. Additionally, in the previous reporting period, the IMT noted that the CPD and BIA did not meet the reporting requirements of providing the Deputy PSIG with the complete investigative file within ten days of final disposition. To meet further levels of compliance, the CPD and BIA must meet the reporting requirements to the Deputy PSIG.

To assess Secondary compliance, the IMT reviewed COPA’s revised version of its *Sexual Misconduct and Domestic Violence Training*, which addresses ¶1444. COPA provided documentation showing that 97% of its employees completed the training. The IMT virtually observed the training. The instructor’s experience and enthusiasm provided an excellent delivery of the Lesson Plan and fully addressed the requirements of ¶1444.

To assess Full compliance the IMT reviewed COPA’s documentation demonstrating that COPA provides a complete investigative file to the Deputy PSIG within 10 days of final disciplinary decision. COPA also explained its creation of category codes of sexual misconduct investigations for digital production, tracking, and review of the investigations. COPA collaborated with the Deputy PSIG to create automatic Case Management System notifications to flag cases with associated category codes at both the case closure and final disciplinary decision phases, which creates a more efficient process. This notification process far exceeds the requirements of ¶1444.

For the CPD, we will look to review training materials that instruct compliance with the requirements of this paragraph and the CPD’s policies. The CPD also must work meet their reporting requirement to the Deputy PSIG. For COPA we will look for continued evidence that its employees are acting in accordance with ¶1444, as well as working to meet their reporting requirement to the Deputy PSIG.

A fuller description of the history of compliance efforts, methodologies, compliance determinations for this paragraph—and each original monitorable paragraphs in the Accountability and Transparency section—is available in [Comprehensive Assessment Part I](https://cpdmonitoringteam.com/wp-content/uploads/2023/11/IMR8-Appendix-9-Accountability-and-Transparency-2023.11.01.pdf) (which included *Independent Monitoring Report 8*): <https://cpdmonitoringteam.com/wp-content/uploads/2023/11/IMR8-Appendix-9-Accountability-and-Transparency-2023.11.01.pdf>.

Paragraph 444 Compliance Progress History

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

COMPLIANCE PROGRESS:
Status Update

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

COMPLIANCE PROGRESS:
Status Update

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

COMPLIANCE PROGRESS:
None

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

COMPLIANCE PROGRESS:
None

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

COMPLIANCE PROGRESS:
None

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

COMPLIANCE PROGRESS:
None

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

COMPLIANCE PROGRESS:
None

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

COMPLIANCE PROGRESS:
Preliminary

NINTH REPORTING PERIOD
JULY 1, 2023 – DECEMBER 31, 2023

COMPLIANCE PROGRESS:
Preliminary

Accountability and Transparency: ¶1445

445. The City will use best efforts to initiate and undertake a process with the CCSAO, United States Attorney’s Office, Cook County Public Defender’s Office, and the Federal Defender’s Office to share information on at least a quarterly basis regarding any affirmative judicial findings made during the course of criminal proceedings that a CPD member was untruthful, including any findings made at suppression hearings. Upon receipt of information from the CCSAO, United States Attorney’s Office, Cook County Public Defender’s Office, and the Federal Defender’s Office that may suggest misconduct COPA will initiate the intake process.

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

Recurring Schedule: Quarterly Met Missed

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

The City and the CPD maintained Preliminary compliance and COPA reached Full compliance with ¶1445 in the ninth reporting period. Because all relevant City entities must reach levels of compliance to bring the City, as a whole, into compliance, the City has not yet reached Secondary compliance.

This reporting period, the CPD did not produce any documentation that demonstrated efforts related to ¶1445.

Towards Full compliance, COPA provided documentation that establishes that the City and COPA have a fully executed Memorandum of Understanding (MOU) with the United States Attorney’s Office, the Federal Defender’s Office, and the Cook County State’s Attorney’s Office. On a quarterly basis, COPA sends a request to the Offices seeking the identity of any CPD member in which an affirmative finding of truthfulness was made. Pursuant to the MOU, COPA forwards any information it receives to the CPD’s BIA. Although the City included the Cook County Public Defender’s Office as a party to the MOU, the office declined to execute the document. However, COPA should continue to include the Cook County Public Defender’s Officer in their quarterly request for information. COPA reached Full compliance in the ninth reporting period with ¶1445.

The City and the CPD maintained Preliminary compliance with this paragraph in the ninth reporting period. Moving forward, we will look for the CPD to develop training relevant to the requirements of ¶445. For COPA, we will look for evidence maintaining that it has sufficiently implemented its policies and trainings. Additionally, we will look for COPA to continue to include the Cook County Public Defender’s Office in their quarterly request for information. The City should ensure the process is institutionalized by updating the MOU either annually or semi-annually.

A fuller description of the history of compliance efforts, methodologies, compliance determinations for this paragraph—and each original monitorable paragraphs in the Accountability and Transparency section—is available in [Comprehensive Assessment Part I](https://cpdmonitoringteam.com/wp-content/uploads/2023/11/IMR8-Appendix-9-Accountability-and-Transparency-2023.11.01.pdf) (which included *Independent Monitoring Report 8*): <https://cpdmonitoringteam.com/wp-content/uploads/2023/11/IMR8-Appendix-9-Accountability-and-Transparency-2023.11.01.pdf>.

Paragraph 445 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: Status Update	THIRD REPORTING PERIOD MARCH 1, 2020 – DECEMBER 31, 2020 COMPLIANCE PROGRESS: None
FOURTH REPORTING PERIOD JANUARY 1, 2021 – JUNE 30, 2021 COMPLIANCE PROGRESS: None	FIFTH REPORTING PERIOD JULY 1, 2021 – DECEMBER 31, 2021 COMPLIANCE PROGRESS: None	SIXTH REPORTING PERIOD JANUARY 1, 2022 – JUNE 30, 2022 COMPLIANCE PROGRESS: None
SEVENTH REPORTING PERIOD JULY 1, 2022 – DECEMBER 31, 2022 COMPLIANCE PROGRESS: Preliminary	EIGHTH REPORTING PERIOD JANUARY 1, 2023 – JUNE 30, 2023 COMPLIANCE PROGRESS: Preliminary	NINTH REPORTING PERIOD JULY 1, 2023 – DECEMBER 31, 2023 COMPLIANCE PROGRESS: Preliminary

Accountability and Transparency: ¶447

447. *The City and CPD will require that all COPA and BIA personnel and Accountability Sergeants communicate with complainants and involved CPD members in a professional and respectful manner.*

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

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

In the ninth reporting period, COPA reached Full compliance with ¶447, and the City and the CPD reached Secondary compliance. Because all relevant City entities must reach levels of compliance to bring the City, as a whole, into compliance, the City has not yet reached Full compliance.

This reporting period, the CPD produced *BIA's New Intake Personnel Orientation and Training* for review with ¶447. The IMT provided comments on October 13, 2023. Overall, we did not think the quality, content, and structure of the training was to the same standard as other approved BIA modules of instruction. For example, the Lesson Plan provides limited direction and information to the instructor regarding how to present the material and what material they must ensure the students understand. Within the Lesson Plan and PowerPoint, the CPD should discuss what the requirements of the intended paragraphs for compliance mean to BIA Investigators and Accountability Sergeants. Additionally, the training should discuss how BIA Investigators and Accountability Sergeants can accomplish the requirements of ¶447. At the end of the reporting period, the training remained in the collaborative review and revision process.

With regard to Secondary compliance, the CPD produced a draft of its five-day BIA Onboard Training on December 1, 2022, for review with numerous paragraphs, including ¶447. The IMT provided extensive feedback on these training materials on February 13, 2023, and explained that the training was an improvement from the previous version, but still required significant revisions to provide adequate instruction and to address the designated Consent Decree paragraphs. After extensive discussions about the format of the training (one all-encompassing training rather than individual blocks of instruction), the Parties decided that BIA would

move forward with producing individual blocks of instruction. During the ninth reporting period, the CPD produced eight modules of instruction for review with multiple paragraphs. Specifically, Module 7, *Procedural Justice, Implicit Bias, and Conflicts of Interest*, was produced for review with ¶447. The IMT provided a no-objection notice with feedback on September 27, 2023, and the CPD delivered the training to 95% of the required BIA personnel. The CPD reached Secondary compliance with ¶447.

Although the CPD reached Secondary compliance this reporting period with ¶447, the CPD must ensure that future training records are provided through clear documentation that includes who attended the training, as well as who was required to attend. The IMT received clarifications on the training records in January 2024, and we expect these records to be produced formally early in the tenth reporting period.

To assess Full compliance, the IMT reviewed COPA's transcripts of interviews of complainants and officers demonstrating that COPA personnel communicate in a professional and respectful manner. The documentation addressed the requirements of ¶447.

Moving forward, we look forward to continuing our collaboration with BIA as it works to develop and revise additional individual blocks of instruction for the BIA initial in-service, initial onboard, and refresher trainings, as well as *BIA's New Intake Personnel Orientation and Training*. Additionally, we will look for evidence of Full compliance with ¶447's mandates.

For COPA, we look forward to receiving additional information related to ¶447 to ensure COPA has sufficiently implemented its policies and training. To maintain Full compliance, COPA must provide such materials in each future reporting period.

A fuller description of the history of compliance efforts, methodologies, compliance determinations for this paragraph—and each original monitorable paragraphs in the Accountability and Transparency section—is available in [Comprehensive Assessment Part I](https://cpdmonitoringteam.com/wp-content/uploads/2023/11/IMR8-Appendix-9-Accountability-and-Transparency-2023.11.01.pdf) (which included *Independent Monitoring Report 8*): <https://cpdmonitoringteam.com/wp-content/uploads/2023/11/IMR8-Appendix-9-Accountability-and-Transparency-2023.11.01.pdf>.

Paragraph 447 Compliance Progress History

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

Accountability and Transparency: ¶448

448. If COPA, BIA, or the district does not arrive at the investigative findings and recommendations within 180 days, COPA, BIA or an Accountability Sergeant will, thereafter, periodically, but not less than once every 60 days, attempt contact with the complainant or his or her representative to provide status updates until the investigative findings and recommendations are issued. Such contacts will be documented in the administrative investigative file. By 2020, this requirement will be satisfied by providing complainants and their representatives the ability to track the status of non-confidential unique tracking numbers from the intake process through final disposition online.

Compliance Progress	(Reporting Period: July 1, 2023, through December 31, 2023)
Preliminary:	<i>In Compliance (FIFTH REPORTING PERIOD)</i>
CPD	<i>In Compliance (FIFTH REPORTING PERIOD)</i>
COPA	<i>In Compliance (FOURTH REPORTING PERIOD)</i>
Secondary:	<i>Not in Compliance</i>
CPD	<i>Not in Compliance</i>
COPA	<i>In Compliance (SEVENTH REPORTING PERIOD)</i>
Full:	<i>Not in Compliance</i>
CPD	<i>Not Yet Assessed</i>
COPA	<i>In Compliance (NEW)</i>

In the ninth reporting period, the CPD maintained Preliminary compliance with ¶448 and COPA reached Full compliance. Because all relevant City entities must reach levels of compliance to bring the City, as a whole, into compliance, the City has not yet reached Secondary compliance.

This reporting period, the CPD did not produce any documentation that demonstrated efforts related to ¶448.

To assess Full compliance, the IMT reviewed COPA’s documentation regarding its publishing and distribution of Final Summary Reports. COPA demonstrated that letters are sent to complainants if it does not arrive at the investigative findings and recommendations within 180 days.

The CPD maintained Preliminary compliance with ¶448 in the ninth reporting period, while COPA reached Full compliance. Moving forward, we will look for the CPD to develop training relevant to the requirements of ¶448. For COPA, we will look for evidence that COPA has sufficiently implemented its policies, training, and notification systems to meet the requirements of this paragraph.

A fuller description of the history of compliance efforts, methodologies, compliance determinations for this paragraph—and each original monitorable paragraphs in the Accountability and Transparency section—is available in [Comprehensive Assessment Part I](https://cpdmonitoringteam.com/wp-content/uploads/2023/11/IMR8-Appendix-9-Accountability-and-Transparency-2023.11.01.pdf) (which included *Independent Monitoring Report 8*): <https://cpdmonitoringteam.com/wp-content/uploads/2023/11/IMR8-Appendix-9-Accountability-and-Transparency-2023.11.01.pdf>.

Paragraph 448 Compliance Progress History

FIRST REPORTING PERIOD SEPTEMBER 1, 2019 – AUGUST 31, 2019 COMPLIANCE PROGRESS: Status Update	SECOND REPORTING PERIOD SEPTEMBER 1, 2019 – FEBRUARY 29, 2020 COMPLIANCE PROGRESS: Status Update	THIRD REPORTING PERIOD MARCH 1, 2020 – DECEMBER 31, 2020 COMPLIANCE PROGRESS: Status Update
FOURTH REPORTING PERIOD JANUARY 1, 2021 – JUNE 30, 2021 COMPLIANCE PROGRESS: None	FIFTH REPORTING PERIOD JULY 1, 2021 – DECEMBER 31, 2021 COMPLIANCE PROGRESS: Preliminary	SIXTH REPORTING PERIOD JANUARY 1, 2022 – JUNE 30, 2022 COMPLIANCE PROGRESS: Preliminary
SEVENTH REPORTING PERIOD JULY 1, 2022 – DECEMBER 31, 2022 COMPLIANCE PROGRESS: Preliminary	EIGHTH REPORTING PERIOD JANUARY 1, 2023 – JUNE 30, 2023 COMPLIANCE PROGRESS: Preliminary	NINTH REPORTING PERIOD JULY 1, 2023 – DECEMBER 31, 2023 COMPLIANCE PROGRESS: Preliminary

Accountability and Transparency: ¶450

450. CPD will develop and implement policies to ensure that a CPD member who is alleged to be involved in misconduct (the “involved member”) receives notice that he or she is under administrative investigation. The policies will provide, at a minimum: a. CPD members under investigation will not receive such notice of confidential investigations, but will receive notice prior to being formally interviewed by COPA, BIA, or an Accountability Sergeant; b. such notice will comport with due process and the law, and will describe the nature of the complaint made against the involved member, and the involved member’s rights, but will not contain any information that is part of a confidential investigation; and c. once a CPD member has been notified or otherwise becomes aware that he or she is the subject of an administrative investigation, the CPD member will not review the following documents and evidence related to an incident under administrative investigation, until notified by BIA that he or she is permitted to do so, or as may be required to testify as a witness in criminal or civil proceedings: i. any investigative files; ii. any reports (except for reports about the incident authored by the CPD member); or iii. any other evidence, from any source, including body and dashboard camera footage (except as permitted for purposes of completing incident reports or other documentation).

Compliance Progress

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

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

In the ninth reporting period, the City and the CPD reached Secondary compliance with ¶450.

With regard to Secondary compliance, the CPD produced a draft of its five-day BIA Onboard Training on December 1, 2022, for review with numerous paragraphs, including ¶450. The IMT provided extensive feedback on these training materials on February 13, 2023, and explained that the training was an improvement from the previous version, but still required significant revisions to provide adequate instruction and to address the designated Consent Decree paragraphs. After extensive discussions about the format of the training (one all-encompassing training rather than individual blocks of instruction), the Parties decided that BIA would move forward with producing individual blocks of instruction. During the ninth reporting period, the CPD produced eight modules of instruction for review with multiple paragraphs. Specifically, Module 5, *Consent Decree and Law Review*, was produced for review with ¶450. The IMT provided a no-objection notice with feedback on September 27, 2023, and the CPD delivered the training to 95% of the required BIA personnel. The CPD reached Secondary compliance with ¶450.

Although the CPD reached Secondary compliance this reporting period with ¶450, the CPD must ensure that future training records are provided through clear documentation that includes who attended the training, as well as who was required to attend. The IMT received clarifications on the training records in January 2024, and we expect these records to be produced formally early in the tenth reporting period.

Moving forward, we look forward to continuing our collaboration with BIA as it works to develop and revise additional individual blocks of instruction for the BIA initial in-service, initial onboard, and refresher trainings. Additionally, we will look for documentation that the CPD and its employees are acting in accordance with ¶450’s mandates.

A fuller description of the history of compliance efforts, methodologies, compliance determinations for this paragraph—and each original monitorable paragraphs in the Accountability and Transparency section—is available in [Comprehensive Assessment Part I](https://cpdmonitoringteam.com/wp-content/uploads/2023/11/IMR8-Appendix-9-Accountability-and-Transparency-2023.11.01.pdf) (which included *Independent Monitoring Report 8*): <https://cpdmonitoringteam.com/wp-content/uploads/2023/11/IMR8-Appendix-9-Accountability-and-Transparency-2023.11.01.pdf>.

Paragraph 450 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: Status Update	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: 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

Accountability and Transparency: ¶453

453. If a criminal investigation of a CPD member’s conduct has commenced, COPA, BIA, or the Accountability Sergeant will continue the administrative investigation, absent specific circumstances that would jeopardize the criminal investigation. In such circumstances, the determination to postpone the administrative investigation, along with the rationale for doing so, will be documented by COPA, BIA or the district in writing.

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

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

The City and the CPD maintained Preliminary compliance with ¶453 in the eighth reporting period, and COPA reached Full compliance. Because all relevant City entities must reach levels of compliance to bring the City, as a whole, into compliance, the City has not yet reached Secondary compliance.

This reporting period, the CPD did not produce any documentation that demonstrated efforts related to ¶453.

To assess Full compliance, the IMT reviewed COPA’s documentation evidencing that COPA has conducted a search of cases relevant to the requirements of ¶453 and cannot identify any cases or investigations where an administrative investigation was postponed while a criminal investigation was conducted since 2019.

Moving forward, we will look for documentation maintaining that COPA and its employees are acting in accordance with ¶453’s mandates.

A fuller description of the history of compliance efforts, methodologies, compliance determinations for this paragraph—and each original monitorable paragraphs in the Accountability and Transparency section—is available in [Comprehensive Assessment Part I](https://cpdmonitoringteam.com/wp-content/uploads/2023/11/IMR8-Appendix-9-Accountability-and-Transparency-2023.11.01.pdf) (which included *Independent Monitoring Report 8*): <https://cpdmonitoringteam.com/wp-content/uploads/2023/11/IMR8-Appendix-9-Accountability-and-Transparency-2023.11.01.pdf>.

Paragraph 453 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: Status Update	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: 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

Accountability and Transparency: ¶454

454. COPA, BIA, and the districts will conduct objective, comprehensive, and timely investigations of complaints.

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

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

In the ninth reporting period, COPA reached Full compliance with ¶454 while the CPD maintained Preliminary compliance. Because all relevant City entities must reach levels of compliance to bring the City, as a whole, into compliance, the City has not yet reached Secondary compliance.

To maintain Preliminary compliance, the IMT reviewed the CPD’s revised G08-01, *Complaint and Disciplinary System*, which addressed the requirements of ¶454. The IMT provided a no-objection notice on December 9, 2023.

This reporting period, COPA provided information on its Timeliness Initiative/Backlog Reduction Plan, which is a formal process COPA used during the ninth reporting period to close out complaints and cases involving low-level violations of CPD members. COPA undertook this process after recognizing that many of the cases could no longer be adequately addressed given the volume, without sacrificing its time and effort on current cases. The IMT understands that COPA’s expectation of the initiative would clear out older cases and provide its employees the ability to address and conclude investigations according to the requirements of ¶470. COPA noted that only low-level administrative violations, complaints, or infractions were addressed in this initiative. Additionally, COPA provided a memorandum indicating how many cases were addressed through this initiative and the types of violations involved. COPA provided a Guidance document to its employees with direction regarding which cases could be included in the initiative and how cases were to be resolved. Finally, COPA produced a PowerPoint presentation to provide guidance to COPA employees, but there was no Lesson Plan accompanying the PowerPoint.

With regard to Full compliance, COPA provided random case examples that demonstrate that COPA conducts comprehensive, objective, and timely investigations of complaints. COPA reached Full compliance with ¶454 in the ninth reporting period.

Moving forward, we will look for the CPD to develop training relevant to the requirements of ¶454. For COPA, we will look for documentation maintaining that COPA and its employees are acting in accordance with ¶454’s mandates.

A fuller description of the history of compliance efforts, methodologies, compliance determinations for this paragraph—and each original monitorable paragraphs in the Accountability and Transparency section—is available in [Comprehensive Assessment Part I](https://cpdmonitoringteam.com/wp-content/uploads/2023/11/IMR8-Appendix-9-Accountability-and-Transparency-2023.11.01.pdf) (which included *Independent Monitoring Report 8*): <https://cpdmonitoringteam.com/wp-content/uploads/2023/11/IMR8-Appendix-9-Accountability-and-Transparency-2023.11.01.pdf>.

Paragraph 454 Compliance Progress History

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

Accountability and Transparency: ¶455

455. All investigative findings will be based on the appropriate standard of proof. This standard will be clearly delineated in COPA and BIA policies, training, and procedures.

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

Preliminary:		<i>In Compliance (FIFTH REPORTING PERIOD)</i>
	CPD	<i>In Compliance (FIFTH REPORTING PERIOD)</i>
	COPA	<i>In Compliance (FOURTH REPORTING PERIOD)</i>
Secondary:		<i>Not in Compliance</i>
	CPD	<i>Not in Compliance</i>
	COPA	<i>In Compliance (SEVENTH REPORTING PERIOD)</i>
Full:		<i>Not in Compliance</i>
	CPD	<i>Not Yet Assessed</i>
	COPA	<i>In Compliance (NEW)</i>

The City and the CPD maintained Preliminary compliance while COPA regained Full compliance with ¶455. Because all relevant City entities must reach levels of compliance to bring the City, as a whole, into compliance, the City has not yet reached Secondary compliance.

To maintain Preliminary compliance, the IMT reviewed the CPD’s revised G08-01, *Complaint and Disciplinary System*, which addressed the requirements of ¶455. The IMT provided a no-objection notice on December 9, 2023.

With regard to Secondary compliance, the CPD produced a draft of its five-day BIA Onboard Training on December 1, 2022, for review with numerous paragraphs, not including ¶455. The IMT provided extensive feedback on these training materials on February 13, 2023, and explained that the training was an improvement from the previous version, but still required significant revisions to provide adequate instruction and to address the designated Consent Decree paragraphs. After extensive discussions about the format of the training (one all-encompassing training rather than individual blocks of instruction), the Parties decided that BIA would move forward with producing individual blocks of instruction. During the ninth reporting period, the CPD produced eight modules of instruction for review with multiple paragraphs. Specifically, Module 3, *Credibility, Standards of Proof, and Disciplinary Decision Making*, was produced for review with ¶455. The IMT provided a no-objection notice on October 9, 2023. However, Module 3 was not provided during the ninth reporting period, and thus, the CPD has yet to reach Secondary compliance with ¶455.

This reporting period, COPA provided random case examples demonstrating that its investigative findings are based on the appropriate standard of proof. COPA regained Full compliance with ¶455 in the ninth reporting period.

Moving forward, we look forward to continuing our collaboration with BIA as it works to develop and revise additional individual blocks of instruction for the BIA initial in-service, initial onboard, and refresher trainings. For COPA, we will look for documentation maintaining that COPA and its employees are acting in accordance with ¶455’s mandates. To maintain Full compliance, COPA must provide such materials in each future reporting period.

A fuller description of the history of compliance efforts, methodologies, compliance determinations for this paragraph—and each original monitorable paragraphs in the Accountability and Transparency section—is available in [Comprehensive Assessment Part I](https://cpdmonitoringteam.com/wp-content/uploads/2023/11/IMR8-Appendix-9-Accountability-and-Transparency-2023.11.01.pdf) (which included *Independent Monitoring Report 8*): <https://cpdmonitoringteam.com/wp-content/uploads/2023/11/IMR8-Appendix-9-Accountability-and-Transparency-2023.11.01.pdf>.

Paragraph 455 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: Status Update	COMPLIANCE PROGRESS: Status Update	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: 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	NINTH REPORTING PERIOD JULY 1, 2023 – DECEMBER 31, 2023
COMPLIANCE PROGRESS: Preliminary	COMPLIANCE PROGRESS: Preliminary	COMPLIANCE PROGRESS: Preliminary

Accountability and Transparency: ¶456

456. The City will ensure that the disciplinary histories of current and former CPD members are reviewed prior to employment with COPA, or assignment within BIA or as an Accountability Sergeant.

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

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

In the ninth reporting period, the City and the CPD maintained Preliminary compliance while COPA reached Full compliance with ¶456. Because all relevant City entities must reach levels of compliance to bring the City, as a whole, into compliance, the City has not yet reached Secondary compliance.

To maintain Preliminary compliance, the IMT reviewed the CPD’s revised S08-01, *Complaint and Investigators and Investigations*, which addressed the requirements of ¶456. The IMT provided a no-objection notice on December 2, 2023.

To assess Full compliance, the IMT reviewed COPA’s disciplinary history memorandum where COPA explained that thus far it has not sought to hire any former members of CPD. The documentation also includes a memorandum from the City’s Department of Human Resources (DHR) demonstrating that DHR’s employees are aware of the requirement of ¶456 and directs their employees to notify COPA regarding any information that is applicable to the paragraph.

As stated in previous reporting periods, we will look forward to receiving evidence that individuals responsible for hiring to BIA and COPA are aware of candidate requirements as set out by ¶456 and their respective policies, and that processes are developed to make clear who is tasked with checking disciplinary histories for employment or assignment candidates. The CPD and COPA will then need to provide proof that they are following their respective policies. We expect these materials to be produced in each reporting period. For COPA, we expect to receive evidence of continued compliance in each reporting period to maintain Full compliance.

A fuller description of the history of compliance efforts, methodologies, compliance determinations for this paragraph—and each original monitorable paragraphs in the Accountability and Transparency section—is available in [Comprehensive Assessment Part I](https://cpdmonitoringteam.com/wp-content/uploads/2023/11/IMR8-Appendix-9-Accountability-and-Transparency-2023.11.01.pdf) (which included *Independent Monitoring Report 8*): <https://cpdmonitoringteam.com/wp-content/uploads/2023/11/IMR8-Appendix-9-Accountability-and-Transparency-2023.11.01.pdf>.

Paragraph 456 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: Status Update	COMPLIANCE PROGRESS: Status Update	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: 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	NINTH REPORTING PERIOD JULY 1, 2023 – DECEMBER 31, 2023
COMPLIANCE PROGRESS: Preliminary	COMPLIANCE PROGRESS: Preliminary	COMPLIANCE PROGRESS: Preliminary

Accountability and Transparency: ¶459

459. Within 30 days of receiving an allegation: a. COPA and BIA will assess the allegation to determine whether the complainant has alleged potential misconduct; and b. if potential misconduct is alleged, COPA, BIA, or the district will initiate a preliminary investigation into the complaint.

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

Preliminary:		<i>In Compliance (SEVENTH REPORTING PERIOD)</i>
	CPD	<i>In Compliance (SEVENTH REPORTING PERIOD)</i>
	COPA	<i>In Compliance (FOURTH REPORTING PERIOD)</i>
Secondary:		<i>Not in Compliance</i>
	CPD	<i>Not in Compliance</i>
	COPA	<i>In Compliance (FIFTH REPORTING PERIOD)</i>
Full:		<i>Not in Compliance</i>
	CPD	<i>Not Yet Assessed</i>
	COPA	<i>In Compliance (NEW)</i>

The City and the CPD maintained Preliminary compliance while COPA reached Full compliance with ¶459 in the ninth reporting period. Because all relevant City entities must reach levels of compliance to bring the City, as a whole, into compliance, the City has not yet reached Secondary compliance.

This reporting period, the CPD produced *BIA’s New Intake Personnel Orientation and Training* for review with ¶459. The IMT provided comments on October 13, 2023. Overall, we did not think the quality, content, and structure of the training was to the same standard as other approved BIA modules of instruction. For example, the Lesson Plan provides limited direction and information to the instructor regarding how to present the material and what material they must ensure the students understand. Within the Lesson Plan and PowerPoint, the CPD should discuss what the requirements of the intended paragraphs for compliance mean to BIA Investigators and Accountability Sergeants. Additionally, the training should discuss how BIA Investigators and Accountability Sergeants can accomplish the requirements of ¶459. At the end of the reporting period, the training remained in the collaborative review and revision process.

To assess Full compliance, the IMT reviewed COPA’s documentation of Final Summary Reports, which addressed the requirements of Full compliance for ¶459.

Moving forward, we look forward to continuing our collaboration with BIA as it works to develop and revise additional individual blocks of instruction for the BIA initial in-service, initial onboard, and refresher trainings, as well as *BIA’s New Intake Personnel Orientation and Training*.

For COPA, we will look for evidence that COPA and its employees continue to act in accordance with ¶459’s mandates. For COPA, we expect to receive evidence of continued compliance in each reporting period to maintain Full compliance.

A fuller description of the history of compliance efforts, methodologies, compliance determinations for this paragraph—and each original monitorable paragraphs in the Accountability and Transparency section—is available in [Comprehensive Assessment Part I](https://cpdmonitoringteam.com/wp-content/uploads/2023/11/IMR8-Appendix-9-Accountability-and-Transparency-2023.11.01.pdf) (which included *Independent Monitoring Report 8*): <https://cpdmonitoringteam.com/wp-content/uploads/2023/11/IMR8-Appendix-9-Accountability-and-Transparency-2023.11.01.pdf>.

Paragraph 459 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: Status Update	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: 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

Accountability and Transparency: ¶460

460. Preliminary investigations will take all reasonable steps to discover any and all objective verifiable evidence relevant to the complaint or administrative notification through the identification, retention, review, and analysis of all available evidence, including, but not limited to: all time-sensitive evidence, audio and video evidence, physical evidence, arrest reports, photographic evidence, GPS records, computer data, and witness interviews. All reasonable steps will be taken to preserve relevant evidence identified during the preliminary investigation.

Compliance Progress	(Reporting Period: July 1, 2023, through December 31, 2023)
Preliminary:	<i>In Compliance (SEVENTH REPORTING PERIOD)</i>
CPD	<i>In Compliance (SEVENTH REPORTING PERIOD)</i>
COPA	<i>In Compliance (FOURTH REPORTING PERIOD)</i>
Secondary:	<i>Not in Compliance</i>
CPD	<i>Not Yet Assessed</i>
COPA	<i>In Compliance (SEVENTH REPORTING PERIOD)</i>
Full:	<i>Not Yet Assessed</i>
CPD	<i>Not Yet Assessed</i>
COPA	<i>In Compliance (NEW)</i>

The City and the CPD maintained Preliminary compliance with ¶460 in the ninth reporting period, while COPA reached Full compliance. Because all relevant City entities must reach levels of compliance to bring the City, as a whole, into compliance, the City has not yet reached Secondary compliance.

This reporting period, the CPD produced *BIA’s New Intake Personnel Orientation and Training* for review with ¶460. The IMT provided comments on October 13, 2023. Overall, we did not think the quality, content, and structure of the training was to the same standard as other approved BIA modules of instruction. For example, the Lesson Plan provides limited direction and information to the instructor regarding how to present the material and what material they must ensure the students understand. Within the Lesson Plan and PowerPoint, the CPD should discuss what the requirements of the intended paragraphs for compliance mean to BIA Investigators and Accountability Sergeants. Additionally, the training should discuss how BIA Investigators and Accountability Sergeants can accomplish the requirements of ¶460. At the end of the reporting period, the training remained in the collaborative review and revision process.

To assess Full compliance, the IMT reviewed COPA’s documentation of Final Summary Reports, which addressed the requirements of Full compliance for ¶460.

Moving forward, we look forward to continuing our collaboration with BIA as it works to develop and revise additional individual blocks of instruction for the BIA

initial in-service, initial onboard, and refresher trainings, as well as *BIA's New Intake Personnel Orientation and Training*.

For COPA, we will look for evidence that COPA and its employees continue to act in accordance with ¶460's mandates. For COPA, we expect to receive evidence of continued compliance in each reporting period to maintain Full compliance.

A fuller description of the history of compliance efforts, methodologies, compliance determinations for this paragraph—and each original monitorable paragraphs in the Accountability and Transparency section—is available in [Comprehensive Assessment Part I](https://cpdmonitoringteam.com/wp-content/uploads/2023/11/IMR8-Appendix-9-Accountability-and-Transparency-2023.11.01.pdf) (which included *Independent Monitoring Report 8*): <https://cpdmonitoringteam.com/wp-content/uploads/2023/11/IMR8-Appendix-9-Accountability-and-Transparency-2023.11.01.pdf>.

Paragraph 460 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: Status Update	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: 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

Accountability and Transparency: ¶463

463. *The City, CPD, and COPA will ensure that, within 30 days of receiving a complaint, COPA, BIA, and Accountability Sergeants initiate and make reasonable attempts to secure a signed complainant affidavit, including in-person visits, phone calls, and other methods. Such attempts will reasonably accommodate the complainant’s disability status, language proficiency, and incarceration status. a. If COPA, BIA, or the Accountability Sergeant is unable to obtain a signed complainant affidavit despite having made reasonable attempts to do so, COPA or BIA (for investigations conducted by both BIA and Accountability Sergeants) will assess whether the evidence collected in the preliminary investigation is sufficient to continue the investigation. b. If the preliminary investigation reveals objective verifiable evidence suggesting it is necessary and appropriate for the investigation to continue, BIA (for investigations conducted by BIA and Accountability Sergeants) will seek written approval for an override affidavit executed by the Chief Administrator of COPA, and COPA (for investigations conducted by COPA) will seek written approval for an override affidavit executed by the Chief of BIA. c. The Chief Administrator of COPA or the Chief of BIA will provide an override affidavit if there is objective verifiable evidence suggesting it is necessary and appropriate, and in the interests of justice, for the investigation to continue.*

Compliance Progress		(Reporting Period: July 1, 2023, through December 31, 2023)
Preliminary:		<i>In Compliance (SEVENTH REPORTING PERIOD)</i>
	CPD	<i>In Compliance (SEVENTH REPORTING PERIOD)</i>
	COPA	<i>In Compliance (SEVENTH REPORTING PERIOD)</i>
Secondary:		<i>Not in Compliance</i>
	CPD	<i>Not Yet Assessed</i>
	COPA	<i>In Compliance (EIGHTH REPORTING PERIOD)</i>
Full:		<i>Not in Compliance</i>
	CPD	<i>Not Yet Assessed</i>
	COPA	<i>In Compliance (NEW)</i>

The City and the CPD maintained Preliminary compliance while COPA reached Full compliance with ¶463 in the ninth reporting period. Because all relevant City entities must reach levels of compliance to bring the City, as a whole, into compliance, the City has not yet reached Secondary compliance.

This reporting period, the CPD provided BIA’s Quarter 1 and Quarter 2 Reports for 2023. Page 14 provided an explanation of the sworn affidavit override process. While this does not address the requirements of ¶463, the IMT acknowledges the CPD for continuing to provide this explanation of the override process in its quarterly and annual reports.

To assess Full compliance, the IMT reviewed COPA’s documentation evidencing its efforts to obtain signed affidavits and continue investigations with sufficient evidence without a signed affidavit. Additionally, COPA provided documentation on

the four affidavit requests made to the BIA Chief during 2023, which addressed the requirements of ¶463.

Moving forward, we look forward to continuing our collaboration with BIA as it works to develop and revise additional individual blocks of instruction for the BIA initial in-service, initial onboard, and refresher trainings. For COPA, we will look for documentation maintaining that COPA and its employees are acting in accordance with ¶463’s mandates. To maintain Full compliance, COPA must provide such materials in each future reporting period.

A fuller description of the history of compliance efforts, methodologies, compliance determinations for this paragraph—and each original monitorable paragraphs in the Accountability and Transparency section—is available in *Comprehensive Assessment Part I* (which included *Independent Monitoring Report 8*): <https://cpdmonitoringteam.com/wp-content/uploads/2023/11/IMR8-Appendix-9-Accountability-and-Transparency-2023.11.01.pdf>.

Paragraph 463 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: Status Update	THIRD REPORTING PERIOD MARCH 1, 2020 – DECEMBER 31, 2020 COMPLIANCE PROGRESS: None
FOURTH REPORTING PERIOD JANUARY 1, 2021 – JUNE 30, 2021 COMPLIANCE PROGRESS: None	FIFTH REPORTING PERIOD JULY 1, 2021 – DECEMBER 31, 2021 COMPLIANCE PROGRESS: None	SIXTH REPORTING PERIOD JANUARY 1, 2022 – JUNE 30, 2022 COMPLIANCE PROGRESS: None
SEVENTH REPORTING PERIOD JULY 1, 2022 – DECEMBER 31, 2022 COMPLIANCE PROGRESS: Preliminary	EIGHTH REPORTING PERIOD JANUARY 1, 2023 – JUNE 30, 2023 COMPLIANCE PROGRESS: Preliminary	NINTH REPORTING PERIOD JULY 1, 2023 – DECEMBER 31, 2023 COMPLIANCE PROGRESS: Preliminary

Accountability and Transparency: ¶464

464. *In the course of conducting thorough and complete misconduct investigations, COPA, BIA, and the districts will: a. take all reasonable steps to promptly identify, collect, and consider all relevant circumstantial, direct, and physical evidence, including officer-recorded audio or video taken with body-worn cameras or other recording devices; b. take all reasonable steps to locate and interview all witnesses as soon as feasible, including non-CPD member witnesses, and attempt to interview any complainant or witness in-person at a time and place that is convenient and accessible for the complainant or witness, when feasible; c. determine whether there are any other open administrative investigations involving the same involved member, and monitor or combine the investigation(s), as appropriate; d. audio record non-CPD member interviews subject to the interviewee’s consent, or promptly prepare summaries of interviews when the interview is not recorded; e. take all reasonable steps to identify the involved and witness CPD member(s) if the complainant was unable do so; f. determine if there may have been additional misconduct beyond that initially alleged. COPA, BIA, or the district will take all reasonable steps to ensure that such identified misconduct is fully and fairly documented, classified, and investigated; g. as applicable, consider a CPD member’s behavior based on the available training records and disciplinary history, including complaints in which allegations were not sustained, as permitted by law and any applicable collective bargaining agreement; and h. identify and take into account known relevant evidence gathered in parallel criminal investigation or criminal or civil litigation, if available.*

Compliance Progress		(Reporting Period: July 1, 2023, through December 31, 2023)
Preliminary:		<i>In Compliance (SEVENTH REPORTING PERIOD)</i>
	CPD	<i>In Compliance (SEVENTH REPORTING PERIOD)</i>
	COPA	<i>In Compliance (FIFTH REPORTING PERIOD)</i>
Secondary:		<i>Not in Compliance</i>
	CPD	<i>Not in Compliance</i>
	COPA	<i>In Compliance (SEVENTH REPORTING PERIOD)</i>
Full:		<i>Not Yet Assessed</i>
	CPD	<i>Not in Compliance</i>
	COPA	<i>In Compliance (NEW)</i>

The City and the CPD maintained Preliminary compliance with ¶464 in the ninth reporting period, while COPA reached Full compliance. Because all relevant City entities must reach levels of compliance to bring the City, as a whole, into compliance, the City has not yet reached Secondary compliance.

This reporting period, the CPD produced *BIA’s New Intake Personnel Orientation and Training* for review with ¶464. The IMT provided comments on October 13, 2023. Overall, we did not think the quality, content, and structure of the training was to the same standard as other approved BIA modules of instruction. For example, the Lesson Plan provides limited direction and information to the instructor regarding how to present the material and what material they must ensure the

students understand. Within the Lesson Plan and PowerPoint, the CPD should discuss what the requirements of the intended paragraphs for compliance mean to BIA Investigators and Accountability Sergeants. Additionally, the training should discuss how BIA Investigators and Accountability Sergeants can accomplish the requirements of ¶464. At the end of the reporting period, the training remained in the collaborative review and revision process.

With regard to Secondary compliance, the CPD produced a draft of its five-day BIA Onboard Training on December 1, 2022, for review with numerous paragraphs, including ¶464. The IMT provided extensive feedback on these training materials on February 13, 2023, and explained that the training was an improvement from the previous version, but still required significant revisions to provide adequate instruction and to address the designated Consent Decree paragraphs. After extensive discussions about the format of the training (one all-encompassing training rather than individual blocks of instruction), the Parties decided that BIA would move forward with producing individual blocks of instruction. During the ninth reporting period, the CPD produced eight modules of instruction for review with multiple paragraphs. Specifically, Module 8, *Audio Recording Interview Guidelines*, was produced for review with ¶464. The IMT provided a no-objection notice on October 18, 2023. However, Module 8 was not provided during the ninth reporting period, and thus, the CPD has yet to reach Secondary compliance.

To assess Full compliance, the IMT reviewed COPA's documentation of Final Summary Reports, which addressed the requirements of Full compliance for ¶464.

Moving forward, we look forward to continuing our collaboration with BIA as it works to develop and revise additional individual blocks of instruction for the BIA initial in-service, initial onboard, and refresher trainings, as well as *BIA's New Intake Personnel Orientation and Training*.

For COPA, we will look for evidence that COPA and its employees continue to act in accordance with ¶464's mandates. For COPA, we expect to receive evidence of continued compliance in each reporting period to maintain Full compliance.

A fuller description of the history of compliance efforts, methodologies, compliance determinations for this paragraph—and each original monitorable paragraphs in the Accountability and Transparency section—is available in *Comprehensive Assessment Part I* (which included *Independent Monitoring Report 8*): <https://cpdmonitoringteam.com/wp-content/uploads/2023/11/IMR8-Appendix-9-Accountability-and-Transparency-2023.11.01.pdf>.

Paragraph 464 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: Status Update	THIRD REPORTING PERIOD MARCH 1, 2020 – DECEMBER 31, 2020 COMPLIANCE PROGRESS: None
FOURTH REPORTING PERIOD JANUARY 1, 2021 – JUNE 30, 2021 COMPLIANCE PROGRESS: None	FIFTH REPORTING PERIOD JULY 1, 2021 – DECEMBER 31, 2021 COMPLIANCE PROGRESS: None	SIXTH REPORTING PERIOD JANUARY 1, 2022 – JUNE 30, 2022 COMPLIANCE PROGRESS: None
SEVENTH REPORTING PERIOD JULY 1, 2022 – DECEMBER 31, 2022 COMPLIANCE PROGRESS: Preliminary	EIGHTH REPORTING PERIOD JANUARY 1, 2023 – JUNE 30, 2023 COMPLIANCE PROGRESS: Preliminary	NINTH REPORTING PERIOD JULY 1, 2023 – DECEMBER 31, 2023 COMPLIANCE PROGRESS: Preliminary

Accountability and Transparency: ¶465

465. *When conducting an administrative interview of any CPD member, COPA, BIA, and the districts will: a. ask the identity of other persons with whom he or she has communicated regarding the incident in question, and the date, time, place, and content of such communication, subject to any evidentiary privilege recognized under Illinois or federal law; b. ask whether he or she has reviewed any audio or video footage of the incident in question, and, if so, the date, time, and place the video or audio was reviewed; c. ask whether he or she is aware of any media or social media coverage of the incident in question, and, if so, the content and source of such known media coverage; d. note on the record of the interview anytime the CPD member seeks or obtains information from his or her legal or union representative, as well as the length of any “off the record” discussion between the CPD member and his or her legal or union representative and ensure that the CPD member’s counsel or representative does nothing to disrupt or interfere with the interview; e. document, and make part of the investigative file, all requests made on behalf of a CPD member to reschedule an interview; and f. audio record all CPD member in-person interviews.*

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

Preliminary:		<i>In Compliance (SEVENTH REPORTING PERIOD)</i>
	CPD	<i>In Compliance (SEVENTH REPORTING PERIOD)</i>
	COPA	<i>In Compliance (FIFTH REPORTING PERIOD)</i>
Secondary:		<i>Not in Compliance</i>
	CPD	<i>Not in Compliance</i>
	COPA	<i>In Compliance (SEVENTH REPORTING PERIOD)</i>
Full:		<i>Not in Compliance</i>
	CPD	<i>Not Yet Assessed</i>
	COPA	<i>Under Assessment (NEW)</i>

The City and the CPD maintained Preliminary compliance with ¶465, while COPA remains under assessment for Full compliance. Because all relevant City entities must reach levels of compliance to bring the City, as a whole, into compliance, the City has not yet reached Secondary compliance.

With regard to Secondary compliance, the CPD produced a draft of its five-day BIA Onboard Training on December 1, 2022, for review with numerous paragraphs, including ¶465. The IMT provided extensive feedback on these training materials on February 13, 2023, and explained that the training was an improvement from the previous version, but still required significant revisions to provide adequate instruction and to address the designated Consent Decree paragraphs. After extensive discussions about the format of the training (one all-encompassing training rather than individual blocks of instruction), the Parties decided that BIA would move forward with producing individual blocks of instruction. During the ninth reporting period, the CPD produced eight modules of instruction for review with multiple paragraphs. Specifically, Module 8, *Audio Recording Interview Guidelines*,

was produced for review with ¶465. The IMT provided a no-objection notice on October 18, 2023. However, Module 8 was not provided during the ninth reporting period, and thus, the CPD has yet to reach Secondary compliance.

This reporting period, COPA provided transcripts of interview, even providing evidence that COPA received a request from a CPD member to reschedule an interview, to which they rescheduled. The documentation addressed the requirements of ¶465 in its entirety with the exception of ¶465(d). COPA provided documentation to show that they are unable to comply with the requirements of ¶465(d) due to the settlement agreement between the Fraternal Order of Police and the City of Chicago. Therefore, by the end of the reporting period, COPA did not reach Full compliance as the Parties must have conversations concerning whether or not COPA can comply with the requirements of ¶465(d). COPA remains under assessment for Full compliance this reporting period.

Moving forward, we look forward to continuing our collaboration with BIA as it works to develop and revise additional individual blocks of instruction for the BIA initial in-service, initial onboard, and refresher trainings.

For COPA, we look forward to receiving additional information related to ¶465 to ensure COPA has sufficiently implemented its policies and training. We also look forward to conversations with the Parties concerning whether or not COPA can comply with the requirements of ¶465(d).

A fuller description of the history of compliance efforts, methodologies, compliance determinations for this paragraph—and each original monitorable paragraphs in the Accountability and Transparency section—is available in [Comprehensive Assessment Part I](https://cpdmonitoringteam.com/wp-content/uploads/2023/11/IMR8-Appendix-9-Accountability-and-Transparency-2023.11.01.pdf) (which included *Independent Monitoring Report 8*): <https://cpdmonitoringteam.com/wp-content/uploads/2023/11/IMR8-Appendix-9-Accountability-and-Transparency-2023.11.01.pdf>.

Paragraph 465 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: Status Update	THIRD REPORTING PERIOD MARCH 1, 2020 – DECEMBER 31, 2020 COMPLIANCE PROGRESS: None
FOURTH REPORTING PERIOD JANUARY 1, 2021 – JUNE 30, 2021 COMPLIANCE PROGRESS: None	FIFTH REPORTING PERIOD JULY 1, 2021 – DECEMBER 31, 2021 COMPLIANCE PROGRESS: None	SIXTH REPORTING PERIOD JANUARY 1, 2022 – JUNE 30, 2022 COMPLIANCE PROGRESS: None
SEVENTH REPORTING PERIOD JULY 1, 2022 – DECEMBER 31, 2022 COMPLIANCE PROGRESS: Preliminary	EIGHTH REPORTING PERIOD JANUARY 1, 2023 – JUNE 30, 2023 COMPLIANCE PROGRESS: Preliminary	NINTH REPORTING PERIOD JULY 1, 2023 – DECEMBER 31, 2023 COMPLIANCE PROGRESS: Preliminary

Accountability and Transparency: ¶467

467. For each allegation associated with a misconduct investigation, COPA, BIA, or the districts will explicitly identify and recommend one of the following findings: a. "Sustained," where it is determined the allegation is supported by a preponderance of the evidence; b. "Not Sustained," where it is determined there is insufficient evidence to prove the allegations by a preponderance of the evidence; c. "Unfounded," where it is determined, by clear and convincing evidence, that an allegation is false or not factual; or d. "Exonerated," where it is determined, by clear and convincing evidence, that the conduct described in the allegation occurred but is lawful and proper.

Compliance Progress		(Reporting Period: July 1, 2023, through December 31, 2023)
Preliminary:		<i>In Compliance (FIFTH REPORTING PERIOD)</i>
	CPD	<i>In Compliance (FIFTH REPORTING PERIOD)</i>
	COPA	<i>In Compliance (FOURTH REPORTING PERIOD)</i>
Secondary:		<i>Not in Compliance</i>
	CPD	<i>Not in Compliance</i>
	COPA	<i>In Compliance (SEVENTH REPORTING PERIOD)</i>
Full:		<i>Not in Compliance</i>
	CPD	<i>Not Yet Assessed</i>
	COPA	<i>In Compliance (NEW)</i>

The CPD maintained Preliminary compliance while COPA reached Full compliance with ¶467 in the ninth reporting period. Because all relevant City entities must reach levels of compliance to bring the City, as a whole, into compliance, the City has not yet reached Secondary compliance.

To maintain Preliminary compliance, the IMT reviewed the CPD’s revised G08-01, *Complaint and Disciplinary System*, which addressed the requirements of ¶467. The IMT provided a no-objection notice on December 9, 2023.

With regard to Secondary compliance, the CPD produced a draft of its five-day BIA Onboard Training on December 1, 2022, for review with numerous paragraphs, including ¶467. The IMT provided extensive feedback on these training materials on February 13, 2023, and explained that the training was an improvement from the previous version, but still required significant revisions to provide adequate instruction and to address the designated Consent Decree paragraphs. After extensive discussions about the format of the training (one all-encompassing training rather than individual blocks of instruction), the Parties decided that BIA would move forward with producing individual blocks of instruction. During the ninth reporting period, the CPD produced eight modules of instruction for review with multiple paragraphs. Specifically, Module 3, *Credibility, Standards of Proof, and Disciplinary Decision Making*, was produced for review with ¶467. The IMT pro-

vided a no-objection notice on October 9, 2023. However, Module 3 was not provided during the ninth reporting period, and thus, the CPD has yet to reach Secondary compliance.

To assess Full compliance, the IMT reviewed COPA’s randomized documentation demonstrating that it identifies and recommends findings of sustained, not sustained, unfounded, or exonerated in each of its Final Summary Reports, per the requirements of ¶467.

Moving forward, we look forward to continuing our collaboration with BIA as it works to develop and revise additional individual blocks of instruction for the BIA initial in-service, initial onboard, and refresher trainings. For COPA, we will look for documentation maintaining that COPA and its employees are acting in accordance with ¶467’s mandates. To maintain Full compliance, COPA must provide such materials in each future reporting period.

A fuller description of the history of compliance efforts, methodologies, compliance determinations for this paragraph—and each original monitorable paragraphs in the Accountability and Transparency section—is available in [Comprehensive Assessment Part I](https://cpdmonitoringteam.com/wp-content/uploads/2023/11/IMR8-Appendix-9-Accountability-and-Transparency-2023.11.01.pdf) (which included *Independent Monitoring Report 8*): <https://cpdmonitoringteam.com/wp-content/uploads/2023/11/IMR8-Appendix-9-Accountability-and-Transparency-2023.11.01.pdf>.

Paragraph 467 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: Status Update	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	NINTH REPORTING PERIOD JULY 1, 2023 – DECEMBER 31, 2023 COMPLIANCE PROGRESS: Preliminary

Accountability and Transparency: ¶468

468. COPA, BIA, and the districts will ensure that investigators do not: a. ask leading questions that suggest legal justifications for the CPD member’s conduct during interviews of witnesses, complainants, or the involved CPD member; b. make statements that could discourage a CPD member or non-CPD member witness from providing a full account of the specific allegations; c. close an administrative investigation solely because of findings in a related criminal proceedings; d. consider findings in a related criminal investigation to solely determine whether a CPD member engaged in misconduct; e. disregard a witness’s statement solely because the witness has some connection to either the complainant or the CPD member or because the witness or complainant has a criminal history; or f. close an investigation solely because the complainant seeks to withdraw the complaint or is unavailable, unwilling, or unable to cooperate with an administrative investigation. If the complainant is unable or unwilling to provide information beyond the initial complaint, the administrative investigation will continue based on the available evidence in accordance with this Agreement, applicable law, and any applicable collective bargaining agreements.

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

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

The City and the CPD maintained Preliminary compliance with ¶468 in the ninth reporting period, while COPA reached Full compliance. Because all relevant City entities must reach levels of compliance to bring the City, as a whole, into compliance, the City has not yet reached Secondary compliance.

This reporting period, the CPD did not produce any documentation that demonstrated efforts related to ¶468.

To assess Full compliance, the IMT reviewed COPA’s final summary reports and investigation transcripts and documentation that addressed each subparagraph of ¶468 and its requirements. The documentation included a transcript of an investigative interview in which COPA sustained findings against an officer even though the complainant pleaded guilty to criminal charges.

Moving forward, we look forward to continuing our collaboration with BIA as it works to develop and revise additional individual blocks of instruction for the BIA

initial in-service, initial onboard, and refresher trainings. For COPA, we will look for documentation maintaining that COPA and its employees are acting in accordance with ¶468’s mandates. To maintain Full compliance, COPA must provide such materials in each future reporting period.

A fuller description of the history of compliance efforts, methodologies, compliance determinations for this paragraph—and each original monitorable paragraphs in the Accountability and Transparency section—is available in [Comprehensive Assessment Part I](https://cpdmonitoringteam.com/wp-content/uploads/2023/11/IMR8-Appendix-9-Accountability-and-Transparency-2023.11.01.pdf) (which included *Independent Monitoring Report 8*): <https://cpdmonitoringteam.com/wp-content/uploads/2023/11/IMR8-Appendix-9-Accountability-and-Transparency-2023.11.01.pdf>.

Paragraph 468 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: Status Update	THIRD REPORTING PERIOD MARCH 1, 2020 – DECEMBER 31, 2020 COMPLIANCE PROGRESS: None
FOURTH REPORTING PERIOD JANUARY 1, 2021 – JUNE 30, 2021 COMPLIANCE PROGRESS: None	FIFTH REPORTING PERIOD JULY 1, 2021 – DECEMBER 31, 2021 COMPLIANCE PROGRESS: None	SIXTH REPORTING PERIOD JANUARY 1, 2022 – JUNE 30, 2022 COMPLIANCE PROGRESS: None
SEVENTH REPORTING PERIOD JULY 1, 2022 – DECEMBER 31, 2022 COMPLIANCE PROGRESS: Preliminary	EIGHTH REPORTING PERIOD JANUARY 1, 2023 – JUNE 30, 2023 COMPLIANCE PROGRESS: Preliminary	NINTH REPORTING PERIOD JULY 1, 2023 – DECEMBER 31, 2023 COMPLIANCE PROGRESS: Preliminary

Accountability and Transparency: ¶1469

469. *The City, COPA, and CPD recognize the negative impact of actual bias or the appearance of bias on the legitimacy of administrative investigations. For that reason, conflicts of interest in administrative investigations will be identified and prohibited. The City, COPA, and CPD will ensure the following: a. COPA, BIA, and district personnel will not be assigned to conduct any investigation that could create a conflict of interest; b. an investigation may not be conducted by any supervisor or CPD member who allegedly authorized, engaged in conduct that led to, witnessed, or otherwise allegedly participated in the incident giving rise to the complaint, or who has a conflict of interest as defined by CPD policy or this Agreement. No such person may participate in making any disciplinary recommendations with respect to the investigation; c. no CPD member who has an external business relationship or close personal relationship with an involved CPD member or witness in an administrative investigation will conduct or review the administrative investigation. No such person may participate in making any disciplinary recommendations with respect to the misconduct investigation including in the determination of any applicable grievance or appeal arising from any discipline; and d. no CPD member will participate in making any disciplinary decisions or recommendations with respect to any person to whom he or she directly reports to in his or her chain of command. In cases where CPD is unable to meet this requirement, the investigation must be transferred to OIG.*

Compliance Progress		(Reporting Period: July 1, 2023, through December 31, 2023)
Preliminary:		<i>In Compliance (SEVENTH REPORTING PERIOD)</i>
	CPD	<i>In Compliance (SEVENTH REPORTING PERIOD)</i>
	COPA	<i>In Compliance (THIRD REPORTING PERIOD)</i>
Secondary:		<i>In Compliance (EIGHTH REPORTING PERIOD)</i>
	CPD	<i>In Compliance (EIGHTH REPORTING PERIOD)</i>
	COPA	<i>In Compliance (EIGHTH REPORTING PERIOD)</i>
Full:		<i>Not in Compliance</i>
	CPD	<i>Not Yet Assessed</i>
	COPA	<i>In Compliance (NEW)</i>

The City and the CPD maintained Secondary compliance while COPA reached Full compliance with ¶1469 in the ninth reporting period. Because all relevant City entities must reach levels of compliance to bring the City, as a whole, into compliance, the City has not yet reached Full compliance.

With regard to Secondary compliance, the CPD produced a draft of its five-day BIA Onboard Training on December 1, 2022, for review with numerous paragraphs, including ¶1469. The IMT provided extensive feedback on these training materials on February 13, 2023, and explained that the training was an improvement from the previous version, but still required significant revisions to provide adequate instruction and to address the designated Consent Decree paragraphs. After extensive discussions about the format of the training (one all-encompassing training

rather than individual blocks of instruction), the Parties decided that BIA would move forward with producing individual blocks of instruction. During the ninth reporting period, the CPD produced eight modules of instruction for review with multiple paragraphs. Specifically, Module 7, *Procedural Justice, Implicit Bias, and Conflicts of Interest*, was produced for review with ¶1469. The IMT provided a no-objection notice on September 27, 2023, and the CPD delivered the training to 95% of the required BIA personnel. The CPD maintained Secondary compliance with ¶1469 in the ninth reporting period.

Although the CPD maintained Secondary compliance this reporting period with ¶1469, the CPD must ensure that future training records are provided through clear documentation that includes who attended the training, as well as who was required to attend. The IMT received clarification on the training records in January 2024, and we expect these records to be produced formally early in the tenth reporting period.

To assess Full compliance, the IMT reviewed COPA’s materials detailing information on all five potential conflicts of interest with COPA personnel involving administrative investigations of CPD personnel. It appears that COPA follows the process detailed in its *Conflict of Interest and Recusal Policy* per the requirements of ¶1469.

Moving forward, we look forward to continuing our collaboration with BIA as it works to develop and revise additional individual blocks of instruction for the BIA initial in-service, initial onboard, and refresher trainings. To assess Full compliance for ¶1469, we urge the CPD to ensure that the representation of members who have successfully completed the eLearning course noted in the eighth reporting period includes 95% of civilians, and to strive for achieving 95% successful completion of the eLearning course across position and rank. Additionally, we will look for documentation that the CPD and its employees are acting in accordance with ¶1469’s mandates.

For COPA, we will look for documentation maintaining that COPA and its employees are acting in accordance with ¶1469’s mandates. To maintain Full compliance, COPA must provide such materials in each future reporting period.

A fuller description of the history of compliance efforts, methodologies, compliance determinations for this paragraph—and each original monitorable paragraphs in the Accountability and Transparency section—is available in [Comprehensive Assessment Part I](https://cpdmonitoringteam.com/wp-content/uploads/2023/11/IMR8-Appendix-9-Accountability-and-Transparency-2023.11.01.pdf) (which included *Independent Monitoring Report 8*): <https://cpdmonitoringteam.com/wp-content/uploads/2023/11/IMR8-Appendix-9-Accountability-and-Transparency-2023.11.01.pdf>.

Paragraph 469 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: Status Update	THIRD REPORTING PERIOD MARCH 1, 2020 – DECEMBER 31, 2020 COMPLIANCE PROGRESS: None
FOURTH REPORTING PERIOD JANUARY 1, 2021 – JUNE 30, 2021 COMPLIANCE PROGRESS: None	FIFTH REPORTING PERIOD JULY 1, 2021 – DECEMBER 31, 2021 COMPLIANCE PROGRESS: None	SIXTH REPORTING PERIOD JANUARY 1, 2022 – JUNE 30, 2022 COMPLIANCE PROGRESS: None
SEVENTH REPORTING PERIOD JULY 1, 2022 – DECEMBER 31, 2022 COMPLIANCE PROGRESS: Preliminary	EIGHTH REPORTING PERIOD JANUARY 1, 2023 – JUNE 30, 2023 COMPLIANCE PROGRESS: Secondary	NINTH REPORTING PERIOD JULY 1, 2023 – DECEMBER 31, 2023 COMPLIANCE PROGRESS: Secondary

Accountability and Transparency: ¶470

470. The City will ensure that COPA arrives at the investigative findings and recommendations within 180 days of the initiation of the investigation. Any request for an extension of time must be approved in writing by the Chief Administrator of COPA, or his or her designee, who must provide a short explanation of the reason(s) for granting or denying the extension.

Compliance Progress

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

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

In the ninth reporting period, the City and COPA is under assessment for Full compliance with ¶470.

This reporting period, COPA provided information on its Timeliness Initiative/Backlog Reduction Plan, which is a formal process COPA used during the ninth reporting period to close out complaints and cases involving low-level violations of CPD members. COPA undertook this process after recognizing that many of the cases could no longer be adequately addressed given the volume, without sacrificing its time and effort on current cases. The IMT understands that COPA's expectation of the initiative would clear out older cases and provide its employees the ability to address and conclude investigations according to the requirements of ¶470. COPA noted that only low-level administrative violations, complaints, or infractions were addressed in this initiative.

Additionally, COPA provided a memorandum indicating how many cases were addressed through this initiative and the types of violations involved. COPA provided a Guidance document to its employees with direction regarding which cases could be included in the initiative and how cases were to be resolved. Finally, COPA produced a PowerPoint presentation to provide guidance to COPA employees, but there was no Lesson Plan accompanying the PowerPoint.

With regard to Full compliance, COPA provided documentation of their 180-day letters ensuring that COPA arrives at the investigative findings and recommendations within 180 days of the investigation. Additionally, the documentation detailed extensions of time that are approved in writing by the Chief Administrator of COPA, or his or her designee, with a short explanation for the reason of granting or denying the request. This documentation partially addresses the requirements of ¶470.

As noted previously, to reach Full compliance, COPA must also provide data showing the number and percentage of cases for which COPA arrived at investigative

findings and recommendations within 180 days of the initiation of the investigation, and the number and percentage of cases for which COPA missed the 180-day timeline. COPA remains under assessment with ¶470 while we await this information.

A fuller description of the history of compliance efforts, methodologies, compliance determinations for this paragraph—and each original monitorable paragraphs in the Accountability and Transparency section—is available in [Comprehensive Assessment Part I](https://cpdmonitoringteam.com/wp-content/uploads/2023/11/IMR8-Appendix-9-Accountability-and-Transparency-2023.11.01.pdf) (which included *Independent Monitoring Report 8*): <https://cpdmonitoringteam.com/wp-content/uploads/2023/11/IMR8-Appendix-9-Accountability-and-Transparency-2023.11.01.pdf>.

Paragraph 470 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: Secondary	NINTH REPORTING PERIOD JULY 1, 2023 – DECEMBER 31, 2023 COMPLIANCE PROGRESS: Secondary

Accountability and Transparency: ¶473

473. *The City will ensure that if COPA does not arrive at the investigative findings and recommendations within 180 days, the Chief Administrator of COPA, or his or her designee, will notify, within five days after the end of the 180-day period, the Mayor or his or her designee, the Superintendent, the Chairman of the City Council Committee on Public Safety, the complainant or his or her representative, and the involved CPD member, or his or her counsel (unless such notification would compromise the integrity of the investigation). Such notification will include the reasons the administrative investigation has not concluded within 180 days. COPA will update such notice every 180 days until the administrative investigation is completed.*

Compliance Progress

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

Preliminary: *In Compliance (FOURTH REPORTING PERIOD)*
Secondary: *In Compliance (SEVENTH REPORTING PERIOD)*
Full: *In Compliance (NEW)*
Sustainment Period Ends *December 31, 2025*

In the ninth reporting period, the City and COPA reached Full compliance with ¶473.

With regard to Full compliance, COPA provided documentation of their 180-day letters ensuring that COPA arrives at the investigative findings and recommendations within 180 days of the investigation. Additionally, the documentation provided monthly letters sent to the required parties per ¶470 where COPA does not arrive at the investigative findings and recommendations within 180 days of the investigation. This documentation addressed the requirements of ¶473, and therefore, COPA reached Full compliance in the ninth reporting period.

Moving forward, we will look for documentation maintaining that COPA and its employees are acting in accordance with ¶473's mandates.

A fuller description of the history of compliance efforts, methodologies, compliance determinations for this paragraph—and each original monitorable paragraphs in the Accountability and Transparency section—is available in [Comprehensive Assessment Part I](https://cpdmonitoringteam.com/wp-content/uploads/2023/11/IMR8-Appendix-9-Accountability-and-Transparency-2023.11.01.pdf) (which included *Independent Monitoring Report 8*): <https://cpdmonitoringteam.com/wp-content/uploads/2023/11/IMR8-Appendix-9-Accountability-and-Transparency-2023.11.01.pdf>.

Paragraph 473 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: Secondary	EIGHTH REPORTING PERIOD JANUARY 1, 2023 – JUNE 30, 2023 COMPLIANCE PROGRESS: Secondary	NINTH REPORTING PERIOD JULY 1, 2023 – DECEMBER 31, 2023 COMPLIANCE PROGRESS: Full

Accountability and Transparency: ¶1475

475. The City and CPD will undertake best efforts to ensure that the identities of complainants are not revealed to the involved CPD member prior to the CPD member’s interrogation.

Compliance Progress	(Reporting Period: July 1, 2023, through December 31, 2023)
Preliminary:	<i>In Compliance (FIFTH REPORTING PERIOD)</i>
CPD	<i>In Compliance (FIFTH REPORTING PERIOD)</i>
COPA	<i>In Compliance (FIFTH REPORTING PERIOD)</i>
Secondary:	<i>Not in Compliance</i>
CPD	<i>Not in Compliance</i>
COPA	<i>In Compliance (SEVENTH REPORTING PERIOD)</i>
Full:	<i>Not in Compliance</i>
CPD	<i>Not Yet Assessed</i>
COPA	<i>In Compliance (NEW)</i>

In the ninth reporting period, the CPD maintained Preliminary compliance, while COPA reached Secondary compliance with ¶1475. Because all relevant City entities must reach levels of compliance to bring the City, as a whole, into compliance, the City has not yet reached Secondary compliance.

To maintain Preliminary compliance, the IMT reviewed the CPD’s revised S08-01, *Complaint and Investigators and Investigations*, which addressed the requirements of ¶1475. The IMT provided a no-objection notice on December 2, 2023.

To assess Full compliance, the IMT reviewed COPA’s documentation ensuring that the identities of complainants are not revealed to the involved CPD member prior to the CPD member’s interrogation.

Moving forward, we will continue to look for the CPD to provide training materials that include instruction and outline processes to ensure the requirements of ¶1475 are put into action. Specifically, we look forward to continuing our collaboration with BIA as it works to develop and revise individual blocks of instruction for the BIA initial in-service, initial onboard, and refresher trainings. The CPD will then need to provide their training to 95% of employees to reach Secondary compliance. For COPA, related to maintenance of Full compliance, we will look for COPA to demonstrate that it has sufficiently implemented its policing and training.

A fuller description of the history of compliance efforts, methodologies, compliance determinations for this paragraph—and each original monitorable paragraphs in the Accountability and Transparency section—is available in [Comprehensive Assessment Part I](#) (which included *Independent Monitoring Report 8*):

<https://cpdmonitoringteam.com/wp-content/uploads/2023/11/IMR8-Appendix-9-Accountability-and-Transparency-2023.11.01.pdf>

Paragraph 475 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: Status Update	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	NINTH REPORTING PERIOD JULY 1, 2023 – DECEMBER 31, 2023 COMPLIANCE PROGRESS: Preliminary

Accountability and Transparency: ¶476

476. The City, CPD, and COPA will require that COPA and BIA supervisors regularly communicate with the investigators under their supervision, including Accountability Sergeants, to evaluate the progress of administrative investigations.

Compliance Progress

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

Preliminary:	<i>In Compliance</i> (FIFTH REPORTING PERIOD)
CPD	<i>In Compliance</i> (FIFTH REPORTING PERIOD)
COPA	<i>In Compliance</i> (FOURTH REPORTING PERIOD)
Secondary:	<i>Not in Compliance</i>
CPD	<i>Not in Compliance</i>
COPA	<i>In Compliance</i> (EIGHTH REPORTING PERIOD)
Full:	<i>Not in Compliance</i>
CPD	<i>Not Yet Assessed</i>
COPA	<i>In Compliance</i> (NEW)

In the ninth reporting period, the City and the CPD maintained Preliminary compliance while COPA reached Full compliance with ¶476. Because all relevant City entities must reach levels of compliance to bring the City, as a whole, into compliance, the City has not yet reached Secondary compliance.

This reporting period, the CPD did not produce any documentation that demonstrated efforts related to ¶476.

To assess Full compliance, the IMT reviewed COPA’s documentation of five case examples, which included communication between supervisors and investigators. COPA also produced a total of eighteen case examples that demonstrate COPA intention and demonstration that its supervisors regularly communicate with their investigators regarding the progress of administrative investigations.

In future reporting periods, we will look for the CPD to provide draft training materials that instruct compliance with ¶476 and its relevant policies. For COPA, we will look for documentation maintaining that COPA and its employees are acting in accordance with ¶476’s mandates.

A fuller description of the history of compliance efforts, methodologies, compliance determinations for this paragraph—and each original monitorable paragraphs in the Accountability and Transparency section—is available in [Comprehensive Assessment Part I](https://cpdmonitoringteam.com/wp-content/uploads/2023/11/IMR8-Appendix-9-Accountability-and-Transparency-2023.11.01.pdf) (which included *Independent Monitoring Report 8*): <https://cpdmonitoringteam.com/wp-content/uploads/2023/11/IMR8-Appendix-9-Accountability-and-Transparency-2023.11.01.pdf>.

Paragraph 476 Compliance Progress History

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

Accountability and Transparency: ¶477

477. The City and CPD will undertake best efforts to ensure that all complaints, including anonymous complaints, can be the subject of a misconduct investigation.

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

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

In the ninth reporting period, the City and the CPD reached Secondary compliance with ¶477, while COPA reached Full compliance. Because all relevant City entities must reach levels of compliance to bring the City, as a whole, into compliance, the City has not yet reached Full compliance.

With regard to Secondary compliance, the CPD produced a draft of its five-day BIA Onboard Training on December 1, 2022, for review with numerous paragraphs, including ¶477. The IMT provided extensive feedback on these training materials on February 13, 2023, and explained that the training was an improvement from the previous version, but still required significant revisions to provide adequate instruction and to address the designated Consent Decree paragraphs. After extensive discussions about the format of the training (one all-encompassing training rather than individual blocks of instruction), the Parties decided that BIA would move forward with producing individual blocks of instruction. During the ninth reporting period, the CPD produced eight modules of instruction for review with multiple paragraphs. Specifically, Module 1, *Complaint Management System and Complete Investigatory Files*, was produced for review with ¶477. The CPD also produced Module 2, *Complaint Initiation and Affidavit Overrides*, for review with ¶477. The IMT provided a no-objection notice for both Modules on September 27, 2023, and the CPD delivered the training to 95% of the required BIA personnel. The CPD reached Secondary compliance with ¶477.

Although the CPD reached Secondary compliance this reporting period with ¶477, the CPD must ensure that future training records are provided through clear documentation that includes who attended the training, as well as who was required to attend. The IMT received clarifications on the training records in January 2024,

and we expect these records to be produced formally early in the tenth reporting period.

To assess Full compliance, the IMT reviewed COPA’s documentation with a list of anonymous complaints that were investigated during the reporting period, per the requirements of ¶477.

Moving forward, we look forward to continuing our collaboration with BIA as it works to develop and revise additional individual blocks of instruction for the BIA initial in-service, initial onboard, and refresher trainings. Additionally, we will look for documentation that the CPD and its employees are acting in accordance with ¶477’s mandates.

For COPA, we will look for documentation maintaining that COPA and its employees are acting in accordance with ¶477’s mandates.

A fuller description of the history of compliance efforts, methodologies, compliance determinations for this paragraph—and each original monitorable paragraphs in the Accountability and Transparency section—is available in [Comprehensive Assessment Part I](https://cpdmonitoringteam.com/wp-content/uploads/2023/11/IMR8-Appendix-9-Accountability-and-Transparency-2023.11.01.pdf) (which included *Independent Monitoring Report 8*): <https://cpdmonitoringteam.com/wp-content/uploads/2023/11/IMR8-Appendix-9-Accountability-and-Transparency-2023.11.01.pdf>.

Paragraph 477 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: Status Update	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: Secondary

Accountability and Transparency: ¶1478

478. *Within 120 days of the Effective Date, CPD and COPA will each review and revise its policies regarding Preliminary investigations, including Preliminary investigations of anonymous complaints, and the process for seeking an override affidavit in the absence of a signed complainant affidavit.*

Compliance Progress

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

Preliminary:	<i>In Compliance</i> (SEVENTH REPORTING PERIOD)
CPD	<i>In Compliance</i> (SEVENTH REPORTING PERIOD)
COPA	<i>In Compliance</i> (FOURTH REPORTING PERIOD)
Secondary:	<i>In Compliance</i> (NEW)
CPD	<i>In Compliance</i> (NEW)
COPA	<i>In Compliance</i> (EIGHTH REPORTING PERIOD)
Full:	<i>Not in Compliance</i>
CPD	<i>Not Yet Assessed</i>
COPA	<i>In Compliance</i> (NEW)

The City and the CPD reached Secondary compliance with ¶1478, and COPA reached Full compliance with ¶1478 in the ninth reporting period.

With regard to Secondary compliance, the CPD produced a draft of its five-day BIA Onboard Training on December 1, 2022, for review with numerous paragraphs, not including ¶1478. The IMT provided extensive feedback on these training materials on February 13, 2023, and explained that the training was an improvement from the previous version, but still required significant revisions to provide adequate instruction and to address the designated Consent Decree paragraphs. After extensive discussions about the format of the training (one all-encompassing training rather than individual blocks of instruction), the Parties decided that BIA would move forward with producing individual blocks of instruction. During the ninth reporting period, the CPD produced eight modules of instruction for review with multiple paragraphs. Specifically, Module 2, *Complaint Initiation and Affidavit Overrides*, for review with ¶1478. The IMT provided a no-objection notice on September 27, 2023, and the CPD delivered the training to 95% of the required BIA personnel. The CPD reached Secondary compliance with ¶1478.

Although the CPD reached Secondary compliance this reporting period with ¶1478, the CPD must ensure that future training records are provided through clear documentation that includes who attended the training, as well as who was required to attend. The IMT received clarifications on the training records in January 2024, and we expect these records to be produced formally early in the tenth reporting period.

To assess Full compliance, the IMT reviewed COPA’s documentation showing COPA’s practices regarding preliminary investigations, anonymous complaints, and the process for seeking an affidavit override, per the requirements of ¶478.

Moving forward, we look forward to continuing our collaboration with BIA as it works to develop and revise additional individual blocks of instruction for the BIA initial in-service, initial onboard, and refresher trainings. Additionally, we will look for documentation that the CPD and its employees are acting in accordance with ¶478’s mandates.

For COPA, we will look for documentation maintaining that COPA and its employees are acting in accordance with ¶478’s mandates.

A fuller description of the history of compliance efforts, methodologies, compliance determinations for this paragraph—and each original monitorable paragraphs in the Accountability and Transparency section—is available in *Comprehensive Assessment Part I* (which included *Independent Monitoring Report 8*): <https://cpdmonitoringteam.com/wp-content/uploads/2023/11/IMR8-Appendix-9-Accountability-and-Transparency-2023.11.01.pdf>.

Paragraph 478 Compliance Progress History

FIRST REPORTING PERIOD SEPTEMBER 1, 2019 – AUGUST 31, 2019 COMPLIANCE PROGRESS: None	SECOND REPORTING PERIOD SEPTEMBER 1, 2019 – FEBRUARY 29, 2020 COMPLIANCE PROGRESS: None	THIRD REPORTING PERIOD MARCH 1, 2020 – DECEMBER 31, 2020 COMPLIANCE PROGRESS: None
FOURTH REPORTING PERIOD JANUARY 1, 2021 – JUNE 30, 2021 COMPLIANCE PROGRESS: None	FIFTH REPORTING PERIOD JULY 1, 2021 – DECEMBER 31, 2021 COMPLIANCE PROGRESS: None	SIXTH REPORTING PERIOD JANUARY 1, 2022 – JUNE 30, 2022 COMPLIANCE PROGRESS: Under Assessment
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

Accountability and Transparency: ¶479

479. Within 120 days of the Effective Date, CPD and COPA will each adopt or review and, to the extent necessary, revise its policy establishing investigative timelines, benchmarks, and goals by which the progress of investigations will be measured.

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

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

In the ninth reporting period, the City and the CPD maintained Preliminary compliance with ¶479, while COPA reached Secondary compliance. Because all relevant City entities must reach levels of compliance to bring the City, as a whole, into compliance, the City has not yet reached Secondary compliance.

This reporting period, the CPD did not produce any documentation that demonstrated efforts related to ¶479.

To assess Secondary compliance, the IMT reviewed COPA's *Investigative File Maintenance Training*, which addressed ¶479. COPA provided documentation that 98% of its required personnel completed the training.

The City and the CPD maintained Preliminary compliance with ¶479 in the ninth reporting period. Moving forward, we look forward to continuing our collaboration with BIA as it works to develop and revise individual blocks of instruction for the BIA initial in-service, initial onboard, and refresher trainings. For COPA, we will look for documentation that COPA and its employees are acting in accordance with ¶479's mandates.

A fuller description of the history of compliance efforts, methodologies, compliance determinations for this paragraph—and each original monitorable paragraphs in the Accountability and Transparency section—is available in [Comprehensive Assessment Part I](https://cpdmonitoringteam.com/wp-content/uploads/2023/11/IMR8-Appendix-9-Accountability-and-Transparency-2023.11.01.pdf) (which included *Independent Monitoring Report 8*): <https://cpdmonitoringteam.com/wp-content/uploads/2023/11/IMR8-Appendix-9-Accountability-and-Transparency-2023.11.01.pdf>.

Paragraph 479 Compliance Progress History

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

COMPLIANCE PROGRESS:
None

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

COMPLIANCE PROGRESS:
None

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

COMPLIANCE PROGRESS:
None

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

COMPLIANCE PROGRESS:
None

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

COMPLIANCE PROGRESS:
None

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

COMPLIANCE PROGRESS:
None

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

COMPLIANCE PROGRESS:
Preliminary

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

COMPLIANCE PROGRESS:
Preliminary

NINTH REPORTING PERIOD
JULY 1, 2023 – DECEMBER 31, 2023

COMPLIANCE PROGRESS:
Preliminary

Accountability and Transparency: ¶480

480. Within 120 days of the Effective Date, the City, CPD, and COPA will each develop a policy establishing procedures for COPA, BIA, and Accountability Sergeant’s review and consideration of evidence from civil and criminal litigation.

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

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

The City and the CPD reached Preliminary compliance while COPA reached Secondary compliance with ¶480 in the ninth reporting period. Because all relevant City entities must reach levels of compliance to bring the City, as a whole, into compliance, the City has not yet reached Secondary compliance.

This reporting period, the CPD reached Preliminary compliance by finalizing Special Order S08-01-05, *Conducting Log Number Investigations*. Sections VI and VII addresses the requirements of ¶480.

To assess Secondary compliance, the IMT reviewed COPA’s revised *Civil and Criminal Complaint Review Training*, which addressed the requirements of ¶480. COPA reached Secondary compliance by delivering its *Civil and Criminal Complaint Review Training* to over 95% of personnel before the end of the reporting period.

Moving forward, for Secondary compliance, the CPD will need to develop and implement training. We look forward to continuing our collaboration with BIA as it works to develop and revise additional individual blocks of instruction for the BIA initial in-service, initial onboard, and refresher trainings. For COPA, we will look for documentation that COPA and its employees are acting in accordance with ¶480’s mandates.

A fuller description of the history of compliance efforts, methodologies, compliance determinations for this paragraph—and each original monitorable paragraphs in the Accountability and Transparency section—is available in [Comprehensive Assessment Part I](https://cpdmonitoringteam.com/wp-content/uploads/2023/11/IMR8-Appendix-9-Accountability-and-Transparency-2023.11.01.pdf) (which included *Independent Monitoring Report 8*): <https://cpdmonitoringteam.com/wp-content/uploads/2023/11/IMR8-Appendix-9-Accountability-and-Transparency-2023.11.01.pdf>.

Paragraph 480 Compliance Progress History

FIRST REPORTING PERIOD SEPTEMBER 1, 2019 – AUGUST 31, 2019 COMPLIANCE PROGRESS: None	SECOND REPORTING PERIOD SEPTEMBER 1, 2019 – FEBRUARY 29, 2020 COMPLIANCE PROGRESS: None	THIRD REPORTING PERIOD MARCH 1, 2020 – DECEMBER 31, 2020 COMPLIANCE PROGRESS: None
FOURTH REPORTING PERIOD JANUARY 1, 2021 – JUNE 30, 2021 COMPLIANCE PROGRESS: None	FIFTH REPORTING PERIOD JULY 1, 2021 – DECEMBER 31, 2021 COMPLIANCE PROGRESS: None	SIXTH REPORTING PERIOD JANUARY 1, 2022 – JUNE 30, 2022 COMPLIANCE PROGRESS: None
SEVENTH REPORTING PERIOD JULY 1, 2022 – DECEMBER 31, 2022 COMPLIANCE PROGRESS: 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

Accountability and Transparency: ¶481

481. *The City, CPD, and COPA will ensure that if CPD, COPA, or the OIG requests the Superintendent’s authorization to open an investigation concerning incidents that allegedly occurred more than five years before the date that COPA, CPD, or the OIG became aware of the allegations, the Superintendent will respond within 30 days.*

Compliance Progress	(Reporting Period: July 1, 2023, through December 31, 2023)
Preliminary:	<i>In Compliance (EIGHTH REPORTING PERIOD)</i>
CPD	<i>In Compliance (FIFTH REPORTING PERIOD)</i>
COPA	<i>In Compliance (EIGHTH REPORTING PERIOD)</i>
OIG	<i>In Compliance (THIRD REPORTING PERIOD)</i>
Secondary:	<i>Not in Compliance</i>
CPD	<i>Not in Compliance</i>
COPA	<i>In Compliance (NEW)</i>
OIG	<i>In Compliance (FOURTH REPORTING PERIOD)</i>
Full:	<i>Not in Compliance</i>
CPD	<i>Not Yet Assessed</i>
COPA	<i>In Compliance (NEW)</i>
OIG	<i>In Compliance (FOURTH REPORTING PERIOD)</i>

This reporting period, COPA reached Full compliance in while the CPD maintained Preliminary compliance with ¶481. Because all relevant City entities must reach levels of compliance to bring the City, as a whole, into compliance, the City has not yet reached Secondary compliance. In the previous reporting period, the Deputy PSIG and OIG successfully completed its Sustainment Period, marking two full years that it had maintained Full compliance with all requirements pertaining to its office. Therefore, in the ninth reporting period, the Parties moved to release OIG and PSIG from its Consent Decree requirements because it successfully completed the required two-year sustainment period, which was granted by the Court.

To maintain Preliminary compliance, the IMT reviewed the CPD’s revised G08-01, *Complaint and Disciplinary System*, which addressed the requirements of ¶481. The IMT provided a no-objection notice on December 9, 2023.

To assess Secondary compliance, the IMT reviewed COPA’s *Investigative File Maintenance Training*, which addressed ¶481. COPA provided documentation that 98% of its required personnel completed the training.

To assess Full compliance, the IMT reviewed COPA’s documentation evidencing five cases in which COPA requested authorization from the CPD Superintendent to re-open an investigation occurring more than five years prior. The memorandum also documents all cases and investigations requested to re-open since 2019, the individual case correspondence between COPA and the CPD, and COPA’s Guidance

that directs COPA action in the event the Superintendent does not respond within the thirty-day designation.

In the ninth reporting period, COPA reached Full compliance and the CPD maintained Preliminary compliance for this paragraph. Moving forward, from the CPD we will look to review training materials, specifically including training on drafting a request to the Superintendent and monitoring for timely response and feedback from the CPD regarding the Superintendent’s responses to requests to open an investigation older than five years. For COPA, we expect to receive documentation of efforts towards maintaining Full compliance every reporting period.

A fuller description of the history of compliance efforts, methodologies, compliance determinations for this paragraph—and each original monitorable paragraphs in the Accountability and Transparency section—is available in [Comprehensive Assessment Part I](https://cpdmonitoringteam.com/wp-content/uploads/2023/11/IMR8-Appendix-9-Accountability-and-Transparency-2023.11.01.pdf) (which included *Independent Monitoring Report 8*): <https://cpdmonitoringteam.com/wp-content/uploads/2023/11/IMR8-Appendix-9-Accountability-and-Transparency-2023.11.01.pdf>.

Paragraph 481 Compliance Progress History

FIRST REPORTING PERIOD SEPTEMBER 1, 2019 – AUGUST 31, 2019 COMPLIANCE PROGRESS: None	SECOND REPORTING PERIOD SEPTEMBER 1, 2019 – FEBRUARY 29, 2020 COMPLIANCE PROGRESS: None	THIRD REPORTING PERIOD MARCH 1, 2020 – DECEMBER 31, 2020 COMPLIANCE PROGRESS: None
FOURTH REPORTING PERIOD JANUARY 1, 2021 – JUNE 30, 2021 COMPLIANCE PROGRESS: None	FIFTH REPORTING PERIOD JULY 1, 2021 – DECEMBER 31, 2021 COMPLIANCE PROGRESS: None	SIXTH REPORTING PERIOD JANUARY 1, 2022 – JUNE 30, 2022 COMPLIANCE PROGRESS: None
SEVENTH REPORTING PERIOD JULY 1, 2022 – DECEMBER 31, 2022 COMPLIANCE PROGRESS: None	EIGHTH REPORTING PERIOD JANUARY 1, 2023 – JUNE 30, 2023 COMPLIANCE PROGRESS: Preliminary	NINTH REPORTING PERIOD JULY 1, 2023 – DECEMBER 31, 2023 COMPLIANCE PROGRESS: Preliminary

Accountability and Transparency: ¶484

484. If at any time during the intake or investigation of a complaint, COPA, BIA, or Accountability Sergeants find evidence indicating criminal conduct by any CPD member, the Chief Administrator of COPA or Chief of BIA will refer the investigation to the appropriate prosecuting agency.

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

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

COPA reached Full compliance while the CPD maintained Preliminary compliance with ¶484 in the ninth reporting period. Because all relevant City entities must reach levels of compliance to bring the City, as a whole, into compliance, the City has not yet reached Secondary compliance with ¶484.

The CPD maintained Preliminary compliance in the ninth reporting period by revising and finalizing S08-01-05, *Conducting Log Number Investigations*, which addressed the requirements of ¶484.

With regard to Secondary compliance, the CPD produced a draft of its five-day BIA Onboard Training on December 1, 2022, for review with numerous paragraphs, including ¶484. The IMT provided extensive feedback on these training materials on February 13, 2023, and explained that the training was an improvement from the previous version, but still required significant revisions to provide adequate instruction and to address the designated Consent Decree paragraphs. After extensive discussions about the format of the training (one all-encompassing training rather than individual blocks of instruction), the Parties decided that BIA would move forward with producing individual blocks of instruction. During the ninth reporting period, the CPD produced eight modules of instruction for review with multiple paragraphs, not including ¶484.

In the fifth reporting period, COPA provided its training titled *COPA Intake Unit: Overview of Policies and Procedures In-Service 2021*, which instructed compliance with the requirements of ¶484. COPA provided this training to more than 95% of its personnel. We previously explained that, to reach Secondary compliance, COPA should focus on developing written guidance and a means of directing and tracking

referrals to prosecuting agencies, and that COPA would also need to train personnel on the policy and application of the referral tracking process. This reporting period, COPA produced its *Criminal Referral Protocols* Guidance and delivered its *Civil and Criminal Complaint Review Training* to over 95% of personnel. COPA reached Secondary compliance in the ninth reporting period.

To assess Full compliance, the IMT reviewed COPA’s memorandum detailing its compliance with ¶484 and corresponding evidence documenting all cases referred to a prosecuting agency between January 1, 2019, and October 1, 2023.

Moving forward, we will look for the CPD to develop training relevant to the requirements of ¶484. We look forward to continuing our collaboration with BIA as it works to develop and revise additional individual blocks of instruction for the BIA initial in-service, initial onboard, and refresher trainings.

For COPA, we will look for documentation maintaining that COPA and its employees are acting in accordance with ¶484’s mandates. To maintain Full compliance, COPA must provide such materials in each future reporting period.

A fuller description of the history of compliance efforts, methodologies, compliance determinations for this paragraph—and each original monitorable paragraphs in the Accountability and Transparency section—is available in [Comprehensive Assessment Part I](https://cpdmonitoringteam.com/wp-content/uploads/2023/11/IMR8-Appendix-9-Accountability-and-Transparency-2023.11.01.pdf) (which included *Independent Monitoring Report 8*): <https://cpdmonitoringteam.com/wp-content/uploads/2023/11/IMR8-Appendix-9-Accountability-and-Transparency-2023.11.01.pdf>.

Paragraph 484 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: Status Update	THIRD REPORTING PERIOD MARCH 1, 2020 – DECEMBER 31, 2020 COMPLIANCE PROGRESS: None
FOURTH REPORTING PERIOD JANUARY 1, 2021 – JUNE 30, 2021 COMPLIANCE PROGRESS: None	FIFTH REPORTING PERIOD JULY 1, 2021 – DECEMBER 31, 2021 COMPLIANCE PROGRESS: None	SIXTH REPORTING PERIOD JANUARY 1, 2022 – JUNE 30, 2022 COMPLIANCE PROGRESS: None
SEVENTH REPORTING PERIOD JULY 1, 2022 – DECEMBER 31, 2022 COMPLIANCE PROGRESS: Preliminary	EIGHTH REPORTING PERIOD JANUARY 1, 2023 – JUNE 30, 2023 COMPLIANCE PROGRESS: Preliminary	NINTH REPORTING PERIOD JULY 1, 2023 – DECEMBER 31, 2023 COMPLIANCE PROGRESS: Preliminary

Accountability and Transparency: ¶486

486. *The City, CPD, and COPA will ensure that CPD and COPA maintain thorough and complete administrative investigative files. Such administrative investigative files will include: a. documentation of all evidence that was gathered, including names, phone numbers, and addresses of witnesses to the alleged misconduct. In situations in which there are no known witnesses, the file will specifically state this fact. In situations in which witnesses were present but circumstances prevented the investigator from collecting information from those witnesses, the investigative file will state the reasons why. The investigative file also will include all available identifying information for anyone who refuses to provide a statement; b. documentation of each interview conducted and the recording of those interviews, if available; c. the names of all CPD members who have been identified as witnesses to the alleged misconduct; d. COPA's, BIA's, or the district's narrative description and evaluation of the alleged misconduct, based on its review of the evidence gathered, including a determination of whether the CPD member's actions appear to be within CPD policy, procedure, regulations, orders, or other standards of conduct required of CPD members; e. in cases where material inconsistencies exist between complainant, CPD member, and witness statements, explicit identification of the inconsistencies, including a description of the evidence reviewed and written credibility findings; f. if a CPD member deployed a weapon, documentation of whether the CPD member's certification and training for the weapon were current; g. all CPD member original statements, as well as any amendments or clarifications to the original statement, and any subsequent statements; and h. an explicit identification of each allegation and the recommended finding for each allegation of misconduct in an investigation.*

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

Preliminary:		<i>In Compliance (SEVENTH REPORTING PERIOD)</i>
	CPD	<i>In Compliance (SEVENTH REPORTING PERIOD)</i>
	COPA	<i>In Compliance (SIXTH REPORTING PERIOD)</i>
Secondary:		<i>Under Assessment (NEW)</i>
	CPD	<i>Under Assessment (NEW)</i>
	COPA	<i>In Compliance (NEW)</i>
Full:		<i>Not Yet Assessed</i>

Although COPA reached Secondary compliance, the City and the CPD remains under assessment for Secondary compliance with ¶486 in the ninth reporting period.

With regard to Secondary compliance, the CPD produced a draft of its five-day BIA Onboard Training on December 1, 2022, for review with numerous paragraphs, including ¶486. The IMT provided extensive feedback on these training materials on February 13, 2023, and explained that the training was an improvement from the previous version, but still required significant revisions to provide adequate instruction and to address the designated Consent Decree paragraphs. After extensive discussions about the format of the training (one all-encompassing training

rather than individual blocks of instruction), the Parties decided that BIA would move forward with producing individual blocks of instruction. During the ninth reporting period, the CPD produced eight modules of instruction for review with multiple paragraphs. Specifically, Module 1, *Complaint Management System and Complete Investigatory Files*, was produced for review with ¶486. The IMT provided a no-objection notice on September 27, 2023, and the CPD delivered the training to 95% of the required BIA personnel. However, the IMT looks forward to the CPD further addressing ¶486(d)-(e) in Module 3, *Credibility, Standards of Proof, and Disciplinary Decision Making*. The CPD is under assessment for Secondary compliance with ¶486.

The CPD must ensure that future training records are provided through clear documentation that includes who attended the training, as well as who was required to attend. The IMT received clarification on the training records in January 2024, and we expect these records to be produced formally early in the tenth reporting period.

This reporting period, COPA reached Secondary compliance by delivering its *Investigative File Maintenance Training* to over 95% of personnel, which fully addresses the requirements of ¶486 and its subparagraphs.

For Full compliance, we look forward to the CPD and COPA demonstrating that it has sufficiently implemented its policies and training.

A fuller description of the history of compliance efforts, methodologies, compliance determinations for this paragraph—and each original monitorable paragraphs in the Accountability and Transparency section—is available in [Comprehensive Assessment Part I](https://cpdmonitoringteam.com/wp-content/uploads/2023/11/IMR8-Appendix-9-Accountability-and-Transparency-2023.11.01.pdf) (which included *Independent Monitoring Report 8*): <https://cpdmonitoringteam.com/wp-content/uploads/2023/11/IMR8-Appendix-9-Accountability-and-Transparency-2023.11.01.pdf>.

Paragraph 486 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: Status Update	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: 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

Accountability and Transparency: ¶487

487. Investigators will consider all original statements, and any subsequent statements, including amended or modified statements, for purposes of determining whether a CPD member willfully made a false statement about a fact material to the incident under investigation.

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

Preliminary:	<i>In Compliance (SEVENTH REPORTING PERIOD)</i>
CPD	<i>In Compliance (SEVENTH REPORTING PERIOD)</i>
COPA	<i>In Compliance (FOURTH REPORTING PERIOD)</i>
Secondary:	<i>Not in Compliance</i>
CPD	<i>Not in Compliance</i>
COPA	<i>In Compliance (FOURTH REPORTING PERIOD)</i>
Full:	<i>Not in Compliance</i>
CPD	<i>Not in Compliance</i>
COPA	<i>In Compliance (NEW)</i>

COPA reached Full compliance while the CPD maintained Preliminary compliance with ¶487 in the ninth reporting period. Because all relevant City entities must reach levels of compliance to bring the City, as a whole, into compliance, the City has not yet reached Secondary compliance with ¶487.

With regard to Secondary compliance, the CPD produced a draft of its five-day BIA Onboard Training on December 1, 2022, for review with numerous paragraphs, including ¶487. The IMT provided extensive feedback on these training materials on February 13, 2023, and explained that the training was an improvement from the previous version, but still required significant revisions to provide adequate instruction and to address the designated Consent Decree paragraphs. After extensive discussions about the format of the training (one all-encompassing training rather than individual blocks of instruction), the Parties decided that BIA would move forward with producing individual blocks of instruction. During the ninth reporting period, the CPD produced eight modules of instruction for review with multiple paragraphs, not including ¶487.

To assess Full compliance, the IMT reviewed COPA’s random sampling of cases addressing the requirements of this paragraph. The random sampling demonstrated that COPA investigators consider the accused member’s statement in evaluating a Rule 14 violation.

Moving forward, we will look for the CPD to develop training relevant to the requirements of ¶487. We look forward to continuing our collaboration with BIA as it works to develop and revise additional individual blocks of instruction for the BIA initial in-service, initial onboard, and refresher trainings.

For COPA, we will look for documentation maintaining that COPA and its employees are acting in accordance with ¶487’s mandates. To maintain Full compliance, COPA must provide such materials in each future reporting period.

A fuller description of the history of compliance efforts, methodologies, compliance determinations for this paragraph—and each original monitorable paragraphs in the Accountability and Transparency section—is available in [Comprehensive Assessment Part I](https://cpdmonitoringteam.com/wp-content/uploads/2023/11/IMR8-Appendix-9-Accountability-and-Transparency-2023.11.01.pdf) (which included *Independent Monitoring Report 8*): <https://cpdmonitoringteam.com/wp-content/uploads/2023/11/IMR8-Appendix-9-Accountability-and-Transparency-2023.11.01.pdf>.

Paragraph 487 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: Status Update	THIRD REPORTING PERIOD MARCH 1, 2020 – DECEMBER 31, 2020 COMPLIANCE PROGRESS: None
FOURTH REPORTING PERIOD JANUARY 1, 2021 – JUNE 30, 2021 COMPLIANCE PROGRESS: None	FIFTH REPORTING PERIOD JULY 1, 2021 – DECEMBER 31, 2021 COMPLIANCE PROGRESS: None	SIXTH REPORTING PERIOD JANUARY 1, 2022 – JUNE 30, 2022 COMPLIANCE PROGRESS: None
SEVENTH REPORTING PERIOD JULY 1, 2022 – DECEMBER 31, 2022 COMPLIANCE PROGRESS: Preliminary	EIGHTH REPORTING PERIOD JANUARY 1, 2023 – JUNE 30, 2023 COMPLIANCE PROGRESS: Preliminary	NINTH REPORTING PERIOD JULY 1, 2023 – DECEMBER 31, 2023 COMPLIANCE PROGRESS: Preliminary

Accountability and Transparency: ¶488

488. *In addition to the general investigative requirements established in this Agreement, with respect to the investigation of officer-involved shootings and deaths, the City and CPD will ensure that: a. COPA investigators be provided the opportunity to participate in the preliminary assessment during the immediate aftermath of an officer-involved shooting or death to the same extent as any CPD member or any other law enforcement agency investigating the incident; b. the Chief Administrator of COPA, or his or her designee, is present for the first viewing by CPD of available video or audio material related to the incident and when any audio or video material is collected and preserved at or near the scene from CPD or third-party surveillance systems. i. the requirements of subparagraph (b), above, will not apply if: (1) the Chief Administrator of COPA, or his or her designee, has been informed of the incident and is not available; and (2) COPA is not on scene and there is a public safety need to review or listen to certain available audio or video prior to the COPA arrival on scene. c. there is written documentation identifying each CPD member who viewed video evidence or listened to audio evidence at the scene; d. within 30 days of the Effective Date, CPD issues a policy providing that: i. involved and witness CPD members do not discuss the facts relating to the incident with any witness until interviewed by COPA, except to the extent necessary to ensure public safety, as instructed by counsel in relation to civil or criminal proceedings, or participating in CPD officer wellness programs; ii. COPA may extend the prohibition on discussion to the extent necessary to preserve the integrity of the investigation; and iii. in no event may this prohibition extend beyond the final disciplinary decision, if any. e. involved and witness CPD members will be separated, transported separately from the scene, and monitored to avoid contact or communications relating to the incident until released by the responding supervisor at or above the rank of Commander; f. administrative interviews of involved and witness CPD members will be audio recorded and, where possible, video recorded, with COPA investigators present, except that a member may speak with his or her attorney or union representative in private; and g. investigators will not delay interviewing involved and witness CPD members, and will conduct such interviews as soon as feasible, consistent with any applicable collective bargaining agreement. Investigators will document, and make part of the administrative investigative file, all requests made on behalf of involved or witness CPD members to reschedule an interview.*

Compliance Progress		(Reporting Period: July 1, 2023, through December 31, 2023)
Preliminary:		Not in Compliance
	CPD	Not in Compliance
	COPA	In Compliance (SIXTH REPORTING PERIOD)
Secondary:		Not in Compliance
	CPD	Not in Compliance
	COPA	In Compliance (SEVENTH REPORTING PERIOD)
Full:		Not in Compliance
	CPD	Not Yet Assessed
	COPA	Under Assessment

COPA is under assessment for Full compliance while the CPD has not yet reached Preliminary compliance with ¶488. Because all relevant City entities must reach levels of compliance to bring the City, as a whole, into compliance, the City has not yet reached Preliminary compliance with ¶488.

This reporting period, the CPD provided a revised version of G03-06, *Firearms Discharge and Officer Involved Death Incident Response and Investigation*, for review. As noted in previous reporting periods, the CPD implemented G03-06 as a temporary, emergency policy, and it was not intended to—and does not—fully comply with the Consent Decree’s requirements. The current version of G03-06 still requires substantial revisions to fully comply with ¶488. While the CPD clarified various issues for the IMT and the OAG in its response during the ninth reporting period, the underlying concerns or ambiguities remain in the policies. Additionally, the IMT remains concerned that this policy has been in the revision phase for many years, and we still believe it requires significant work to be finalized. We again suggest that the CPD work closely with the IMT and the OAG to work through the draft before the next draft is sent for review in the tenth reporting period.

To assess Full compliance, the IMT reviewed COPA’s memorandum and supporting documentation for COPA’s response to an investigation of CPD officer-involved shootings and officer-involved deaths. COPA developed a reasonable methodology to provide a sample group of cases for review, and the documentation provided addresses each of the subparagraphs of ¶488 for which COPA is responsible. However, COPA remains under assessment while the Parties discuss the appropriate sample size required to prove COPA and its employees are acting in accordance with ¶488’s mandates.

Moving forward, we anticipate working closely with the CPD in the revision process for G03-06.

For COPA, we look forward to receiving additional information related to ¶488 to ensure that COPA and its employees are acting in accordance with ¶488’s mandates.

A fuller description of the history of compliance efforts, methodologies, compliance determinations for this paragraph—and each original monitorable paragraphs in the Accountability and Transparency section—is available in [Comprehensive Assessment Part I](https://cpdmonitoringteam.com/wp-content/uploads/2023/11/IMR8-Appendix-9-Accountability-and-Transparency-2023.11.01.pdf) (which included *Independent Monitoring Report 8*): <https://cpdmonitoringteam.com/wp-content/uploads/2023/11/IMR8-Appendix-9-Accountability-and-Transparency-2023.11.01.pdf>.

Paragraph 488 Compliance Progress History

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

COMPLIANCE PROGRESS:
None

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

COMPLIANCE PROGRESS:
None

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

COMPLIANCE PROGRESS:
None

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

COMPLIANCE PROGRESS:
None

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

COMPLIANCE PROGRESS:
None

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

COMPLIANCE PROGRESS:
None

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

COMPLIANCE PROGRESS:
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

Accountability and Transparency: ¶494

494. CPD will require that: a. investigations completed by Accountability Sergeants are held to the same investigative standards as those completed by BIA; b. beginning in 2020, and by January 31, 2022, each District Commander designates at least two Accountability Sergeants who will report to the District Commander, and whose primary responsibility is receiving, processing, and investigating complaints against CPD members; c. before a Sergeant is designated an Accountability Sergeant, his or her name will be provided by his or her District Commander to BIA for BIA’s review; d. each Accountability Sergeant is provided with the name of and contact information for the BIA Lieutenant responsible for reviewing the Accountability Sergeant’s work; e. BIA Lieutenants provide regular case-related and overall performance feedback to each of the Accountability Sergeants and his or her respective District Commander; f. BIA Lieutenants review and approve all of the Accountability Sergeant’s proposed investigative findings and disciplinary recommendations; g. all Accountability Sergeants and BIA Lieutenants have access to the PRS or any system replacing the PRS; h. all Accountability Sergeants have access to BIA policies, directives, protocols, and training materials; and i. all Accountability Sergeants receive the initial and in-service training provided to BIA investigators as provided for in this Agreement.

Compliance Progress

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

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

In the ninth reporting period, the City and CPD did not reach Preliminary compliance with ¶494.

This reporting period, the CPD produced a draft of its five-day BIA Onboard Training on December 1, 2022, for review with numerous paragraphs, not including ¶494. The IMT provided extensive feedback on these training materials on February 13, 2023, and explained that the training was an improvement from the previous version, but still required significant revisions to provide adequate instruction and to address the designated Consent Decree paragraphs. After extensive discussions about the format of the training (one all-encompassing training rather than individual blocks of instruction), the Parties decided that BIA would move forward with producing individual blocks of instruction. During the ninth reporting period, the CPD produced eight modules of instruction for review with multiple paragraphs. Specifically, Module 1, *Complaint Management System and Complete Investigatory Files*, was produced for review with ¶494. The IMT provided a no-objection notice on September 27, 2023, and the CPD delivered the training to 95% of the required BIA personnel.

While the IMT appreciates the CPD’s efforts to train on ¶494, the CPD has not yet reached any level of compliance with ¶494 because subparagraph (b) is not reflected in policy.

Additionally, the CPD must ensure that future training records are provided through clear documentation that includes who attended the training, as well as who was required to attend. The IMT received clarification on the training records in January 2024, and we expect these records to be produced formally early in the tenth reporting period.

As we previously stated, the CPD must focus its attention on incorporating into policy the requirements of ¶494(b) to move forward with compliance with this paragraph. We look forward to reviewing revised policy from the CPD in future reporting periods. Additionally, we continue to encourage the CPD to designate two Accountability Sergeants with their **primary responsibility** as receiving, processing, and investigating complaints against CPD members, rather than other duties like serving as the desk sergeant or the field sergeant for the day.

A fuller description of the history of compliance efforts, methodologies, compliance determinations for this paragraph—and each original monitorable paragraphs in the Accountability and Transparency section—is available in [Comprehensive Assessment Part I](https://cpdmonitoringteam.com/wp-content/uploads/2023/11/IMR8-Appendix-9-Accountability-and-Transparency-2023.11.01.pdf) (which included *Independent Monitoring Report 8*): <https://cpdmonitoringteam.com/wp-content/uploads/2023/11/IMR8-Appendix-9-Accountability-and-Transparency-2023.11.01.pdf>.

Paragraph 494 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: None

Accountability and Transparency: ¶495

495. *Supervisory reviews of investigations will be conducted as follows: (a) Accountability Sergeants will forward the administrative investigative file through his or her chain of command to the BIA Lieutenant: (i) the Accountability Sergeant’s chain of command will ensure that the proposed investigative findings and recommendations are complete, meet the requirements of law, CPD policy, and this Agreement, and that findings are supported by the appropriate standard of proof; (ii) BIA Lieutenants will review the proposed investigative findings and recommendations for accuracy and completeness, and will order additional investigation when it appears that there is additional relevant evidence that may assist in resolving inconsistencies or improving the reliability or credibility of the findings; and (iii) whenever a higher ranking of-ficer orders additional investigation, it will be documented in writing. (b) all investigations conducted by COPA or BIA, once complete, will be forwarded through the investigator’s chain of supervision/command to the Chief Administrator of COPA or the Chief of BIA, respectively: (i) COPA and BIA will each ensure that their respective administrative investigative files are complete, meet the requirements of law, COPA and CPD policy, and this Agreement; and that findings are supported by the appropriate standard of proof; (ii) the Chief Administrator or the Chief of BIA, or his or her designee, will order additional investigation when it appears that there is additional relevant evidence that may assist in resolving inconsistencies or improving the reliability or credibility of the findings; and (iii) whenever COPA and BIA orders additional investigation, the request and resulting investigation will be documented in writing.*

Compliance Progress		(Reporting Period: July 1, 2023, through December 31, 2023)
Preliminary:		<i>In Compliance (SEVENTH REPORTING PERIOD)</i>
	CPD	<i>In Compliance (SEVENTH REPORTING PERIOD)</i>
	COPA	<i>In Compliance (FIFTH REPORTING PERIOD)</i>
Secondary:		<i>Not in Compliance</i>
	CPD	<i>Not in Compliance</i>
	COPA	<i>In Compliance (SEVENTH REPORTING PERIOD)</i>
Full:		<i>Not in Compliance</i>
	CPD	<i>Not Yet Assessed</i>
	COPA	<i>In Compliance (NEW)</i>

COPA reached Full compliance while the City and the CPD maintained Preliminary compliance with ¶495 in the ninth reporting period. Because all relevant City entities must reach levels of compliance to bring the City, as a whole, into compliance, the City has not yet reached Secondary compliance with ¶495.

This reporting period, the CPD did not produce any documentation that demonstrated efforts related to ¶495.

To assess Full compliance, the IMT reviewed COPA’s memorandum and supporting documentation of case examples. COPA developed a reasonable methodology to

provide a sample group of cases for review, and the documentation provided addresses ¶495(b) for which COPA is responsible.

Moving forward, we will look for the CPD to develop training relevant to the requirements of ¶495. We look forward to continuing our collaboration with BIA as it works to develop and revise additional individual blocks of instruction for the BIA initial in-service, initial onboard, and refresher trainings.

For COPA, we will look for documentation maintaining that COPA and its employees are acting in accordance with ¶495’s mandates. To maintain Full compliance, COPA must provide such materials in each future reporting period.

A fuller description of the history of compliance efforts, methodologies, compliance determinations for this paragraph—and each original monitorable paragraphs in the Accountability and Transparency section—is available in *Comprehensive Assessment Part I* (which included *Independent Monitoring Report 8*): <https://cpdmonitoringteam.com/wp-content/uploads/2023/11/IMR8-Appendix-9-Accountability-and-Transparency-2023.11.01.pdf>.

Paragraph 495 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: 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

Accountability and Transparency: ¶496

496. *The City and CPD will ensure that interfering with an administrative investigation, including being untruthful in an investigation into misconduct or colluding with other individuals to undermine such an investigation, or intentionally withholding requested evidence or information from an investigator, will result in disciplinary action and/or criminal prosecution based on the seriousness of the conduct.*

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

Preliminary:		<i>In Compliance (FIFTH REPORTING PERIOD)</i>
	CPD	<i>In Compliance (FIFTH REPORTING PERIOD)</i>
	COPA	<i>In Compliance (FIFTH REPORTING PERIOD)</i>
Secondary:		<i>In Compliance (EIGHTH REPORTING PERIOD)</i>
	CPD	<i>In Compliance (EIGHTH REPORTING PERIOD)</i>
	COPA	<i>In Compliance (SEVENTH REPORTING PERIOD)</i>
Full:		<i>Not in Compliance</i>
	CPD	<i>Not in Compliance</i>
	COPA	<i>In Compliance (NEW)</i>

COPA reached Full compliance while the CPD maintained Secondary compliance with ¶496 in the ninth reporting period. Because all relevant City entities must reach levels of compliance to bring the City, as a whole, into compliance, the City has not yet reached Full compliance.

To maintain Preliminary compliance, the IMT reviewed the CPD’s revised G08-01, *Complaint and Disciplinary System*, which addressed the requirements of ¶496. The IMT provided a no-objection notice on December 9, 2023.

This reporting period, COPA delivered its *Criminal Conduct Training* to at least 95% of its personnel. This training completely addresses ¶496 and provides excellent instruction on how investigators should address issues of collusion, recognition, and reporting of criminal conduct in the course of an investigation.

To assess Full compliance, the IMT reviewed COPA’s memorandum and random sampling of cases that demonstrated that COPA does not tolerate interference in investigations, and COPA can and does sustain allegations against CPD members for untruthfulness, collusion, and/or intentional withholding of evidence.

Moving forward, we look forward to continuing our collaboration with BIA as it works to develop and revise additional individual blocks of instruction for the BIA initial in-service, initial onboard, and refresher trainings. To assess Full compliance for ¶496, we urge the CPD to ensure that the representation of members who have successfully completed the eLearning course noted in the eighth reporting period includes 95% of civilians, and to strive for achieving 95% successful completion of

the eLearning course across position and rank. Additionally, we will look for documentation that the CPD and its employees are acting in accordance with ¶496’s mandates.

For COPA, we will look for documentation maintaining that COPA and its employees are acting in accordance with ¶496’s mandates. To maintain Full compliance, COPA must provide such materials in each future reporting period.

A fuller description of the history of compliance efforts, methodologies, compliance determinations for this paragraph—and each original monitorable paragraphs in the Accountability and Transparency section—is available in [Comprehensive Assessment Part I](https://cpdmonitoringteam.com/wp-content/uploads/2023/11/IMR8-Appendix-9-Accountability-and-Transparency-2023.11.01.pdf) (which included *Independent Monitoring Report 8*): <https://cpdmonitoringteam.com/wp-content/uploads/2023/11/IMR8-Appendix-9-Accountability-and-Transparency-2023.11.01.pdf>.

Paragraph 496 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: Secondary	NINTH REPORTING PERIOD JULY 1, 2023 – DECEMBER 31, 2023 COMPLIANCE PROGRESS: Secondary

Accountability and Transparency: ¶499

499. When COPA, BIA, or the investigating district has arrived at the investigative findings and recommendations, it will promptly finalize a summary report (“Administrative Summary Report”). The Administrative Summary Report will include: a. a description of the CPD members and individuals involved in the alleged misconduct; b. the date, time, and location of the alleged misconduct; c. a description of the allegations and applicable policies; d. a narrative summary of the alleged misconduct; e. a narrative summary of the investigation; and f. the investigating body’s findings and conclusions for each allegation of misconduct, including any discipline recommended.

Compliance Progress	(Reporting Period: July 1, 2023, through December 31, 2023)
Preliminary:	<i>In Compliance (FIFTH REPORTING PERIOD)</i>
CPD	<i>In Compliance (FIFTH REPORTING PERIOD)</i>
COPA	<i>In Compliance (FOURTH REPORTING PERIOD)</i>
Secondary:	<i>Not in Compliance</i>
CPD	<i>Not in Compliance</i>
COPA	<i>In Compliance (SEVENTH REPORTING PERIOD)</i>
Full:	<i>Not in Compliance</i>
CPD	<i>Not Yet Assessed</i>
COPA	<i>In Compliance (NEW)</i>

COPA regained Full compliance while the CPD maintained Preliminary compliance with ¶499 in the ninth reporting period. Because all relevant City entities must reach levels of compliance to bring the City, as a whole, into compliance, the City has not yet reached Secondary compliance.

This reporting period, the CPD did not produce any documentation that demonstrated efforts related to ¶499.

This reporting period, COPA produced a memorandum and supporting documentation demonstrating its compliance efforts with ¶499. The documentation included a template for Final Summary Reports and completed reports, which contain the required information as set forth in ¶499 and its subparagraphs. COPA regained Full compliance with ¶499.

Moving forward, we will look for the CPD to develop training relevant to the requirements of ¶499. We look forward to continuing our collaboration with BIA as it works to develop and revise additional individual blocks of instruction for the BIA initial in-service, initial onboard, and refresher trainings.

For COPA, we will look for documentation maintaining that COPA and its employees are acting in accordance with ¶499’s mandates. To maintain Full compliance, COPA must provide such materials in each future reporting period.

A fuller description of the history of compliance efforts, methodologies, compliance determinations for this paragraph—and each original monitorable paragraphs in the Accountability and Transparency section—is available in *Comprehensive Assessment Part I* (which included *Independent Monitoring Report 8*): <https://cpdmonitoringteam.com/wp-content/uploads/2023/11/IMR8-Appendix-9-Accountability-and-Transparency-2023.11.01.pdf>.

Paragraph 499 Compliance Progress History

FIRST REPORTING PERIOD SEPTEMBER 1, 2019 – AUGUST 31, 2019 COMPLIANCE PROGRESS: None	SECOND REPORTING PERIOD SEPTEMBER 1, 2019 – FEBRUARY 29, 2020 COMPLIANCE PROGRESS: Status Update	THIRD REPORTING PERIOD MARCH 1, 2020 – DECEMBER 31, 2020 COMPLIANCE PROGRESS: Status Update
FOURTH REPORTING PERIOD JANUARY 1, 2021 – JUNE 30, 2021 COMPLIANCE PROGRESS: None	FIFTH REPORTING PERIOD JULY 1, 2021 – DECEMBER 31, 2021 COMPLIANCE PROGRESS: Preliminary	SIXTH REPORTING PERIOD JANUARY 1, 2022 – JUNE 30, 2022 COMPLIANCE PROGRESS: Preliminary
SEVENTH REPORTING PERIOD JULY 1, 2022 – DECEMBER 31, 2022 COMPLIANCE PROGRESS: Preliminary	EIGHTH REPORTING PERIOD JANUARY 1, 2023 – JUNE 30, 2023 COMPLIANCE PROGRESS: Preliminary	NINTH REPORTING PERIOD JULY 1, 2023 – DECEMBER 31, 2023 COMPLIANCE PROGRESS: Preliminary

Accountability and Transparency: ¶1500

500. For all misconduct investigations, BIA or COPA will publish the Administrative Summary Report within 60 days of the final disciplinary decision.

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

Preliminary:	<i>In Compliance</i> (FIFTH REPORTING PERIOD)
CPD	<i>In Compliance</i> (FIFTH REPORTING PERIOD)
COPA	<i>In Compliance</i> (FOURTH REPORTING PERIOD)
Secondary:	<i>In Compliance</i> (EIGHTH REPORTING PERIOD)
CPD	<i>In Compliance</i> (EIGHTH REPORTING PERIOD)
COPA	<i>In Compliance</i> (SEVENTH REPORTING PERIOD)
Full:	<i>Not in Compliance</i>
CPD	<i>Not in Compliance</i>
COPA	<i>In Compliance</i> (NEW)

COPA regained Full compliance while the CPD maintained Secondary compliance with ¶1500 in the ninth reporting period. Because all relevant City entities must reach levels of compliance to bring the City, as a whole, into compliance, the City has not yet reached Full compliance.

This reporting period, the CPD provided BIA's *Audit for Investigative Timelines* for review with ¶1500, covering the investigations for 2022. The Audit established that the Administrative Summary Reports are published within 60 days of the final disciplinary decision. The CPD maintained Secondary compliance with ¶1500.¹

This reporting period, COPA produced a memorandum and supporting documentation demonstrating its compliance efforts with ¶1500. The memorandum explains COPA's process for publishing the Final Summary Reports within 60 days of the final disciplinary decision. COPA also provided a random sample of Final Summary Reports, demonstrating that they were published within 60 days of the final disciplinary decision. COPA regained Full compliance with ¶1500.

Moving forward, we look forward to continuing our collaboration with BIA as it works to develop and revise additional individual blocks of instruction for the BIA initial in-service, initial onboard, and refresher trainings. To assess Full compliance for ¶1500, we urge the CPD to ensure that the representation of members who have successfully completed the eLearning course noted in the eighth reporting period includes 95% of civilians, and to strive for achieving 95% successful completion of

¹ The CPD also produced BIA's *Audit for Investigative Timelines* for review with ¶¶446(b), 471, 472, 474, and 498. The CPD maintained Preliminary compliance with ¶471 and maintained Secondary compliance with ¶¶446(b), 472, 474, 498, and 500, which were the compliance levels sought in the production letter.

the eLearning course across position and rank. Additionally, we will look for documentation that the CPD and its employees are acting in accordance with ¶1500’s mandates.

For COPA, we will look for documentation maintaining that COPA and its employees are acting in accordance with ¶1500’s mandates. To maintain Full compliance, COPA must provide such materials in each future reporting period.

A fuller description of the history of compliance efforts, methodologies, compliance determinations for this paragraph—and each original monitorable paragraphs in the Accountability and Transparency section—is available in [Comprehensive Assessment Part I](https://cpdmonitoringteam.com/wp-content/uploads/2023/11/IMR8-Appendix-9-Accountability-and-Transparency-2023.11.01.pdf) (which included *Independent Monitoring Report 8*): <https://cpdmonitoringteam.com/wp-content/uploads/2023/11/IMR8-Appendix-9-Accountability-and-Transparency-2023.11.01.pdf>.

Paragraph 500 Compliance Progress History

FIRST REPORTING PERIOD SEPTEMBER 1, 2019 – AUGUST 31, 2019 COMPLIANCE PROGRESS: None	SECOND REPORTING PERIOD SEPTEMBER 1, 2019 – FEBRUARY 29, 2020 COMPLIANCE PROGRESS: Status Update	THIRD REPORTING PERIOD MARCH 1, 2020 – DECEMBER 31, 2020 COMPLIANCE PROGRESS: Status Update
FOURTH REPORTING PERIOD JANUARY 1, 2021 – JUNE 30, 2021 COMPLIANCE PROGRESS: None	FIFTH REPORTING PERIOD JULY 1, 2021 – DECEMBER 31, 2021 COMPLIANCE PROGRESS: Preliminary	SIXTH REPORTING PERIOD JANUARY 1, 2022 – JUNE 30, 2022 COMPLIANCE PROGRESS: Preliminary
SEVENTH REPORTING PERIOD JULY 1, 2022 – DECEMBER 31, 2022 COMPLIANCE PROGRESS: Preliminary	EIGHTH REPORTING PERIOD JANUARY 1, 2023 – JUNE 30, 2023 COMPLIANCE PROGRESS: Secondary	NINTH REPORTING PERIOD JULY 1, 2023 – DECEMBER 31, 2023 COMPLIANCE PROGRESS: Secondary

Accountability and Transparency: ¶502

502. Information contained in the Administrative Summary Report that is legally exempt from disclosure for privacy or other purposes will be redacted prior to electronic publication.

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

Preliminary:		<i>In Compliance</i> (FIFTH REPORTING PERIOD)
	CPD	<i>In Compliance</i> (FIFTH REPORTING PERIOD)
	COPA	<i>In Compliance</i> (FOURTH REPORTING PERIOD)
Secondary:		<i>In Compliance</i> (EIGHTH REPORTING PERIOD)
	CPD	<i>In Compliance</i> (EIGHTH REPORTING PERIOD)
	COPA	<i>In Compliance</i> (SEVENTH REPORTING PERIOD)
Full:		<i>Not in Compliance</i>
	CPD	<i>Not in Compliance</i>
	COPA	<i>In Compliance</i> (NEW)

COPA regained Full compliance while the CPD maintained Secondary compliance with ¶502 in the ninth reporting period. Because all relevant City entities must reach levels of compliance to bring the City, as a whole, into compliance, the City has not yet reached Full compliance.

This reporting period, the CPD did not produce any documentation that demonstrated efforts related to ¶502.

This reporting period, COPA produced a memorandum and supporting documentation demonstrating its compliance efforts with ¶502. The documentation included published Final Summary Reports containing appropriate redactions, as required by this paragraph. COPA regained Full compliance with ¶502.

Moving forward, we look forward to continuing our collaboration with BIA as it works to develop and revise additional individual blocks of instruction for the BIA initial in-service, initial onboard, and refresher trainings. To assess Full compliance for ¶502, we urge the CPD to ensure that the representation of members who have successfully completed the eLearning course noted in the eighth reporting period includes 95% of civilians, and to strive for achieving 95% successful completion of the eLearning course across position and rank. Additionally, we will look for documentation that the CPD and its employees are acting in accordance with ¶502’s mandates.

For COPA, we will look for documentation maintaining that COPA and its employees are acting in accordance with ¶502’s mandates. To maintain Full compliance, COPA must provide such materials in each future reporting period.

A fuller description of the history of compliance efforts, methodologies, compliance determinations for this paragraph—and each original monitorable paragraphs in the Accountability and Transparency section—is available in [Comprehensive Assessment Part I](https://cpdmonitoringteam.com/wp-content/uploads/2023/11/IMR8-Appendix-9-Accountability-and-Transparency-2023.11.01.pdf) (which included *Independent Monitoring Report 8*): <https://cpdmonitoringteam.com/wp-content/uploads/2023/11/IMR8-Appendix-9-Accountability-and-Transparency-2023.11.01.pdf>.

Paragraph 502 Compliance Progress History

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

Accountability and Transparency: ¶503

503. *When an allegation of misconduct contains multiple separate potential policy violations, all applicable violations will be identified and investigated. Exoneration for the most serious allegations of misconduct will not preclude the recommendation of discipline, training, or other corrective measures for less serious misconduct stemming from the same set of allegations.*

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

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

COPA reached Full compliance while the CPD maintained Preliminary compliance with ¶503 in the ninth reporting period. Because all relevant City entities must reach levels of compliance to bring the City, as a whole, into compliance, the City has not yet reached Secondary compliance.

With regard to Secondary compliance, the CPD produced a draft of its five-day BIA Onboard Training on December 1, 2022, for review with numerous paragraphs, including ¶503. The IMT provided extensive feedback on these training materials on February 13, 2023, and explained that the training was an improvement from the previous version, but still required significant revisions to provide adequate instruction and to address the designated Consent Decree paragraphs. After extensive discussions about the format of the training (one all-encompassing training rather than individual blocks of instruction), the Parties decided that BIA would move forward with producing individual blocks of instruction. During the ninth reporting period, the CPD produced eight modules of instruction for review with multiple paragraphs. Specifically, Module 3, *Credibility, Standards of Proof, and Disciplinary Decision Making*, was produced for review ¶503. The IMT provided a no-objection notice on October 9, 2023. However, Module 3 was not provided during the ninth reporting period, and thus, the CPD has yet to reach Secondary compliance.

To assess Full compliance, the IMT reviewed COPA’s memorandum and supporting documentation, including randomized Final Summary Reports, demonstrating that COPA will investigate and recommend discipline for less serious allegations even if the most serious allegations are exonerated.

Moving forward, we look forward to continuing our collaboration with BIA as it works to develop and revise additional individual blocks of instruction for the BIA initial in-service, initial onboard, and refresher trainings.

For COPA, we will look for documentation maintaining that COPA and its employees are acting in accordance with ¶503’s mandates. To maintain Full compliance, COPA must provide such materials in each future reporting period.

A fuller description of the history of compliance efforts, methodologies, compliance determinations for this paragraph—and each original monitorable paragraphs in the Accountability and Transparency section—is available in [Comprehensive Assessment Part I](https://cpdmonitoringteam.com/wp-content/uploads/2023/11/IMR8-Appendix-9-Accountability-and-Transparency-2023.11.01.pdf) (which included *Independent Monitoring Report 8*): <https://cpdmonitoringteam.com/wp-content/uploads/2023/11/IMR8-Appendix-9-Accountability-and-Transparency-2023.11.01.pdf>.

Paragraph 503 Compliance Progress History

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

Accountability and Transparency: ¶504

504. As soon as feasible, but by no later than January 2020, upon arriving at the final disciplinary decision, CPD and COPA will ensure that the Administrative Summary Report is provided to the involved CPD member and the Department. CPD will ensure that the Administrative Summary Report is provided to the involved CPD member's District or Unit Commander and immediate supervisor.

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

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

The City, the CPD, and COPA maintained Preliminary compliance with ¶504 in the ninth reporting period.

This reporting period, the City and the CPD did not produce any documentation that demonstrated efforts related to ¶504.

For COPA, we have previously noted that to reach Secondary compliance, COPA would need to provide training materials related to the requirements of this paragraph and train 95% of its staff, or alternatively, revise its Guidance as needed to specify that Final Summary Reports (FSRs) are automatically distributed to “the involved CPD member and the Department.” See ¶504. This reporting period, COPA produced a revised Guidance that indicated that FSRs are automatically distributed to the CPD. In memoranda, COPA further indicated that after it completes an FSR and closes an investigation, it has no further control over the contents of the log or its distribution.

However, while COPA’s revised Guidance automatically distributes the FSRs to the CPD, it does not automatically distribute the FSRs directly to the involved CPD member as required by ¶504. Instead, COPA puts the burden on the CPD to provide the FSRs to the involved CPD member without any acknowledgement from the CPD to accept this burden. COPA and the CPD should work together to see if this process is appropriate and to ensure adequate systems are in place to automatically distribute the FSRs directly to the involved CPD member.

Moving forward, we will look for evidence that the CPD and COPA are developing sufficient systems to instruct compliance with the requirements of ¶504 and each entity’s related policies.

A fuller description of the history of compliance efforts, methodologies, compliance determinations for this paragraph—and each original monitorable paragraphs in the Accountability and Transparency section—is available in *Comprehensive Assessment Part I* (which included *Independent Monitoring Report 8*): <https://cpdmonitoringteam.com/wp-content/uploads/2023/11/IMR8-Appendix-9-Accountability-and-Transparency-2023.11.01.pdf>.

Paragraph 504 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	NINTH REPORTING PERIOD JULY 1, 2023 – DECEMBER 31, 2023 COMPLIANCE PROGRESS: Preliminary

Accountability and Transparency: ¶1505

505. The CMS will have the following capacities: a. maintain accurate and reliable data regarding the number, nature, and status of all complaints and administrative notifications, from the intake process to final disposition; b. identify the status of administrative investigations; c. identify caseloads for investigators; and d. maintain all documents and investigative materials—including audio and video—in a digital format, accessible via the CMS.

Compliance Progress	(Reporting Period: July 1, 2023, through December 31, 2023)
Preliminary:	<i>In Compliance (SEVENTH REPORTING PERIOD)</i>
CPD	<i>In Compliance (SEVENTH REPORTING PERIOD)</i>
COPA	<i>In Compliance (FOURTH REPORTING PERIOD)</i>
Secondary:	<i>In Compliance (NEW)</i>
CPD	<i>In Compliance (NEW)</i>
COPA	<i>In Compliance (SEVENTH REPORTING PERIOD)</i>
Full:	<i>Not in Compliance</i>
CPD	<i>Not Yet Assessed</i>
COPA	<i>In Compliance (SEVENTH REPORTING PERIOD)</i>

The City and the CPD reached Secondary compliance while COPA maintained Full compliance with ¶1505. Because all relevant City entities must reach levels of compliance to bring the City as a whole into compliance, the City has not yet reached Full compliance.

With regard to Secondary compliance, the CPD produced a draft of its five-day BIA Onboard Training on December 1, 2022, for review with numerous paragraphs, including ¶1505. The IMT provided extensive feedback on these training materials on February 13, 2023, and explained that the training was an improvement from the previous version, but still required significant revisions to provide adequate instruction and to address the designated Consent Decree paragraphs. After extensive discussions about the format of the training (one all-encompassing training rather than individual blocks of instruction), the Parties decided that BIA would move forward with producing individual blocks of instruction. During the ninth reporting period, the CPD produced eight modules of instruction for review with multiple paragraphs. Specifically, Module 1, *Complaint Management System and Complete Investigatory Files*, was produced for review with ¶1505. The IMT provided a no-objection notice on September 27, 2023, and the CPD delivered the training to 95% of the required BIA personnel. The CPD reached Secondary compliance with ¶1505 in the ninth reporting period.

Although the CPD reached Secondary compliance this reporting period with ¶1505, the CPD must ensure that future training records are provided through clear documentation that includes who attended the training, as well as who was required to attend. The IMT received clarification on the training records in January 2024,

and we expect these records to be produced formally early in the tenth reporting period.

COPA maintained Full compliance in the ninth reporting period by providing a memorandum and supporting evidence that demonstrates COPA’s ability to manage investigator caseloads, determine case status, and view raw data of cases, as required by ¶1505.

Moving forward, we look forward to continuing our collaboration with BIA as it works to develop and revise additional individual blocks of instruction for the BIA initial in-service, initial onboard, and refresher trainings. Additionally, we will look for documentation that the CPD and its employees are acting in accordance with ¶1505’s mandates.

For COPA, we will look for documentation maintaining that COPA and its employees are acting in accordance with ¶1505’s mandates. To maintain Full compliance, COPA must provide such materials in each future reporting period.

A fuller description of the history of compliance efforts, methodologies, compliance determinations for this paragraph—and each original monitorable paragraphs in the Accountability and Transparency section—is available in [Comprehensive Assessment Part I](https://cpdmonitoringteam.com/wp-content/uploads/2023/11/IMR8-Appendix-9-Accountability-and-Transparency-2023.11.01.pdf) (which included *Independent Monitoring Report 8*): <https://cpdmonitoringteam.com/wp-content/uploads/2023/11/IMR8-Appendix-9-Accountability-and-Transparency-2023.11.01.pdf>.

Paragraph 505 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: 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

Accountability and Transparency: ¶506

506. COPA, BIA, and the Accountability Sergeants will have access to the CMS as necessary to undertake their respective duties.

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

Preliminary:	<i>In Compliance</i> (FIFTH REPORTING PERIOD)
CPD	<i>In Compliance</i> (FIFTH REPORTING PERIOD)
COPA	<i>In Compliance</i> (FOURTH REPORTING PERIOD)
Secondary:	<i>In Compliance</i> (NEW)
CPD	<i>In Compliance</i> (NEW)
COPA	<i>In Compliance</i> (SEVENTH REPORTING PERIOD)
Full:	<i>Not in Compliance</i>
CPD	<i>Not Yet Assessed</i>
COPA	<i>In Compliance</i> (SEVENTH REPORTING PERIOD)

The City and the CPD reached Secondary compliance while COPA maintained Full compliance with ¶506. Because all relevant City entities must reach levels of compliance to bring the City as a whole into compliance, the City has not yet reached Full compliance.

To maintain Preliminary compliance, the IMT reviewed the CPD’s revised S08-01, *Complaint and Investigators and Investigations*, which addressed the requirements of ¶506. The IMT provided a no-objection notice on December 2, 2023.

With regard to Secondary compliance, the CPD produced a draft of its five-day BIA Onboard Training on December 1, 2022, for review with numerous paragraphs, not including ¶506. The IMT provided extensive feedback on these training materials on February 13, 2023, and explained that the training was an improvement from the previous version, but still required significant revisions to provide adequate instruction and to address the designated Consent Decree paragraphs. After extensive discussions about the format of the training (one all-encompassing training rather than individual blocks of instruction), the Parties decided that BIA would move forward with producing individual blocks of instruction. During the ninth reporting period, the CPD produced eight modules of instruction for review with multiple paragraphs. Specifically, Module 1, *Complaint Management System and Complete Investigatory Files*, was produced for review with ¶506. The IMT provided a no-objection notice on September 27, 2023, and the CPD delivered the training to 95% of the required BIA personnel. The CPD reached Secondary compliance with ¶506.

Although the CPD reached Secondary compliance this reporting period with ¶506, the CPD must ensure that future training records are provided through clear documentation that includes who attended the training, as well as who was required

to attend. The IMT received clarification on the training records in January 2024, and we expect these records to be produced formally early in the tenth reporting period.

COPA maintained Full compliance in the ninth reporting period by providing a memorandum and supporting evidence that demonstrates that COPA employees have access to the Case Management System and are assigned different levels of access based upon their specific roles and responsibilities, as required by ¶506.

Moving forward, we look forward to continuing our collaboration with BIA as it works to develop and revise additional individual blocks of instruction for the BIA initial in-service, initial onboard, and refresher trainings. Additionally, we will look for documentation that the CPD and its employees are acting in accordance with ¶506’s mandates.

For COPA, we will look for documentation maintaining that COPA and its employees are acting in accordance with ¶506’s mandates. To maintain Full compliance, COPA must provide such materials in each future reporting period.

A fuller description of the history of compliance efforts, methodologies, compliance determinations for this paragraph—and each original monitorable paragraphs in the Accountability and Transparency section—is available in [Comprehensive Assessment Part I](https://cpdmonitoringteam.com/wp-content/uploads/2023/11/IMR8-Appendix-9-Accountability-and-Transparency-2023.11.01.pdf) (which included *Independent Monitoring Report 8*): <https://cpdmonitoringteam.com/wp-content/uploads/2023/11/IMR8-Appendix-9-Accountability-and-Transparency-2023.11.01.pdf>.

Paragraph 506 Compliance Progress History

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

Accountability and Transparency: ¶1507

507. Administrative investigative files will be electronically preserved within the CMS.

Compliance Progress		(Reporting Period: July 1, 2023, through December 31, 2023)
Preliminary:		<i>In Compliance</i> (FIFTH REPORTING PERIOD)
	CPD	<i>In Compliance</i> (FIFTH REPORTING PERIOD)
	COPA	<i>In Compliance</i> (FOURTH REPORTING PERIOD)
Secondary:		<i>In Compliance</i> (NEW)
	CPD	<i>In Compliance</i> (NEW)
	COPA	<i>In Compliance</i> (SEVENTH REPORTING PERIOD)
Full:		<i>Not in Compliance</i>
	CPD	<i>Not Yet Assessed</i>
	COPA	<i>In Compliance</i> (SEVENTH REPORTING PERIOD)

The City and the CPD reached Secondary compliance while COPA maintained Full compliance with ¶1507. Because all relevant City entities must reach levels of compliance to bring the City as a whole into compliance, the City has not yet reached Full compliance.

With regard to Secondary compliance, the CPD produced a draft of its five-day BIA Onboard Training on December 1, 2022, for review with numerous paragraphs, not including ¶1507. The IMT provided extensive feedback on these training materials on February 13, 2023, and explained that the training was an improvement from the previous version, but still required significant revisions to provide adequate instruction and to address the designated Consent Decree paragraphs. After extensive discussions about the format of the training (one all-encompassing training rather than individual blocks of instruction), the Parties decided that BIA would move forward with producing individual blocks of instruction. During the ninth reporting period, the CPD produced eight modules of instruction for review with multiple paragraphs. Specifically, Module 1, *Complaint Management System and Complete Investigatory Files*, was produced for review with ¶1507. The IMT provided a no-objection notice on September 27, 2023, and the CPD delivered the training to 95% of the required BIA personnel. The CPD reached Secondary compliance with ¶1507.

Although the CPD reached Secondary compliance this reporting period with ¶1507, the CPD must ensure that future training records are provided through clear documentation that includes who attended the training, as well as who was required to attend. The IMT received clarification on the training records in January 2024, and we expect these records to be produced formally early in the tenth reporting period.

COPA maintained Full compliance in the ninth reporting period by providing a memorandum and supporting evidence that demonstrates how cases are filed and stored electronically including digital and audio files, as required by ¶1507.

Moving forward, we look forward to continuing our collaboration with BIA as it works to develop and revise additional individual blocks of instruction for the BIA initial in-service, initial onboard, and refresher trainings. Additionally, we will look for documentation that the CPD and its employees are acting in accordance with ¶1507’s mandates.

For COPA, we will look for documentation maintaining that COPA and its employees are acting in accordance with ¶1507’s mandates. To maintain Full compliance, COPA must provide such materials in each future reporting period.

A fuller description of the history of compliance efforts, methodologies, compliance determinations for this paragraph—and each original monitorable paragraphs in the Accountability and Transparency section—is available in [Comprehensive Assessment Part I](https://cpdmonitoringteam.com/wp-content/uploads/2023/11/IMR8-Appendix-9-Accountability-and-Transparency-2023.11.01.pdf) (which included *Independent Monitoring Report 8*): <https://cpdmonitoringteam.com/wp-content/uploads/2023/11/IMR8-Appendix-9-Accountability-and-Transparency-2023.11.01.pdf>.

Paragraph 507 Compliance Progress History

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

Accountability and Transparency: ¶1508

508. The City and CPD will undertake best efforts to ensure that all administrative investigation files, disciplinary history card entries, COPA and BIA disciplinary records, and any other disciplinary record or summary of such record, are retained electronically, and indefinitely, for purposes of historical trend analysis, non-disciplinary EIS, and public transparency.

Compliance Progress	(Reporting Period: July 1, 2023, through December 31, 2023)
Preliminary:	<i>In Compliance (SEVENTH REPORTING PERIOD)</i>
CPD	<i>In Compliance (SEVENTH REPORTING PERIOD)</i>
COPA	<i>In Compliance (FOURTH REPORTING PERIOD)</i>
Secondary:	<i>In Compliance (NEW)</i>
CPD	<i>In Compliance (NEW)</i>
COPA	<i>In Compliance (SEVENTH REPORTING PERIOD)</i>
Full:	<i>Not in Compliance</i>
CPD	<i>Not Yet Assessed</i>
COPA	<i>In Compliance (NEW)</i>

The City and the CPD reached Secondary compliance while COPA reached Full compliance with ¶1508. Because all relevant City entities must reach levels of compliance to bring the City as a whole into compliance, the City has not yet reached Full compliance.

With regard to Secondary compliance, the CPD produced a draft of its five-day BIA Onboard Training on December 1, 2022, for review with numerous paragraphs, not including ¶1508. The IMT provided extensive feedback on these training materials on February 13, 2023, and explained that the training was an improvement from the previous version, but still required significant revisions to provide adequate instruction and to address the designated Consent Decree paragraphs. After extensive discussions about the format of the training (one all-encompassing training rather than individual blocks of instruction), the Parties decided that BIA would move forward with producing individual blocks of instruction. During the ninth reporting period, the CPD produced eight modules of instruction for review with multiple paragraphs. Specifically, Module 1, *Complaint Management System and Complete Investigatory Files*, was produced for review with ¶1508. The IMT provided a no-objection notice on September 27, 2023, and the CPD delivered the training to 95% of the required BIA personnel. The CPD reached Secondary compliance with ¶1508.

Although the CPD reached Secondary compliance this reporting period with ¶1508, the CPD must ensure that future training records are provided through clear documentation that includes who attended the training, as well as who was required to attend. The IMT received clarification on the training records in January 2024,

and we expect these records to be produced formally early in the tenth reporting period.

To assess Full compliance, the IMT reviewed COPA’s memorandum and supporting documentation that demonstrates COPA employee’s ability to select CPD members’ full history reports, which provides a list of all cases of an officer’s accused misconduct and the result of the investigation.

Moving forward, we look forward to continuing our collaboration with BIA as it works to develop and revise additional individual blocks of instruction for the BIA initial in-service, initial onboard, and refresher trainings. Additionally, we will look for documentation that the CPD and its employees are acting in accordance with ¶1508’s mandates.

For COPA, we will look for documentation maintaining that COPA and its employees are acting in accordance with ¶1508’s mandates. To maintain Full compliance, COPA must provide such materials in each future reporting period.

A fuller description of the history of compliance efforts, methodologies, compliance determinations for this paragraph—and each original monitorable paragraphs in the Accountability and Transparency section—is available in [Comprehensive Assessment Part I](https://cpdmonitoringteam.com/wp-content/uploads/2023/11/IMR8-Appendix-9-Accountability-and-Transparency-2023.11.01.pdf) (which included *Independent Monitoring Report 8*): <https://cpdmonitoringteam.com/wp-content/uploads/2023/11/IMR8-Appendix-9-Accountability-and-Transparency-2023.11.01.pdf>.

Paragraph 508 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: Status Update	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: 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

Accountability and Transparency: ¶1509

509. For each complaint, the CMS will separately track, and have capacity to conduct searches and generate reports sufficient to identify and analyze trends relating to, at a minimum, the following: a. allegations of discriminatory policing based on an individual’s membership or perceived membership in an identifiable group, based upon, but not limited to: race, physical or mental disability, gender, gender identity, sexual orientation, religion, and age; b. allegations of unlawful stop, search, citation, or arrest practices; c. allegations of excessive force; d. allegations of misconduct arising during an interaction with individuals in crisis; e. allegations of retaliation against non-CPD members; f. allegations of conduct alleged to have occurred in retaliation for engaging in First Amendment protected activities, such as lawful demonstrations, protected speech, observing or filming police activity, or criticizing an officer or the officer’s conduct; g. allegations of officer-involved gender-based violence, domestic violence, or sexual misconduct; h. allegations of CPD member substance and/or alcohol abuse; and i. the self-reported demographic information of complainants, including race, physical or mental disability, gender, gender identity, sexual orientation, religion, and age.

Compliance Progress		(Reporting Period: July 1, 2023, through December 31, 2023)
Preliminary:		<i>In Compliance</i> (SEVENTH REPORTING PERIOD)
	CPD	<i>In Compliance</i> (SEVENTH REPORTING PERIOD)
	COPA	<i>In Compliance</i> (FOURTH REPORTING PERIOD)
Secondary:		<i>In Compliance</i> (NEW)
	CPD	<i>In Compliance</i> (NEW)
	COPA	<i>In Compliance</i> (SEVENTH REPORTING PERIOD)
Full:		<i>Not in Compliance</i>
	CPD	<i>Not Yet Assessed</i>
	COPA	<i>In Compliance</i> (NEW)

The City and the CPD reached Secondary compliance while COPA reached Full compliance with ¶1509. Because all relevant City entities must reach levels of compliance to bring the City as a whole into compliance, the City has not yet reached Full compliance.

With regard to Secondary compliance, the CPD produced a draft of its five-day BIA Onboard Training on December 1, 2022, for review with numerous paragraphs, including ¶1509. The IMT provided extensive feedback on these training materials on February 13, 2023, and explained that the training was an improvement from the previous version, but still required significant revisions to provide adequate instruction and to address the designated Consent Decree paragraphs. After extensive discussions about the format of the training (one all-encompassing training rather than individual blocks of instruction), the Parties decided that BIA would move forward with producing individual blocks of instruction. During the ninth reporting period, the CPD produced eight modules of instruction for review with multiple paragraphs. Specifically, Module 1, *Complaint Management System and*

Complete Investigatory Files, was produced for review with ¶1509. The IMT provided a no-objection notice on September 27, 2023, and the CPD delivered the training to 95% of the required BIA personnel. The CPD reached Secondary compliance with ¶1509.

Although the CPD reached Secondary compliance this reporting period with ¶1509, the CPD must ensure that future training records are provided through clear documentation that includes who attended the training, as well as who was required to attend. The IMT received clarification on the training records in January 2024, and we expect these records to be produced formally early in the tenth reporting period.

To assess Full compliance, the IMT reviewed COPA’s memorandum and supporting documentation that provides information regarding COPA’s website that allows users the ability to search for statistics of misconduct by category. Users may search by allegations by beat, districts, complainant, officer demographics, and allegation category. The interactive dashboard allows users to see specifics of individual reports and demonstrates that the Case Management System collects data and generates reports related to a person’s group membership and the types of allegations described as required by ¶1509.

Moving forward, we look forward to continuing our collaboration with BIA as it works to develop and revise additional individual blocks of instruction for the BIA initial in-service, initial onboard, and refresher trainings. Additionally, we will look for documentation that the CPD and its employees are acting in accordance with ¶1509’s mandates, specifically its policies, training, and Case Management System.

For COPA, we will look for documentation maintaining that COPA and its employees are acting in accordance with ¶1509’s mandates, specifically its policies, training, and Case Management System. To maintain Full compliance, COPA must provide such materials in each future reporting period.

A fuller description of the history of compliance efforts, methodologies, compliance determinations for this paragraph—and each original monitorable paragraphs in the Accountability and Transparency section—is available in *Comprehensive Assessment Part I* (which included *Independent Monitoring Report 8*): <https://cpdmonitoringteam.com/wp-content/uploads/2023/11/IMR8-Appendix-9-Accountability-and-Transparency-2023.11.01.pdf>.

Paragraph 509 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: 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

Accountability and Transparency: ¶513

513. COPA will ensure that the recommended level of discipline for findings is consistently applied in a fair, thorough, and timely fashion, based on the nature of the misconduct. COPA and CPD will also ensure that mitigating and aggravating factors are identified, consistently applied, and documented.

Compliance Progress

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

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

The City and the CPD reached Secondary compliance while COPA maintained Secondary compliance with ¶513 in the ninth reporting period. Because all relevant City entities must reach levels of compliance to bring the City, as a whole, into compliance, the City has not yet reached Full compliance.

With regard to Secondary compliance, the CPD produced a draft of its five-day BIA Onboard Training on December 1, 2022, for review with numerous paragraphs, including ¶513. The IMT provided extensive feedback on these training materials on February 13, 2023, and explained that the training was an improvement from the previous version, but still required significant revisions to provide adequate instruction and to address the designated Consent Decree paragraphs. After extensive discussions about the format of the training (one all-encompassing training rather than individual blocks of instruction), the Parties decided that BIA would move forward with producing individual blocks of instruction. During the ninth reporting period, the CPD produced eight modules of instruction for review with multiple paragraphs. Specifically, Module 3, *Credibility, Standards of Proof, and Disciplinary Decision Making*, and Module 5, *Consent Decree and Law Review*, were produced for review with ¶513. The IMT provided no-objection notices to Modules 3 and 5 on October 9, 2023, and September 27, 2023, respectively. The CPD delivered the Module 5 training to 95% of the required BIA personnel, but Module 3 was not provided during the ninth reporting period. Because Module 5 fully addresses ¶513, the CPD reached Secondary compliance.

Although the CPD reached Secondary compliance this reporting period with ¶513, the CPD must ensure that future training records are provided through clear documentation that includes who attended the training, as well as who was required to attend. The IMT received clarification on the training records in January 2024, and we expect these records to be produced formally early in the tenth reporting period.

This reporting period, COPA did not produce any documentation that demonstrated efforts related to ¶513.

Moving forward, we look forward to continuing our collaboration with BIA as it works to develop and revise additional individual blocks of instruction for the BIA initial in-service, initial onboard, and refresher trainings, specifically the delivery of the Module 3 training. Additionally, we will look for documentation that the CPD and its employees are acting in accordance with ¶513’s mandates.

For COPA, we will look for documentation that COPA and its employees are acting in accordance with ¶513’s mandates. To maintain Full compliance, COPA must provide such materials in each future reporting period.

A fuller description of the history of compliance efforts, methodologies, compliance determinations for this paragraph—and each original monitorable paragraphs in the Accountability and Transparency section—is available in *Comprehensive Assessment Part I* (which included *Independent Monitoring Report 8*): <https://cpdmonitoringteam.com/wp-content/uploads/2023/11/IMR8-Appendix-9-Accountability-and-Transparency-2023.11.01.pdf>.

Paragraph 513 Compliance Progress History

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

Accountability and Transparency: ¶514

514. *The City, COPA, and CPD will use best efforts to ensure that the level of discipline recommended for sustained findings is applied consistently across CPD districts and without regard for the race of the complainant or the race of the involved CPD member.*

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

Preliminary: *In Compliance (SEVENTH REPORTING PERIOD)*

CPD *In Compliance (SEVENTH REPORTING PERIOD)*

COPA *In Compliance (FOURTH REPORTING PERIOD)*

Secondary: *In Compliance (NEW)*

CPD *In Compliance (NEW)*

COPA *In Compliance (SEVENTH REPORTING PERIOD)*

Full: *Not in Compliance*

CPD *Not Yet Assessed*

COPA *Under Assessment (NEW)*

The City and the CPD reached Secondary compliance with ¶514 in the ninth reporting period, while COPA is under assessment for Full compliance.

With regard to Secondary compliance, the CPD produced a draft of its five-day BIA Onboard Training on December 1, 2022, for review with numerous paragraphs, including ¶514. The IMT provided extensive feedback on these training materials on February 13, 2023, and explained that the training was an improvement from the previous version, but still required significant revisions to provide adequate instruction and to address the designated Consent Decree paragraphs. After extensive discussions about the format of the training (one all-encompassing training rather than individual blocks of instruction), the Parties decided that BIA would move forward with producing individual blocks of instruction. During the ninth reporting period, the CPD produced eight modules of instruction for review with multiple paragraphs. Specifically, Module 3, *Credibility, Standards of Proof, and Disciplinary Decision Making*, Module 5, *Consent Decree and Law Review*, and Module 7, *Procedural Justice, Implicit Bias, and Conflicts of Interest*, were produced for review with ¶514. The IMT provided no-objection notices on October 9, 2023 for Module 3 and on September 27, 2023 for Modules 5 and 7. The CPD delivered Modules 5 and 7 to 95% of the required BIA personnel, but Module 3 was not provided during the ninth reporting period. Because Modules 5 and 7 fully address ¶514, the CPD reached Secondary compliance in the ninth reporting period.

Although the CPD reached Secondary compliance this reporting period with ¶514, the CPD must ensure that future training records are provided through clear documentation that includes who attended the training, as well as who was required to attend. The IMT received clarification on the training records in January 2024,

and we expect these records to be produced formally early in the tenth reporting period.

This reporting period, COPA provided data to demonstrate its efforts related to ¶514. While the documentation supports that COPA’s discipline is consistent with respect to the race of the complainant or the race of the involved CPD member and other factors across the Districts, the documentation does not reflect the rationale or process that COPA uses to ensure fairness in consistency. COPA is under assessment for Full compliance this reporting period.

Moving forward, we look forward to continuing our collaboration with BIA as it works to develop and revise additional individual blocks of instruction for the BIA initial in-service, initial onboard, and refresher trainings, specifically the delivery of the Module 3 training. Additionally, we will look for documentation that the CPD and its employees are acting in accordance with ¶514’s mandates.

Moving forward, the IMT will look for documentation explaining the rationale or process COPA uses to ensure that COPA and its employees are acting in accordance with ¶514’s mandates. This could include a tool to ensure consistency and fairness.

A fuller description of the history of compliance efforts, methodologies, compliance determinations for this paragraph—and each original monitorable paragraphs in the Accountability and Transparency section—is available in [Comprehensive Assessment Part I](https://cpdmonitoringteam.com/wp-content/uploads/2023/11/IMR8-Appendix-9-Accountability-and-Transparency-2023.11.01.pdf) (which included *Independent Monitoring Report 8*): <https://cpdmonitoringteam.com/wp-content/uploads/2023/11/IMR8-Appendix-9-Accountability-and-Transparency-2023.11.01.pdf>.

Paragraph 514 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: Status Update	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: 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

Accountability and Transparency: ¶515

515. All disciplinary decisions and discipline imposed will be documented in writing, maintained in the administrative investigative file and the CPD member's disciplinary history, and reported within the CMS consistent with CPD policy and this Agreement.

Compliance Progress

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

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

The City and the CPD reached Secondary compliance with ¶515 in the ninth reporting period.

With regard to Secondary compliance, the CPD produced a draft of its five-day BIA Onboard Training on December 1, 2022, for review with numerous paragraphs, including ¶515. The IMT provided extensive feedback on these training materials on February 13, 2023, and explained that the training was an improvement from the previous version, but still required significant revisions to provide adequate instruction and to address the designated Consent Decree paragraphs. After extensive discussions about the format of the training (one all-encompassing training rather than individual blocks of instruction), the Parties decided that BIA would move forward with producing individual blocks of instruction. During the ninth reporting period, the CPD produced eight modules of instruction for review with multiple paragraphs. Specifically, Module 1, *Complaint Management System and Complete Investigatory Files*, and Module 3, *Credibility, Standards of Proof, and Disciplinary Decision Making*, were produced for review with ¶515. The IMT provided no-objection notices on September 27, 2023, and October 9, 2023, respectively. The CPD delivered the Module 1 training to 95% of the required BIA personnel, but Module 3 was not provided during the ninth reporting period. Because Module 1 fully addresses ¶515, the CPD reached Secondary compliance.

Although the CPD reached Secondary compliance this reporting period with ¶515, the CPD must ensure that future training records are provided through clear documentation that includes who attended the training, as well as who was required to attend. The IMT received clarification on the training records in January 2024, and we expect these records to be produced formally early in the tenth reporting period.

Moving forward, we look forward to continuing our collaboration with BIA as it works to develop and revise additional individual blocks of instruction for the BIA initial in-service, initial onboard, and refresher trainings, specifically the delivery of the Module 3 training. Additionally, we will look for documentation that the CPD and its employees are acting in accordance with ¶515's mandates.

A fuller description of the history of compliance efforts, methodologies, compliance determinations for this paragraph—and each original monitorable paragraphs in the Accountability and Transparency section—is available in *Comprehensive Assessment Part I* (which included *Independent Monitoring Report 8*): <https://cpdmonitoringteam.com/wp-content/uploads/2023/11/IMR8-Appendix-9-Accountability-and-Transparency-2023.11.01.pdf>.

Paragraph 515 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: Status Update	THIRD REPORTING PERIOD MARCH 1, 2020 – DECEMBER 31, 2020 COMPLIANCE PROGRESS: Status Update
FOURTH REPORTING PERIOD JANUARY 1, 2021 – JUNE 30, 2021 COMPLIANCE PROGRESS: None	FIFTH REPORTING PERIOD JULY 1, 2021 – DECEMBER 31, 2021 COMPLIANCE PROGRESS: Preliminary	SIXTH REPORTING PERIOD JANUARY 1, 2022 – JUNE 30, 2022 COMPLIANCE PROGRESS: Preliminary
SEVENTH REPORTING PERIOD JULY 1, 2022 – DECEMBER 31, 2022 COMPLIANCE PROGRESS: Preliminary	EIGHTH REPORTING PERIOD JANUARY 1, 2023 – JUNE 30, 2023 COMPLIANCE PROGRESS: Preliminary	NINTH REPORTING PERIOD JULY 1, 2023 – DECEMBER 31, 2023 COMPLIANCE PROGRESS: Secondary

Accountability and Transparency: ¶516

516. Each sustained finding contained within a CPD member’s disciplinary history will be considered for the purposes of recommending discipline for a subsequent sustained finding for a period of up to five years after the date of the incident or the date on which the violation is discovered, whichever is later.

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

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

COPA reached Full compliance while the City and the CPD maintained Preliminary compliance with ¶516 in the ninth reporting period. Because all relevant City entities must reach levels of compliance to bring the City, as a whole, into compliance, the City has not yet reached Secondary compliance.

With regard to Secondary compliance, the CPD produced a draft of its five-day BIA Onboard Training on December 1, 2022, for review with numerous paragraphs, including ¶516. The IMT provided extensive feedback on these training materials on February 13, 2023, and explained that the training was an improvement from the previous version, but still required significant revisions to provide adequate instruction and to address the designated Consent Decree paragraphs. After extensive discussions about the format of the training (one all-encompassing training rather than individual blocks of instruction), the Parties decided that BIA would move forward with producing individual blocks of instruction. During the ninth reporting period, the CPD produced eight modules of instruction for review with multiple paragraphs. Specifically, Module 3, *Credibility, Standards of Proof, and Disciplinary Decision Making*, was produced for review with ¶516. The IMT provided a no-objection notice on October 9, 2023. However, Module 3 was not provided during the ninth reporting period, and thus, the CPD has yet to reach Secondary compliance with ¶516.

To assess Full compliance, the IMT reviewed COPA’s memorandum and supporting documentation demonstrating that the disciplinary histories were received and considered before COPA rendered a disciplinary recommendation, as required by

¶516. COPA developed a reasonable methodology to provide a sample group of cases for review.²

Moving forward, for Secondary compliance for the CPD, we will look for delivery of the Module 3 training. We look forward to continuing our collaboration with BIA as it works to develop and revise additional individual blocks of instruction for the BIA initial in-service, initial onboard, and refresher trainings.

For COPA, we will look for documentation maintaining that COPA and its employees are acting in accordance with ¶516’s mandates. To maintain Full compliance, COPA must provide such materials in each future reporting period.

A fuller description of the history of compliance efforts, methodologies, compliance determinations for this paragraph—and each original monitorable paragraphs in the Accountability and Transparency section—is available in [Comprehensive Assessment Part I](https://cpdmonitoringteam.com/wp-content/uploads/2023/11/IMR8-Appendix-9-Accountability-and-Transparency-2023.11.01.pdf) (which included *Independent Monitoring Report 8*): <https://cpdmonitoringteam.com/wp-content/uploads/2023/11/IMR8-Appendix-9-Accountability-and-Transparency-2023.11.01.pdf>.

Paragraph 516 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: Status Update	THIRD REPORTING PERIOD MARCH 1, 2020 – DECEMBER 31, 2020 COMPLIANCE PROGRESS: Status Update
FOURTH REPORTING PERIOD JANUARY 1, 2021 – JUNE 30, 2021 COMPLIANCE PROGRESS: None	FIFTH REPORTING PERIOD JULY 1, 2021 – DECEMBER 31, 2021 COMPLIANCE PROGRESS: Preliminary	SIXTH REPORTING PERIOD JANUARY 1, 2022 – JUNE 30, 2022 COMPLIANCE PROGRESS: None
SEVENTH REPORTING PERIOD JULY 1, 2022 – DECEMBER 31, 2022 COMPLIANCE PROGRESS: Preliminary	EIGHTH REPORTING PERIOD JANUARY 1, 2023 – JUNE 30, 2023 COMPLIANCE PROGRESS: Preliminary	NINTH REPORTING PERIOD JULY 1, 2023 – DECEMBER 31, 2023 COMPLIANCE PROGRESS: Preliminary

² As of the date of this report, the IMT understands that the City, CPD, and COPA have participated in collaborative conversations due to changes in state law, which removed the five-year requirement stated in ¶516.

Accountability and Transparency: ¶517

517. The City, CPD, and COPA will ensure that findings of “Sustained – Violation Noted, No Disciplinary Action”: a. may not be used in any investigation in which the conduct resulted in injury to any person; and b. will only be used for investigations that warrant a sustained finding, but were a result of unintentional violations of policy or law.

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

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

COPA reached Full compliance while the City and the CPD maintained Preliminary compliance with ¶517 in the ninth reporting period. Because all relevant City entities must reach levels of compliance to bring the City, as a whole, into compliance, the City has not yet reached Secondary compliance.

With regard to Secondary compliance, the CPD produced a draft of its five-day BIA Onboard Training on December 1, 2022, for review with numerous paragraphs, including ¶517. The IMT provided extensive feedback on these training materials on February 13, 2023, and explained that the training was an improvement from the previous version, but still required significant revisions to provide adequate instruction and to address the designated Consent Decree paragraphs. After extensive discussions about the format of the training (one all-encompassing training rather than individual blocks of instruction), the Parties decided that BIA would move forward with producing individual blocks of instruction. During the ninth reporting period, the CPD produced eight modules of instruction for review with multiple paragraphs. Specifically, Module 3, *Credibility, Standards of Proof, and Disciplinary Decision Making*, was produced for review ¶517. The IMT provided a no-objection notice on October 9, 2023. However, Module 3 was not provided during the ninth reporting period, and thus, the CPD has yet to reach Secondary compliance.

To assess Full compliance, the IMT reviewed COPA’s memorandum and supporting documentation demonstrating compliance with ¶517 and its subparagraphs. The randomized Final Summary Reports found policy violations that did not cause injury to a person and that were unintentional violations of department policy or

law. Most notably, officers were found responsible for not activating their body worn camera.

Moving forward, for Secondary compliance for the CPD, we will look for delivery of the Module 3 training. We look forward to continuing our collaboration with BIA as it works to develop and revise additional individual blocks of instruction for the BIA initial in-service, initial onboard, and refresher trainings.

For COPA, we will look for documentation maintaining that COPA and its employees are acting in accordance with ¶1517’s mandates. To maintain Full compliance, COPA must provide such materials in each future reporting period.

A fuller description of the history of compliance efforts, methodologies, compliance determinations for this paragraph—and each original monitorable paragraphs in the Accountability and Transparency section—is available in [Comprehensive Assessment Part I](https://cpdmonitoringteam.com/wp-content/uploads/2023/11/IMR8-Appendix-9-Accountability-and-Transparency-2023.11.01.pdf) (which included *Independent Monitoring Report 8*): <https://cpdmonitoringteam.com/wp-content/uploads/2023/11/IMR8-Appendix-9-Accountability-and-Transparency-2023.11.01.pdf>.

Paragraph 517 Compliance Progress History

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

Accountability and Transparency: ¶521

521. The City, CPD, and COPA will continue to build on these critical efforts by ensuring that BIA, COPA, the Police Board, and the Deputy PSIG have sufficient funding and an adequate number of qualified staff to fulfill their respective missions as required by law, each entity's policies, and this Agreement.

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

Preliminary:	Not in Compliance
CITY	Under Assessment (SEVENTH REPORTING PERIOD)
CPD	Not in Compliance
COPA	In Compliance (SEVENTH REPORTING PERIOD)
Secondary:	Not in Compliance
CITY	Not Yet Assessed
CPD	Not Yet Assessed
COPA	In Compliance (NEW)
Full:	Not Yet Assessed

COPA reached Secondary compliance while the City and the CPD have not reached Preliminary compliance with ¶521 in the ninth reporting period. Because all relevant City entities must reach levels of compliance to bring the City, as a whole, into compliance, the City has not yet reached Preliminary compliance.

This reporting period, the CPD provided G08-01, *Complaint and Disciplinary System*, for review with ¶521, which addresses the requirements of this paragraph. The IMT provided a no-objection notice on December 9, 2023. However, as noted in previous reporting periods, the CPD must conduct an appropriate staffing and needs assessment that addresses the requirements of the paragraph for Preliminary compliance.³

This reporting period, the CPD produced its staffing and equipment needs assessments. As written, similar to prior plans the IMT reviewed, the plan suggests that Accountability Sergeants are not expected to be full-time investigators and that “[s]taffing for accountability sergeants can be fluid” due to factors such as “temporary staffing shortages that require sergeants to perform multiple functions.”

However, as we have previously explained, ¶494(b) does not provide that Accountability Sergeants merely serve in this role on a part-time basis. Rather, ¶494(b) describes Accountability Sergeants’ “**primary responsibility**” as “receiving, processing, and investigating complaints against CPD members.” See ¶494(b) (emphasis added). Given the Accountability Sergeants’ significant caseload and resulting

³ In the City’s comments to an earlier draft of this report, the City and the CPD erroneously state that policy is the only requirement for Preliminary compliance for ¶521. The methodology for Preliminary compliance for ¶521 has remained unchanged the sixth reporting period.

challenges in completing cases in a timely manner per the timeline requirements set out by CPD policy, the IMT does not believe it is realistic to expect that this role can be adequately performed on a part-time basis, and the IMT again recommends that the CPD consider Accountability Sergeants for other assignments only when their caseload of assigned investigations is current. Otherwise, the Accountability Sergeants would not be able to complete the investigations in a timely manner.

We also continue to recommend including information in the Plan regarding the number of Accountability Sergeants that are not considered full-time, the number of cases that are open, and the number of open cases that are past the timelines stated in CPD policy. We encourage the CPD and BIA to provide data that takes into consideration the caseload and duties and responsibilities of Accountability Sergeants to fully assess staffing needs and recommended including additional information in the plan regarding the primary responsibility of Accountability Sergeants to complete investigations per the timeline requirements set out by CPD policy to fully assess staffing needs related to this responsibility. Therefore, the CPD has yet to reach Preliminary compliance with ¶1521.

To assess Secondary compliance, the IMT reviewed COPA's staffing and equipment needs assessments. In its plan, COPA identifies a basis for staffing, equipment, and other resource needs building on prior levels and future plans. The 2024 plan also includes cost estimates for additional investigative staff, equipment, and space.

We look forward to reviewing City documents relevant to ¶1521 in the next reporting period. We will also look for evidence demonstrating that the City is fulfilling the requirements of this paragraph.

For the CPD, we look forward to reviewing its revised staffing and needs assessment. For COPA, we will look for documentation that COPA and its employees are acting in accordance with ¶1521's mandates.

A fuller description of the history of compliance efforts, methodologies, compliance determinations for this paragraph—and each original monitorable paragraphs in the Accountability and Transparency section—is available in *Comprehensive Assessment Part I* (which included *Independent Monitoring Report 8*): <https://cpdmonitoringteam.com/wp-content/uploads/2023/11/IMR8-Appendix-9-Accountability-and-Transparency-2023.11.01.pdf>.

Paragraph 521 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	NINTH REPORTING PERIOD JULY 1, 2023 – DECEMBER 31, 2023 COMPLIANCE PROGRESS: None

Accountability and Transparency: ¶526

526. *Within 180 days of being assigned to BIA or being hired by COPA, all new BIA personnel and COPA employees will receive initial on-boarding training that is adequate in quality, quantity, scope, and type. Within 120 days of the Effective Date, COPA and BIA will verify that all existing personnel received training that is consistent with this Agreement.*

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

Preliminary:		<i>In Compliance (NEW)</i>
	CPD	<i>In Compliance (NEW)</i>
	COPA	<i>In Compliance (THIRD REPORTING PERIOD)</i>
Secondary:		<i>Not in Compliance</i>
	CPD	<i>Not in Compliance</i>
	COPA	<i>In Compliance (FOURTH REPORTING PERIOD)</i>
Full:		<i>Not in Compliance</i>
	CPD	<i>Not Yet Assessed</i>
	COPA	<i>In Compliance (FIFTH REPORTING PERIOD)</i>

The City and the CPD reached Preliminary compliance while COPA maintained Full compliance with ¶526 in the ninth reporting period. Because all relevant City entities must reach levels of compliance to bring the City, as a whole, into compliance, the City has not yet reached Secondary compliance.

This reporting period, the CPD provided a revised S08-01, *Complaint and Investigators and Investigations*, for review, which addressed the requirements of ¶526. The IMT provided a no-objection notice on December 2, 2023.

As we have noted in previous reporting periods, to reach Preliminary compliance with ¶526, the CPD must show that it has a detailed, written plan for actually providing the training in accordance with the requirements of the paragraph. This reporting period, the CPD provided BIA’s *2024 In-Service Training Plan* and BIA’s *2024 Onboard Training Plan* for review, not including ¶526. The IMT provided a no-objection notice with feedback at the end of the reporting period. The CPD reached Preliminary compliance this reporting period. The IMT looks forward to the CPD continuing to develop the modules of instruction listed in the training plans that have yet to be developed.

Moving forward, we look forward to continuing our collaboration with BIA as it works to develop and revise additional individual blocks of instruction for the BIA initial in-service, initial onboard, and refresher trainings.

Additionally, the CPD produced BIA’s *New Intake Personnel Orientation and Training* for review with ¶526. The IMT provided comments on October 13, 2023. Overall, we did not think the quality, content, and structure of the training was to the

same standard as other approved BIA modules of instruction. For example, the Lesson Plan provides limited direction and information to the instructor regarding how to present the material and what material they must ensure the students understand. Within the Lesson Plan and PowerPoint, the CPD should discuss what the requirements of the intended paragraphs for compliance mean to BIA Investigators and Accountability Sergeants. Additionally, the training should discuss how BIA Investigators and Accountability Sergeants can accomplish the requirements of ¶526. At the end of the reporting period, the training remained in the collaborative review and revision process.

To maintain Full compliance, the IMT reviewed COPA’s training records for numerous trainings given to its employees in the ninth reporting period. The training records showed that its employees are receiving the required on-boarding training as required by the requirements of ¶526.

The City and the CPD reached Preliminary compliance with ¶526 in the ninth reporting period. COPA maintained Full compliance. In the coming reporting periods, we will look for the CPD to further develop its training materials. For COPA, we will look for evidence of continued Full compliance with ¶526’s mandates. To maintain Full compliance, COPA must provide such materials in each future reporting period.

A fuller description of the history of compliance efforts, methodologies, compliance determinations for this paragraph—and each original monitorable paragraphs in the Accountability and Transparency section—is available in *Comprehensive Assessment Part I* (which included *Independent Monitoring Report 8*): <https://cpdmonitoringteam.com/wp-content/uploads/2023/11/IMR8-Appendix-9-Accountability-and-Transparency-2023.11.01.pdf>.

Paragraph 526 Compliance Progress History

FIRST REPORTING PERIOD SEPTEMBER 1, 2019 – AUGUST 31, 2019 COMPLIANCE PROGRESS: None	SECOND REPORTING PERIOD SEPTEMBER 1, 2019 – FEBRUARY 29, 2020 COMPLIANCE PROGRESS: None	THIRD REPORTING PERIOD MARCH 1, 2020 – DECEMBER 31, 2020 COMPLIANCE PROGRESS: None
FOURTH REPORTING PERIOD JANUARY 1, 2021 – JUNE 30, 2021 COMPLIANCE PROGRESS: None	FIFTH REPORTING PERIOD JULY 1, 2021 – DECEMBER 31, 2021 COMPLIANCE PROGRESS: None	SIXTH REPORTING PERIOD JANUARY 1, 2022 – JUNE 30, 2022 COMPLIANCE PROGRESS: None
SEVENTH REPORTING PERIOD JULY 1, 2022 – DECEMBER 31, 2022 COMPLIANCE PROGRESS: 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

Accountability and Transparency: ¶527

527. Within 180 days of the Effective Date, COPA and BIA will begin providing all investigation staff members with at least eight hours of annual, comprehensive, in-service training.

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

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

The City and the CPD reached Preliminary compliance in the ninth reporting period, while COPA maintained Full compliance with ¶527. Because all relevant City entities must reach levels of compliance to bring the City, as a whole, into compliance, the City has not yet reached Secondary compliance.

This reporting period, the CPD provided a revised S08-01, *Complaint and Investigators and Investigations*, for review, which addressed the requirements of ¶527. The IMT provided a no-objection notice on December 2, 2023.

As we have noted in previous reporting periods, to reach Preliminary compliance with ¶527, the CPD must show that it has a detailed, written plan for actually providing the training in accordance with the requirements of the paragraph. This reporting period, the CPD provided BIA’s *2024 In-Service Training Plan* and BIA’s *2024 Onboard Training Plan* for review, not including ¶527. The IMT provided a no-objection notice with feedback at the end of the reporting period. The CPD reached Preliminary compliance this reporting period. The IMT looks forward to the CPD continuing to develop the modules of instruction listed in the training plans that have yet to be developed.

To maintain Full compliance, the IMT reviewed COPA’s training records for numerous trainings given to its employees in the ninth reporting period. The training records showed that more than 95% of its employees received at least eight hours of in-service training as required by the requirements of ¶527. Additionally, the IMT observed COPA’s *Compelled Statements Training*, *Criminal Conduct Training*, and *Fourth Amendment Training*. The IMT provided verbal updates regarding COPA’s continued training efforts throughout the reporting period. COPA also provided its *2024 Consent Decree Training Plan* for review, not with ¶527. The Training Plan is

sufficiently detailed to explain COPA's in-service training intentions for 2024 and continues to address the requirements of ¶527.

The City and the CPD reached Preliminary compliance in the ninth reporting period. COPA maintained Full compliance in the ninth reporting period. Moving forward, we look forward to continuing our collaboration with BIA as it works to develop and revise additional individual blocks of instruction for the BIA initial in-service, initial onboard, and refresher trainings. For COPA, we will look for COPA to continue to provide evidence that is it fully complying with ¶527's requirements. To maintain Full compliance, COPA must provide such materials in each future reporting period.

A fuller description of the history of compliance efforts, methodologies, compliance determinations for this paragraph—and each original monitorable paragraphs in the Accountability and Transparency section—is available in *Comprehensive Assessment Part I* (which included *Independent Monitoring Report 8*): <https://cpdmonitoringteam.com/wp-content/uploads/2023/11/IMR8-Appendix-9-Accountability-and-Transparency-2023.11.01.pdf>.

Paragraph 527 Compliance Progress History

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

Accountability and Transparency: ¶1528

528. *The initial and annual in-service training for COPA and BIA investigators will include instruction in: a. how to properly handle complaint intake, and the consequences for failing to take complaints; b. best practices in procedural justice, including techniques for communicating with complainants and members of the public; c. the collection of objective verifiable evidence; d. the process for seeking an override affidavit in the absence of a signed complainant affidavit; e. for COPA investigators, techniques for conducting impartial investigations of domestic violence and sexual misconduct; f. for BIA investigators, techniques for conducting impartial investigations of sexual misconduct; g. investigative skills, including proper interrogation and interview techniques, gathering and objectively analyzing evidence, and data and case management; h. the challenges of law enforcement administrative investigations, including identifying alleged misconduct that is not clearly stated in the complaint or that becomes apparent during the investigation; i. properly weighing the credibility of witnesses against CPD members; j. using objective evidence to identify and resolve inconsistent statements; k. implicit bias; l. the proper application of the relevant standards of proof; m. relevant COPA and CPD rules, policies, and protocols including the requirements of this Agreement; n. relevant state and federal law; o. relevant CPD Rules of Conduct, including Rules 14, 21, and 22; p. the CMS; q. the applicable collective bargaining agreements; and r. how to access and use the PRS or information available on the PRS.*

Compliance Progress	(Reporting Period: July 1, 2023, through December 31, 2023)
Preliminary:	<i>Not in Compliance</i>
CPD	<i>Not in Compliance</i>
COPA	<i>In Compliance (SECOND REPORTING PERIOD)</i>
Secondary:	<i>Not in Compliance</i>
CPD	<i>Not Yet Assessed</i>
COPA	<i>In Compliance (NEW)</i>
Full:	<i>Not Yet Assessed</i>

The City and the CPD did not reach Preliminary compliance with ¶1528 in the ninth reporting period. COPA reached Secondary compliance with ¶1528. Because all relevant City entities must reach levels of compliance to bring the City, as a whole, into compliance, the City has not yet reached Preliminary compliance.

In the ninth reporting period, the CPD provided a revised S08-01, *Complaint and Investigators and Investigations*, for review, which addressed the requirements of ¶1528. The IMT provided a no-objection notice on December 2, 2023. Although the policy is one requirement of Preliminary compliance for this paragraph, the CPD has not yet met Preliminary compliance. As we have noted in previous reporting periods and meetings with the CPD, the CPD must also develop individual training

lesson plans for each requirement of ¶528. Once the CPD completes this step, it will reach Preliminary compliance.⁴

This reporting period, the CPD produced *BIA's New Intake Personnel Orientation and Training* for review with ¶528. The IMT provided comments on October 13, 2023. Overall, we did not think the quality, content, and structure of the training was to the same standard as other approved BIA modules of instruction. For example, the Lesson Plan provides limited direction and information to the instructor regarding how to present the material and what material they must ensure the students understand. Within the Lesson Plan and PowerPoint, the CPD should discuss what the requirements of the intended paragraphs for compliance mean to BIA Investigators and Accountability Sergeants. Additionally, the training should discuss how BIA Investigators and Accountability Sergeants can accomplish the requirements of ¶528(i). At the end of the reporting period, the training remained in the collaborative review and revision process.

With regard to Secondary compliance, the CPD produced a draft of its five-day BIA Onboard Training on December 1, 2022, for review with numerous paragraphs. The IMT provided extensive feedback on these training materials on February 13, 2023, and explained that the training was an improvement from the previous version, but still required significant revisions to provide adequate instruction and to address the designated Consent Decree paragraphs. After extensive discussions about the format of the training (one all-encompassing training rather than individual blocks of instruction), the Parties decided that BIA would move forward with producing individual blocks of instruction. During the ninth reporting period, the CPD produced eight modules of instruction for review with multiple paragraphs. Specifically, the following Modules were produced for review with ¶528: Module 1, *Compliant Management System and Complete Investigatory Files*; Module 2, *Complaint Initiation and Affidavit Overrides*; Module 4, *Sexual Misconduct Initiation*; Module 5, *Consent Decree and Law Review*; Module 6, *SharePoint, SPARS and the Performance Recognition System (PRS)*; and Module 7, *Procedural Justice, Implicit Bias, and Conflicts of Interest*. The IMT provided no-objection notices for the aforementioned modules, and the CPD delivered the training to 95% of the required BIA personnel. Additionally, the CPD produced Module 3, *Credibility, Standards of Proof, and Disciplinary Decision Making*, and Module 8, *Audio Recording Interview Guidelines*, for review with ¶528. The IMT provided no-objection notices for Modules 3 and 8. However, Modules 3 and 8 were not provided during the ninth reporting period.

The IMT notes that the CPD must ensure that future training records are provided through clear documentation that includes who attended the training, as well as

⁴ In the City's comments to an earlier draft of this report, the City and the CPD erroneously state that policy is the only requirement for Preliminary compliance for ¶528. The methodology for Preliminary compliance for ¶528 has remained unchanged since the eighth reporting period.

who was required to attend. The IMT received clarification on the training records in January 2024, and we expect these records to be produced formally early in the tenth reporting period.

Additionally, the CPD provided BIA's *2024 In-Service Training Plan* and BIA's *2024 Onboard Training Plan* for review with ¶1528. The IMT provided a no-objection notice with feedback at the end of the reporting period. The IMT looks forward to the CPD continuing to develop the modules of instruction listed in the training plans that have yet to be developed.

Moving forward, we look forward to continuing our collaboration with BIA as it works to develop and revise additional individual blocks of instruction for the BIA initial in-service, initial onboard, and refresher trainings. Additionally, we will look for documentation that the CPD and its employees are acting in accordance with ¶1528's mandates.

This reporting period, COPA provided the IMT with records demonstrating that 97% of the required personnel attended its *Sexual Misconduct and Domestic Violence* training, which satisfy the requirements of ¶1528(e). In addition to the FETI training previously provided to COPA personnel, this demonstrates COPA's commitment to ensuring that its staff are appropriately training its personnel to conduct sexual misconduct and domestic violence investigations involving CPD personnel. COPA also provided the IMT with records demonstrating that 99% of the required personnel attended its *Fourth Amendment Training*, which satisfies the requirements of ¶1528(n) by addressing federal and state law, as well as CPD policy, as related to the Fourth Amendment in the context of administrative investigations. With these additional trainings, COPA has drafted (and the IMT has approved) the necessary curricula to satisfy the requirements of ¶1528 for Secondary compliance.⁵

The City and the CPD made efforts toward but did not reach Preliminary compliance with ¶1528 in the ninth reporting period, while COPA reached Secondary compliance. To reach further levels of compliance, the CPD will need to provide training materials that cover all listed topics in ¶1528 and its subparagraphs. For COPA, we will look for documentation that COPA and its employees are acting in accordance with ¶1528's mandates.

We continue to recognize that many of the training topics required by ¶1528 are complex and require significant time and resources to ensure that BIA Investigators, COPA Investigators, and Accountability Sergeants have a comprehensive understanding of the material. These topics largely involve new processes, procedures, directives, and technology. Additionally, many of the topics will require the

⁵ Through discussions with COPA, the IMT understands that COPA does not have access to the PRS or the information on the PRS. Therefore, COPA is unable to comply with ¶1528(r).

CPD and COPA to engage with subject matter experts to sufficiently develop and deliver the trainings. We are encouraged by the CPD and COPA’s progress and look forward to reviewing further trainings related to all the topics outlined in ¶528 and its subparagraphs.

A fuller description of the history of compliance efforts, methodologies, compliance determinations for this paragraph—and each original monitorable paragraphs in the Accountability and Transparency section—is available in [Comprehensive Assessment Part I](https://cpdmonitoringteam.com/wp-content/uploads/2023/11/IMR8-Appendix-9-Accountability-and-Transparency-2023.11.01.pdf) (which included *Independent Monitoring Report 8*): <https://cpdmonitoringteam.com/wp-content/uploads/2023/11/IMR8-Appendix-9-Accountability-and-Transparency-2023.11.01.pdf>.

Paragraph 528 Compliance Progress History

FIRST REPORTING PERIOD SEPTEMBER 1, 2019 – AUGUST 31, 2019 COMPLIANCE PROGRESS: None	SECOND REPORTING PERIOD SEPTEMBER 1, 2019 – FEBRUARY 29, 2020 COMPLIANCE PROGRESS: None	THIRD REPORTING PERIOD MARCH 1, 2020 – DECEMBER 31, 2020 COMPLIANCE PROGRESS: None
FOURTH REPORTING PERIOD JANUARY 1, 2021 – JUNE 30, 2021 COMPLIANCE PROGRESS: None	FIFTH REPORTING PERIOD JULY 1, 2021 – DECEMBER 31, 2021 COMPLIANCE PROGRESS: None	SIXTH REPORTING PERIOD JANUARY 1, 2022 – JUNE 30, 2022 COMPLIANCE PROGRESS: None
SEVENTH REPORTING PERIOD JULY 1, 2022 – DECEMBER 31, 2022 COMPLIANCE PROGRESS: 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

Accountability and Transparency: ¶1530

530. Within 90 days of the Effective Date, COPA and BIA will create separate initial and in-service training plans.

Compliance Progress

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

Preliminary:	<i>In Compliance (NEW)</i>
CPD	<i>In Compliance (NEW)</i>
COPA	<i>In Compliance (THIRD REPORTING PERIOD)</i>
Secondary:	<i>Not in Compliance</i>
CPD	<i>Not in Compliance</i>
COPA	<i>In Compliance (THIRD REPORTING PERIOD)</i>
Full:	<i>Not in Compliance</i>

The City and the CPD reached Preliminary compliance while COPA maintained Secondary compliance with ¶1530. Because all relevant City entities must reach levels of compliance to bring the City, as a whole, into compliance, the City has not yet reached Secondary compliance.

To assess Preliminary compliance, the IMT reviewed the CPD’s revised S08-01, *Complaint and Investigators and Investigations*, which addressed the requirements of ¶1530. The IMT provided a no-objection notice on December 2, 2023.

Additionally, the CPD provided BIA’s *2024 In-Service Training Plan* and BIA’s *2024 Onboard Training Plan* for review with ¶1530. The IMT provided a no-objection notice with feedback at the end of the reporting period. The IMT looks forward to the CPD continuing to develop the modules of instruction listed in the training plans that have yet to be developed.

Moving forward, we look forward to continuing our collaboration with BIA as it works to develop and revise additional individual blocks of instruction for the BIA initial in-service, initial onboard, and refresher trainings. Additionally, we will look to determine that the CPD’s training plans under ¶1528 are sufficient.

This reporting period, COPA maintained Secondary compliance by providing its *2024 Training Plan* for review with ¶1530. The IMT looks forward to receiving documentation in future reporting periods to determine whether COPA is implementing the initial and in-service training plans as developed and approved by the IMT and OAG.

The CPD reached Preliminary compliance with ¶1530, and COPA maintained Secondary compliance in the ninth reporting period. In the next reporting period, for CPD, we will look forward to reviewing lesson plans and observing instruction relevant to this paragraph. For COPA, we look forward to reviewing whether it is fully

implementing its initial and in-service training plans, per the requirements of ¶1530.

A fuller description of the history of compliance efforts, methodologies, compliance determinations for this paragraph—and each original monitorable paragraphs in the Accountability and Transparency section—is available in *Comprehensive Assessment Part I* (which included *Independent Monitoring Report 8*): <https://cpdmonitoringteam.com/wp-content/uploads/2023/11/IMR8-Appendix-9-Accountability-and-Transparency-2023.11.01.pdf>.

Paragraph 530 Compliance Progress History

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

Accountability and Transparency: ¶531

531. In order to function effectively, CPD’s accountability system must protect the due process rights of involved CPD members. In order to build public trust and credibility, CPD must provide opportunities for meaningful community engagement that extends beyond the complaint process. The Police Board strives to play the important dual roles of protecting CPD members’ due process rights and providing a platform for regular community feedback. The City will ensure that the Police Board has adequate resources, training, and institutional support to fulfill its important duties.

Compliance Progress	(Reporting Period: July 1, 2023, through December 31, 2023)
Preliminary:	<i>In Compliance (NEW)</i>
CPD	<i>In Compliance (NEW)</i>
Police Board	<i>In Compliance (SIXTH REPORTING PERIOD)</i>
Secondary:	<i>Under Assessment (SIXTH REPORTING PERIOD)</i>
CPD	<i>Under Assessment (SIXTH REPORTING PERIOD)</i>
Police Board	<i>In Compliance (SIXTH REPORTING PERIOD)</i>
Full:	<i>Under Assessment (SIXTH REPORTING PERIOD)</i>
CPD	<i>Under Assessment (SIXTH REPORTING PERIOD)</i>
Police Board	<i>In Compliance (NEW)</i>

The City and the CPD reached Preliminary compliance while the Police Board regained Full compliance with ¶531 in the ninth reporting period. The CPD remains under assessment for Secondary and Full compliance because further discussion is required between the City, the CPD, the Police Board, the Office of the Illinois Attorney General, and the IMT.

To assess Preliminary compliance, the IMT reviewed the CPD’s G08-01, *Complaint and Disciplinary System*, which addressed the requirements of this paragraph. The IMT provided a no-objection notice on December 9, 2023.

This reporting period, the Police Board provided a letter indicating that it has adequate physical, equipment, and personnel resources to adequately perform its assigned duties. The letter also stated that the City provides training to Police Board employees on a variety of topics that support the Police Board’s efforts to fulfill its duties. The Police Board further explained that it provides an in-depth assessment of the Police Board’s resources and needs on an annual basis as part of the City’s annual budget process to ensure that the Police Board has sufficient resources for each upcoming year. The Police Board regained Full compliance with ¶531 in the ninth reporting period.

The CPD remains under assessment for Secondary and Full compliance. As we explained last reporting period, additional conversations with the Parties are necessary to ascertain the measurable requirements set out by this paragraph and how the CPD should begin to move toward compliance.

For the Police Board, as we noted last reporting period, to maintain Full compliance, we must receive documentation pertaining to the requirements of ¶531 each reporting period, even if it is a memorandum noting that there are no updates to efforts regarding ¶531.

A fuller description of the history of compliance efforts, methodologies, compliance determinations for this paragraph—and each original monitorable paragraphs in the Accountability and Transparency section—is available in *Comprehensive Assessment Part I* (which included *Independent Monitoring Report 8*): <https://cpdmonitoringteam.com/wp-content/uploads/2023/11/IMR8-Appendix-9-Accountability-and-Transparency-2023.11.01.pdf>.

Paragraph 531 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: Under Assessment
SEVENTH REPORTING PERIOD JULY 1, 2022 – DECEMBER 31, 2022 COMPLIANCE PROGRESS: Under Assessment	EIGHTH REPORTING PERIOD JANUARY 1, 2023 – JUNE 30, 2023 COMPLIANCE PROGRESS: Under Assessment	NINTH REPORTING PERIOD JULY 1, 2023 – DECEMBER 31, 2023 COMPLIANCE PROGRESS: Preliminary

Accountability and Transparency: ¶532

532. Within 180 days of the Effective Date, the City will draft selection criteria for Police Board members with the objective of identifying individuals who possess sufficient experience, judgment, and impartiality to perform the duties of members of the Police Board. Selection criteria may include prior work in law or law enforcement, and service with Chicago-based community and non-profit organizations. The draft selection criteria will be published on the Police Board's website for a period of 30 days for public review and comment. Following the 30-day public review and comment period, the City will provide the draft criteria to OAG for review and comment. The final selection criteria will be published and maintained on the Police Board's website. The City will ensure that the selection criteria are the basis for future selection of Police Board members.

Compliance Progress

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

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

The City maintained Preliminary compliance with ¶532 in the ninth reporting period.

With the creation of the Community Commission for Public Safety and Accountability (CCPSA), the Police Board is no longer responsible or accountable for the requirements of ¶532. During this reporting period, the CCPSA took on the responsibility for filling the vacant positions for Police Board members. On November 30, 2023, the City produced material attempting to demonstrate CCPSA's continued compliance with ¶532. The material included CCPSA's *Police Board Member Selection Procedures*, which addressed the requirements of this paragraph. Thus, the City maintained Preliminary compliance.

However, the material contained no information on candidates or whether the selection criteria was followed in making recommendations to the Mayor for filling Police Board member vacancies during the ninth reporting period. Collectively, the six candidates submitted to the Mayor for selection did not fully meet the requirements of ¶532. The Mayor rejected five of the six candidates, and then the CCPSA missed the 30-day deadline for providing additional candidates. Thus, the CCPSA did not follow the established selection process and criteria previously developed by the Police Board and the City.

The City maintained Preliminary compliance with ¶532. Moving forward, we will determine whether the CCPSA developed a process for properly applying the selection criteria should a vacancy occur.

A fuller description of the history of compliance efforts, methodologies, compliance determinations for this paragraph—and each original monitorable paragraphs in the Accountability and Transparency section—is available in [Comprehensive Assessment Part I](https://cpdmonitoringteam.com/wp-content/uploads/2023/11/IMR8-Appendix-9-Accountability-and-Transparency-2023.11.01.pdf) (which included *Independent Monitoring Report 8*): <https://cpdmonitoringteam.com/wp-content/uploads/2023/11/IMR8-Appendix-9-Accountability-and-Transparency-2023.11.01.pdf>.

Paragraph 532 Compliance Progress History

FIRST REPORTING PERIOD SEPTEMBER 1, 2019 – AUGUST 31, 2019 COMPLIANCE PROGRESS: None	SECOND REPORTING PERIOD SEPTEMBER 1, 2019 – FEBRUARY 29, 2020 COMPLIANCE PROGRESS: 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	NINTH REPORTING PERIOD JULY 1, 2023 – DECEMBER 31, 2023 COMPLIANCE PROGRESS: Preliminary

Accountability and Transparency: ¶544

544. The City, CPD, and COPA recognize the importance of transparency to improving CPD-community relations, and the City, CPD, and COPA have taken important steps to increase transparency about their operations, including how they conduct investigations into CPD member misconduct. The City, CPD, and COPA will continue to take steps to increase transparency, including the implementation of the requirements set forth below.

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

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

The City and the CPD reached Preliminary compliance while COPA maintained Full compliance with ¶544 in the ninth reporting period. Because all relevant City entities must reach levels of compliance to bring the City, as a whole, into compliance, the City has not yet reached Secondary compliance.

To assess Preliminary compliance, the IMT reviewed the CPD’s G08-01, *Complaint and Disciplinary System*, which addresses the requirements of this paragraph. The IMT provided a no-objection notice on December 9, 2023.

COPA maintained Full compliance by posting timely and accurate quarterly reports within fifteen days on its website. Although the production of these reports to the IMT is often slowed by the administrative process of the City, the IMT is able to view the COPA website to know that the reports are posted in a timely manner. The quarterly reports continue each quarter, providing the reader with background information and specific data that address the transparency requirements of ¶544.

We look forward to reviewing various data sources, including the CPD’s quarterly and annual reports to determine if those reports comply with the policies aimed at promoting transparency, and determine whether the CPD is engaging with the community related to their policies and directives.

For COPA, we will look for evidence that it continues to prioritize transparency by timely providing information to the public, and self-assessing how it can further

improve transparency with the public. We expect to receive evidence of continued compliance in each reporting period to maintain Full compliance.

A fuller description of the history of compliance efforts, methodologies, compliance determinations for this paragraph—and each original monitorable paragraphs in the Accountability and Transparency section—is available in [Comprehensive Assessment Part I](https://cpdmonitoringteam.com/wp-content/uploads/2023/11/IMR8-Appendix-9-Accountability-and-Transparency-2023.11.01.pdf) (which included *Independent Monitoring Report 8*): <https://cpdmonitoringteam.com/wp-content/uploads/2023/11/IMR8-Appendix-9-Accountability-and-Transparency-2023.11.01.pdf>.

Paragraph 544 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	NINTH REPORTING PERIOD JULY 1, 2023 – DECEMBER 31, 2023 COMPLIANCE PROGRESS: Preliminary

Accountability and Transparency: ¶551

551. BIA's quarterly and annual reports will include data reflecting investigations conducted by the districts.

Compliance Progress

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

Recurring Schedule:	Quarterly	<input checked="" type="checkbox"/>	Met	<input type="checkbox"/>	Missed
Recurring Schedule:	Annually	<input checked="" type="checkbox"/>	Met	<input type="checkbox"/>	Missed

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

The City and the CPD maintained Secondary compliance with ¶551 in the ninth reporting period.

In the ninth reporting period, the CPD provided the IMT with BIA's Second and Third Quarter 2023 Reports. The Reports included data on investigations assigned to the individual districts and units for investigations. This addressed the requirements of ¶551, therefore, maintaining Secondary compliance with this paragraph.

In the coming reporting periods, we will look for BIA to continue to provide quarterly and annual reports that comply with the requirements of ¶551 in a timely manner to allow for adequate review and discussion with the CPD. Specifically, the IMT will look to determine whether the CPD's quarterly and annual reports are timely completed and sufficiently capture data reflecting investigations conducted by the districts. We also look forward to reviewing BIA's 2024 Annual Report in the next reporting period.

A fuller description of the history of compliance efforts, methodologies, compliance determinations for this paragraph—and each original monitorable paragraphs in the Accountability and Transparency section—is available in *Comprehensive Assessment Part I* (which included *Independent Monitoring Report 8*): <https://cpdmonitoringteam.com/wp-content/uploads/2023/11/IMR8-Appendix-9-Accountability-and-Transparency-2023.11.01.pdf>.

Paragraph 551 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:
Secondary

NINTH REPORTING PERIOD
JULY 1, 2023 – DECEMBER 31, 2023

COMPLIANCE PROGRESS:
Secondary

Accountability and Transparency: ¶1552

552. For non-disciplinary purposes, including historical trend analysis, CPD will track, for each CPD member, for every misconduct investigation: the nature of allegations, the outcome of the investigation, and the disposition of discipline.

Compliance Progress

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

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

The City and the CPD reached Secondary compliance with ¶1552 in the ninth reporting period.

With regard to Secondary compliance, the CPD produced a draft of its five-day BIA Onboard Training on December 1, 2022, for review with numerous paragraphs, not including ¶1552. The IMT provided extensive feedback on these training materials on February 13, 2023, and explained that the training was an improvement from the previous version, but still required significant revisions to provide adequate instruction and to address the designated Consent Decree paragraphs. After extensive discussions about the format of the training (one all-encompassing training rather than individual blocks of instruction), the Parties decided that BIA would move forward with producing individual blocks of instruction. During the ninth reporting period, the CPD produced eight modules of instruction for review with multiple paragraphs. Specifically, Module 1, *Compliant Management System and Complete Investigatory Files*, was produced for review with ¶1552. The IMT provided a no-objection notice on September 27, 2023, and the CPD delivered the training to 95% of the required BIA personnel. The CPD reached Secondary compliance with ¶1552.

Although the CPD reached Secondary compliance this reporting period with ¶1552, the CPD must ensure that future training records are provided through clear documentation that includes who attended the training, as well as who was required to attend. The IMT received clarification on the training records in January 2024, and we expect these records to be produced formally early in the tenth reporting period.

Moving forward, we look forward to continuing our collaboration with BIA as it works to develop and revise additional individual blocks of instruction for the BIA initial in-service, initial onboard, and refresher trainings. Additionally, we will look for documentation that the CPD and its employees are acting in accordance with ¶1552's mandates.

A fuller description of the history of compliance efforts, methodologies, compliance determinations for this paragraph—and each original monitorable paragraphs in the Accountability and Transparency section—is available in [Comprehensive Assessment Part I](https://cpdmonitoringteam.com/wp-content/uploads/2023/11/IMR8-Appendix-9-Accountability-and-Transparency-2023.11.01.pdf) (which included *Independent Monitoring Report 8*): <https://cpdmonitoringteam.com/wp-content/uploads/2023/11/IMR8-Appendix-9-Accountability-and-Transparency-2023.11.01.pdf>.

Paragraph 552 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: Status Update	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: 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

Accountability and Transparency: ¶564

564. *The Deputy PSIG will exercise his or her discretionary and oversight responsibilities without interference from any person, group, or organization, including CPD, COPA, the Police Board, and City officials. Any person that knowingly interferes with the Deputy PSIG’s performance of his or her duties will be subject to the penalties set forth in Municipal Code of Chicago Sections 2-56-140, 145, 270.*

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

Preliminary:		<i>In Compliance (NEW)</i>
	CPD	<i>In Compliance (NEW)</i>
	COPA	<i>In Compliance (SEVENTH REPORTING PERIOD)</i>
	Police Board	<i>Not in Compliance</i>
Secondary:		<i>Not Yet Assessed</i>
	CPD	<i>Not Yet Assessed</i>
	COPA	<i>In Compliance (EIGHTH REPORTING PERIOD)</i>
	Police Board	<i>Not Yet Assessed</i>
Full:		<i>Not Yet Assessed</i>
	CPD	<i>Not Yet Assessed</i>
	COPA	<i>In Compliance (NEW)</i>
	Police Board	<i>Not Yet Assessed</i>

The CPD reached Preliminary compliance with ¶564 in the ninth reporting period. The Police Board did not reach Preliminary compliance. COPA reached Full compliance with ¶564. Because all relevant City entities must reach levels of compliance to bring the City, as a whole, into compliance, the City has not yet reached Preliminary compliance.

To assess Preliminary compliance, the IMT reviewed the CPD’s G08-01, *Complaint and Disciplinary System*, which addressed the requirements of this paragraph. The IMT provided a no-objection notice on December 9, 2023.

The Police Board produced documentation reflecting PSIG’s requests to the Police Board for aggregate data and specific case information of the Police Board. The documentation indicated that the Police Board responded in a timely and thorough manner to each specific request or comment. However, as we explained in prior reports, to reach Preliminary compliance, each entity must produce written guidance such as a policy that captures the requirement of this paragraph.

This reporting period, COPA produced a memorandum indicating it is “unaware of any interference” with PSIG’s requests. The memorandum further indicates that COPA has created systems and procedures to ensure any such interference is detected and reported appropriately. The procedures include monthly calls with PSIG/OIG to review requests and to identify any potential interference. COPA also

posted a reminder to COPA employees on the prohibition on PSIG interference and provided reporting guidelines for any such interference. COPA reached Full compliance with ¶564 this reporting period.

Additionally, PSIG produced a memorandum this reporting period stating that “PSIG is unaware of any interference from any person, group, organization—including CPD, COPA, the Police Board, and City officials—that has impaired or affected its ability to conduct its discretionary and oversight responsibilities.”

Moving forward, we will look for the Police Board to produce written guidance such as a policy that captures the requirements of this paragraph. For the CPD, we will determine whether systems are in place to detect and report any interference from the CPD and implement appropriate penalties. For COPA, we expect to receive evidence of continued compliance in each reporting period to maintain Full compliance.

A fuller description of the history of compliance efforts, methodologies, compliance determinations for this paragraph—and each original monitorable paragraphs in the Accountability and Transparency section—is available in [Comprehensive Assessment Part I](https://cpdmonitoringteam.com/wp-content/uploads/2023/11/IMR8-Appendix-9-Accountability-and-Transparency-2023.11.01.pdf) (which included *Independent Monitoring Report 8*): <https://cpdmonitoringteam.com/wp-content/uploads/2023/11/IMR8-Appendix-9-Accountability-and-Transparency-2023.11.01.pdf>.

Paragraph 564 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	NINTH REPORTING PERIOD JULY 1, 2023 – DECEMBER 31, 2023 COMPLIANCE PROGRESS: None