

Independent Monitoring Report 10
Accountability and Transparency
Compliance Assessments by Paragraph

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: January 1, 2024, through June 30, 2024)

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>Under Assessment</i>
	CPD	<i>Under Assessment</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 (NINTH REPORTING PERIOD)</i>

In the tenth reporting period, the City and the CPD are now under assessment for Secondary compliance while the Civilian Office of Police Accountability (COPA) maintained Full compliance with ¶456. Because all relevant City entities must achieve levels of compliance to bring the City, as a whole, into compliance, the City has not yet achieved 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 no-objection notices in the ninth and tenth reporting periods.

This reporting period, COPA provided documentation that maintained Full compliance with ¶456.

As stated in previous reporting periods, we will look forward to receiving evidence that individuals responsible for hiring to the CPD’s Bureau of Internal Affairs (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 reviewing disciplinary histories for employment or assignment candidates. To achieve Secondary compliance, the CPD must provide evidence that the appropriate personnel reviewed and understood S08-01, *Complaint and Investigators and Investigations*. The CPD and COPA will then need to provide documentation that

they are following their respective policies.¹ 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/2024/06/IMR8-Appendix-9-Accountability-and-Transparency-2023.11.01.pdf) (which included *Independent Monitoring Report 8*): <https://cpdmonitoringteam.com/wp-content/uploads/2024/06/IMR8-Appendix-9-Accountability-and-Transparency-2023.11.01.pdf>.

Paragraph 456 Compliance Progress History

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

¹ The 2023 BIA Annual Report was produced for Full compliance review with ¶¶456, 462, 476, 526–28, and 530, and the 2024 BIA Quarter 1 Report was produced for Full compliance review with ¶¶456, 462, 476, and 526–27. However, the reports alone are insufficient for Full compliance with those paragraphs. To achieve Full compliance with those paragraphs, the CPD must produce the underlying data relevant to those paragraphs rather than a summary of that data. The reports include all necessary aggregate data regarding investigations conducted by BIA and Accountability Sergeants, as required by ¶¶550–51.

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: January 1, 2024, through June 30, 2024)

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 ¶465, while COPA achieved Full compliance. Because all relevant City entities must achieve levels of compliance to bring the City, as a whole, into compliance, the City has not yet achieved Secondary compliance.

This reporting period, the CPD did not produce documentation that demonstrated an increased level of compliance with the requirements of ¶465.

To achieve Full compliance, COPA provided documentation of a sample of cases in which complaints were completed and closed between July 1, 2023, and January 29, 2024. The documentation included copies of case management system reports, administrative rights notices, notices of allegations, interview requests, interview transcripts, related criminal reports, and final summary reports. The documentation provided demonstrated that COPA sought the information described in ¶465.

This reporting period, the IMT attended and observed COPA's *Officer Interviews In-Service* Training. Student participation generated discussion and allowed for the sharing of best practices. However, the instructors trained on some CPD General Orders that were outdated. Specifically, the instructors trained on outdated versions of G08-01 and G08-01-01. Additionally, the IMT noticed that the requirements of ¶465(a) were not addressed entirely in the delivery of the training. COPA maintained Secondary compliance by providing documentation showing that 97% of COPA staff attended the training, but we expect COPA to address our concerns in future trainings by ensuring they include only the current versions of CPD policies.

Additionally, to assess the effectiveness of the training, COPA surveyed the training attendees to evaluate the course and to provide feedback (*see* ¶287). However, only 27% of attendees provided an evaluation. In future reporting periods, we hope to see COPA improve its evaluation survey response rate to ensure feedback is being received from the majority of attendees. COPA should also expand its evaluation component to include collection of data on the instructors. Lastly, we hope to see a mechanism in place to ensure that feedback is received, analyzed, and reviewed and that training is improved in future iterations based on participant feedback.

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. Specifically, we will look to review a larger sample of materials including both interview transcripts and audio samples.

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/2024/06/IMR8-Appendix-9-Accountability-and-Transparency-2023.11.01.pdf) (which included *Independent Monitoring Report 8*): <https://cpdmonitoringteam.com/wp-content/uploads/2024/06/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
TENTH REPORTING PERIOD JANUARY 1, 2024 – JUNE 30, 2024 COMPLIANCE PROGRESS: Preliminary		

Accountability and Transparency: ¶1479

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: January 1, 2024, through June 30, 2024)

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 in Compliance</i>
COPA	<i>In Compliance</i> (NINTH REPORTING PERIOD)
Full:	<i>Not in Compliance</i>
CPD	<i>Not Yet Assessed</i>
COPA	<i>Under Assessment</i>

In the tenth reporting period, the City and the CPD maintained Preliminary compliance with ¶1479, while COPA is now under assessment for Full compliance. Because all relevant City entities must achieve levels of compliance to bring the City, as a whole, into compliance, the City has not yet achieved Secondary compliance.

This reporting period, the CPD did not produce documentation that demonstrated an increased level of compliance with the requirements of ¶1479.

To assess Full compliance, the IMT reviewed documentation of COPA’s Timeliness Initiative, as well as its 180-day letters, which addressed the requirements of ¶1479. COPA produced records to show that its *Timeliness Benchmarks* Policy was fully implemented and continues to guide their investigation review process, including case investigations reports for 2023 and 2024. These reports include year-to-date data on the number of open and closed cases, case closure goals for each month and whether they met the goals, the number of cases assigned to each investigator, and the number of cases assigned to supervising investigators for their review and closure. Importantly, COPA tracks the number of cases submitted to the Deputy Chief(s) for review and the “mean number of days” a case remains with a Deputy Chief for review and closure. The documentation also included other records that contribute to a holistic approach to investigative timeliness and case closure.

In the previous reporting period, COPA achieved Secondary compliance by delivering its *Investigative File Maintenance Training*, but the IMT did not receive training evaluation records (see ¶1287) by the end of the reporting period. In future reporting periods, we hope to see COPA improve its evaluation survey response rate to ensure feedback is being received from the majority of attendees. COPA should also expand its evaluation component to include collection of data on the

instructors. Lastly, we hope to see a mechanism in place to ensure that feedback is received, analyzed, and reviewed and that training is improved in future iterations based on participant feedback.

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 implementing ¶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/2024/06/IMR8-Appendix-9-Accountability-and-Transparency-2023.11.01.pdf) (which included *Independent Monitoring Report 8*): <https://cpdmonitoringteam.com/wp-content/uploads/2024/06/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
TENTH REPORTING PERIOD JANUARY 1, 2024 – JUNE 30, 2024 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: January 1, 2024, through June 30, 2024)

Preliminary:	<i>In Compliance</i> (NINTH REPORTING PERIOD)
CPD	<i>In Compliance</i> (NINTH REPORTING PERIOD)
COPA	<i>In Compliance</i> (SEVENTH REPORTING PERIOD)
Secondary:	<i>Not in Compliance</i>
CPD	<i>Not in Compliance</i>
COPA	<i>In Compliance</i> (NINTH 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 maintained Preliminary compliance while COPA achieved Full compliance with ¶480 in the tenth reporting period. Because all relevant City entities must achieve levels of compliance to bring the City, as a whole, into compliance, the City has not yet achieved Secondary compliance.

This reporting period, the CPD did not produce documentation that demonstrated an increased level of compliance with the requirements of ¶480.

This reporting period, the IMT did not attend and observe COPA's *Civil and Criminal Complaint Review In-Service* Training. However, COPA maintained Secondary compliance by providing documentation demonstrating that 96% of COPA staff attended the training.

Additionally, to assess the effectiveness of the training, COPA surveyed the training attendees to evaluate the course and to provide feedback (see ¶287); 36% of attendees provided an evaluation, which is a larger response rate than any other training COPA conducted in the tenth reporting period. In future reporting periods, we hope to see COPA improve its evaluation survey response rate to ensure feedback is being received from the majority of attendees. COPA should also expand its evaluation component to include collection of data on the instructors. Lastly, we hope to see a mechanism in place to ensure that feedback is received, analyzed, and reviewed and that training is improved in future iterations based on participant feedback.

To achieve Full compliance, COPA provided documentation of some investigations, conducted between October 1, 2023 and February 1, 2024. The documentation demonstrates that a COPA investigator uses information obtained from parallel

civil or criminal litigation either to initiate a misconduct investigation or as objective verifiable evidence concerning a misconduct investigation. For each investigation selected, the Final Summary Report (FSR) identifies the civil or criminal litigation, the nature of the evidence obtained, and how the evidence was used to support the COPA administrative investigation. COPA also submitted the Log Number Investigation attachment log, which identifies where the transcript or other information from the parallel investigation is located within the administrative file. The documentation provided addressed the requirements of ¶1465 for Full compliance.

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 continue to implement ¶1480’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/2024/06/IMR8-Appendix-9-Accountability-and-Transparency-2023.11.01.pdf) (which included *Independent Monitoring Report 8*): <https://cpdmonitoringteam.com/wp-content/uploads/2024/06/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
TENTH REPORTING PERIOD JANUARY 1, 2024 – JUNE 30, 2024 COMPLIANCE PROGRESS: Preliminary		

Accountability and Transparency: ¶483

483. *The City and CPD will ensure there are regularly conducted satisfaction surveys relating to the complaint intake and investigation processes. The City and CPD will evaluate trends and training opportunities identified as a result of information received from such quality control surveys.*

Compliance Progress

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

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

In the tenth reporting period, the City and the CPD maintained Preliminary compliance with ¶483 but did not achieve Secondary compliance.

To assess Secondary compliance, the IMT reviewed BIA's *Accountability Supplemental eLearning*. Although the training appears to address the requirements of ¶483, it remained in the collaborative review and revision phase at the end of the reporting period. Additionally, the IMT's methodology for ¶483 does not require training for any level of compliance.

In the previous reporting period, we noted that BIA's *Satisfaction Survey Administration Plan* did not achieve Secondary compliance because it did not fully address the concerns the IMT noted in December 2022. This reporting period, the CPD provided comments and responses to previous IMT comments and outlined their plans for ensuring compliance with the requirements of ¶483 through training and evaluation of the 2023 survey responses.

Additionally, the IMT reviewed the 2023 survey responses, which included unfavorable opinions about the length of time it takes to complete a complaint investigation and perceived rudeness of the intake personnel. To address these concerns, BIA noted they will continue to reinforce the importance of policies, practices, and training that stress the importance of communicating respectfully with members of the community and department members. Additionally, in an effort to increase the number of survey responses, BIA now posts the survey link to the BIA web portal and includes a link to the survey in the Administrative Summary Report distributed to reporting parties and involved department members.

Moving forward, we will look for the CPD to revise, finalize, and implement BIA's *Accountability Supplemental eLearning* relevant to the requirements of ¶483. Additionally, for Secondary compliance, the CPD must provide documentation demonstrating that individuals responsible for conducting surveys are aware of expectations set by policy and are provided means to conduct surveys. The CPD also must identify additional training needs and continue to strengthen its survey process. For Full compliance, the CPD must ensure that satisfaction surveys are

regularly conducted and additional training needs are identified to continually improve the complaint intake and investigation processes.

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/2024/06/IMR8-Appendix-9-Accountability-and-Transparency-2023.11.01.pdf) (which included *Independent Monitoring Report 8*): <https://cpdmonitoringteam.com/wp-content/uploads/2024/06/IMR8-Appendix-9-Accountability-and-Transparency-2023.11.01.pdf>.

Paragraph 483 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: Preliminary
TENTH REPORTING PERIOD JANUARY 1, 2024 – JUNE 30, 2024 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: January 1, 2024, through June 30, 2024)
Preliminary:	CPD	<i>In Compliance (SEVENTH REPORTING PERIOD)</i>
	COPA	<i>In Compliance (SIXTH REPORTING PERIOD)</i>
Secondary:	CPD	<i>Under Assessment</i>
	COPA	<i>In Compliance (NINTH REPORTING PERIOD)</i>
Full:	CPD	<i>Not in Compliance</i>
	COPA	<i>Not Yet Assessed</i>
	COPA	<i>Under Assessment</i>

The City and the CPD remain under assessment for Secondary compliance with ¶486, while COPA is now under assessment for Full compliance in the tenth reporting period. Because all relevant City entities must achieve levels of compliance to bring the City, as a whole, into compliance, the City has not yet achieved Secondary compliance.

This reporting period, the CPD did not produce documentation that demonstrated an increased level of compliance with the requirements of ¶486.

This reporting period, the IMT attended and observed COPA's *Witness Reliability Assessment in Police Misconduct Investigations In-Service Training*. Student participation generated discussion and allowed for the sharing of best practices. The instructors elaborated on various points throughout the lesson plan and curriculum to ensure the attendees understood and digested the material. COPA maintained Secondary compliance by providing documentation demonstrating that 98% of COPA staff attended the training.

Additionally, to assess the effectiveness of the training, COPA surveyed the training attendees to evaluate the course and to provide feedback (see ¶1287). However, only 20% of attendees provided an evaluation. In the previous reporting period, COPA achieved Secondary compliance by delivering its *Investigative File Maintenance Training*, but the IMT did not receive training evaluation records (see ¶1287) by the end of the reporting period. In future reporting periods, we hope to see COPA improve its evaluation survey response rate to ensure feedback is being received from the majority of attendees. COPA should also expand its evaluation component to include collection of data on the instructors. Lastly, we hope to see a mechanism in place to ensure that feedback is received, analyzed, and reviewed and that training is improved in future iterations based on participant feedback.

To assess Full compliance, the IMT reviewed COPA's documentation on its administrative investigative files. The documentation included Final Summary Reports (FSRs), Case Management System (CMS) screenshots, Log Number attachment reports, and CMS notes. While this documentation partially addresses ¶1486 for Full compliance, the IMT will conduct a more in-depth review of completed investigations to assess whether investigation files are thorough and complete.

For Full compliance, we look forward to the CPD and COPA demonstrating that they have sufficiently implemented their policies and training to ensure that the CPD and COPA maintain thorough and complete administrative investigative files as outlined in this paragraph. This will include an in-depth review of investigation files.

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/2024/06/IMR8-Appendix-9-Accountability-and-Transparency-2023.11.01.pdf) (which included *Independent Monitoring Report 8*): <https://cpdmonitoringteam.com/wp-content/uploads/2024/06/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: Preliminary
TENTH REPORTING PERIOD JANUARY 1, 2024 – JUNE 30, 2024 COMPLIANCE PROGRESS: Preliminary		

Accountability and Transparency: ¶1497

497. COPA and CPD will review and revise, as necessary, the policies governing COPA and CPD to ensure the processes for prevention of CPD member collusion and witness contamination comply with the terms of this agreement.

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

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>

The City and the CPD maintained Preliminary compliance with ¶1497 in the tenth reporting period, while COPA achieved Full compliance. Because all relevant City entities must achieve levels of compliance to bring the City, as a whole, into compliance, the City has not yet achieved Secondary compliance.

This reporting period, the CPD did not produce documentation that demonstrated an increased level of compliance with the requirements of ¶1497.

To assess Full compliance, the COPA provided documentation of a Final Summary Report (FSR) that sustained misconduct for failure to separate CPD members to prevent collusion or witness contamination, which addresses the requirements of ¶1497.

Additionally, this reporting period, the IMT attended and observed COPA’s *Fact Gathering – Evidence Collection In-Service* Training. There was less student participation in this training than previous COPA training, and therefore, it did not generate much discussion and allow for the sharing of best practices. The lesson plan and curriculum was also not as closely followed as past COPA trainings, which causes a concern for consistency across trainings by year and by instructor. Although COPA’s records indicate this training served 2 hours of in-service training, the training itself lasted 1.75 hours, including the post-test. Additionally, pieces of the training were skipped, such as “canvassing procedures” because the instructors noted that COPA employees previously received a training on that topic. We hope in the future to see COPA instructors continue with the lesson plan to ensure everyone in the room receives the approved content. Lastly, the IMT noticed that the requirements of ¶1460, 464(e), 464(g), and 496 were not addressed entirely in the delivery of the training. COPA maintained Secondary compliance by providing

documentation showing that 99% of COPA staff attended the training, but we expect COPA to address our concerns in future trainings.

Additionally, to assess the effectiveness of the training, COPA surveyed the training attendees to evaluate the course and to provide feedback (see ¶1287). However, only 22% of attendees provided an evaluation. In future reporting periods, we hope to see COPA improve its evaluation survey response rate to ensure feedback is being received from the majority of attendees. COPA should also expand its evaluation component to include collection of data on the instructors. Lastly, we hope to see a mechanism in place to ensure that feedback is received, analyzed, and reviewed and that training is improved in future iterations based on participant feedback.

In the next reporting period, we will look for the CPD to further develop its training. Moving forward, we will look for COPA to continue to demonstrate 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/2024/06/IMR8-Appendix-9-Accountability-and-Transparency-2023.11.01.pdf) (which included *Independent Monitoring Report 8*): <https://cpdmonitoringteam.com/wp-content/uploads/2024/06/IMR8-Appendix-9-Accountability-and-Transparency-2023.11.01.pdf>.

Paragraph 497 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
TENTH REPORTING PERIOD JANUARY 1, 2024 – JUNE 30, 2024 COMPLIANCE PROGRESS: Preliminary		

Accountability and Transparency: ¶1502

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: January 1, 2024, through June 30, 2024)

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>Under Assessment</i>
CPD	<i>Under Assessment</i>
COPA	<i>In Compliance</i> (NINTH REPORTING PERIOD)

COPA maintained Full compliance while the CPD is now under assessment for Full compliance with ¶1502 in the tenth reporting period. Because all relevant City entities must achieve levels of compliance to bring the City, as a whole, into compliance, the City has not yet achieved Full compliance.

To maintain Secondary compliance, the CPD provided BIA’s *Accountability Supplemental eLearning* for review with ¶1502. Overall, the eLearning appropriately supplements the previously approved and delivered *BIA Accountability eLearning* in the eighth reporting period. Through the tenth reporting period, the IMT met with BIA to provide feedback on the supplemental eLearning to ensure paragraphs that were not addressed in the eighth reporting period were addressed in the new eLearning. However, by the end of the reporting period, the eLearning remained in the collaborative review and revision process.

To assess Full compliance, the IMT reviewed the CPD’s documentation on Administrative Summary Reports (ASRs). The documentation indicates that the CPD ensures information legally exempt from disclosure for privacy or other purposes is redacted from ASRs prior to their electronic reporting. We look forward to the CPD providing additional examples of ASRs that are compliant with the requirements of ¶1502, including a more fulsome description of the information that is exempt from disclosure.

In the eighth reporting period, the CPD achieved Secondary compliance by delivering its *BIA Accountability eLearning*, but the IMT did not receive training evaluation records (see ¶1287). In future reporting periods, we hope to see the CPD produce evaluation records for all trainings moving forward, ensuring that its evaluation survey response rate is high to ensure feedback is being received from the

majority of attendees. The CPD should also ensure its evaluation component includes collection of data on the instructors. Lastly, we hope to see a mechanism in place to ensure that feedback is received, analyzed, and reviewed and that training is improved in future iterations based on participant feedback.

This reporting period, COPA provided documentation that maintained Full compliance with ¶502.

Moving forward, we look forward to the CPD revising, finalizing, and implementing its *Accountability Supplemental eLearning*, along with evaluation records (see ¶287). Additionally, we will look for documentation that the CPD and its employees are implementing ¶502’s mandates.

For COPA, we will look for documentation maintaining that COPA and its employees continue to implement ¶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* (which included *Independent Monitoring Report 8*): <https://cpdmonitoringteam.com/wp-content/uploads/2024/06/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 JANUARY 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
TENTH REPORTING PERIOD JANUARY 1, 2024 – JUNE 30, 2024 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: January 1, 2024, through June 30, 2024)

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 (NINTH REPORTING PERIOD)</i>
	CPD	<i>In Compliance (NINTH REPORTING PERIOD)</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</i>

The City and the CPD maintained Secondary compliance while COPA is now under assessment for Full compliance with ¶513 in the tenth reporting period. Because all relevant City entities must achieve levels of compliance to bring the City, as a whole, into compliance, the City has not yet achieved Full compliance.

This reporting period, the CPD did not produce documentation that demonstrated an increased level of compliance with the requirements of ¶513.

To assess Full compliance, the IMT reviewed COPA’s *Disciplinary and Remedial Recommendations Policy Guidance*. The guidance appears to be consistent with the requirements of ¶513, including analysis of disciplinary recommendations from 2019 to 2024. However, the IMT is concerned that the examples of disciplinary recommendations provided for review for appropriateness and consistency occurred before the guidance was implemented. Additionally, we continue to encourage the CPD and COPA to work together on a joint solution to the requirements of ¶¶513–14.

Additionally, in the seventh reporting period, COPA achieved Secondary compliance by delivering its *Disciplinary and Remedial Recommendations Training*, but the IMT did not receive training evaluation records (see ¶287) by the end of the reporting period. In future reporting periods, we hope to see COPA improve its evaluation survey response rate to ensure feedback is being received from the majority of attendees. COPA should also expand its evaluation component to include collection of data on the instructors. Lastly, we hope to see a mechanism in place to ensure that feedback is received, analyzed, and reviewed and that training is improved in future iterations based on participant feedback.

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, refresher trainings, and specifically, the delivery of the Module 3 training. Additionally, we will look for documentation that the CPD and its employees are implementing ¶513’s mandates.

Moving forward, we will look for documentation that COPA and its employees are implementing ¶513’s mandates, as well as collaborating with the CPD to address the requirements of ¶¶513–14.

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/2024/06/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
TENTH REPORTING PERIOD JANUARY 1, 2024 – JUNE 30, 2024 COMPLIANCE PROGRESS: Secondary		

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: January 1, 2024, through June 30, 2024)

Preliminary:

Not in Compliance

CITY *Under Assessment*

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 (NINTH REPORTING PERIOD)*

Full:

Not in Compliance

CITY *Not Yet Assessed*

CPD *Not Yet Assessed*

COPA *In Compliance (NEW)*

In the tenth reporting period, COPA achieved Full compliance while the City and the CPD have not achieved Preliminary compliance with ¶521. Because all relevant City entities must achieve levels of compliance to bring the City, as a whole, into compliance, the City has not yet achieved Preliminary compliance.

This reporting period, the CPD did not produce documentation that demonstrated an increased level of compliance with the requirements of ¶521.

To assess Full compliance, the IMT reviewed COPA's staffing plan and current authorized strength and vacancy reports. The documentation provided demonstrates that COPA's staffing policies and practices remain operational, which addresses the requirements of this paragraph.

This reporting period, the Police Board provided documentation 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.

Moving forward, we look forward to reviewing the CPD’s revised staffing and needs assessment. We will also look for evidence demonstrating that the City is fulfilling 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/2024/06/IMR8-Appendix-9-Accountability-and-Transparency-2023.11.01.pdf) (which included *Independent Monitoring Report 8*): <https://cpdmonitoringteam.com/wp-content/uploads/2024/06/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
TENTH REPORTING PERIOD JANUARY 1, 2024 – JUNE 30, 2024 COMPLIANCE PROGRESS: None		

Accountability and Transparency: ¶525

525. Within 60 days of the Effective Date, the City will propose a permanent method of selecting the Chief Administrator of COPA. In creating the permanent selection method for COPA's Chief Administrator, the City will consider the views and recommendations of community stakeholders.

Compliance Progress

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

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

Years after the Consent Decree took effect, the City of Chicago created the Community Commission for Public Safety and Accountability (CCPSA); the CCPSA's municipal ordinance requires them to perform the requirements of ¶525. The CCPSA and the City achieved Secondary compliance with ¶525 in the tenth reporting period.

This reporting period, the CCPSA provided materials related to the process for selecting a COPA Chief Administrator should a vacancy occur. The materials included a PowerPoint presentation for new CCPSA members to ensure that the selection process and criteria is clear.

Additionally, the CCPSA produced draft surveys seeking responses from CPD and COPA personnel regarding the qualities needed of a COPA Chief Administrator. The CCPSA also indicated that it plans to hold public hearings regarding the same. We appreciate the CCPSA's community outreach efforts and look forward to seeing the results of those efforts in future reporting periods.

Moving forward, for Full compliance, the CCPSA must complete its community engagement work. We will also determine whether the CCPSA follows the set method for selecting a new COPA Chief Administrator, when necessary.

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/2024/06/IMR8-Appendix-9-Accountability-and-Transparency-2023.11.01.pdf>.

Paragraph 525 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
TENTH REPORTING PERIOD JANUARY 1, 2024 – JUNE 30, 2024 COMPLIANCE PROGRESS: Secondary		

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: January 1, 2024, through June 30, 2024)
Preliminary:		<i>In Compliance (NEW)</i>
	CPD	<i>In Compliance (NEW)</i>
	COPA	<i>In Compliance (SECOND REPORTING PERIOD)</i>
Secondary:		<i>Not in Compliance</i>
	CPD	<i>Not in Compliance</i>
	COPA	<i>In Compliance (NINTH 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 achieved Preliminary compliance with ¶1528 in the tenth reporting period. COPA achieved Full compliance with ¶1528. Because all relevant City entities must achieve levels of compliance to bring the City, as a whole, into compliance, the City has not yet achieved Secondary compliance.

To assess Preliminary compliance for the CPD, the IMT reviewed various lesson plans submitted for review under ¶1528, including Module 3, *Credibility, Standards of Proof, and Disciplinary Decision Making*; Module 8, *Audio Recording Interview Guidelines*; Module 9, *Interviewing Department Members*; Module 10, *Mistakes and Updates; Investigation Assignment and Timelines*; and *Collection of Evidence and Interviews with Non-Department Members*. With the development of these

lesson plans, the CPD has now developed approved trainings for each subparagraph of ¶528 (see below chart). The CPD also provided its *BIA New Intake Personnel Training* for review this reporting period. However, the CPD did not identify which ¶528 subparagraphs the training purports to address.

Additionally, the CPD provided its finalized S08-01, *Complaint and Investigators and Investigations*, along with public comments. The CPD also produced its 2023 BIA Annual Report for Full compliance review with ¶528. However, the report alone is insufficient for Full compliance with ¶528. Additionally, the CPD cannot achieve Full compliance without first achieving Secondary compliance. To achieve Secondary compliance, the CPD must provide initial and annual in-service training to all required personnel.

To assess Full compliance for COPA, the IMT reviewed COPA's *2024-2025 Training Plan*. The IMT provided a no-objection notice on May 29, 2024. COPA also provided its training tracker demonstrating that training was provided to at least 95% of COPA personnel and provided course evaluations for its 2024 trainings. Finally, COPA provided revised versions of its *Fact Gathering–Evidence Collection In-Service Training*, its *Officer Interviews Training*, and its *CPD Rules and Objectives Training*, to which the IMT provided no-objection notices.

This reporting period, the IMT attended and observed multiple COPA trainings relevant to ¶528: *Witness Reliability Training*; *Complaint Register In-Service Training*; *CPD Rules and Directives In-Service Training*; *Fact Gathering–Evidence Collection In-Service Training*; and *Officer Interviews In-Service Training*.

With respect to COPA's *Witness Reliability Assessment in Police Misconduct Investigations In-Service Training*, student participation generated discussion and allowed for the sharing of best practices. The instructors elaborated on various points throughout the lesson plan and curriculum to ensure the attendees understood and digested the material. Similarly, COPA's *Complaint Register In-Service Training* had good student participation that generated discussion and allowed for the sharing of best practices. The instructors answered many questions from the audience in real time and even took time during the break to gather further answers to disseminate to the attendees. Although COPA's records indicate this training served 1.5 hours of in-service training, the training itself lasted only one hour. Additionally, some post-test questions garnered incorrect responses from many attendees.

With respect to COPA's *CPD Rules and Directives In-Service Training*, there was less student participation in this training than previous COPA trainings, and therefore, it did not generate much discussion and allow for the sharing of best practices. Although COPA's records indicate this training only served one hour of in-service training, the training itself lasted less than an hour. Similarly, COPA's *Fact Gathering–Evidence Collection In-Service Training* also had less student participation than

previous COPA trainings, and therefore, it did not generate much discussion and allow for the sharing of best practices. The lesson plan and curriculum were not as closely followed as past COPA training sessions on this curriculum, which causes a concern for consistency across trainings by year and by instructor. Although COPA’s records indicate this training served 2 hours of in-service training, the training itself lasted 1.75 hours. Additionally, pieces of the training were skipped, such as “canvassing procedures” because the instructors noted that COPA employees previously received a training on that topic. We hope in the future to see COPA instructors follow the approved lesson plan to ensure everyone in the room receives the proper content. The IMT also noticed that the requirements of ¶460, 464(e), 464(g), and 496 were not addressed entirely in the delivery of the training.

With respect to COPA’s *Officer Interviews In-Service Training*, student participation again generated discussion and allowed for the sharing of best practices. However, the instructors trained on some CPD General Orders that were outdated. Specifically, the instructors trained on outdated versions of G08-01 and G08-01-01. Additionally, the IMT noted that the requirements of ¶465(a) were not addressed entirely in the delivery of the training.

To assess the effectiveness of the trainings, COPA surveyed the training attendees to evaluate the courses and to provide feedback (see ¶1287). However, on average, only 24% of attendees provided an evaluation. In future reporting periods, we hope to see COPA improve its evaluation survey response rate to ensure feedback is being received from the majority of attendees. COPA should also expand its evaluation component to include collection of data on the instructors. Lastly, we hope to see a mechanism in place to ensure that feedback is received, analyzed, and reviewed and that training is improved in future iterations based on participant feedback. We expect COPA to address our concerns in future trainings.

The below chart indicates which CPD trainings and COPA trainings have been approved for each subparagraph, along with the status of delivery for each training.

¶528 Topic	Relevant CPD Training(s)	Relevant COPA Training(s)
a. how to properly handle complaint intake, and the consequences for failing to take complaints	Module 2, <i>Complaint Initiation and Affidavit Overrides</i> (delivered in IMR9)	<i>COPA Intake Unit: Overview of Policies and Procedures</i> (delivered in IMR5)
b. best practices in procedural justice, including techniques for communicating with complainants and members of the public	Module 4, <i>Sexual Misconduct Initiation</i> (delivered in IMR9) Module 7, <i>Procedural Justice, Implicit Bias, and Conflicts of Interest</i> (delivered in IMR9)	<i>COPA Intake Unit: Overview of Policies and Procedures</i> (delivered in IMR5) <i>Procedural Justice Training</i> (delivered in IMR4)

	<i>Collection of Evidence and Interviews with Non-Department Members</i> (yet to be delivered)	
c. the collection of objective verifiable evidence	<i>Collection of Evidence and Interviews with Non-Department Members</i> (yet to be delivered)	<i>Fact Gathering-Evidence Collection Training</i> (delivered in IMR7)
d. the process for seeking an override affidavit in the absence of a signed complainant affidavit	Module 2, <i>Complaint Initiation and Affidavit Overrides</i> (delivered in IMR9)	<i>Complaint Register Training</i> (delivered in IMR8)
e. for COPA investigators, techniques for conducting impartial investigations of domestic violence and sexual misconduct	Not Applicable	<i>Forensic Experiential Trauma Interviews (FETI) Training</i> (delivered in IMR6) <i>Sexual Misconduct and Domestic Violence Training</i> (delivered in IMR 9)
f. for BIA investigators, techniques for conducting impartial investigations of sexual misconduct	Module 4, <i>Sexual Misconduct Initiation</i> (delivered in IMR9)	Not Applicable
g. investigative skills, including proper interrogation and interview techniques, gathering, and objectively analyzing evidence, and data and case management	Module 9, <i>Interviewing Department Members</i> (yet to be delivered)	<i>COPA Intake Unit: Overview of Policies and Procedures</i> (delivered in IMR5) <i>COPA Officer Interviews Training</i> (delivered in IMR7) <i>Fact Gathering-Evidence Collection Training</i> (delivered in IMR7)
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	Module 10, <i>Mistakes and Updates</i> (yet to be delivered)	<i>Fact Gathering-Evidence Collection Training</i> (delivered in IMR7)

<p>i. properly weighing the credibility of witnesses against CPD members</p>	<p>Module 3, <i>Credibility, Standards of Proof, and Disciplinary Decision Making</i> (yet to be delivered)</p>	<p><i>Fact Gathering-Evidence Collection Training</i> (delivered in IMR7)</p> <p><i>Witness Reliability Training</i> (delivered in IMR4)</p>
<p>j. using objective evidence to identify and resolve inconsistent statements</p>	<p>Module 3, <i>Credibility, Standards of Proof, and Disciplinary Decision Making</i> (yet to be delivered)</p>	<p><i>COPA Officer Interviews Training</i> (delivered in IMR7)</p> <p><i>Fact Gathering-Evidence Collection Training</i> (delivered in IMR7)</p> <p><i>CPD Rules and Directives</i> (delivered in IMR4)</p>
<p>k. implicit bias</p>	<p>Module 3, <i>Credibility, Standards of Proof, and Disciplinary Decision Making</i> (yet to be delivered)</p> <p>Module 7, <i>Procedural Justice, Implicit Bias, and Conflicts of Interest</i> (delivered in IMR9)</p>	<p><i>Implicit Bias Training</i> (delivered in IMR4)</p>
<p>l. the proper application of the relevant standards of proof</p>	<p>Module 3, <i>Credibility, Standards of Proof, and Disciplinary Decision Making</i> (yet to be delivered)</p>	<p><i>Final Summary Reports Training</i> (delivered in IMR7)</p>
<p>m. relevant COPA and CPD rules, policies, and protocols including the requirements of this Agreement</p>	<p>Module 7, <i>Procedural Justice, Implicit Bias, and Conflicts of Interest</i> (delivered in IMR9)</p> <p>Module 10, <i>Mistakes and Updates</i> (yet to be delivered)</p> <p><i>Investigation Assignment and Timelines</i> (yet to be delivered)</p>	<p><i>Consent Decree Overview</i> (delivered in IMR3)</p> <p><i>CPD Rules and Directives</i> (delivered in IMR4)</p>
<p>n. relevant state and federal law</p>	<p>Module 4, <i>Sexual Misconduct Initiation</i> (delivered in IMR9)</p> <p>Module 5, <i>Consent Decree and Law Review</i> (delivered in IMR9)</p> <p>Module 10, <i>Mistakes and Updates</i> (yet to be delivered)</p>	<p><i>Fourth Amendment Training</i> (delivered in IMR9)</p> <p><i>Compelled Statements Training</i> (delivered in IMR9)</p>

<p>o. relevant CPD Rules of Conduct, including Rules 14, 21, and 22</p>	<p>Module 2, <i>Complaint Initiation and Affidavit Overrides</i> (delivered in IMR9)</p> <p>Module 3, <i>Credibility, Standards of Proof, and Disciplinary Decision Making</i> (yet to be delivered)</p>	<p><i>CPD Rules and Directives</i> (delivered in IMR4)</p>
<p>p. the CMS</p>	<p>Module 1, <i>Complaint Management System and Complete Investigatory Files</i> (delivered in IMR9)</p>	<p><i>Case Management System: Overview of Policy and Procedures</i> (delivered in IMR6)</p>
<p>q. the applicable collective bargaining agreements</p>	<p>Module 8, <i>Audio Recording Interview Guidelines</i> (yet to be delivered)</p>	<p><i>Collective Bargaining Agreement Training</i> (delivered in IMR3)</p>
<p>r. how to access and use the PRS or information available on the PRS</p>	<p>Module 6, <i>SharePoint, SPARS & Performance Recognition System</i> (delivered in IMR9)</p>	<p>Not Applicable</p>

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 will look for evidence that BIA’s initial and annual in-service training is provided to all required personnel for Secondary compliance. For COPA, we will look for documentation maintaining that COPA and its employees continue to implement ¶528’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/2024/06/IMR8-Appendix-9-Accountability-and-Transparency-2023.11.01.pdf) (which included *Independent Monitoring Report 8*): <https://cpdmonitoringteam.com/wp-content/uploads/2024/06/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
TENTH REPORTING PERIOD JANUARY 1, 2024 – JUNE 30, 2024 COMPLIANCE PROGRESS: Preliminary		

Accountability and Transparency: ¶529

529. *Within 180 days of the Effective Date, CPD will begin providing training to all CPD members on the terms of this Agreement and COPA's and CPD's revised or new policies related to administrative investigations and discipline. To the extent appropriate and necessary based upon a CPD member's duties, and contact with members of the public and/or individuals in custody, this training will include instruction on: a. identifying and reporting misconduct, the consequences for failing to report misconduct, and the consequences for retaliating against a person for reporting misconduct or participating in an investigation; b. use of the City's anonymous reporting website; c. for CPD supervisors: i. the proper initiation of the intake process, including providing COPA's contact information and the consequences for failing to initiate the intake process; and ii. techniques for turning the initiation of a complaint into a positive police-community member interaction.*

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 with ¶529 in the tenth reporting period.

This reporting period, the CPD produced attendance records reflecting that more than 95% of all CPD members had taken and passed the *CPD Consent Decree eLearning*. However, the eLearning curriculum was never submitted for review under ¶529. The CPD must submit the eLearning for review under ¶529 so the IMT can assess whether it meets the requirements of this paragraph.

Additionally, the CPD must have a policy or training plan in place to achieve Preliminary compliance with ¶529. The CPD cannot achieve Secondary compliance for the eLearning without first achieving Preliminary compliance. Moving forward, we will look for a policy or training plan reflecting 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/2024/06/IMR8-Appendix-9-Accountability-and-Transparency-2023.11.01.pdf) (which included *Independent Monitoring Report 8*): <https://cpdmonitoringteam.com/wp-content/uploads/2024/06/IMR8-Appendix-9-Accountability-and-Transparency-2023.11.01.pdf>.

Paragraph 529 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: None
TENTH REPORTING PERIOD JANUARY 1, 2024 – JUNE 30, 2024 COMPLIANCE PROGRESS: None		

Accountability and Transparency: ¶530

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

Compliance Progress

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

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

COPA is now under assessment for Full compliance with ¶530 while the City and the CPD maintained Preliminary compliance with ¶530. Because all relevant City entities must achieve levels of compliance to bring the City, as a whole, into compliance, the City has not yet achieved Secondary compliance.

The reporting period, the CPD provided its finalized S08-01, *Complaint and Investigators and Investigations*, along with public comments. The CPD also produced its 2023 BIA Annual Report for Full compliance review with ¶530. However, the report alone is insufficient for Full compliance with ¶530. Additionally, the CPD cannot achieve Full compliance without first achieving Secondary compliance. To achieve Secondary compliance, the CPD must provide initial and annual in-service training to all required personnel. Additionally, we will look to determine that the CPD’s training plans to address the requirements of ¶528 are sufficient.

During the tenth reporting period, COPA produced its *2024-2025 Training Plan*. The IMT provided a no-objection notice on May 29, 2024. COPA remains under assessment while it implements its training plan and provides attendance records and evaluations to the IMT (see ¶287). In future reporting periods, we hope to see COPA improve its evaluation survey response rate to ensure feedback is being received from the majority of attendees. COPA should also expand its evaluation component to include collection of data on the instructors. Lastly, we hope to see a mechanism in place to ensure that feedback is received, analyzed, and reviewed and that training is improved in future iterations based on participant feedback.

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 ¶530.

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/2024/06/IMR8-Appendix-9-Accountability-and-Transparency-2023.11.01.pdf) (which included *Independent Monitoring Report 8*): <https://cpdmonitoringteam.com/wp-content/uploads/2024/06/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
TENTH REPORTING PERIOD JANUARY 1, 2024 – JUNE 30, 2024 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: January 1, 2024, through June 30, 2024)

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

Years after the Consent Decree took effect, the City of Chicago created the Community Commission for Public Safety and Accountability (CCPSA); the CCPSA's municipal ordinance requires them to perform the requirements of ¶532. The CCPSA and the City achieved Secondary compliance with ¶532 in the tenth reporting period.

This reporting period, the CCPSA provided materials related to the process for selecting Police Board members should vacancies occur. The materials included a PowerPoint presentation for new CCPSA members to ensure that the selection process and criteria is clear.

In the last reporting period, we noted concerns that the CCPSA did not follow the established selection process and criteria previously developed by the Police Board and the City. In the tenth reporting period, the CCPSA again had the opportunity to select candidates to fill additional Police Board member vacancies, and provided information on candidates to demonstrate that the selection criteria was considered in making recommendations to the Mayor. The CCPSA also demonstrated that it followed the established selection process. The IMT appreciates the CCPSA's efforts to closely follow the process despite challenges related to gaining interest from qualified applicants.

Additionally, the CCPSA produced draft surveys seeking responses from CPD members regarding the qualities needed of a Police Board member. The CCPSA also indicated that it plans to hold public hearings regarding the same. We appreciate the CCPSA's community outreach efforts and look forward to seeing the results of those efforts in future reporting periods.

Moving forward, for Full compliance, the CCPSA must complete its community engagement work. We will also determine whether the CCPSA continues to follow the set method for filing Police Board member vacancies, when necessary.

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/2024/06/IMR8-Appendix-9-Accountability-and-Transparency-2023.11.01.pdf) (which included *Independent Monitoring Report 8*): <https://cpdmonitoringteam.com/wp-content/uploads/2024/06/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
TENTH REPORTING PERIOD JANUARY 1, 2024 – JUNE 30, 2024 COMPLIANCE PROGRESS: Secondary		

Accountability and Transparency: ¶1540

540. Within 180 days of the Effective Date, Police Board members and hearing officers will receive initial and annual training that is adequate in quality, quantity, scope, and type and will cover, at minimum, the following topics: a. constitutional and other relevant law on police-community encounters, including law on the use of force and stops, searches, and arrests; b. police tactics; c. investigations of police conduct; d. impartial policing; e. policing individuals in crisis; f. CPD policies, procedures, and disciplinary rules; g. procedural justice; and h. community outreach.

Compliance Progress

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

Recurring Schedule: Annually



Not Yet Applicable

Preliminary: *In Compliance (FIFTH REPORTING PERIOD)*

Secondary: *Not in Compliance*

Full: *Not Yet Assessed*

The City and the Police Board maintained Preliminary compliance with ¶1540 in the tenth reporting period.

This reporting period, the Police Board provided its *Procedural Justice and Police Legitimacy Training* to relevant personnel. The training materials appropriately address impartial policing (see ¶1540(d)) and procedural justice (see ¶1540(g)). The training included discussion regarding how the perception of being treated fairly and respectfully influences a person’s perception of legitimacy and justice. The training also includes discussion of the four pillars of procedural justice (respect, voice, neutrality, trust), as commonly defined in contemporary policing literature and practices and defined in ¶777.

Additionally, the Police Board provided its *Community Policing and Outreach Training* to relevant personnel. The training materials purported to address community outreach (see ¶1540(h)). However, the IMT cannot determine whether the materials addressed ¶¶282–89² adequately because the Police Board did not produce the lesson plan for review.

The Police Board has yet to produce a training regarding investigations of police conduct (see ¶1540(c)).

² The City takes the position that ¶¶282–89 do not apply to the Police Board. However, ¶1540 specifies that the Police Board receive training that is “adequate in quality, quantity, scope, and type.” Therefore, the IMT will utilize the requirements set out in ¶¶282–89 to determine whether the Police Board trainings are “adequate in quality, quantity, scope, and type.”

Moving forward, the IMT will look for the Police Board to provide training materials on the topics outlined in ¶540(c) (“investigations of police conduct”) and ¶540(h) (“community outreach”).

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/2024/06/IMR8-Appendix-9-Accountability-and-Transparency-2023.11.01.pdf) (which included *Independent Monitoring Report 8*): <https://cpdmonitoringteam.com/wp-content/uploads/2024/06/IMR8-Appendix-9-Accountability-and-Transparency-2023.11.01.pdf>.

Paragraph 540 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, 2024 – DECEMBER 31, 2024 COMPLIANCE PROGRESS: Preliminary
TENTH REPORTING PERIOD JANUARY 1, 2024 – JUNE 30, 2024 COMPLIANCE PROGRESS: Preliminary		

Accountability and Transparency: ¶542

542. Within 90 days of the Effective Date, the City will create a training policy for Police Board members and hearing officers.

Compliance Progress

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

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

The City and the Police Board maintained Preliminary compliance with ¶542 in the tenth reporting period.

This reporting period, the Police Board provided its *Policy Regarding Training of Police Board Members and Hearing Officers*. The policy requires that each Police Board member and Hearing Officer receive initial training within six months of taking their position, along with annual training every calendar year. The trainings required are also consistent with ¶¶540–41.

Moving forward, for Secondary compliance, we will determine whether each Police Board member and Hearing Officer receives initial training on each topic. For Full compliance, the Police Board must provide evidence that it has created a system to ensure continued training will be provided annually in the years to come.

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/2024/06/IMR8-Appendix-9-Accountability-and-Transparency-2023.11.01.pdf>.

Paragraph 542 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, 2024 – DECEMBER 31, 2024 COMPLIANCE PROGRESS: Preliminary
TENTH REPORTING PERIOD JANUARY 1, 2024 – JUNE 30, 2024 COMPLIANCE PROGRESS: Preliminary		

Accountability and Transparency: ¶1546

546. Within 180 days following the expiration of each calendar year of the term of this Agreement, the City will produce and publish an annual report describing CPD activity during the previous calendar year (“CPD Annual Report”). The purpose of the CPD Annual Report will be to inform the public of the City’s law enforcement achievements and challenges, as well as new programs and steps taken to address challenges and build on successes. The CPD Annual Report will further provide information regarding the City’s implementation and status of this Agreement. The CPD Annual Report will not include any specific information or data by law that may not be disclosed. Subject to applicable law, the CPD Annual Report will provide data and program updates analyzing: a. community engagement and problem-solving policing efforts, identifying successes, challenges, and recommendations for future improvement; b. stop, search, and arrest data and any analysis of that data that was undertaken; c. use-of-force data and associated analyses; d. CPD responses to requests for service from individuals in crisis; e. initiatives that CPD has implemented for officer assistance and support; f. recruitment efforts, challenges, and successes; and g. in-service and supplemental recruit training.

Compliance Progress

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

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

Preliminary: *Under Assessment*

Secondary: *Not Yet Assessed*

Full: *Not Yet Assessed*

The City and the CPD are under assessment for Preliminary compliance with ¶1546 in the tenth reporting period.

This reporting period, the CPD produced its *2023 Annual Report* and met the requirement of ¶1546 that the report be produced and published within 180 days following the expiration of the calendar year. The CPD’s report is comprehensive and formatted similarly to previous annual reports, but with updated information. The report appropriately addresses the requirements of this paragraph. With respect to ¶1546(c), the CPD’s *2023 Annual Report* incorporates by reference the *2023 Annual Use of Force Report*, which was also produced and published during the tenth reporting period.

However, as previously noted, to achieve Preliminary compliance, the CPD must also develop a policy regarding the compilation and publication of an annual report. Moving forward, we will look for a policy to address the requirements of this paragraph and for the CPD to continue to finalize and publish detailed and timely annual reports that address the requirements of ¶1546.

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/2024/06/IMR8-Appendix-9-Accountability-and-Transparency-2023.11.01.pdf) (which included *Independent Monitoring Report 8*): <https://cpdmonitoringteam.com/wp-content/uploads/2024/06/IMR8-Appendix-9-Accountability-and-Transparency-2023.11.01.pdf>.

Paragraph 546 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, 2024 – DECEMBER 31, 2024 COMPLIANCE PROGRESS: None
TENTH REPORTING PERIOD JANUARY 1, 2024 – JUNE 30, 2024 COMPLIANCE PROGRESS: None		

Accountability and Transparency: ¶1547

547. CPD will regularly analyze the information it collects regarding reportable uses of force to identify significant trends. CPD will include information about any such trends in the CPD Annual Report.

Compliance Progress

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

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

Preliminary: *Under Assessment*

Secondary: *Not Yet Assessed*

Full: *Not Yet Assessed*

The City and the CPD are under assessment for Preliminary compliance with ¶1547 in the tenth reporting period.

This reporting period, the CPD produced its *2023 Annual Report*. The report incorporates by reference the CPD's *2023 Annual Use of Force Report*, which was also produced and published during the tenth reporting period. The *2023 Annual Use of Force Report* appropriately addresses the requirements of ¶1547 by discussing significant patterns and trends. The use of force report also discusses COPA's responsibility for conducting administrative investigations of officer-involved shooting incidents and complaints of excessive and/or improper use of force. It includes a link to access COPA's *2023 Annual Report*, which among other things, discusses relevant information with regard to COPA's use of force investigations for the period. Additionally, the CPD's *2023 Annual of Force Report* describes the Police Board's role in holding officers accountable for the use of force.

However, as previously noted, to achieve Preliminary compliance, the CPD must also develop a policy regarding the compilation and publication of an annual report that meets the requirements of ¶1547. Moving forward, we will look for a policy to address the requirements of this paragraph and for the CPD to continue to finalize and publish detailed and timely annual reports that address the requirements of ¶1547.

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/2024/06/IMR8-Appendix-9-Accountability-and-Transparency-2023.11.01.pdf>.

Paragraph 547 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, 2024 – DECEMBER 31, 2024 COMPLIANCE PROGRESS: None
TENTH REPORTING PERIOD JANUARY 1, 2024 – JUNE 30, 2024 COMPLIANCE PROGRESS: None		

Accountability and Transparency: ¶1548

548. *Within 180 days following the expiration of each calendar year of the term of this Agreement, the City will produce and publish an annual report describing certain legal activity involving CPD during the previous calendar year (“CPD Annual Litigation Report”). The CPD Annual Litigation Report will not include any specific information or data that may not be disclosed pursuant to applicable law. Subject to applicable law, the CPD Annual Litigation Report will address:*

- a. a list of civil lawsuits in which the plaintiff(s) seek(s) to hold the City responsible for the conduct of one or more current or former CPD members and information that either (i) the lawsuit was concluded by final order and all opportunities for appellate review were exhausted, or (ii) any judgment was satisfied during the prior calendar year. This list will include civil lawsuits handled by the City’s Department of Law’s (“DOL’s”) Federal Civil Rights Division, as well as lawsuits handled by DOL’s Torts Division if the complaint seeks relief associated with a vehicle pursuit, only.*
- b. for each case identified in (a) above, the following information will be provided in spreadsheet or open-data format:*
 - i. case name;*
 - ii. case number;*
 - iii. the date the trial court entered the final order;*
 - iv. a list of the parties at the time the final order was entered;*
 - v. the nature of the order (e.g., dismissal with prejudice, summary judgment for plaintiff(s)/defendant(s), judgment of not liable, judgment of liable);*
 - vi. the amount of the compensatory and punitive damages awarded (if applicable);*
 - and vii. the amount of attorney’s fees and costs awarded (if applicable).*
- c. a list of civil lawsuits in which the plaintiff(s) seek(s) to hold the City responsible for the conduct of one or more current or former CPD members and a settlement was reached (including approval by City Council, if applicable) during the prior calendar year. This list will include civil lawsuits handled by DOL’s Federal Civil Rights Division, as well as such lawsuits handled by DOL’s Torts Division if the complaint seeks relief associated with a vehicle pursuit, only.*
- d. for each case identified in (c) above, the following information will be provided in spreadsheet or open-data format:*
 - i. case name;*
 - ii. case number;*
 - iii. a list of the parties at the time the case was settled;*
 - iv. the amount of the settlement;*
 - and v. the amount of settlement allocated to attorney’s fees and costs (if known).*
- e. the amount of attorney’s fees paid by the City during the prior calendar year to outside counsel engaged to defend the City and/or one or more current or former CPD members in civil lawsuits handled by DOL’s Federal Civil Rights Division, as well as such lawsuits handled by DOL’s Tort’s Division if the complaint seeks relief associated with a vehicle pursuit, only. This amount will be presented in the aggregate.*
- f. for all individually named defendants in the cases identified in (a) and (c) above, the status (e.g., pending with BIA/COPA/OIG or charges sustained, not sustained, unfounded, or exonerated by BIA/COPA/OIG) of any administrative investigation(s) by BIA, COPA, or OIG at the time the trial court entered its final order or the settlement was reached.*
- g. the disposition of any felony criminal prosecutions of current or former CPD members from the previous year.*
- h. the number of pending civil lawsuits that seek to hold the City responsible for one or more current or former CPD members that the City is defending. This number will include civil lawsuits handled by the Department of Law’s Federal Civil Rights Division, as well as lawsuits handled by DOL’s Torts Division if the complaint seeks relief associated with a vehicle only.*

Compliance Progress

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

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

Preliminary: *In Compliance (NEW)*

Secondary: *Not in Compliance*

Full: *Not Yet Assessed*

The City achieved Preliminary compliance with ¶1548 in the tenth reporting period.

This reporting period, the City produced and published its *2023 Report on Chicago Police Department Litigation* within 180 days following the end of the 2023 calendar year, along with a spreadsheet containing relevant data (see ¶1548(b)).³ The report appropriately addresses the requirements of ¶1548 by including data and discussion regarding the total number of lawsuits concluded by a final order of settlement, court or jury verdict, or dismissal. The report includes visual aids that show the total reportable cases. Notably, payouts for cases related to reversed convictions was the largest category, accounting for approximately 62% of the total payout amount, while payouts for cases related to use of force, false arrest, and vehicle pursuits accounted for approximately 25% of the total payout amount.

Moving forward, for Secondary compliance, we will determine whether the City has allocated sufficient resources to timely submit its annual litigation report that meets 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* (which included *Independent Monitoring Report 8*): <https://cpdmonitoringteam.com/wp-content/uploads/2024/06/IMR8-Appendix-9-Accountability-and-Transparency-2023.11.01.pdf>.

³ The report and corresponding spreadsheet containing relevant data is available at: https://www.chicago.gov/city/en/depts/dol/supp_info/CPDAnnLitReports.html.

Paragraph 548 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: 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		

Accountability and Transparency: ¶549

549. As part of the CPD Annual Litigation Report, the City will analyze the data and trends collected, and include a risk analysis and resulting recommendations.

Compliance Progress

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

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

Preliminary: *In Compliance (NEW)*

Secondary: *Not in Compliance*

Full: *Not Yet Assessed*

The City achieved Preliminary compliance with ¶549 in the tenth reporting period.

This reporting period, the City produced and published its *2023 Report on Chicago Police Department Litigation*. The report includes a trend and risk analysis, as required by ¶549. However, as the City acknowledges, the risk assessment of resolved cases is not sufficiently robust to support meaningful discussions to improve CPD policy, leadership, supervision, or training of department members. Despite the uncertainty of the data analysis, the Department of Law provides input to the CPD with regard to issues raised in litigation through weekly conversations and providing recommendations for training.

Moving forward, for Secondary compliance, we will determine whether the City has allocated sufficient resources to analyze the data and trends collected and to include a risk analysis and resulting recommendations as required by 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* (which included *Independent Monitoring Report 8*): <https://cpdmonitoringteam.com/wp-content/uploads/2024/06/IMR8-Appendix-9-Accountability-and-Transparency-2023.11.01.pdf>.

Paragraph 549 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: 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		

Accountability and Transparency: ¶551

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

Compliance Progress

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

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: *In Compliance* (NEW)

The City and the CPD achieved Full compliance with ¶551 in the tenth reporting period.

This reporting period, the CPD produced its *2023 BIA Annual Report* and its *2024 BIA Quarter 1 Report*. The reports include all necessary aggregate data regarding investigations conducted by Accountability Sergeants, as required by ¶551.⁴ The IMT appreciates the CPD's efforts to create and publish the reports in a timely manner. The reports demonstrate a commitment to transparency and building trust in BIA's operations.

Moving forward, to maintain Full compliance, BIA must continue to provide quarterly and annual reports that comply with the requirements of ¶551 in a timely manner.

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/2024/06/IMR8-Appendix-9-Accountability-and-Transparency-2023.11.01.pdf>.

⁴ The CPD maintained Full compliance with ¶550 by producing its 2023 BIA Annual Report and its 2024 BIA Quarter 1 Report. The 2023 BIA Annual Report was also produced for Full compliance review with ¶¶456, 462, 476, 526–28, and 530, and the 2024 BIA Quarter 1 Report was also produced for Full compliance review with ¶¶456, 462, 476, and 526–27. However, the reports alone are insufficient for Full compliance with those paragraphs. To achieve Full compliance with those paragraphs, the CPD must produce the underlying data relevant to those paragraphs rather than a summary of that data.

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

Accountability and Transparency: ¶1560

560. The Deputy PSIG will have timely and full access to all information in the possession or control of COPA, CPD, the Police Board, and any other City departments or agencies in order to conduct any review or audit within the Deputy PSIG’s jurisdiction.

Compliance Progress	(Reporting Period: January 1, 2024, through June 30, 2024)
Preliminary:	<i>In Compliance (SIXTH REPORTING PERIOD)</i>
CPD	<i>In Compliance (SIXTH REPORTING PERIOD)</i>
COPA	<i>In Compliance (SIXTH REPORTING PERIOD)</i>
Police Board	<i>In Compliance (SIXTH REPORTING PERIOD)</i>
Secondary:	<i>In Compliance (SIXTH REPORTING PERIOD)</i>
CPD	<i>In Compliance (SIXTH REPORTING PERIOD)</i>
COPA	<i>In Compliance (SIXTH REPORTING PERIOD)</i>
Police Board	<i>In Compliance (SIXTH REPORTING PERIOD)</i>
Full:	<i>Not in Compliance</i>
CPD	<i>Not in Compliance</i>
COPA	<i>In Compliance (SEVENTH REPORTING PERIOD)</i>
Police Board	<i>In Compliance (NEW)</i>

The Police Board achieved Full compliance with ¶1560, while the CPD maintained Secondary compliance and COPA maintained Full compliance in the tenth reporting period. Because all relevant City entities must achieve a particular level of compliance to bring the City, as a whole, into that level of compliance, the City has not yet achieved Full compliance.

In the tenth reporting period, the Deputy PSIG produced a memorandum that explained the Deputy PSIG’s ability to fully and timely access all information in the possession or control of COPA, the CPD, the Police Board, and other City entities related to audits or reviews in the Deputy PSIG’s jurisdiction.⁵ The Deputy PSIG reported that it made 22 requests for information from the CPD this reporting period; the CPD responded fully and timely to 21 of those requests. The Deputy PSIG made ten requests for information from COPA; COPA responded fully and timely to nine of those requests. The Deputy PSIG made one request for information from the Police Board; the Police Board fully and timely responded to the one request.

The Deputy PSIG made five requests for information from the OPSA; the OPSA responded fully and timely to those five requests. However, the Deputy PSIG noted

⁵ In the eighth 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.

concern about two long outstanding production requests that have yet to be fulfilled by the OPSA. These requests are (1) full access to the timekeeping database, and (2) full access to the CPD’s legacy CMS data. The OPSA has not provided a reasonable explanation for the delay in granting the access. The IMT encourages the City and the OPSA to timely resolve the outstanding requests, as required by this paragraph.

Finally, the Deputy PSIG made six additional requests to other City entities, and those requests were fulfilled in a full and timely manner. The Deputy PSIG further reported that it continues to meet twice per month with the CPD and once per month with COPA, allowing those parties to discuss the Deputy PSIG’s requests and provide clarification when necessary. As we have noted in previous reporting periods, these meetings are not required by the Consent Decree but indicate that the relevant entities are taking initiative to meet and comply with the requirements of ¶560.

During the tenth reporting period, the Police Board produced a draft *Policy Regarding Deputy Public Safety Inspector General Review and Audits*. The IMT provided comments on June 10, 2024. The IMT received the revised and implemented policy early in the eleventh reporting period, although the Police Board revised and implemented its *Policy Regarding Deputy Public Safety Inspector General Review and Audits* during the tenth reporting period. Therefore, the Police Board achieved Full compliance by implementing this policy and by providing the Deputy PSIG full and timely access to information, as confirmed by the Deputy PSIG.

This reporting period, the CPD did not produce documentation that demonstrated an increased level of compliance with the requirements of ¶560.

Moving forward, we will look for the CPD to develop a policy that incorporates the requirements of this paragraph. For COPA and the Police Board, 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/2024/06/IMR8-Appendix-9-Accountability-and-Transparency-2023.11.01.pdf) (which included *Independent Monitoring Report 8*): <https://cpdmonitoringteam.com/wp-content/uploads/2024/06/IMR8-Appendix-9-Accountability-and-Transparency-2023.11.01.pdf>.

Paragraph 560 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: Secondary
SEVENTH REPORTING PERIOD JULY 1, 2022 – DECEMBER 31, 2022 COMPLIANCE PROGRESS: Secondary	EIGHTH REPORTING PERIOD JANUARY 1, 2023 – JUNE 30, 2023 COMPLIANCE PROGRESS: Secondary	NINTH REPORTING PERIOD JULY 1, 2024 – DECEMBER 30, 2024 COMPLIANCE PROGRESS: Secondary
TENTH REPORTING PERIOD JANUARY 1, 2024 – JUNE 30, 2024 COMPLIANCE PROGRESS: Secondary		

Accountability and Transparency: ¶1564

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: January 1, 2024, through June 20, 2024)

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

The Police Board achieved Preliminary compliance with ¶1564, while the CPD maintained Preliminary compliance and COPA maintained Full compliance during the tenth reporting period. Because all relevant City entities must achieve levels of compliance to bring the City, as a whole, into compliance, the City has not yet achieved Secondary compliance.

To assess Secondary compliance for the CPD, the IMT reviewed the CPD’s *BIA Accountability Supplemental eLearning*. The IMT provided comments on June 12, 2024. However, by the end of the reporting period, the eLearning remained in the collaborative review and revision process.

To assess Preliminary compliance for the Police Board, the IMT reviewed the Police Board’s draft *Policy Regarding Deputy Public Safety Inspector General Review and Audits*. The IMT provided comments on June 10, 2024. The IMT received the revised and implemented policy early in the eleventh reporting period, although the Police Board revised and implemented its *Policy Regarding Deputy Public Safety Inspector General Review and Audits* during the tenth reporting period. Therefore, the Police Board achieved Preliminary compliance with ¶1564.

To assess Full compliance for COPA, the IMT reviewed a COPA 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.

Additionally, the Deputy 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.”⁶

Moving forward, we will determine whether the CPD and the Police Board have systems in place to detect and report any interference 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/2024/06/IMR8-Appendix-9-Accountability-and-Transparency-2023.11.01.pdf) (which included *Independent Monitoring Report 8*): <https://cpdmonitoringteam.com/wp-content/uploads/2024/06/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
TENTH REPORTING PERIOD JANUARY 1, 2024 – JUNE 30, 2024 COMPLIANCE PROGRESS: Preliminary		

⁶ In the eighth 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.