# Independent Monitoring Report 10 Officer Wellness and Support Compliance Assessments by Paragraph

**387.** Within 180 days of the Effective Date, CPD will develop and implement a roll call training to explain and address the effects on Firearm Owners Identification ("FOID") card eligibility, if any, when a CPD member seeks or receives CPD support services, including, but not limited to, counseling and mental health treatment.

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

Preliminary: In Compliance (SECOND REPORTING PERIOD)
Secondary: In Compliance (THIRD REPORTING PERIOD)

Full: In Compliance (NEW)

The City and the CPD achieved Full compliance with ¶387 during the tenth reporting period.

In previous reporting periods, the CPD achieved Preliminary and Secondary compliance with ¶387 by developing FOID card roll-call training, providing documentation demonstrating that 99% of eligible employees had received the training, and providing post-training survey data indicating the CPD members found the training helpful. Additionally, the CPD incorporated FOID card revocation into other relevant trainings, including the 2022 CIT In-Service Training and the FOID Mental Health Card Eligibility eLearning training.

During the tenth reporting period, the CPD provided evidence of continued compliance with ¶387 with a submission detailing new employee completions of the *Mental Health Treatment FOID Card Eligibility* training. The CPD provided documentation indicating that the completion rate for the training was 98.76%.

In our efforts to monitor the CPD's sustained compliance with ¶387, the IMT will look for the CPD to continue to produce the documentation of training completion for the *FOID Card Eligibility* training for all CPD members, including recruits.

Further, to ensure member awareness of any implications that seeking mental health services may have on FOID card eligibility, the IMT suggests the CPD consider uploading relevant information (including a list of frequently asked questions) onto the Cordico Wellness app.

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A fuller description of the history of compliance efforts, methodologies, compliance determinations for this paragraph—and each monitorable paragraph in the Officer Wellness and Support section—is available in *Comprehensive Assessment* 

Part I (which included Independent Monitoring Report 8): https://cpdmonitoringteam.com/wp-content/uploads/2024/06/IMR8-Appendix-8-Officer-Wellnessand-Support-2023.11.01.pdf.

## Paragraph 387 Compliance Progress History

FIRST REPORTING PERIOD COMPLIANCE PROGRESS:

None

COMPLIANCE PROGRESS:

Secondary

SEVENTH REPORTING PERIOD EIGHTH REPORTING PERIOD NINTH REPORTING PERIOD JULY 1, 2022 – DECEMBER 31, 2022 JANUARY 1, 2023 – JUNE 30, 2023 JULY 1, 2023 – DECEMBER 31, 202 COMPLIANCE PROGRESS:

Secondary

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

Full

SECOND REPORTING PERIOD MARCH 1, 2019 – AUGUST 31, 2019 SEPTEMBER 1, 2019 – FEBRUARY 29, 2020 MARCH 1, 2020 – DECEMBER 31, 2020 COMPLIANCE PROGRESS:

Preliminary

FOURTH REPORTING PERIOD FIFTH REPORTING PERIOD SIXTH REPORTING PERIOD

JANUARY 1, 2021 – JUNE 30, 2021 JULY 1, 2021 – DECEMBER 31, 2021 JANUARY 1, 2022 – JUNE 30, 2022 COMPLIANCE PROGRESS:

Secondary

COMPLIANCE PROGRESS: Secondary

THIRD REPORTING PERIOD COMPLIANCE PROGRESS:

Secondary

COMPLIANCE PROGRESS:

Secondary

JULY 1, 2023 - DECEMBER 31, 2023 COMPLIANCE PROGRESS: Secondary

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

Compliance Progress	(Reporting Period: January 1, 2024, through June 30, 2024		
Recurring Schedule:	At Least Annually	✓ Met	Missed
Preliminary:	In Compliance (NEW)		
Secondary:	Not In Compliance		
Full:	Not Yet Assessed		

During the tenth reporting period, the City and the CPD achieved Preliminary compliance with ¶389.

In the first quarter of the tenth reporting period, the CPD produced the combined 2023 and 2024 Annual Report to the Superintendent. The CPD has combined the reports during this reporting period to enable them to establish an annual cadence for the report in the future. The IMT appreciates the submission, as well as the time and effort expended in the creation of the report.

The 2023 and 2024 Annual Report to the Superintendent indicates that the CPD would benefit from a system that allows for a continuous tracking of PCD activities, services, response time, and other specific metrics noted in the Consent Decree.

The IMT is encouraged by the City and the CPD engaging in contract discussions with a software vendor that will enable the PCD to improve and evaluate its data collection and analysis. The IMT recognizes the CPD's determination to continue to work through the necessary steps in their current manual inputting of data to establish a platform for a more automated system.

To achieve Secondary compliance with ¶389, the CPD must submit an annual report that includes all the discrete elements required by this paragraph. To maintain Secondary compliance, the CPD must continue to produce such a report annually.

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A fuller description of the history of compliance efforts, methodologies, compliance determinations for this paragraph—and each monitorable paragraph in the

Officer Wellness and Support section—is available in Comprehensive Assessment Part I (which included Independent Monitoring Report 8): https://cpdmonitoringteam.com/wp-content/uploads/2024/06/IMR8-Appendix-8-Officer-Wellnessand-Support-2023.11.01.pdf.

#### Paragraph 389 Compliance Progress History

FIRST REPORTING PERIOD COMPLIANCE PROGRESS: Not Applicable

FOURTH REPORTING PERIOD JANUARY 1, 2021 – JUNE 30, 2021 COMPLIANCE PROGRESS:

None

SEVENTH REPORTING PERIOD JULY 1, 2022 - DECEMBER 31, 2022 COMPLIANCE PROGRESS:

None

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

SECOND REPORTING PERIOD MARCH 1, 2019 – AUGUST 31, 2019 SEPTEMBER 1, 2019 – FEBRUARY 29, 2020 MARCH 1, 2020 – DECEMBER 31, 2020 COMPLIANCE PROGRESS: COMPLIANCE PROGRESS:

None

FIFTH REPORTING PERIOD JULY 1, 2021 — DECEMBER 31, 2021 COMPLIANCE PROGRESS:

None

EIGHTH REPORTING PERIOD JANUARY 1, 2023 – JUNE 30, 2023 COMPLIANCE PROGRESS:

None

THIRD REPORTING PERIOD Preliminary

SIXTH REPORTING PERIOD JANUARY 1, 2022 – JUNE 30, 2022 COMPLIANCE PROGRESS:

None

NINTH REPORTING PERIOD JULY 1, 2023 - DECEMBER 31, 2023 COMPLIANCE PROGRESS:

None

**392.** CPD will ensure that its staff of licensed mental health professionals includes individuals with specialized training in one or more of each of the following subjects: posttraumatic stress disorder, domestic violence, alcohol and substance abuse, anger management, depression, and anxiety.

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

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

Full: In Compliance (NEW)

The City and the CPD achieved Full compliance with ¶392 during the tenth reporting period.

In previous reporting periods, the CPD achieved Preliminary and Secondary compliance with ¶392 by submitting policies and procedures addressing the requirements of this paragraph, including SOP 19-01, *Chicago Police Department Chaplains Unit* and the *Officer Wellness and Support Plan*.

During the tenth reporting period, the CPD submitted the licenses for the mental health clinicians along with documentation noting their professional specialties. The IMT recognizes the CPD for its concise compilation of the clinicians' licenses and supports the CPD achieving Full compliance with ¶392.

Moving forward, the IMT will look for the CPD to produce the relevant records once per reporting period, allowing the IMT to monitor the evolution of the clinicians' licensing status as the PCD continues to grow.

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A fuller description of the history of compliance efforts, methodologies, compliance determinations for this paragraph—and each monitorable paragraph in the Officer Wellness and Support section—is available in *Comprehensive Assessment Part I* (which included *Independent Monitoring Report 8*): https://cpdmonitoringteam.com/wp-content/uploads/2024/06/IMR8-Appendix-8-Officer-Wellness-and-Support-2023.11.01.pdf.

## Paragraph 392 Compliance Progress History

FIRST REPORTING PERIOD

MARCH 1, 2019 – AUGUST 31, 2019

COMPLIANCE PROGRESS:

Not Applicable

FOURTH REPORTING PERIOD JANUARY 1, 2021 – JUNE 30, 2021 COMPLIANCE PROGRESS:

Secondary

SEVENTH REPORTING PERIOD
JULY 1, 2022 – DECEMBER 31, 2022
COMPLIANCE PROGRESS:
Secondary

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

Full

SECOND REPORTING PERIOD
SEPTEMBER 1, 2019 – FEBRUARY 29, 2020
COMPLIANCE PROGRESS:
Not Applicable

FIFTH REPORTING PERIOD
JULY 1, 2021 – DECEMBER 31, 2021
COMPLIANCE PROGRESS:
Secondary

EIGHTH REPORTING PERIOD
JANUARY 1, 2023 – JUNE 30, 2023
COMPLIANCE PROGRESS:
Secondary

THIRD REPORTING PERIOD

MARCH 1, 2020 – DECEMBER 31, 2020

COMPLIANCE PROGRESS:

Not Applicable

SIXTH REPORTING PERIOD
JANUARY 1, 2022 – JUNE 30, 2022
COMPLIANCE PROGRESS:
Secondary

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

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

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

Preliminary: In Compliance (FOURTH REPORTING PERIOD)

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

In the tenth reporting period, the City and the CPD achieved Secondary compliance with ¶394.

In previous reporting periods, the CPD achieved Preliminary compliance with ¶394 by submitting policies and procedures addressing the requirements of this paragraph, including the *Officer Wellness and Support Plan*, the *2021 Report to the Superintendent*, and SOP 19-01, *Chicago Police Department Chaplains Unit*.

During the tenth reporting period, the CPD submitted anonymized data reflecting outside referrals. While the CPD is continuing to refine its methodology for collecting this data, it has provided documentation of its efforts to improve its data collection. Conversations on data connection and metrics with the CPD, IMT and OAG are beginning to yield results.

The PCD has continued its efforts to redesign its current data collection method—paper forms which are entered manually into an Excel spreadsheet—to identify those key functions and services they must report on to meet compliance. Currently, the PCD is improving its processes of collecting and evaluating their referral data—both internal (*i.e.*, from one entity within the PCD to another) and external (*i.e.*, from a PCD entity to an outside service provider) to ensure that their efforts meet the requirements of the Consent Decree.

To evaluate Full compliance, the IMT will review data sources to assess whether the CPD sufficiently offers members (both sworn and non-sworn) referrals to external clinical service providers for specialized counseling, when necessary.

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A fuller description of the history of compliance efforts, methodologies, compliance determinations for this paragraph—and each monitorable paragraph in the Officer Wellness and Support section—is available in *Comprehensive Assessment* 

Part I (which included Independent Monitoring Report 8): https://cpdmonitoringteam.com/wp-content/uploads/2024/06/IMR8-Appendix-8-Officer-Wellnessand-Support-2023.11.01.pdf.

## Paragraph 394 Compliance Progress History

FIRST REPORTING PERIOD MARCH 1, 2019 – AUGUST 31, 2019 COMPLIANCE PROGRESS: Not Applicable

COMPLIANCE PROGRESS: Preliminary

SEVENTH REPORTING PERIOD JULY 1, 2022 – DECEMBER 31, 2022 COMPLIANCE PROGRESS:

Preliminary

TENTH REPORTING PERIOD JANUARY 1, 2024 – JUNE 30, 2024 COMPLIANCE PROGRESS: Secondary

SECOND REPORTING PERIOD SEPTEMBER 1, 2019 – FEBRUARY 29, 2020 MARCH 1, 2020 – DECEMBER 31, 2020 COMPLIANCE PROGRESS:

Not Applicable

FOURTH REPORTING PERIOD FIFTH REPORTING PERIOD

JANUARY 1, 2021 – JUNE 30, 2021

JULY 1, 2021 – DECEMBER 31, 2021 COMPLIANCE PROGRESS:

Preliminary

EIGHTH REPORTING PERIOD JANUARY 1, 2023 – JUNE 30, 2023 COMPLIANCE PROGRESS: Preliminary

THIRD REPORTING PERIOD COMPLIANCE PROGRESS:

Not Applicable

SIXTH REPORTING PERIOD SIXTH REPORTING PERIOD JANUARY 1, 2022 – JUNE 30, 2022 COMPLIANCE PROGRESS: Preliminary

NINTH REPORTING PERIOD JULY 1, 2023 — DECEMBER 31, 2023 COMPLIANCE PROGRESS: Preliminary

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

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

Preliminary: In Compliance (FOURTH REPORTING PERIOD)
Secondary: In Compliance (NINTH REPORTING PERIOD)

Full: In Compliance (NEW)

During the tenth reporting period, the City and the CPD achieved Full compliance with ¶396.

In previous reporting periods, the CPD achieved Preliminary and Secondary compliance with ¶396 by submitting policies and procedures addressing the requirements of this paragraph, including Directive E06-01, *Professional Counseling Division*, and SOP 19-01, *Chicago Police Department Chaplains Unit*, as both policies stress privacy and confidentiality. Further, the CPD has submitted several training curricula and documentation of members' attendance for trainings emphasizing confidentiality between the client and the clinician (with exception of some critical circumstances that by law require the condition to report) and its importance as it relates to the expectations of those providing and receiving services.

During the tenth reporting period, the CPD demonstrated how it ensures confidentiality regarding mental health counseling services provided to members in a manner consistently with applicable laws and policies. The PCD has continued to provide evidence of their clinicians' certifications, which have specific guidance and implications for confidentiality and services provided. Further, at the end of the tenth reporting period, the CPD conducted an inspection of their twenty-two department districts and five detective division areas to ensure the presence of Employee Assistance Program (EAP) posters and pamphlets, which discuss confidentiality for mental-health services provided to CPD members.

The IMT recognizes the CPD for its continued efforts to ensure confidentiality. Moving forward, the IMT will review documentation indicating that the CPD maintains systems and processes that demonstrate confidentiality through proof of counselors' and members' training, counselors' certifications and licenses, and continued presence of EAP posters and pamphlets at all CPD districts and detective division areas.

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A fuller description of the history of compliance efforts, methodologies, compliance determinations for this paragraph—and each monitorable paragraph in the

Officer Wellness and Support 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-8-Officer-Wellness-and-Support-2023.11.01.pdf.

#### Paragraph 396 Compliance Progress History

FIRST REPORTING PERIOD

MARCH 1, 2019 – AUGUST 31, 2019

COMPLIANCE PROGRESS:

Not Applicable

FOURTH REPORTING PERIOD
JANUARY 1, 2021 – JUNE 30, 2021
COMPLIANCE PROGRESS:

Preliminary

SEVENTH REPORTING PERIOD
JULY 1, 2022 — DECEMBER 31, 2022
COMPLIANCE PROGRESS:

Preliminary

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

Full

SECOND REPORTING PERIOD
SEPTEMBER 1, 2019 – FEBRUARY 29, 2020
COMPLIANCE PROGRESS:

Not Applicable

FIFTH REPORTING PERIOD
JULY 1, 2021 — DECEMBER 31, 2021
COMPLIANCE PROGRESS:

Preliminary

EIGHTH REPORTING PERIOD
JANUARY 1, 2023 — JUNE 30, 2023
COMPLIANCE PROGRESS:
Preliminary

THIRD REPORTING PERIOD

MARCH 1, 2020 – DECEMBER 31, 2020

COMPLIANCE PROGRESS:

Not Applicable

SIXTH REPORTING PERIOD
JANUARY 1, 2022 – JUNE 30, 2022
COMPLIANCE PROGRESS:
Preliminary

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

**400.** CPD will ensure that its drug and alcohol counselors are certified in Illinois as Certified Alcohol and Other Drug Abuse Counselors.

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

Preliminary: In Compliance (FOURTH REPORTING PERIOD)

Secondary: In Compliance (NEW)
Full: Not In Compliance

The City and the CPD achieved Secondary compliance with ¶400 during the tenth reporting period.

In previous reporting periods, the CPD achieved Preliminary compliance with ¶400 by submitting Directive E06-01, *Professional Counseling Division*, which addressed the requirements of the paragraph.

The CPD has continued to ensure that the alcohol and drug counselors obtain the required certifications. The requirements at the time of hire states that the individual must be able to obtain the certification after they are employed. Through various discussions, the CPD has indicated that the certification process can be lengthy based on the date of the counselor's initial certification and the schedule of further certification course offerings. The renewal dates are every two years.

The CPD has agreed to produce the relevant records for the alcohol and drug counselors twice a year—once per reporting period—to ensure that the IMT remains apprised of any changes in the AOD certification requirement, as well as their ongoing progress.

To achieve Full compliance with ¶400, the CPD must demonstrate that it systematically ensures that counselors have necessary certifications.

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A fuller description of the history of compliance efforts, methodologies, compliance determinations for this paragraph—and each monitorable paragraph in the Officer Wellness and Support section—is available in *Comprehensive Assessment Part I* (which included *Independent Monitoring Report 8*): https://cpdmonitoringteam.com/wp-content/uploads/2024/06/IMR8-Appendix-8-Officer-Wellness-and-Support-2023.11.01.pdf.

## Paragraph 400 Compliance Progress History

FIRST REPORTING PERIOD

MARCH 1, 2019 – AUGUST 31, 2019

COMPLIANCE PROGRESS:

Not Applicable

FOURTH REPORTING PERIOD
JANUARY 1, 2021 – JUNE 30, 2021
COMPLIANCE PROGRESS:
Preliminary

SEVENTH REPORTING PERIOD JULY 1, 2022 — DECEMBER 31, 2022 COMPLIANCE PROGRESS:

Preliminary

TENTH REPORTING PERIOD
JANUARY 1, 2024 – JUNE 30, 2024
COMPLIANCE PROGRESS:
Secondary

SECOND REPORTING PERIOD
SEPTEMBER 1, 2019 – FEBRUARY 29, 2020
COMPLIANCE PROGRESS:
Not Applicable

FIFTH REPORTING PERIOD
JULY 1, 2021 – DECEMBER 31, 2021
COMPLIANCE PROGRESS:
Preliminary

EIGHTH REPORTING PERIOD
JANUARY 1, 2023 – JUNE 30, 2023
COMPLIANCE PROGRESS:
Preliminary

THIRD REPORTING PERIOD

MARCH 1, 2020 – DECEMBER 31, 2020

COMPLIANCE PROGRESS:

Not Applicable

SIXTH REPORTING PERIOD
JANUARY 1, 2022 – JUNE 30, 2022
COMPLIANCE PROGRESS:
Preliminary

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

**401.** CPD currently offers anonymous support groups and programs for alcoholism and other addictions. CPD will ensure that a licensed mental health professional assigned to the Professional Counseling Division oversees any such programs offered by CPD, that the programs adhere to generally accepted practices in the field of addiction treatment (e.g., 12-step addiction treatment program), and that each program is reviewed at least annually by the Director of the Professional Counseling Division.

Compliance Progress	(Reporting Period: January 1, 2024, through June 30, 2024)				4)	
Recurring Schedule:	Annually	<b>√</b>	Met		Missed	
Preliminary: Secondary: Full:	In Compliance (SECOND REPORTING PERIOD) In Compliance (THIRD REPORTING PERIOD) Under Assessment					

The City and the CPD are under assessment for Full compliance with ¶401 during the tenth reporting period.

In previous reporting periods, the CPD achieved Preliminary and Secondary compliance with ¶401 by increasing staffing of the Employee Assistance Program (EAP) and demonstrating the organization and supervision of the services, clinicians, and number of members utilizing the services.

This reporting period, the CPD produced the 2023-2024 Annual Report to the Superintendent for review. However, as written, the report is unclear whether the PCD conducted the annual review of the anonymous support groups and programs for alcoholism, as required by ¶401. As noted in our last monitoring report, the IMT suggests that the PCD document such annual reviews separately from the annual report to the superintendent.¹ Alternatively, if the PCD chooses to document its annual reviews in these reports, the PCD must clearly articulate its process of conducting annual reviews and the results of the annual reviews in the report.

To achieve Full compliance with ¶401, the Director of PCD must annually review CPD's anonymous support groups and programs for alcoholism and other addictions. The City and the CPD remain under assessment for Full compliance, as the

Providing separate reports may also benefit the CPD by ensuring that all of their compliance efforts are not tied up in one report. That is, if CPD planned to provide one report that is meant to support compliance with many paragraphs but misses the annual deadline, the CPD would put in jeopardy compliance with all those paragraphs. By creating separate reports, the CPD can timely comply with the Consent Decree, provide more helpful information to all the Consent Decree stakeholders, and ensure that it does not jeopardize compliance with multiple paragraphs if it misses a single annual deadline.

IMT evaluates the CPD's ability to conduct and document the annual reviews, as required by ¶401.

A fuller description of the history of compliance efforts, methodologies, compliance determinations for this paragraph—and each monitorable paragraph in the Officer Wellness and Support section—is available in Comprehensive Assessment Part I (which included Independent Monitoring Report 8): https://cpdmonitoringteam.com/wp-content/uploads/2024/06/IMR8-Appendix-8-Officer-Wellnessand-Support-2023.11.01.pdf.

## Paragraph 401 Compliance Progress History

FIRST REPORTING PERIOD MARCH 1, 2019 – AUGUST 31, 2019 COMPLIANCE PROGRESS: Not Applicable

FOURTH REPORTING PERIOD JANUARY 1, 2021 – JUNE 30, 2021 COMPLIANCE PROGRESS:

Secondary

SEVENTH REPORTING PERIOD JULY 1, 2022 - DECEMBER 31, 2022 COMPLIANCE PROGRESS: Secondary

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

**SECONDARY** 

SECOND REPORTING PERIOD SEPTEMBER 1, 2019 – FEBRUARY 29, 2020 MARCH 1, 2020 – DECEMBER 31, 2020 COMPLIANCE PROGRESS: Preliminary

FIFTH REPORTING PERIOD JULY 1, 2021 — DECEMBER 31, 2021 COMPLIANCE PROGRESS:

Secondary

EIGHTH REPORTING PERIOD JANUARY 1, 2023 – JUNE 30, 2023 COMPLIANCE PROGRESS: Secondary

THIRD REPORTING PERIOD COMPLIANCE PROGRESS: Secondary

SIXTH REPORTING PERIOD JANUARY 1, 2022 – JUNE 30, 2022 COMPLIANCE PROGRESS:

Secondary

NINTH REPORTING PERIOD JULY 1, 2023 - DECEMBER 31, 2023 COMPLIANCE PROGRESS: Secondary

**409.** CPD has implemented a mandatory program for members who have experienced an officer-involved firearms discharge that consists of peer group discussions and other components. CPD will ensure that this program is overseen by a licensed mental health professional assigned to the Professional Counseling Division, reflects best practices, and comports with CPD's use of force policies and training.

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

Preliminary: In Compliance (FIRST REPORTING PERIOD)

Secondary: Under Assessment
Full: Not Yet Assessed

During the tenth reporting period, the City and the CPD are under assessment for Secondary compliance with ¶409.

In previous reporting periods, the CPD achieved Preliminary compliance with ¶409 by implementing a mandatory, Commission on Accreditation for Law Enforcement Agencies (CALEA)-qualified program for officers who have experienced an officer-involved firearm discharge, as well as finalizing Directive E06-03, *Traumatic Incident Stress Management Program* (TISMP).

In the tenth reporting period, the City and the CPD continued to provide documentation indicating that the TISMP is overseen by a licensed mental health clinician assigned to the PCD. Furthermore, the CPD presented training data for the *Critical Incident Overview Training* (CIOT) and the *Individualized Critical Incident Overview Training* (ICIOT), which comport with the CPD's use-of-force policies and training. Finally, the most recent audit of the TISMP program, along with the recently produced *TISMP eLearning Training* curriculum, provided indication that the CPD has compared their practices to those of other agencies around the country to determine whether CPD's TISMP reflects generally-accepted best practices.

To achieve Secondary compliance with ¶409, the CPD must provide documentation relating to the required peer group discussions and completion of the *TISMP eLearning Training* by CPD members.

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A fuller description of the history of compliance efforts, methodologies, compliance determinations for this paragraph—and each monitorable paragraph in the Officer Wellness and Support section—is available in *Comprehensive Assessment Part I* (which included *Independent Monitoring Report 8*): https://cpdmonitoringteam.com/wp-content/uploads/2024/06/IMR8-Appendix-8-Officer-Wellness-and-Support-2023.11.01.pdf.

## Paragraph 409 Compliance Progress History

FIRST REPORTING PERIOD

MARCH 1, 2019 – AUGUST 31, 2019

COMPLIANCE PROGRESS:

Preliminary

FOURTH REPORTING PERIOD
JANUARY 1, 2021 – JUNE 30, 2021
COMPLIANCE PROGRESS:
Preliminary

SEVENTH REPORTING PERIOD
JULY 1, 2022 – DECEMBER 31, 2022
COMPLIANCE PROGRESS:

Preliminary

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

**Preliminary** 

SECOND REPORTING PERIOD
SEPTEMBER 1, 2019 – FEBRUARY 29, 2020
COMPLIANCE PROGRESS:
Preliminary

FIFTH REPORTING PERIOD
JULY 1, 2021 – DECEMBER 31, 2021
COMPLIANCE PROGRESS:
Preliminary

EIGHTH REPORTING PERIOD
JANUARY 1, 2023 – JUNE 30, 2023
COMPLIANCE PROGRESS:
Preliminary

THIRD REPORTING PERIOD

MARCH 1, 2020 – DECEMBER 31, 2020

COMPLIANCE PROGRESS:

Preliminary

SIXTH REPORTING PERIOD
JANUARY 1, 2022 – JUNE 30, 2022
COMPLIANCE PROGRESS:
Preliminary

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

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

Compliance Progress	(Reporting Period: January 1, 2024, through June 30, 2024			
Recurring Schedule:	Annually	✓ Met	Missed	
Preliminary:	In Compliance (s	SECOND REPORTING PERIOD)		

Secondary: Under Assessment
Full: Not Yet Assessed

During the tenth reporting period, the City and the CPD remained under assessment for Secondary compliance with ¶411.

In previous reporting periods, the City and the CPD achieved Preliminary compliance by codifying ¶411's requirements into Directive E06-03, *Traumatic Incident Stress Management Program* (TISMP). To assess Secondary compliance with ¶411, the IMT reviewed the two annual TISMP audits produced and determined whether the Audit Division had the necessary staff to complete these reviews on an annual basis.

Each of the two TISMP audits has identified both successes and shortcomings. In accordance with the requirements of ¶411, the audits have served as a tool to determine whether eligible members have been referred to the TISMP and completed the program. While the second TISMP audit contained factual errors, the Audit Division amended and reproduced the report for review during the ninth reporting period. The IMT acknowledges the steps taken by the Audit Division to improve its ability to identify factual errors before the reports are finalized in the future.

The TISMP audits produced to date have identified key areas of improvement for the mandatory referral program. The IMT looks forward to the continued effort by the CPD to ensure that they adequately addressed the recommendations and findings of the audit and prioritized those concerns prior to the next annual review. It will be important throughout the suite of the TISMP related paragraphs to show continued progress, sufficient means, mechanisms, and systems that support an efficient and effective TISMP program.

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A fuller description of the history of compliance efforts, methodologies, compliance determinations for this paragraph—and each monitorable paragraph in the

Officer Wellness and Support section—is available in Comprehensive Assessment Part I (which included Independent Monitoring Report 8): https://cpdmonitoringteam.com/wp-content/uploads/2024/06/IMR8-Appendix-8-Officer-Wellnessand-Support-2023.11.01.pdf.

#### Paragraph 411 Compliance Progress History

FIRST REPORTING PERIOD MARCH 1, 2019 - AUGUST 31, 2019 COMPLIANCE PROGRESS: Not Applicable

FOURTH REPORTING PERIOD JANUARY 1, 2021 – JUNE 30, 2021 COMPLIANCE PROGRESS:

Preliminary

COMPLIANCE PROGRESS:

Preliminary

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

SECOND REPORTING PERIOD SEPTEMBER 1, 2019 – FEBRUARY 29, 2020 MARCH 1, 2020 – DECEMBER 31, 2020 COMPLIANCE PROGRESS: Preliminary

FIFTH REPORTING PERIOD JULY 1, 2021 — DECEMBER 31, 2021 COMPLIANCE PROGRESS: Preliminary

SEVENTH REPORTING PERIOD EIGHTH REPORTING PERIOD NINTH REPORTING PERIOD

JULY 1, 2022 – DECEMBER 31, 2022 JANUARY 1, 2023 – JUNE 30, 2023 JULY 1, 2023 – DECEMBER 31, 2023 COMPLIANCE PROGRESS: Preliminary

THIRD REPORTING PERIOD COMPLIANCE PROGRESS: Not Applicable

SIXTH REPORTING PERIOD JANUARY 1, 2022 – JUNE 30, 2022 COMPLIANCE PROGRESS: Preliminary

COMPLIANCE PROGRESS: Preliminary