

Independent Monitoring Report
Impartial Policing
Compliance Assessments by Paragraph

Impartial Policing: ¶52

52. In developing or revising policies and training referenced in this section, the CPD will seek input from members of the community and community-based organizations with relevant knowledge and experience through community engagement efforts.

Compliance Progress

(Reporting Period: January 1, 2024, through June 30, 2024)

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

In the tenth reporting period, the City and the CPD maintained Preliminary compliance with the requirements of ¶52. Although no changes to compliance progress have been made during this reporting period, the IMT wanted to annotate the work that has taken place in regard to ¶52.

During this reporting period, the IMT reviewed the CPD’s *Racial Equity Action Plan*, meeting minutes from the Training Community and Advisory Committee (TCAC) meeting minutes, and a draft outline of its *Community Engagement Plan*, as well as other supporting documents. While supportive in the demonstration of compliance with this paragraph, achieving Secondary compliance with this paragraph will require that the CPD implement a formal process for seeking input from members of the community and community-based organizations in the development or revision of policies and training relative to impartial policing.

The IMT last reviewed and commented on D22-08, *Community Engagement in Policy Development Pilot*, in March of 2023. Comments from the IMT largely focused on the need to also revise and update the related policy, G01-03-01 *Community Engagement in Policy Development*, and to identify performance metrics and objectives for the pilot. It is the IMT’s understanding that the pilot was not formally implemented as the CPD continued to revise the directive and related policy. Subsequently, the CPD also presented to the IMT iterations of these proposed changes to the policy and process, none of which were finalized or formally produced. In April of 2024, the IMT met with the CPD on site and discussed a potential framework for its *Community Engagement Plan*. In May 2024, the CPD informally produced a revised draft of its *Community Engagement Plan*. In June 2024, the IMT informally submitted comments recommending that the plan be further streamlined and encompassing of the community engagement processes and strategies at both the CPD wide and district level. The finalization of the policy and incorporation of this process into the CPD’s *Community Engagement Plan* will be imperative to moving compliance forward. It will also be imperative for the CPD to involve the OAG in the review process once finalized.

Moving forward, to further maintain Preliminary compliance in future reporting periods, the CPD must finalize the *Community Engagement in Policy*, G01-03-01. Further, this process should be outlined in the CPD’s *Community Engagement Plan* as it is one mechanism for which to engage and seek input from the community in its larger community engagement efforts. *See, e.g.*, ¶10 (“CPD will ensure that its community policing philosophy is a core component of its provision of police services, crime reduction strategies and tactics, training, management, resource deployment, and accountability systems. All CPD members will be responsible for furthering this philosophy and employing the principles of community policing, which include trust and legitimacy; community engagement; community partnerships; problem-solving; and the collaboration of CPD, City agencies, and members of the community to promote public safety.”).¹

To achieve Secondary compliance, the CPD must demonstrate that the process has been implemented, per policy, and that the feedback gathered from the community on policy and training is incorporated. Full compliance will be contingent on the CPD’s ability to demonstrate the sustainability of this process. The IMT intends to review and seek input from the community on this process along with reviewing related data on the usage and success of the process to assess Full compliance.

A fuller description of the history of compliance efforts, methodologies, compliance determinations for this paragraph—and each original monitorable paragraphs in the Impartial Policing section—is available in *Comprehensive Assessment Part I* (which included *Independent Monitoring Report 8*): <https://cpdmonitoring-team.com/wp-content/uploads/2024/06/IMR8-Appendix-2-Impartial-Policing-2023.11.01.pdf>.

¹ In setting forth the guiding principles of its community policing requirements, the Consent Decree sets forth community engagement as a core principle.

Paragraph 52 Compliance Progress History

FIRST REPORTING PERIOD MARCH 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: Preliminary
TENTH REPORTING PERIOD JANUARY 1, 2024 – JUNE 30, 2024 COMPLIANCE PROGRESS: Preliminary		

Impartial Policing: ¶53

53. The CPD will, consistent with this Agreement, ensure that its policies and practices prohibit discrimination on the basis of any protected class under federal, state, and local law, including race, color, sex, gender identity, age, religion, disability, national origin, ancestry, sexual orientation, marital status, parental status, military status, source of income, credit history, criminal record, or criminal history. The CPD’s policies and practices will prohibit retaliation consistent with Section 6-101 of the Illinois Human Rights Act (eff. Jan, 1, 2015) and Section 2-160-100 of the Municipal Code of Chicago (amended Oct. 11, 2017).

Compliance Progress

(Reporting Period: January 1, 2024, through June 30, 2024)

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

In the tenth reporting period, the City and the CPD achieved Preliminary compliance with ¶53.

This reporting period, the City and the CPD delivered the *Equity Framework*, which incorporates the requirements of ¶53. The Framework outlines the specific policies and training that refer to impartial policing as outlined in this paragraph. These policies and trainings are meant to serve as the primary foundation for ensuring fair and equitable policing throughout the CPD. The City and the CPD also produced a revised Search Warrants Policy Suite and related forms during this reporting period in support of Preliminary compliance with this paragraph along with ¶54–55. By the end of the reporting period, this policy remained in the collaborative review and revision phase.

During this reporting period, the CPD also began working with a third-party contractor to assist in the development of the CPD’s Equity Plan/Strategy. The Plan will not only outline the CPD’s efforts to ensure fair and equitable policing but will also include broader aspects of equity internal to the CPD, such as in recruitment and performance evaluations.

Moving forward, to assess Secondary compliance, the IMT will evaluate the CPD’s ability to incorporate this framework into the broader department Equity Office Plan or Strategy and in completing the revisions and/or development of the policies identified in the framework, if not already completed. Full compliance will be assessed by evaluating the outcomes of the practical application of the concepts outlined in the impartial policing policies.

A fuller description of the history of compliance efforts, methodologies, compliance determinations for this paragraph—and each original monitorable paragraphs in the Impartial Policing section—is available in *Comprehensive Assessment Part I* (which included *Independent Monitoring Report 8*): <https://cpdmonitoring-team.com/wp-content/uploads/2024/06/IMR8-Appendix-2-Impartial-Policing-2023.11.01.pdf>.

Paragraph 53 Compliance Progress History

FIRST REPORTING PERIOD MARCH 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: None
TENTH REPORTING PERIOD JANUARY 1, 2024 – JUNE 30, 2024 COMPLIANCE PROGRESS: Preliminary		

Impartial Policing: ¶64

64. Within 180 days of the Effective Date, the CPD will review and, to the extent necessary, revise its language access policy to provide meaningful access to the CPD programs and services for individuals who have a limited ability to speak, read, write, or understand English. The CPD will ensure that its language access policy provides timely and meaningful access to police services for individuals with limited English proficiency ("LEP"). The CPD will also require that qualified and Department-authorized interpreters are used in accordance with the CPD policy, including for the provision of Miranda warnings. The CPD will publish its language access policy on its website and, consistent with the requirements of Paragraph 28 of the Community Policing section of this Agreement, make the policy available to community-based groups serving LEP communities in Chicago.

Compliance Progress

(Reporting Period: January 1, 2024, through June 30, 2024)

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

The City and the CPD achieved Preliminary compliance with ¶64 during the tenth reporting period.

To assess Preliminary compliance, the IMT reviewed the CPD's revised version of its *Interactions with Persons with Limited English Proficiency* policy, S02-01-05, and provided a no-objection notice. The policy and supporting documentation produced during this reporting period addressed previous comments and feedback and outlined the use of the Language Line, the role of the Language Access Coordinator, and resources available to ensure proper services to those with limited English proficiency.

During this reporting period, the CPD also contracted a third-party contractor to establish the authorization process for multilingual officers. This authorization process will ensure greater compliance with the paragraph requirements. Further, once the authorization process is established, the CPD must update and revise S02-01-05 to include this additional detail and process to maintain Preliminary compliance with ¶64.

Moving forward, we will assess Secondary compliance based on the CPD's implementation of the training on the related policy and its completion of the language authorization process for its officers. Full compliance will be assessed by evaluating the practical implementation of the policy (*i.e.*, translation and post of documents in multiple languages) and training along with feedback from respective community members and officers on their perspectives about the ease of use and access to Language Line and multilingual CPD-authorized officers.

A fuller description of the history of compliance efforts, methodologies, compliance determinations for this paragraph—and each original monitorable paragraphs in the Impartial Policing section—is available in *Comprehensive Assessment Part I* (which included *Independent Monitoring Report 8*): <https://cpdmonitoring-team.com/wp-content/uploads/2024/06/IMR8-Appendix-2-Impartial-Policing-2023.11.01.pdf>.

Paragraph 64 Compliance Progress History

FIRST REPORTING PERIOD MARCH 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: None
TENTH REPORTING PERIOD JANUARY 1, 2024 – JUNE 30, 2024 COMPLIANCE PROGRESS: Preliminary		

Impartial Policing: ¶68

68. Before January 1, 2020, CPD will review and, to the extent necessary, revise its policies and practices for ensuring effective communication and meaningful access to CPD programs, services, and activities for individuals with physical, mental, or developmental disabilities. These policies will identify specific procedures and responsibilities applicable to circumstances in which CPD officers encounter persons with intellectual or developmental disabilities, autism, dementia, blindness, deafness, hearing loss, and mobility disabilities, including, but not limited to: a. properly defining terms related to individuals with disabilities and the disability community; b. providing reasonable accommodations, to the extent safe and feasible, in order to facilitate CPD officer encounters with individuals with a disability; c. the arrest and transport of individuals with disabilities or who require the assistance of ambulatory devices; and d. using qualified and Department-authorized interpreters, consistent with CPD policy, to communicate with people who are deaf, hard of hearing, or who have a speech impairment, including for the provision of Miranda warnings.

Compliance Progress

(Reporting Period: January 1, 2024, through June 30, 2024)

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

The City and the CPD did not achieve Preliminary compliance regarding this paragraph because the CPD has not finished revising its policies for ensuring effective communication and meaningful access to CPD services for individuals with physical, mental, or developmental disabilities.

To assess Preliminary compliance, the IMT assessed compliance based on the quality of directive S02-01-01, *People with Disabilities*, along with the related sub policies, and extent of community engagement in its development.

At the end of the ninth reporting period, the CPD and the City produced the draft *S02-07 Interactions with Persons with Disabilities*, for which the IMT submitted comments. During this reporting period, the City and the CPD also produced *S02-07, Interactions with Persons with Persons Who are Deaf, Hard of Hearing, or Deaf-Blind*. The policy, which was developed with input from the Chicago Hearing Society was reviewed and commented on by the IMT. No further drafts of these policies or the other sub policies in this suite were provided during the tenth reporting period. The IMT expects that the CPD will produce drafts of the remaining policies in this suite in the eleventh reporting period and encourages the department to seek input from community stakeholders in this process.

The City and the CPD did produce a revised *Constitutional Policing* course in this reporting period, which includes training concepts ancillary to this paragraph. On March 1, 2023, the IMT provided a no-objection on this training and appreciates

the inclusion of content related to this paragraph. However, the IMT cautions that the CPD will need to review the training once it finalizes S02-01-01 and its sub-policies to ensure alignment and consistency with the final policies.

Moving forward, we will assess the CPD’s efforts to finalize S02-01-01 and its sub policies and incorporate these requirements into training. We will also continue to assess the CPD’s efforts to engage relevant disability communities and their advocates. The IMT stresses that it is imperative that the CPD substantively engage those community organizations and stakeholders in the policy development process. It is the input of these community members, who will be most impacted by such policies, that will ensure their comprehensiveness and accuracy.

After the CPD finalizes S02-01-01 and any sub policies related to this paragraph, we will assess the CPD’s efforts to train its officers on the updated policies, including the extent to which training aligns with the CPD’s efforts to comply with ¶69.

A fuller description of the history of compliance efforts, methodologies, compliance determinations for this paragraph—and each original monitorable paragraphs in the Impartial Policing section—is available in *Comprehensive Assessment Part I* (which included *Independent Monitoring Report 8*): <https://cpdmonitoring-team.com/wp-content/uploads/2024/06/IMR8-Appendix-2-Impartial-Policing-2023.11.01.pdf>.

Paragraph 68 Compliance Progress History

FIRST REPORTING PERIOD MARCH 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: None
TENTH REPORTING PERIOD JANUARY 1, 2024 – JUNE 30, 2024 COMPLIANCE PROGRESS: None		

Impartial Policing: ¶72

72. The Parties recognize that training is a necessary component of impartial policing. The CPD will integrate the concept of impartial policing into related the CPD training courses when appropriate, including, but not limited to, use of force courses, weapons training courses, and Fourth Amendment subjects courses.

Compliance Progress

(Reporting Period: January 1, 2024, through June 30, 2024)

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

In the tenth reporting period, the City and the CPD achieved Preliminary compliance with ¶72.

This reporting period, the City and the CPD delivered the *Equity Framework*, which incorporates the requirements of ¶72. The *Equity Framework* outlines the specific policies and training that refer to impartial policing as outlined in this paragraph. These policies and trainings are meant to serve as the primary foundation for ensuring fair and equitable policing throughout the CPD.

During this reporting period, the CPD also began working with a third-party contractor to assist in the development of the CPD’s Equity Plan/Strategy. The Plan will not only outline the department’s efforts to ensure fair and equitable policing but will also include broader aspects of equity internal to the CPD, such as in recruitment and performance evaluations.

Moving forward, to assess Secondary compliance, the IMT will evaluate the CPD’s ability to incorporate this framework into the broader department Equity Office Plan or Strategy and in completing the revisions and/or development of the trainings identified in the framework, if not already completed. These further, should also be outlined in the CPD annual training plans as appropriate. Full compliance will be assessed by evaluating the outcomes of the practical application of the concepts outlined in the impartial policing trainings.

A fuller description of the history of compliance efforts, methodologies, compliance determinations for this paragraph—and each original monitorable paragraphs in the Impartial Policing section—is available in *Comprehensive Assessment Part I* (which included *Independent Monitoring Report 8*): <https://cpdmonitoring-team.com/wp-content/uploads/2024/06/IMR8-Appendix-2-Impartial-Policing-2023.11.01.pdf>.

Paragraph 72 Compliance Progress History

FIRST REPORTING PERIOD MARCH 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: None
TENTH REPORTING PERIOD JANUARY 1, 2024 – JUNE 30, 2024 COMPLIANCE PROGRESS: Preliminary		

Impartial Policing: ¶78

78. Within 180 days following the expiration of each calendar year of the term of this Agreement, the CPD will publish an annual report summarizing reported hate crimes and non-criminal incidents motivated by hate during the previous calendar year (“The CPD Hate Crime Report”). The CPD Hate Crime Report will provide information regarding the total number of reported hate crimes and non-criminal incidents motivated by hate, organized by type of crime, classification of bias motivation, and disposition of hate crime investigations in each district.

Compliance Progress

(Reporting Period: January 1, 2024, through June 30, 2024)

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

In the tenth reporting period, the City and the CPD achieved Full compliance with the requirements of ¶78.

During this reporting period, the IMT reviewed the CPD’s *2023 Annual Hate Crimes Annual Report*. The publication of the 2023 report along with the CPD’s consistency producing prior annual reports meets the requirements for Full compliance with ¶78. The IMT also notes that General Order G04-06 *Hate Crimes* was informally produced during this reporting period. The IMT expects to receive the formal production of this finalized policy and related community engagement input in the eleventh reporting period and will be assessed as part of paragraph ¶76.

Moving forward, to maintain Full compliance, the IMT will assess the CPD’s ability to maintain an annual production of this report, as required by ¶78.

A fuller description of the history of compliance efforts, methodologies, compliance determinations for this paragraph—and each original monitorable paragraphs in the Impartial Policing section—is available in *Comprehensive Assessment Part I* (which included *Independent Monitoring Report 8*): <https://cpdmonitoring-team.com/wp-content/uploads/2024/06/IMR8-Appendix-2-Impartial-Policing-2023.11.01.pdf>.

Paragraph 78 Compliance Progress History

FIRST REPORTING PERIOD MARCH 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: Secondary	EIGHTH REPORTING PERIOD JANUARY 1, 2023 – JUNE 30, 2023 COMPLIANCE PROGRESS: Secondary	NINTH REPORTING PERIOD JULY 1, 2023 – DECEMBER 31, 2023 COMPLIANCE PROGRESS: Secondary
TENTH REPORTING PERIOD JANUARY 1, 2024 – JUNE 30, 2024 COMPLIANCE PROGRESS: Full		