Independent Monitoring Report 11 Crisis Intervention Compliance Assessments by Paragraph

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

96. CPD's Basic CIT Training is an in-depth, specialized course that teaches officers how to recognize and effectively respond to individuals in crisis. In addition to the crisis intervention-related topics covered in the training provided to all officers, the Basic CIT Training will address signs and symptoms of individuals in crisis, suicide intervention, community resources, common mental health conditions and psychotropic medications, the effects of drug and alcohol abuse, perspectives of individuals with mental conditions and their family members, the rights of individuals with mental conditions, civil commitment criteria, crisis de-escalation, and scenario-based exercises.

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

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

Full: Under Assessment

In the eleventh reporting period, the City and the CPD maintained Preliminary and Secondary compliance with ¶96 and are under assessment for Full compliance.

The CPD's Special Order S05-14, *Crisis Intervention Team (CIT) Program*, details the responsibilities of the Crisis Intervention Team Training Section, including developing, reviewing, and revising the CIT curricula and administering and delivering the Basic CIT Training.

The CPD maintained Secondary compliance and made progress toward achieving Full compliance by reviewing the 40-hour Basic CIT course this reporting period, making updates not only required by the ILETSB, but also by the IMT. Overall, the Basic CIT training course is strong and addresses the training topics required by this paragraph. The CPD also produced training evaluations in the eleventh reporting period, which has not been accomplished for many reporting periods. The IMT has been requesting, over several reporting periods, that the CPD share evidence of the evaluations of both the CIT Basic training and the CIT Refresher training. These evaluations are consistent with the ADDIE model and are necessary to assess the CPD's Secondary compliance with ¶96.

The CPD produced partial evaluations in the previous reporting period, and at the end of the eleventh reporting period, instructor evaluations for both the CIT Basic and CIT Refresher. Overall, the evaluations received were very strong.

While the Crisis Intervention Unit (CIU) added four training staff at the end of this reporting period, the IMT remains concerned that trainers are still understaffed and lack adequate resources and administrative support to accomplish the steep training requirements again in 2025. During the last reporting period, CIT Basic and CIT Refresher classes were canceled due to staffing issues, and this is the fourth

consecutive year without any advanced CIT training. The last CIT course focused on veterans' issues was offered in 2009. Over 1,000 officers need training in CIT Refresher in 2025 to maintain compliance, along with Basic CIT courses for ongoing growth required to meet Consent Decree response ratios. The CPD must prioritize its support for CIU instructors.

To achieve and maintain Full compliance, the IMT will look for the CPD to produce complete training and instructor evaluations *each month*, along with the annually required training review and revisions required under ¶¶103 and 130. The IMT will also monitor how the training resources affect the quality of the overall training requirements of ¶96. The CPD must develop a more formalized policy and training review process with the CCMHE like the process that is in place with the CPD's TCAC, continue inviting the Chicago Council on Mental Health Equity to attend trainings and to offer feedback, produce training attendance records and evaluations each reporting period, show evidence of annual review and revision of the training, and maintain sufficient staffing to support CIT training.

Paragraph 96 Compliance Progress History

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

COMPLIANCE PROGRESS:

Not Applicable

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

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

TENTH REPORTING PERIOD

JANUARY 1, 2024 – JUNE 30, 2024

COMPLIANCE PROGRESS:

Secondary

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

Not Applicable

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

EIGHTH REPORTING PERIOD

JANUARY 1, 2023 – JUNE 30, 2023

COMPLIANCE PROGRESS:

Secondary

ELEVENTH REPORTING PERIOD
JULY 1, 2024 – DECEMBER 31, 2024
COMPLIANCE PROGRESS:
Under Assessment

THIRD REPORTING PERIOD

MARCH 1, 2020 – DECEMBER 31, 2020

COMPLIANCE PROGRESS: Secondary

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

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

104. CPD will develop policies regarding the criteria for ongoing participation as a Certified CIT Officer, consistent with this Agreement.

Compliance Progress (Reporting Period: January 1, 2023, through June 30, 2023)

Preliminary: In Compliance (SIXTH REPORTING PERIOD)

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

In the eleventh reporting period, the City and the CPD achieved Secondary compliance with the requirements of ¶104.

The CPD's Special Order S05-14, *Crisis Intervention Team (CIT) Program*, outlines the criteria for ongoing participation as a Certified CIT Officer, as required by this paragraph. With this, the City and the CPD maintained Preliminary compliance.

This reporting period, the City and the CPD achieved Secondary compliance by demonstrating that all officers have received training on the requirements of being a Certified CIT officer. All CIT officers were sent a survey to confirm their voluntary participation in the Crisis Intervention program. Only Certified CIT Officers who have opted into the program will be prioritized to respond to calls involving individuals in crisis. 1,372 opted into the CIT program, 115 officers opted out of the program, and 987 did not respond. Additionally, all officers were vetted through the Bureau of Internal Affairs (BIA) to ensure they met the requirements related to disciplinary and performance history.

The CPD has identified the following process for ensuring CIT officers have been vetted according to policy:

- **1. Historical Certified CIT Officer Vetting**: This process will involve BIA reviewing all CIT-Trained Officers who opted into the CIT Program to determine if any of these officers have had a sustained use of force Complaint Register (CR), as well as vetting all Certified CIT Officers for a sustained physical or verbal abuse CR with an individual in crisis. This is a one-time vetting process to establish a comprehensive list of eligible, active, Certified CIT Officers. BIA's vetting results will feed directly into Clarity's central Certified CIT Officer database.
- **2. Pre-Training Certification Vetting**: This process involves sending a list of officers who have expressed interest in Certified CIT status and are scheduled for training to BIA to vet their disciplinary history. Column Case Management, the Department's contractor, has

created a disciplinary report that vets applicants to CIT Training according to the criteria outlined above in S05-14, Crisis Intervention Team Program. CPD is able to run this disciplinary report at will to verify trainees' eligibility. The digitization of this process simplifies existing efforts and will support future compliance submissions in the Consent Decree.

3. Close of Investigation: Complaint Register (CR) investigations that result in sustained allegations of excessive use of force, or verbal abuse against an individual in crisis, require automated notifications to CIT and SID via the automated Command Channel Review system. The system will remove the officer from the CIT Certified roster in both OEMC and CIT databases. Updates will be made daily through this automated process. CPD has committed to regularly provide a list of these eligible officers to the IMT and the OAG.

To assess Full compliance, the IMT will seek data demonstrating reliable implementation of the system to identify and remove officers from the roster of Certified CIT Officers when necessary. The CPD must also demonstrate that officers who have received the Basic CIT training years ago—prior to the Consent Decree approved training—have taken an updated CIT Refresher training, which is presently being worked on by the CPD and contains key elements that were missing from the Basic 40-Hour and current refresher training.

Paragraph 104 Compliance Progress History

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

> COMPLIANCE PROGRESS: Not Applicable

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

None

SEVENTH REPORTING PERIOD EIGHTH REPORTING PERIOD

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

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

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

Not Applicable

FIFTH REPORTING PERIOD July 1, 2021 - December 31, 2021 COMPLIANCE PROGRESS:

None

JANUARY 1, 2023 – JUNE 30, 2023 COMPLIANCE PROGRESS: Preliminary

JULY 1, 2024 – DECEMBER 31, 2024 COMPLIANCE PROGRESS: Secondary

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

COMPLIANCE PROGRESS:

None

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

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

115. CPD has designated and will maintain a Certified CIT Officer, at the rank of Lieutenant or above, with the sole responsibility to act as a Crisis Intervention Team Program Coordinator ("CIT Coordinator"). The CIT Coordinator will work to increase the effectiveness of CPD's CIT Program, improve CPD's responses to incidents involving individuals in crisis, and facilitate community engagement between CPD and crisis intervention-related stakeholders.

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

Preliminary: In Compliance (SIXTH REPORTING PERIOD)

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

In the eleventh reporting period, the City and the CPD maintained Preliminary compliance and achieved Secondary compliance with the requirements of ¶115. The IMT reviewed CPD policy S05-14, *Crisis Intervention Team (CIT) Program*, which adequately incorporates the requirements of ¶115. The CIT Coordinator has remained consistent at the rank of Lieutenant or above, with the sole responsibility to act as the CIT Coordinator and has made notable progress this reporting period to improve the program's effectiveness as detailed throughout this report.

In the eleventh reporting period, the CPD onboarded a new CIT Coordinator with the sole responsibility of overseeing the CIT Program, as required by ¶115. The IMT reviewed the new CIT Coordinator's credentials, and she is qualified to serve in this role.

Paragraph 115 requires the CIT Coordinator to "work to increase the effectiveness of CPD's CIT Program, improve CPD's responses to incidents involving individuals in crisis, and facilitate community engagement between CPD and crisis intervention-related stakeholders." For the first time since 2021, 10 new dedicated staff were added to the Crisis Intervention Unit bringing the unit up to 41 people at the end of the reporting period. The CPD's Crisis Intervention Unit's dedicated staffing was at its peak in March 2021, when it was staffed with 58 people consisting of a commander, lieutenant, seven sergeants, 38 police officers (with 14 assigned to the training unit and 24 assigned to district, operations, and community support), a data analyst, and a community outreach coordinator.

Crisis Intervention Unit Staffing over Several Reporting Periods

					Community		
Reporting					Outreach	Data	
Period	Commander	Lieutenants	Sergeants	Officers	Coordinator	Analyst	Totals
IMR-4	1	1	7	46	1	0	56
IMR-5	0	1	7	39	1	0	48
IMR-6	0	1	7	38	0	1	47
IMR-7	0	1	4	24	0	1	30
IMR-8	0	1	5	22	0	1	29
IMR-9	0	1	5	20	1	1	28
IMR-10	0	1	5	20	1	1	28
IMR-11	0	1	7	32	0	1	41

The IMT is encouraged by the CPD's progress regarding the CIT Program during this reporting period. Not only has staffing improved, but also efforts with training, dashboards, eligibility review of CIT Certified Officers, and strategic planning have been notable.

Moving forward, the IMT expects to see evidence staffing increases to meet the needs of the Crisis Intervention Unit, which will help promote the CIT Coordinator's ability to demonstrate proactive leadership. As indicated, ¶115 requires outcomes, including community engagement and demonstrating the CIT Program's increasing effectiveness.

Paragraph 115 Compliance Progress History

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

> COMPLIANCE PROGRESS: Not Applicable

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

None

COMPLIANCE PROGRESS: Preliminary

COMPLIANCE PROGRESS: Secondary

SECOND REPORTING PERIOD SEPTEMBER 1, 2019 – FEBRUARY 29,

COMPLIANCE PROGRESS: Not Applicable

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

None

COMPLIANCE PROGRESS: Preliminary

TENTH REPORTING PERIOD ELEVENTH REPORTING PERIOD

JANUARY 1, 2024 – JUNE 30, 2024

JULY 1, 2024 – DECEMBER 31, 2024 COMPLIANCE PROGRESS: Secondary

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

> COMPLIANCE PROGRESS: Not Applicable

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

SEVENTH REPORTING PERIOD EIGHTH REPORTING PERIOD NINTH REPORTING PERIOD

JULY 1, 2022 – DECEMBER 31, 2022

JANUARY 1, 2023 – JUNE 30, 2023

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

116. The CIT Coordinator will receive initial and refresher professional development training that is adequate in quality, quantity, type, frequency, and scope to prepare the CIT Coordinator to take on the role and responsibilities of the CIT Coordinator, in addition to the Basic CIT training.

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

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

Full: In Compliance (NEW)

During the eleventh monitoring period, the CPD maintained Preliminary and Secondary compliance and achieved Full compliance with the requirements of ¶116.

To assess Preliminary compliance, the IMT reviewed the CPD's policy S05-14, *Crisis Intervention Team (CIT) Program*, which adequately reflects the requirements of ¶116. Moreover, the CPD achieved Secondary compliance in the third reporting period because the previous CIT Program Coordinator had adequate training and the requisite background to fulfill the role.

The City and the CPD achieved Full compliance during the eleventh reporting period by reliably demonstrating the CIT Coordinator's ongoing continuing education and professional development training as required under ¶116. A new CIT coordinator was onboarded during this reporting period. The CPD demonstrated that her training is adequate in "quality, quantity, type, frequency, and scope to prepare the CIT Coordinator to take on the role and responsibilities of the CIT Coordinator, in addition to the Basic CIT training." Records demonstrated that she completed the 40-hour Basic CIT course, the CIT Coordinator Certification course, and attended the CIT International Conference.

The new CIT Coordinator began her new role in June of 2024. Records show she has served CPD for nearly 25 years in various roles, including an officer in the Special Operations Section, Detective in Areas 2 and 4, and a Sergeant in the 007th District. She holds a Bachelor of Arts in Psychology, a Master of Science in Criminal/Social Justice, and a Master of Science in Threat and Response Management. She is certified by the State of Illinois in Critical Incident Response and as an Emergency Medical Technician.

While noting the exceptional skills the new CIT Coordinator has, the IMT remains concerned that the CIU remains understaffed, making it challenging for the CIT coordinator to complete the role's requirements. See \P 115.

To maintain Full compliance, the CIT Program Coordinator must provide evidence that the requirements of $\P\P115-17$ are being met, demonstrating the CIT

Coordinator is effectively engaged in the roles and responsibilities outlined for this position, and continue to demonstrate her ongoing training is adequate in "quality, quantity, type, frequency, and scope to prepare the CIT Coordinator to take on the role and responsibilities of the CIT Coordinator, in addition to the Basic CIT training."

Paragraph 116 Compliance Progress History

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

> COMPLIANCE PROGRESS: Not Applicable

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

Secondary

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

Secondary

COMPLIANCE PROGRESS: Secondary

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

COMPLIANCE PROGRESS:

Preliminary

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

Secondary

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

JANUARY 1, 2024 – JUNE 30, 2024

COMPLIANCE 25.7 COMPLIANCE PROGRESS: Full

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

> COMPLIANCE PROGRESS: Secondary

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

NINTH REPORTING PERIOD July 1, 2023 - December 31, 2023 COMPLIANCE PROGRESS: Secondary

127. All new recruits will receive training that is adequate in quantity, quality, and scope regarding responding to individuals in crisis. It will include, but not be limited to, training on the subjects identified above.

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

Preliminary: In Compliance (FIFTH REPORTING PERIOD)

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

During the eleventh monitoring period, the City and the CPD maintained Preliminary compliance and achieved Secondary compliance with the requirements of ¶127. The CPD achieved Preliminary compliance with ¶127 by developing and finalizing its policy S011-10-01, *Recruit Training*, which incorporates ¶127's requirements and maintained it by reviewing and revising that policy.

The IMT reviewed two additional recruit trainings this reporting period: *Mental Health Awareness and Response* and *Neurobiology of Trauma and PTSD*. Both are important trainings that covered pertinent information. The *Mental Health Awareness and Response* training independently includes all topics required by ¶126. This training, in combination with the *CIT Recruit Concepts* training and the *Neurobiology of Trauma and PTSD* training, provides an excellent foundation for all recruits.

The IMT observed portions of the *Mental Health Awareness and Response* training during this reporting period to assess Secondary compliance. While the training content is excellent, the CPD must evaluate instructor qualifications to achieve Full compliance. The instructor appeared to be a CPD sworn officer who largely read from the slides. Training ¶¶284–85 require subject matter expertise, and given the content of these trainings, it is important to establish that the instructor is well qualified. The IMT plans to observe the *Neurobiology of Trauma* training course in the next reporting period.

The IMT recommends that members of the Chicago Council on Mental Health Equity (CCMHE) observe these trainings and, where appropriate, provide community and lived-experience feedback, specifically for the *Mental Health Awareness and Response* training, which covers ¶¶126–27. *See also* ¶¶103 and 130.

To assess Full compliance, the IMT will consider the ongoing delivery of these trainings, along with the relevant course evaluations, training attendance records, and instructor evaluations. We will also consider the annual review of the training curricula and, where necessary, any revision of the training courses.

Paragraph 127 Compliance Progress History

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

COMPLIANCE PROGRESS:

Not Applicable

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

None

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

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

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

COMPLIANCE PROGRESS:

Not Applicable

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

COMPLIANCE PROGRESS:

Preliminary

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

ELEVENTH REPORTING PERIOD
JULY 1, 2024 – DECEMBER 31, 2024
COMPLIANCE PROGRESS:
Secondary

THIRD REPORTING PERIOD

MARCH 1, 2020 – DECEMBER 31, 2020

COMPLIANCE PROGRESS:
Status Update

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

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