

Independent Monitoring Report

Impartial Policing

Compliance Assessments by Paragraph

Specific compliance assessments, by paragraph, for the Impartial Policing 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 Impartial Policing section is available in *Comprehensive Assessment Part I* (which included *Independent Monitoring Report 8*): <https://cpdmonitoringteam.com/imr-8-1/>.

Impartial Policing: ¶52

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

Compliance Progress

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

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

In the eleventh reporting period, the City and the CPD maintained Preliminary compliance with the requirements of ¶52.

The IMT reviewed and commented on D22-08, *Community Engagement in Policy Development Pilot*, in March of 2023. Comments from the IMT largely focused on the need to also revise and update the related policy—G01-03-01, *Community Engagement in Policy Development*—and to identify performance metrics and objectives for the pilot.

In April of 2024, the IMT met with the CPD on site and discussed a potential framework for its *Community Engagement Plan*. In May 2024, the CPD informally produced a revised draft of its *Community Engagement Plan*. And in June 2024, the IMT submitted comments recommending that the plan be further streamlined and encompass community engagement processes and strategies at both the Bureau wide and district levels. The CPD delivered the updated directive D22-08 *Community Engagement in Policy Development* in the last month of the reporting period, and the IMT subsequently provided comments noting the need for CPD to demonstrate community engagement in the review of the draft of policy per ¶52. The IMT appreciates the progress on this paragraph and the associated directive, and finalization of this policy will ensure that CPD maintains Preliminary compliance with ¶52.

To achieve Secondary compliance, the CPD must demonstrate that the process has been implemented, per policy, and is part of its larger annual community engagement plans and strategies as well as its Equity Office strategic planning. Further, the IMT recommends the CPD consider using project management software or a similar mechanism to track its community engagement efforts. Tracking these efforts will ensure that the CPD maintains an accurate report of its engagement activity, the feedback received from the community regarding policies and training, and the outcomes of such feedback. Full compliance will be contingent on the CPD’s ability to demonstrate the sustainability of this process. The IMT intends to review and seek input from the community on this process along with reviewing related data on the outcomes and success of the process to assess full compliance.

Paragraph 52 Compliance Progress History

FIRST REPORTING PERIOD MARCH 1, 2019 – AUGUST 31, 2019 COMPLIANCE PROGRESS: Not Applicable	SECOND REPORTING PERIOD SEPTEMBER 1, 2019 – FEBRUARY 29, 2020 COMPLIANCE PROGRESS: Not Applicable	THIRD REPORTING PERIOD MARCH 1, 2020 – DECEMBER 31, 2020 COMPLIANCE PROGRESS: Preliminary
FOURTH REPORTING PERIOD JANUARY 1, 2021 – JUNE 30, 2021 COMPLIANCE PROGRESS: Preliminary	FIFTH REPORTING PERIOD JULY 1, 2021 – DECEMBER 31, 2021 COMPLIANCE PROGRESS: Preliminary	SIXTH REPORTING PERIOD JANUARY 1, 2022 – JUNE 30, 2022 COMPLIANCE PROGRESS: Preliminary
SEVENTH REPORTING PERIOD JULY 1, 2022 – DECEMBER 31, 2022 COMPLIANCE PROGRESS: Preliminary	EIGHTH REPORTING PERIOD JANUARY 1, 2023 – JUNE 30, 2023 COMPLIANCE PROGRESS: Preliminary	NINTH REPORTING PERIOD JULY 1, 2023 – DECEMBER 31, 2023 COMPLIANCE PROGRESS: Preliminary
TENTH REPORTING PERIOD JANUARY 1, 2024 – JUNE 30, 2024 COMPLIANCE PROGRESS: Preliminary	ELEVENTH REPORTING PERIOD JULY 1, 2024 – DECEMBER 31, 2024 COMPLIANCE PROGRESS: Preliminary	

Impartial Policing: ¶53

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

Compliance Progress

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

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

In the eleventh reporting period, the City and the CPD maintained Preliminary compliance with ¶53. Although no changes were made during this reporting period, the CPD began working to establish its Equity Office and the development of the annual *Equity Action Plan* for the Office. A draft of the strategic plan for the Equity Office was produced at the end of the reporting period and discussed during meetings with the CPD in December. The development of this draft plan demonstrates the CPD is working towards continuing to ensure that the principles of impartial policing are incorporated throughout its policies and training.

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

The IMT appreciates the work done on this paragraph and in establishing the Equity Office Plan and related Action Plan. Moving forward, to assess Secondary compliance, the IMT will evaluate the CPD's ability to finalize its *Equity Action Plan* and in completing the revisions or development of the policies identified in the framework and in its *Equity Action Plan*, if not already completed. Full compliance will be assessed by evaluating the outcomes of the practical application of the concepts outlined in the impartial policing policies.

Paragraph 53 Compliance Progress History

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

Impartial Policing: ¶62

62. CPD will require that officers comply with CPD policies related to officer response to allegations of sexual assault, sexual abuse, stalking, and domestic violence. All officers will receive in-service training every three years to ensure CPD's response to allegations of gender-based violence, including dispatch response, initial officer response, and on-scene and follow-up investigation, is both effective and unbiased.

Compliance Progress

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

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

During the eleventh reporting period, the City and the CPD continued to work on its policies related to Gender Based Violence. During this reporting period, the City and the CPD delivered an updated draft *Gender-Based Violence Incidents* policy suite (G04-XX), for review with ¶62. Although this iteration of the policy was much improved from the previous production, the production did not include material related to community engagement for review. As such, the IMT requested that the CPD seek community input on GO4-XX and submit supporting documentation along with an updated policy for further review. Further, in conversations with the CPD, it was clarified that G04-XX, *Gender-Based Violence Incidents*, would serve as the CPD's standalone policy on gender-based violence incidents and include references to its standing policies on topics related to gender-based violence such as domestic violence, stalking, and sexual assaults.

While the IMT appreciates CPD's work on this paragraph, moving forward, to assess Preliminary compliance, the City and the CPD must deliver the community engagement documentation along with a revised *Gender-Based Violence Incidents* policy for IMT review. Secondary compliance will be assessed by examining the CPD's efforts to train on responses to gender-based violence incidents, and Full compliance will be assessed by measuring the CPD's ability to respond and conduct on-scene and follow up investigations related to these incidents in an effective and unbiased manner.

Paragraph 62 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	ELEVENTH REPORTING PERIOD JULY 1, 2024 – DECEMBER 31, 2024 COMPLIANCE PROGRESS: None	

Impartial Policing: ¶68

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

Compliance Progress

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

Preliminary:	<i>Not in Compliance</i>
Secondary:	<i>Not Yet Assessed</i>
Full:	<i>Not Yet Assessed</i>

During this reporting period, the City and the CPD continued to develop and revise its *Persons with Disabilities* policy suite. The City and the CPD did not achieve Preliminary compliance with ¶68 because the CPD has not finished revising its policies for ensuring effective communication and meaningful access to CPD programs and services for individuals with physical, mental, or developmental disabilities.

Since 2021, the IMT reviewed and provided feedback on multiple versions of the CPD's *People with Disabilities* policy suite. In 2022, the City and the CPD met with the IMT to discuss a comprehensive policy for interactions with people with disabilities and sub-policies regarding interactions with people with specific disabilities. After community engagement and further consideration, the City and the CPD proceeded with drafting those policies. In 2023, the IMT reviewed and provided feedback on the City and the CPD's *Interactions with Persons with Disabilities* policy (S02-07). The IMT also reviewed the City and the CPD's S02-07-01, *Interactions with Persons with Physical Disabilities* and provided feedback. In the last month of the reporting period, the IMT reviewed and provided a no-objection notice to the CPD on the policy suite. As of the date of this draft, the OAG is reviewing the updated policies and is expected to provide comments for further revisions to the parent and sub policies. The IMT appreciates the CPD's significant work on these policies and in the continued community engagement in the development of the parent and sub policies.

Moving forward, to assess Secondary compliance, we will assess the CPD’s efforts to finalize S02-07-02 along with its sub-policies and incorporate these requirements into training. We will also continue to assess the CPD’s efforts to engage relevant disability communities and their advocates as part of this process. The IMT stresses that it is imperative for the CPD to substantively engage community organizations and disability community stakeholders in the training development process. Community members who will be most impacted by officer interactions are best positioned to ensure the comprehensiveness and accuracy of these training curricula. Further, the IMT recommends that the CPD track its community engagement efforts related to these policies in a comprehensive manner (see related recommendations noted in ¶152).

After the CPD finalizes S02-07-02 and all sub-policies related to this paragraph, we will assess the CPD’s efforts to train its officers on the updated policies, including the extent to which training aligns with the CPD’s efforts to comply with ¶169. Full compliance will be assessed by examining related data and other outcomes including complaints, incident reports involving interactions with persons with disabilities, related audits completed by the ADA coordinator, contact surveys, and by conducting interviews with members and organizations representing these communities.

Paragraph 68 Compliance Progress History

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

Impartial Policing: ¶72

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

Compliance Progress

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

Preliminary: *In Compliance (TENTH REPORTING PERIOD)*

Secondary: *Not Yet Assessed*

Full: *Not Yet Assessed*

Similar to ¶53, although no changes to the compliance status of ¶72 were made in the eleventh reporting period, the IMT appreciates the City and the CPD's continued efforts to work on its draft *Equity Action Plan*. A draft of the strategic plan for the CPD's Equity Office was produced in the last month of the reporting period and discussed during meetings with the CPD in the same month. The IMT provided initial feedback to the CPD. The draft plan expanded on the framework provided in IMR-10 and outlined those trainings that the CPD will focus on in the upcoming year.

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

Moving forward, to assess Secondary compliance, the IMT will evaluate the CPD's ability to finalize and implement the *Equity Action Plan* and to complete the revisions and/or development of the trainings identified in the *Plan*, if not already completed. These training curricula should also be included in the *CPD Annual Training Plan* as appropriate. Full compliance will be assessed by evaluating sustainability of the process and the outcomes of the practical application of the concepts outlined in the impartial policing trainings.

Paragraph 72 Compliance Progress History

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

Impartial Policing: ¶75

75. OEMC currently provides diversity awareness training to all new telecommunicators which, among other things, addresses the existence of and methods for minimizing the impact of implicit bias. OEMC will continue to provide training on this topic to all new tele-communicators and, beginning in 2020, will provide all tele-communicators with refresher training every two years on this topic that is adequate in quantity, quality, type, and scope.

Compliance Progress

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

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

In the eleventh reporting period, the OEMC achieved Preliminary compliance with ¶75. The OEMC delivered the updated *Diversity Awareness* training materials and SOP in the last month of the reporting period. After receiving no-objection notices from the IMT and the OAG for the *Diversity Awareness and Implicit Bias Training Program* Standard Operating Procedure, the OEMC achieved Preliminary compliance with ¶75. The IMT notes that although the OEMC included training materials for review, the materials were not inclusive of training for new tele-communicators, as required by this paragraph. As such, the IMT recommends that the OEMC resubmit the training materials for both new and current tele-communicators.

Moving forward, materials related to the training for both new and current tele-communicators will be required to assess Secondary compliance. To assess Full compliance, the IMT will examine the OEMC’s sustainability of the training program.

Paragraph 75 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	ELEVENTH REPORTING PERIOD JULY 1, 2024 – DECEMBER 31, 2024 COMPLIANCE PROGRESS: Preliminary	