

Independent Monitoring Report 11

Data Collection, Analysis & Management

Compliance Assessments by Paragraph

Specific assessments, by paragraph, for the Data Collection, Analysis & Management section are available here. This includes paragraphs where the City gained or lost compliance in the eleventh reporting period, as well as paragraphs with significant developments toward or away from compliance. A fuller description of the history of compliance efforts, methodologies, compliance determinations for each original monitorable paragraphs in the Data Collection, Analysis, and Management section is available in *Comprehensive Assessment Part I* (which included *Independent Monitoring Report 8*): <https://cpdmonitoringteam.com/imr-8-1/>.

Data Collection, Analysis & Management: ¶568

568. CPD will collect and maintain the data and records necessary to accurately evaluate its use of force practices and to facilitate transparency and accountability regarding those practices.

Compliance Progress

(Reporting Period: July 1, 2024, through December 31, 2024)

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

In the eleventh reporting period, the City and the CPD maintained Preliminary compliance and achieved Secondary and Full compliance with the requirements ¶568.

To assess Preliminary compliance with ¶568, the IMT reviewed the CPD’s directives and forms which reflect data collection efforts required by this paragraph, including those referenced in ¶569. To assess Secondary compliance, we evaluated whether CPD officers had received sufficient training on each directive and each form to complete. To assess Full compliance, we evaluated whether the CPD’s data collection processes “facilitate transparency and accountability regarding those practices.”

During the eleventh reporting period, the CPD demonstrated Secondary compliance by providing the IMT with a list of trainings related to the data and records required by ¶¶568 and 569, evidencing that officers have received instruction in the range of data forms and documents that are required following a use of force event.¹

Additionally, during the eleventh reporting period, the IMT reviewed an audit conducted by CPD’s Audit Division, which found that officers consistently collect use of force data following a use-of-force event. Therefore, publicly available data on CPD’s *Use of Force Dashboard*, housed on the CPD’s public website, may be viewed as a valid picture of such practices, facilitating transparency as required by ¶568. Furthermore, the data and records continue to facilitate accountability, both formally (*i.e.*, through COPA and BIA) as well as informally (*e.g.*, through field supervision, TRED debriefings and advisements). Although we recognize additional reforms will be required to further enhance the CPD’s force review and accountability processes, we do not find this to be a concern with the data but rather with

¹ To maintain Secondary compliance in future reporting periods, the CPD must produce a list of trainings and associated attendance records on an ongoing basis that are relevant to each subsection of this paragraph. See also ¶¶290–91.

certain processes. The CPD achieved Full compliance with the requirements of ¶568 through their work during this reporting period.

Paragraph 568 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:
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

ELEVENTH REPORTING PERIOD
JULY 1, 2024 – DECEMBER 31, 2024

COMPLIANCE PROGRESS:
Full

Data Collection, Analysis & Management: ¶569

569. CPD must collect, track, and maintain all available documents related to use of force incidents, including: a. TRRs, or any other similar form of documentation CPD may implement for initial reporting of reportable use of force incidents; b. TRR-Is, or any other similar form of documentation CPD may implement to document supervisory investigation of reportable use of force incidents; c. Tactical Response Reports – Review (“TRR-Rs”), or any other similar form of documentation CPD may implement to document review or auditing of reportable use of force incidents; d. arrest reports, original case incident reports, and investigatory stop reports associated with a reportable use of force incident; e. administrative investigative files, including investigative materials generated, collected, or received by BIA, or COPA, or any similar form of documentation CPD may implement for misconduct allegations or civilian complaints; and f. all reasonably available documentation and materials relating to any reportable use of force, in-custody injury or death, or misconduct allegation, including body-worn, in-car, or known third-party camera recordings, and statements, notes, or recordings from witness and officer interviews.

Compliance Progress

(Reporting Period: July 1, 2024, through December 31, 2024)

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

In the eleventh reporting period, the City and the CPD maintained Preliminary and achieved Secondary compliance with the requirements of ¶568. The City and the CPD are under assessment for Full compliance.

To assess Preliminary compliance with ¶568, the IMT reviewed the CPD’s directives and forms that demonstrated data collection efforts required by this paragraph, including those referenced in ¶569. To assess Secondary compliance, we evaluated whether CPD officers had received sufficient training on each directive and each form to complete. To assess Full compliance, we evaluated whether the CPD’s data collection processes “facilitate transparency and accountability regarding those practices” as required by ¶568.

During the eleventh reporting period, the CPD provided the IMT with a list of trainings, related to the data and records required by ¶¶568 and 569, evidencing that officers have received instruction in the range of data forms and documents that are required following a use of force event. To maintain Secondary compliance in future reporting periods, the CPD must produce a list of trainings and associated attendance records on an ongoing basis that are relevant to each subsection of this paragraph. *See also* ¶¶290–91.

Additionally, during the eleventh reporting period, the IMT reviewed an audit conducted by CPD’s Audit Division, which found that officers consistently collect use-of-force data following a use-of-force event.

Paragraph 569 Compliance Progress History

FIRST REPORTING PERIOD SEPTEMBER 1, 2019 – AUGUST 31, 2019	SECOND REPORTING PERIOD SEPTEMBER 1, 2019 – FEBRUARY 29, 2020	THIRD REPORTING PERIOD MARCH 1, 2020 – DECEMBER 31, 2020
COMPLIANCE PROGRESS: None	COMPLIANCE PROGRESS: None	COMPLIANCE PROGRESS: None
FOURTH REPORTING PERIOD JANUARY 1, 2021 – JUNE 30, 2021	FIFTH REPORTING PERIOD JULY 1, 2021 – DECEMBER 31, 2021	SIXTH REPORTING PERIOD JANUARY 1, 2022 – JUNE 30, 2022
COMPLIANCE PROGRESS: Preliminary	COMPLIANCE PROGRESS: Preliminary	COMPLIANCE PROGRESS: Preliminary
SEVENTH REPORTING PERIOD JULY 1, 2022 – DECEMBER 31, 2022	EIGHTH REPORTING PERIOD JANUARY 1, 2023 – JUNE 30, 2023	NINTH REPORTING PERIOD JULY 1, 2023 – DECEMBER 31, 2023
COMPLIANCE PROGRESS: Preliminary	COMPLIANCE PROGRESS: Preliminary	COMPLIANCE PROGRESS: Preliminary
TENTH REPORTING PERIOD JANUARY 1, 2024 – JUNE 30, 2024	ELEVENTH REPORTING PERIOD JULY 1, 2024 – DECEMBER 31, 2024	
COMPLIANCE PROGRESS: Preliminary	COMPLIANCE PROGRESS: Under Assessment	

Data Collection, Analysis & Management: ¶571

571. CPD must have an electronic system that accurately and reliably tracks all data derived from reportable use of force incidents, including: a. the response by CPD members during the incident, including the type(s) of force used; b. the date, time, location, and district of the incident; c. whether a foot or vehicle pursuit occurred that is associated with the incident; d. the actual or, if unavailable, perceived race, ethnicity, age, and gender of the subject; e. the name, watch, employee number, and unit and beat of assignment of any CPD member(s) who used force; f. CPD units identified in the incident report as being on the scene of the use of force incident; g. whether the incident occurred during an officer-initiated contact or a call for service; h. the subject's mental health or medical condition, use of drugs or alcohol, ability to understand verbal commands, or disability, as perceived by the CPD member(s) at the time force was used; i. the subject's actions that led to the CPD member's use of force; j. whether the CPD member perceived that the subject possessed a weapon and, if so, what type(s); k. whether the subject possessed a weapon and, if so, what type(s); l. whether reportable force was used against a subject that was handcuffed or otherwise in physical restraints; m. any injuries sustained by CPD members; n. any injuries sustained or alleged by the subject(s) and any medical treatment that was offered or performed on the scene of the incident; o. for each weapon discharged by an officer, including firearms, Tasers, and OC devices, the number of discharges per weapon; and p. whether the subject was charged with an offense and, if so, which offense(s).

Compliance Progress

(Reporting Period: July 1, 2024, through December 31, 2024)

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

In the eleventh reporting period, the City and the CPD maintained Preliminary and Secondary compliance and achieved Full compliance with the requirements of ¶571.

To assess Preliminary compliance with ¶571, the IMT reviewed records demonstrating that the City's entities have qualified personnel to meet the requirements of this paragraph, and determined whether the database required by this paragraph exists and that all forms and relevant information can be stored within the database. To assess Secondary compliance with this paragraph, we reviewed the CPD's training development, implementation, and evaluation (¶286) and determined whether all officers are adequately trained in completing each of the forms required by this paragraph. To assess Full compliance, the IMT reviewed the CPD's data to determine whether the requirements of ¶571 have been operationalized and that data related to uses of force is valid.

The City and the CPD achieved Preliminary compliance with ¶571 in the fourth reporting period by finalizing enhancements to the Tactical Response Report (TRR) form, which contains the requirements of ¶571. The City and the CPD achieved Secondary compliance in the sixth reporting period by completing training of officers and supervisors on reporting requirements after a use-of-force event. The CPD continues to utilize the Tactical Response Report (TRR) and TRR-Review (TRR-R) forms and both officers and supervisors have received training on completing the documents.

In assessing Full compliance, we reviewed the methodology, findings, and recommendations for the use of force audit recently completed by CPD. The audit was conducted to ensure officers and supervisors are consistently completing the required forms following a use-of-force event. According to the audit conducted by the CPD Audit Division, the audit team reviewed over 10,000 report narratives and, from this review, identified only 30 unreported use-of-force incidents. Based on these findings, the Audit Division concluded that “Department members comply with the Department’s use of force reporting policy with minimal exceptions.”

The IMT had the opportunity to weigh in on the methodology before the audit being conducted and agree with the conclusions drawn by the Audit Division. Although we find the audit to demonstrate that CPD’s use-of-force data is valid, the Audit Division’s report “did not attempt to analyze how many TRRs were not required under GO3-O2-O2” (*i.e.*, over-reported uses of force). Moving forward, the IMT encourages the City and CPD to develop an audit approach to analyze how many TRRs were included in the sample size and were not required under GO3-O2-O2 and provide corrective instruction to members who over-report force and the supervisors who approve them.

The City achieved Full compliance with ¶571 in the eleventh reporting period. Moving forward, the IMT will continue to monitor that officers and supervisors are completing the relevant forms accurately.

Paragraph 571 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:
Status Update

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

COMPLIANCE PROGRESS:
Preliminary

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

COMPLIANCE PROGRESS:
Preliminary

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

COMPLIANCE PROGRESS:
Secondary

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

COMPLIANCE PROGRESS:
Secondary

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

COMPLIANCE PROGRESS:
Secondary

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

COMPLIANCE PROGRESS:
Secondary

TENTH REPORTING PERIOD
JANUARY 1, 2024 – JUNE 30, 2024

COMPLIANCE PROGRESS:
Secondary

ELEVENTH REPORTING PERIOD
JULY 1, 2024 – DECEMBER 31, 2024

COMPLIANCE PROGRESS:
Full

Data Collection, Analysis & Management: ¶576

576. CPD will conduct random audits of body-worn and in-car camera recordings of incidents that involved civilian interactions to assess whether CPD officers are complying with CPD policy. CPD will take corrective action to address identified instances where CPD officers have not complied with CPD policy as permitted by law, and will identify any trends that warrant changes to policy, training, tactics, equipment, or Department practice.

Compliance Progress

(Reporting Period: July 1, 2024, through December 31, 2024)

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

In the eleventh monitoring period, the City and CPD achieved both Preliminary and Secondary compliance with the requirements of ¶576.

To assess Preliminary compliance with ¶576, the IMT reviewed the CPD’s relevant policies and documents following the process described in the Consent Decree (¶¶626–41), and the CPD’s data. To assess Secondary compliance, the IMT reviewed the CPD’s data collection tools related to ¶576, including specific forms used by supervisors to ensure a consistent process for the data collection required by this paragraph.

During the reporting period, the IMT provided a no-objection notice to the CPD for Special Order SO3-05, *In-Car Video Systems*, which contains the requirement for lieutenants to review one in-car camera video per day. Coupled with our prior no-objection notice to Special Order SO3-14, *Body Worn Cameras*, the CPD has sufficiently memorialized the requirements of ¶576 between these two Special Orders. With this, the City and the CPD achieved Preliminary compliance.

Furthermore, the IMT provided a no-objection notice to the CPD Form 21.130, *Random Video Review*, which the CPD is using to capture data from lieutenant random reviews of both body-worn camera video and in-car camera video. This form provides a standardized process for conducting the random reviews required by ¶576 and therefore serves as a training mechanism for watch lieutenants. With this, the City and the CPD achieved Secondary compliance.

To achieve Full compliance with this paragraph, the CPD needs to provide reliable data demonstrating that lieutenants are consistently conducting the reviews required under SO3-14 and SO3-05 and reliably using Form 21.130 to document their reviews. Further, the CPD must demonstrate that the body-worn camera and in-car camera hardware is consistently operational and that CPD members are consistently and reliably tagging videos to facilitate reviews. Additionally, the IMT will need to see evidence that the CPD is using the data to identify any issues with

policy, training, or personnel and that, if so, remedial steps are taken as appropriate.

Paragraph 576 Compliance Progress History

FIRST REPORTING PERIOD SEPTEMBER 1, 2019 – AUGUST 31, 2019	SECOND REPORTING PERIOD SEPTEMBER 1, 2019 – FEBRUARY 29, 2020	THIRD REPORTING PERIOD MARCH 1, 2020 – DECEMBER 31, 2020
COMPLIANCE PROGRESS: Not Applicable	COMPLIANCE PROGRESS: Status Update	COMPLIANCE PROGRESS: None
FOURTH REPORTING PERIOD JANUARY 1, 2021 – JUNE 30, 2021	FIFTH REPORTING PERIOD JULY 1, 2021 – DECEMBER 31, 2021	SIXTH REPORTING PERIOD JANUARY 1, 2022 – JUNE 30, 2022
COMPLIANCE PROGRESS: None	COMPLIANCE PROGRESS: None	COMPLIANCE PROGRESS: None
SEVENTH REPORTING PERIOD JULY 1, 2022 – DECEMBER 31, 2022	EIGHTH REPORTING PERIOD JANUARY 1, 2023 – JUNE 30, 2023	NINTH REPORTING PERIOD JULY 1, 2023 – DECEMBER 31, 2023
COMPLIANCE PROGRESS: None	COMPLIANCE PROGRESS: None	COMPLIANCE PROGRESS: None
TENTH REPORTING PERIOD JANUARY 1, 2024 – JUNE 30, 2024	ELEVENTH REPORTING PERIOD JULY 1, 2024 – DECEMBER 31, 2024	
COMPLIANCE PROGRESS: None	COMPLIANCE PROGRESS: Secondary	

Data Collection, Analysis & Management: ¶577

577. CPD will create a Force Review Board (“FRB”) to review, from a Department improvement perspective: (a) any level 3 reportable use of force incident, except for accidental firearms discharges and animal destructions with no human injuries, and (b) any reportable uses of force by a CPD command staff member.

Compliance Progress

(Reporting Period: July 1, 2024, through December 31, 2024)

Preliminary:	<i>In Compliance</i> (THIRD REPORTING PERIOD)
Secondary:	<i>In Compliance</i> (SEVENTH REPORTING PERIOD)
Full:	<i>In Compliance</i> (TENTH REPORTING PERIOD)

In the eleventh reporting period, the City and the CPD maintained Preliminary, Secondary, and Full compliance with ¶577.

To assess Preliminary compliance with ¶577, the IMT reviewed the CPD’s relevant policies and documents following the process described in the Consent Decree (¶¶626–41), and the CPD’s data. Additionally, the IMT reviewed records demonstrating that the CPD has qualified personnel to meet the requirements of this paragraph. To assess Secondary compliance, the IMT reviewed the CPD’s training development, implementation, and evaluation (¶286), including the implementation of a decision-point analysis. To assess Full compliance, the IMT considered whether the CPD has sufficiently implemented its policy and training.

The CPD has maintained General Order G03-02-08, *Department Review of Use of Force*, which memorializes the role of the Force Review Board (FRB) in reviewing Level 3 uses of force and reportable uses of force by a CPD command staff member. As the FRB continues to be detailed in policy, the CPD has remained in Preliminary compliance with ¶577. Additionally, the CPD continues to maintain Standard Operating Procedure (SOP) 2020-03, *Force Review Board*, which we have previously noted as demonstrating Secondary compliance.

Full compliance with ¶577 requires the creation of the FRB and sets forth the reportable uses of force that shall be reviewed by the FRB. During the eleventh monitoring period, we continued to observe the CPD utilize FRBs for the types of force identified in subsections (a) and (b)—consistent with the requirements of ¶577.²

² To achieve Full compliance with the requirements of ¶578 and ¶580, the CPD must demonstrate that the FRB is consistently engaging in a critical review of the incidents and making a decision-point analysis that enhances the CPD.

Paragraph 577 Compliance Progress History

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

COMPLIANCE PROGRESS:
Not Applicable

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

COMPLIANCE PROGRESS:
None

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

COMPLIANCE PROGRESS:
Preliminary

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

COMPLIANCE PROGRESS:
Preliminary

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

COMPLIANCE PROGRESS:
Preliminary

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

COMPLIANCE PROGRESS:
Preliminary

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

COMPLIANCE PROGRESS:
Secondary

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

COMPLIANCE PROGRESS:
Secondary

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

COMPLIANCE PROGRESS:
Secondary

TENTH REPORTING PERIOD
JANUARY 1, 2024 – JUNE 30, 2024

COMPLIANCE PROGRESS:
Full

ELEVENTH REPORTING PERIOD
JULY 1, 2024 – DECEMBER 31, 2024

COMPLIANCE PROGRESS:
Full

Data Collection, Analysis & Management: ¶578

578. For any reportable use of force incident subject to an ongoing investigation by COPA, COPA will be exclusively responsible for recommending disciplinary action relating to the incident. The purpose of FRB's review will be to: a. evaluate if actions by CPD members during the incident were tactically sound and consistent with CPD training; and b. if applicable, identify specific modifications to existing policy, training, tactics, or equipment that could minimize the risk of deadly force incidents occurring and the risk of harm to officers and the public.

Compliance Progress

(Reporting Period: July 1, 2024, through December 31, 2024)

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

In the eleventh reporting period, the City and the CPD maintained Preliminary and Secondary compliance with ¶578 but did not achieve Full compliance.

To assess Preliminary compliance with ¶578, the IMT reviewed the entities' relevant policies and documents following the process described in the Consent Decree (¶¶626–41). To assess Secondary compliance, the IMT reviewed the CPD's training development, implementation, and evaluation (¶286), including the implementation of a decision-point analysis. To assess Full compliance, the IMT reviewed the entities' data collection and evaluated whether the Force Review Board consistently engaged in a critical review of incidents and made a decision-point analysis per the requirements of this paragraph.

During the eleventh reporting period, the CPD maintained General Order G03-02-08, *Department Review of Use of Force*, which memorializes the role of the Force Review Board (FRB) in reviewing Level 3 uses of force and reportable uses of force by a CPD command staff member. As the FRB continues to be detailed in policy, the CPD has remained in Preliminary compliance with ¶578. Additionally, the CPD continues to possess Standard Operating Procedure (SOP) 2020-03, *Force Review Board*, which we have previously found to evidence Secondary compliance.

However, we continue to observe inconsistent execution of FRBs, and those which we observed during this monitoring period did not sufficiently evaluate each opportunity for operational improvement. As we have noted in our previous reports, FRB reviews should be designed to look at each decision during an event to understand how they contributed to the outcome and whether, from an operational perspective, there is an opportunity to improve. Yet, the FRBs we observed continue to be summary reviews of the force event without the nuance required by SOP 2020-03. We therefore continue to find that FRBs, as they are presently conducted,

continue to fall short of the requirements of this paragraph. The IMT continues to be available for consultation with CPD as to how they should be enhanced.

The City and the CPD maintained Preliminary and Secondary compliance with ¶578 in the eleventh reporting period. To achieve Full compliance with the requirements of ¶578, we will need to observe the FRB consistently engaging in a critical review of the incidents and making a decision-point analysis that enhances the CPD.

Paragraph 578 Compliance Progress History

FIRST REPORTING PERIOD SEPTEMBER 1, 2019 – AUGUST 31, 2019	SECOND REPORTING PERIOD SEPTEMBER 1, 2019 – FEBRUARY 29, 2020	THIRD REPORTING PERIOD MARCH 1, 2020 – DECEMBER 31, 2020
COMPLIANCE PROGRESS: Not Applicable	COMPLIANCE PROGRESS: None	COMPLIANCE PROGRESS: Preliminary
FOURTH REPORTING PERIOD JANUARY 1, 2021 – JUNE 30, 2021	FIFTH REPORTING PERIOD JULY 1, 2021 – DECEMBER 31, 2021	SIXTH REPORTING PERIOD JANUARY 1, 2022 – JUNE 30, 2022
COMPLIANCE PROGRESS: Preliminary	COMPLIANCE PROGRESS: Preliminary	COMPLIANCE PROGRESS: Preliminary
SEVENTH REPORTING PERIOD JULY 1, 2022 – DECEMBER 31, 2022	EIGHTH REPORTING PERIOD JANUARY 1, 2023 – JUNE 30, 2023	NINTH REPORTING PERIOD JULY 1, 2023 – DECEMBER 31, 2023
COMPLIANCE PROGRESS: Secondary	COMPLIANCE PROGRESS: Secondary	COMPLIANCE PROGRESS: Secondary
TENTH REPORTING PERIOD JANUARY 1, 2024 – JUNE 30, 2024	ELEVENTH REPORTING PERIOD JULY 1, 2024 – DECEMBER 31, 2024	
COMPLIANCE PROGRESS: Secondary	COMPLIANCE PROGRESS: Secondary	

Data Collection, Analysis & Management: ¶580

580. The FRB will review each incident within its purview promptly, which will in no event be more than 96 hours after the incident occurs. Within 30 days after its review of an incident, the FRB will issue recommendations, if appropriate, to the Superintendent regarding any need for additional training or modifications to policies, tactics, equipment, or Department practices. Upon review and approval by the Superintendent, or his or her designee, the FRB will assign each approved recommendation to a specific CPD command staff member for implementation. CPD will promptly implement each approved recommendation.

Compliance Progress

(Reporting Period: July 1, 2024, through December 31, 2024)

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

In the eleventh reporting period, the City and the CPD maintained Preliminary and Secondary compliance with ¶580.

To assess Preliminary compliance with ¶580, the IMT reviewed the entities' relevant policies and documents following the process described in the Consent Decree (¶¶626–41). To assess Secondary compliance, the IMT reviewed the CPD's training development, implementation, and evaluation (¶286), including the implementation of a decision-point analysis. To assess Full compliance, the IMT reviewed the entities' data collection and evaluated whether the Force Review Board consistently engaged in a critical review of incidents and made a decision-point analysis per the requirements of this paragraph.

During the eleventh reporting period, the CPD maintained General Order G03-02-08, *Department Review of Use of Force*, which memorializes the role of the Force Review Board (FRB) in reviewing Level 3 uses of force and reportable uses of force by a CPD command staff member. As the FRB continues to be detailed in policy, the CPD has remained in Preliminary compliance with ¶580. Additionally, the CPD continues to possess Standard Operating Procedure (SOP) 2020-03, *Force Review Board* which, as we have previously noted, meets Secondary compliance.

However, we continue to observe inconsistent execution of FRBs and those which we observed during this monitoring period did not sufficiently evaluate each opportunity for operational improvement. As we have noted in our past reports, FRB reviews should be designed to look at each decision during an event to understand how they contributed to the outcome and whether, from an operational perspective, there is an opportunity to improve. Yet, the FRBs we observed continue to be summary reviews of the force event without the nuance required by SOP 2020-03.

We therefore continue to find that FRBs, as they are presently conducted, continue to fall short of the requirements of this paragraph. The IMT continues to be available for consultation with CPD as to how they should be enhanced.

The City and the CPD maintained Preliminary and Secondary compliance with ¶580. To achieve Full compliance with the requirements of ¶580, we will look for evidence that the FRB is consistently engaging in a critical review of the incidents and making a decision-point analysis that enhances the CPD and that the reviews occur no more than 96 hours after an incident.

Paragraph 580 Compliance Progress History

FIRST REPORTING PERIOD SEPTEMBER 1, 2019 – AUGUST 31, 2019	SECOND REPORTING PERIOD SEPTEMBER 1, 2019 – FEBRUARY 29, 2020	THIRD REPORTING PERIOD MARCH 1, 2020 – DECEMBER 31, 2020
COMPLIANCE PROGRESS: Not Applicable	COMPLIANCE PROGRESS: None	COMPLIANCE PROGRESS: Preliminary
FOURTH REPORTING PERIOD JANUARY 1, 2021 – JUNE 30, 2021	FIFTH REPORTING PERIOD JULY 1, 2021 – DECEMBER 31, 2021	SIXTH REPORTING PERIOD JANUARY 1, 2022 – JUNE 30, 2022
COMPLIANCE PROGRESS: Preliminary	COMPLIANCE PROGRESS: Preliminary	COMPLIANCE PROGRESS: Preliminary
SEVENTH REPORTING PERIOD JULY 1, 2022 – DECEMBER 31, 2022	EIGHTH REPORTING PERIOD JANUARY 1, 2023 – JUNE 30, 2023	NINTH REPORTING PERIOD JULY 1, 2023 – DECEMBER 31, 2023
COMPLIANCE PROGRESS: Secondary	COMPLIANCE PROGRESS: Secondary	COMPLIANCE PROGRESS: Secondary
TENTH REPORTING PERIOD JANUARY 1, 2024 – JUNE 30, 2024	ELEVENTH REPORTING PERIOD JULY 1, 2024 – DECEMBER 31, 2024	
COMPLIANCE PROGRESS: Secondary	COMPLIANCE PROGRESS: Secondary	

Data Collection, Analysis & Management: ¶581

581. Beginning within 180 days of the Effective Date, CPD will publish on at least a monthly basis aggregated and incident-level data, excluding personal identifying information (e.g., name, address, contact information), regarding reportable use of force incidents via a publicly accessible, web-based data platform.

Compliance Progress

(Reporting Period: July 1, 2024, through December 31, 2024)

Recurring Schedule: Monthly **Met** **Missed**

Preliminary: *In Compliance (NINTH REPORTING PERIOD)*

Secondary: *In Compliance (NINTH REPORTING PERIOD)*

Full: *Under Assessment*

In the eleventh reporting period, the City and the CPD maintained Preliminary and Secondary compliance and are Under Assessment for Full compliance with ¶581.

During the eleventh reporting period, the CPD maintained its public-facing, web-based *Use of Force Dashboard*, which updates data on a monthly basis. The CPD has maintained the ability to download the underlying data in the dashboard, allowing for review of the data at the incident-level, as well as at the individual officer/community member level.

During this reporting period, the CPD demonstrated the reliability of the Use of Force Dashboard data through a comprehensive audit approach of use-of-force events. The CPD's Audit Division team concluded that "department members comply with the Department's use of force reporting policy with minimal exceptions." The audit team reviewed over 10,000 report narratives and, of those report narratives, only 0.3% were identified as unreported use-of-force incidents. The IMT has had the opportunity to weigh in on the design of the audit and believe the analysis and findings indicate that the data available to the public are a reliable reflection of CPD force events. However, during this reporting period, the IMT was unable to verify that all community comments to the dashboard were properly handled by the CPD in accordance with Tactical Review and Evaluation Division (TRED) procedures.

The City maintained Secondary compliance with ¶581 in the eleventh reporting period. The IMT will continue to monitor that community comments are appropriately and timely addressed. Additionally, the IMT will also continue to monitor the CPD's ability to demonstrate the reliability of the Use of Force Dashboard data.

Paragraph 581 Compliance Progress History

FIRST REPORTING PERIOD SEPTEMBER 1, 2019 – AUGUST 31, 2019 COMPLIANCE PROGRESS: Not Applicable	SECOND REPORTING PERIOD SEPTEMBER 1, 2019 – FEBRUARY 29, 2020 COMPLIANCE PROGRESS: None	THIRD REPORTING PERIOD MARCH 1, 2020 – DECEMBER 31, 2020 COMPLIANCE PROGRESS: Preliminary
FOURTH REPORTING PERIOD JANUARY 1, 2021 – JUNE 30, 2021 COMPLIANCE PROGRESS: Preliminary	FIFTH REPORTING PERIOD JULY 1, 2021 – DECEMBER 31, 2021 COMPLIANCE PROGRESS: Preliminary	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: None	NINTH REPORTING PERIOD JULY 1, 2023 – DECEMBER 31, 2023 COMPLIANCE PROGRESS: Secondary
TENTH REPORTING PERIOD JULY 1, 2024 – DECEMBER 31, 2024 COMPLIANCE PROGRESS: Secondary	ELEVENTH REPORTING PERIOD JULY 1, 2024 – DECEMBER 31, 2024 COMPLIANCE PROGRESS: Under Assessment	

Data Collection, Analysis & Management: ¶582

582. The publicly accessible, web-based data platform will enable visitors to: a. identify where reportable uses of force occur through interactive maps depicting incident frequencies at a citywide, district, neighborhood, and ward level; b. identify the frequency, in the aggregate and by type, of reportable uses of force at the citywide, district, neighborhood, and ward level through graphs, charts, and other data visualizations; and c. review aggregate demographic information about the race, ethnicity, age, and gender of persons subjected to reportable uses of force at the citywide, district, neighborhood, and ward level through graphs, charts, and other data visualizations.

Compliance Progress

(Reporting Period: July 1, 2024, through December 31, 2024)

Preliminary:	<i>In Compliance</i> (THIRD REPORTING PERIOD)
Secondary:	<i>In Compliance</i> (NINTH REPORTING PERIOD)
Full:	<i>Under Assessment</i>

In the eleventh reporting period, the City and the CPD maintained Preliminary and Secondary compliance and are under assessment for Full compliance with ¶582.

During the eleventh reporting period, the CPD maintained its *Use of Force Dashboard*, which updates on a monthly basis. The elements of ¶582 continue to be incorporated into the aggregate-level data presented through the dashboard’s “graphs, charts, and other data visualizations” as required.

During this reporting period, the CPD demonstrated the reliability of the *Use of Force Dashboard* data through a comprehensive audit approach of use of force events. The CPD’s Audit Division team concluded that “department members comply with the Department’s use of force reporting policy with minimal exceptions.” The audit team reviewed over 10,000 report narratives and of those report narratives, only 0.003% were identified as unreported use of force incidents. The IMT has had the opportunity to weigh in on the design of the audit and believe the analysis and findings indicate that the data available to the public are a reliable reflection of CPD force events. However, during this reporting period, the IMT was unable to verify that all community comments to the dashboard were properly handled by the CPD in accordance with Tactical Review and Evaluation Division (TRED) procedures.

The City is under assessment for Full compliance with ¶582 in the eleventh reporting period. The IMT will continue to monitor that community comments are appropriately and timely addressed. Additionally, the IMT will also continue to monitor the CPD’s ability to demonstrate the reliability of the *Use of Force Dashboard* data.

Paragraph 582 Compliance Progress History

FIRST REPORTING PERIOD SEPTEMBER 1, 2019 – AUGUST 31, 2019 COMPLIANCE PROGRESS: Not Applicable	SECOND REPORTING PERIOD SEPTEMBER 1, 2019 – FEBRUARY 29, 2020 COMPLIANCE PROGRESS: None	THIRD REPORTING PERIOD MARCH 1, 2020 – DECEMBER 31, 2020 COMPLIANCE PROGRESS: Preliminary
FOURTH REPORTING PERIOD JANUARY 1, 2021 – JUNE 30, 2021 COMPLIANCE PROGRESS: Preliminary	FIFTH REPORTING PERIOD JULY 1, 2021 – DECEMBER 31, 2021 COMPLIANCE PROGRESS: Preliminary	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: Preliminary	NINTH REPORTING PERIOD JULY 1, 2023 – DECEMBER 30, 2023 COMPLIANCE PROGRESS: Secondary
TENTH REPORTING PERIOD JANUARY 1, 2024 – JUNE 30, 2024 COMPLIANCE PROGRESS: Secondary	ELEVENTH REPORTING PERIOD JULY 1, 2024 – DECEMBER 31, 2024 COMPLIANCE PROGRESS: Under Assessment	

Data Collection, Analysis & Management: ¶607

607. Within 90 days of completion of the assessment described in the preceding paragraph, CPD will develop a plan, including a timeline for implementation, to prioritize and address the needs identified to enhance CPD's information collection mechanisms and data management technology ("Data Systems Plan"). CPD will implement the Data Systems Plan in accordance with the specified timeline for implementation.

Compliance Progress

(Reporting Period: July 1, 2024, through December 31, 2024)

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

In the eleventh reporting period, the City and the CPD achieved Preliminary compliance with the requirements of ¶607.

To evaluate Preliminary compliance, the IMT reviewed records demonstrating that the CPD has qualified personnel to meet the requirements of this paragraph, and looked for demonstrated progress in developing a *Data Systems Plan* that is responsive to the needs identified from the assessment required by ¶606.

During this reporting period, the CPD provided the IMT with an executed contract between the City of Chicago and Benchmark Analytics that will result in a new Records Management System for the CPD. Additionally, the CPD provided the IMT with an overall timeline for implementing the new RMS, identifying key milestones during implementation. As a new RMS is a critical resolution to many of the data system needs identified from the ¶606 assessment, and the CPD has provided an overall timeline for its implementation, we believe the City has taken the preliminary steps needed to comply with this paragraph and have therefore achieved Preliminary compliance.

To achieve Secondary compliance, we will still need to review a formal *Data Systems Plan* that contains the specific implementation approaches for each initiative designed to address the needs identified by the ¶606 assessment. While we agree that the RMS is a substantial component of resolving CPD's data system needs, we do not believe it to be a solution for all data needs. Other efforts, including those discussed in an October 3, 2023 email to the City titled "IMT Response - CPD Overview of Data Required by Consent Decree," fall outside the remedial ability of the RMS. Upon finalization of the *Data Systems Plan*, we will then assess Full compliance based on the CPD's full implementation of the plan.

Paragraph 607 Compliance Progress History

FIRST REPORTING PERIOD SEPTEMBER 1, 2019 – AUGUST 31, 2019 COMPLIANCE PROGRESS: Not Applicable	SECOND REPORTING PERIOD SEPTEMBER 1, 2019 – FEBRUARY 29, 2020 COMPLIANCE PROGRESS: Not Applicable	THIRD REPORTING PERIOD MARCH 1, 2020 – DECEMBER 31, 2020 COMPLIANCE PROGRESS: Status Update
FOURTH REPORTING PERIOD JANUARY 1, 2021 – JUNE 30, 2021 COMPLIANCE PROGRESS: None	FIFTH REPORTING PERIOD JULY 1, 2021 – DECEMBER 31, 2021 COMPLIANCE PROGRESS: None	SIXTH REPORTING PERIOD JANUARY 1, 2022 – JUNE 30, 2022 COMPLIANCE PROGRESS: None
SEVENTH REPORTING PERIOD JULY 1, 2022 – DECEMBER 31, 2022 COMPLIANCE PROGRESS: None	EIGHTH REPORTING PERIOD JANUARY 1, 2023 – JUNE 30, 2023 COMPLIANCE PROGRESS: None	NINTH REPORTING PERIOD JULY 1, 2023 – DECEMBER 31, 2023 COMPLIANCE PROGRESS: None
TENTH REPORTING PERIOD JANUARY 1, 2024 – JUNE 30, 2024 COMPLIANCE PROGRESS: None	ELEVENTH REPORTING PERIOD JULY 1, 2024 – DECEMBER 31, 2024 COMPLIANCE PROGRESS: Preliminary	

Data Collection, Analysis & Management: ¶609

609. On an annual basis, to improve the accuracy, reliability, and efficiency of its data collection, CPD will review and, as necessary, revise departmental forms relating to: use of force, arrests, interactions with individuals in crisis, and the disciplinary process.

Compliance Progress

(Reporting Period: July 1, 2024, through December 31, 2024)

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

Preliminary: *In Compliance* (FOURTH REPORTING PERIOD)

Secondary: *In Compliance* (FOURTH REPORTING PERIOD)

Full: *In Compliance* (NINTH REPORTING PERIOD)

In the eleventh reporting period, the City and the CPD maintained Preliminary, Secondary, and Full compliance with ¶609.

To assess Preliminary compliance with ¶609, the IMT reviewed the CPD’s relevant policies and documents following the process described in the Consent Decree (¶¶626–41). To assess Secondary compliance, the IMT reviewed the CPD’s training development, implementation, and evaluation (¶1286). To assess Full compliance, the IMT reviewed data sources relevant to the requirements of this paragraph.

During the eleventh reporting period, the CPD maintained Special Order S09-03-02, *Forms Management System*, which clearly states that the CPD will review departmental forms on an annual basis consistent with the requirements of ¶609. Embedded within S09-03-02 is the “Transmittal/Response Sheet-Forms Management” form which serves to standardize the process for ensuring reviews of all CPD directives and data collection forms. The “Transmittal/Response Sheet-Forms Management” form, coupled with S09-03-02, continues to evidence Secondary compliance with the requirements of this paragraph.

Furthermore, the CPD continued to provide the IMT with completed “Transmittal/Response Sheet-Forms Management” forms, which the IMT reviewed for ongoing compliance with this paragraph. The CPD continues to demonstrate the process by which district or division executives provide feedback on forms as part of an ongoing data quality assurance process and thereby maintains Full compliance with ¶609.

To maintain Full compliance moving forward, the CPD needs to continue to demonstrate improvements in the accuracy, reliability, and efficiency of its data collection and continue to provide revised departmental forms on an annual basis related to use of force, arrests, interactions with individuals in crisis, and the disciplinary process. We will also work with the CPD in future monitoring periods to

determine how this paragraph may be better automated in accordance with the incoming RMS given that the current process is largely paper-based.

Paragraph 609 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:
Secondary

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

COMPLIANCE PROGRESS:
Secondary

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

COMPLIANCE PROGRESS:
Secondary

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

COMPLIANCE PROGRESS:
Secondary

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

COMPLIANCE PROGRESS:
Secondary

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

COMPLIANCE PROGRESS:
Full

TENTH REPORTING PERIOD
JANUARY 1, 2024 – JUNE 30, 2024

COMPLIANCE PROGRESS:
Full

ELEVENTH REPORTING PERIOD
JULY 1, 2024 – DECEMBER 31, 2024

COMPLIANCE PROGRESS:
Full