

# *Independent Monitoring Report 11*

## Officer Wellness and Support

### Compliance Assessments by Paragraph

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

## Officer Wellness and Support: ¶382

**382.** CPD currently offers clinical counseling services, programs regarding alcoholism and other addictions, and a peer support program to help CPD members cope with the psychological and personal toll their jobs can impose. By September 1, 2019, CPD will complete a needs assessment to determine what additional resources are necessary to ensure the support services available to CPD members comport with best practices and mental health professional standards.

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### Compliance Progress

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

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

The City and the CPD achieved Full compliance with ¶382 during the eleventh reporting period.

In the third reporting period, the City and the CPD achieved Preliminary and Secondary compliance with ¶382 by completing a needs assessment and the CPD's *Officer Wellness Support Plan*.<sup>1</sup> In the ninth reporting period, the City and the CPD produced a second needs assessment. The IMT determined that the second needs assessment had not addressed the minimum requirements specified in ¶383(a)–(k) and was not sufficient to “determine what additional resources are necessary to ensure the support services available to CPD members comport with best practices and mental health professional standards.” ¶382. The IMT recommended that the CPD partner with a third party to create a needs assessment that would better meet the requirements specified by ¶383(a)–(k), and specifically that would include a survey instrument that was statistically valid per ¶383(f).

The City and the CPD have achieved Full compliance with ¶382 after completing two needs assessments, which have helped the CPD to determine what additional support services are necessary. Furthermore, the CPD is currently working with the University of Chicago to create a statistically valid survey instrument as part of

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<sup>1</sup> While the IMT determined that the CPD had achieved Preliminary and Secondary compliance with ¶382, the IMT also determined that the needs assessment contained shortcomings, such as “the lack of a vision of the future of the wellness program” and “the lack of a plan for using technology to advance wellness programs.” See *Independent Monitoring Report 3*, INDEPENDENT MONITORING TEAM (March 30, 2021) at 488, [https://live-chicago-imt.pantheonsite.io/wp-content/uploads/2024/09/2021\\_03\\_30-Independent-Monitoring-Report-3-amended-filed.pdf](https://live-chicago-imt.pantheonsite.io/wp-content/uploads/2024/09/2021_03_30-Independent-Monitoring-Report-3-amended-filed.pdf). Nevertheless, the IMT determined that “(1) the CPD sufficiently addressed the concerns we had with the [needs assessment] in the new *Officer Wellness Support Plan*; and (2) the *Officer Wellness Support Plan* provid[ed] the framework for assessing the ongoing needs specified in ¶382 and for refining and supplementing services to meet changing or increasing demands.” *Id.* at 488–89.

the next needs assessment. The IMT will evaluate the substance of the needs assessment under ¶383. The City and the CPD anticipate that the next needs assessment will be completed during the twelfth reporting period.

To maintain Full compliance with ¶382, the City and the CPD must create and analyze future needs assessments on a regular cadence to ensure that the CPD is meeting the wellness needs of its members consistent with ¶¶382 and 383—including all of its subparts.<sup>2</sup>

### Paragraph 382 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: Secondary
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: Secondary	COMPLIANCE PROGRESS: Secondary	COMPLIANCE PROGRESS: Secondary
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: Full	

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<sup>2</sup> The CPD has previously indicated that they intend to perform needs assessments every two years.

## Officer Wellness and Support: ¶388

**388.** *As a component of the Officer Support Systems Plan, by January 1, 2020, CPD will develop and implement a comprehensive suicide prevention initiative (“Suicide Prevention Initiative”). In designing the Suicide Prevention Initiative, CPD will examine similar initiatives implemented in other large departments and incorporate guidance available from law enforcement professional associations. The Suicide Prevention Initiative will be overseen by a licensed mental health professional working in conjunction with a command staff member.*

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### Compliance Progress

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

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

The City and the CPD maintained Preliminary compliance with ¶388 during the eleventh reporting period.

The City and the CPD achieved Preliminary compliance with ¶388 during the third reporting period by “submitting a variety of CPD documents, including the first *Officer Wellness Support Plan*, communications regarding expanded Employee Assistance Program services, and drafts of the *Traumatic Incident Stress Management Plan (TISMP)* directive.”<sup>3</sup> The IMT “acknowledged that there is currently no “best practice” approach to use as a benchmark to measure the CPD’s efforts related to suicide prevention.”<sup>4</sup> Therefore, the CPD worked to “create a holistic wellness program to address the underlying concerns of ¶388.”<sup>5</sup> This holistic approach “took the place of a stand-alone suicide prevention initiative” because “death by suicide is a complicated outcome rooted in factors still poorly understood.”<sup>6</sup>

In the sixth and seventh reporting periods, the CPD submitted a first and second *Suicide Prevention Initiative*. These initiatives “introduced several national resources the PCD identified as best practices to create a model that support and sustains the CPD’s framework to care for its personnel,” “indicated [the CPD’s] intention to expand internal resources,” included analyses on the capturing and reporting of relevant data, included ongoing efforts to address the topic of member suicide, and included a discussion of the tragic role that firearms may play during a mental health crisis.<sup>7</sup>

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<sup>3</sup> *Independent Monitoring Report 8*, INDEPENDENT MONITORING TEAM (Nov. 1, 2023), Appendix 8 at 22, <https://cpdmonitoringteam.com/wp-content/uploads/2024/06/IMR8-Appendix-8-Officer-Wellness-and-Support-2023.11.01.pdf>.

<sup>4</sup> *Id.*

<sup>5</sup> *Id.*

<sup>6</sup> *Id.*

<sup>7</sup> *Id.*

During the eleventh reporting period, the City and the CPD made limited progress toward Secondary compliance with ¶388. The CPD has not produced evidence showing that it is taking steps to develop and implement the next Suicide Prevention initiative.

To achieve Secondary compliance with ¶388, the City and the CPD must develop a Suicide Prevention Initiative that meets the requirements of ¶388. This Suicide Prevention Initiative must be part of a compliant *Officer Wellness Support Plan*, which must in turn, be based on a compliant needs assessment. The Suicide Prevention Initiative should include plans for corrective measures, if any, and include actionable goals regarding prevention, intervention, and postvention of member suicides.

To achieve Full compliance with ¶388, the City and the CPD must fully implement the Suicide Prevention Initiative referenced above.

### Paragraph 388 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: 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: Preliminary	

## Officer Wellness and Support: ¶391

**391.** CPD will initially increase the staffing level in its Professional Counseling Division to at least ten full-time licensed mental health professionals (or a combination of full- and part-time licensed mental health professionals capable of providing an equivalent amount of weekly clinical therapy hours) by January 1, 2020. CPD may contract with licensed mental health professionals external to CPD on an interim basis while CPD completes the process for creating these new positions and hiring individuals to fill them. Additional changes to staffing levels will be made consistent with the results of the needs assessment and Officer Support Systems Plan.

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### Compliance Progress

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

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

The City and the CPD maintained Secondary compliance with ¶391 during the eleventh reporting period.

The City and the CPD gained Preliminary and Secondary compliance with ¶391 during the second and third reporting periods, respectively, by “hiring additional clinicians, expanding the resources of the PCD, maintaining staff levels, and strategically assigning its clinical workforce.”<sup>8</sup>

During the ninth reporting period, the IMT noted that to maintain Secondary compliance with ¶391, the CPD must show that the PCD has sufficient staffing levels to meet wellness needs without the use of contractors. At present, the CPD has not provided data sources that would allow the IMT to determine (1) the extent to which the CPD uses outside contractors to supplement the PCD and (2) whether the PCD has sufficient staffing levels without the use of outside contractors.

During the ninth reporting period, the CPD also produced a second *Officer Wellness Support Plan*. While the IMT commended the CPD for its submission, the IMT determined that the second *Officer Wellness Support Plan* had a number of deficiencies preventing further levels of compliance. Because the *Officer Wellness Support Plan* did not address the requirements of ¶384 and was based on a needs assessment that did not include the minimum requirements of ¶383, it was insufficient to inform further hiring under ¶391.

While the IMT has raised concerns about the CPD’s ability to sustain compliance levels without the requisite data collection and analysis, the City and the CPD have

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<sup>8</sup> *Independent Monitoring Report 8*, INDEPENDENT MONITORING TEAM (Nov. 1, 2023), Appendix 8 at 30, <https://cpdmonitoringteam.com/wp-content/uploads/2024/06/IMR8-Appendix-8-Officer-Wellness-and-Support-2023.11.01.pdf>.

continued to hire additional PCD personnel and have produced license renewal information for those personnel. As before, however, these decisions were not based on a compliant needs assessment and *Officer Wellness Support Plan*. Additionally, the CPD has not provided data sources that would allow the IMT to determine (1) the extent to which the CPD uses outside contractors to supplement the PCD and (2) whether the PCD has sufficient staffing levels without the use of outside contractors.

It is important to note that the CPD will be conducting a staffing study in 2025.<sup>9</sup> During the tenth reporting period, the City and the CPD selected a vendor, Matrix, to complete the Workforce Allocation Study (“WFA Study”). During the eleventh reporting period, the City and the CPD produced an executed vendor agreement and scope of work. The IMT recognizes the immense effort required to reach this stage in the WFA Study. The City and the CPD have informed the IMT that the WFA Study will likely be completed during the thirteenth or fourteenth reporting periods. This staffing study will include an assessment of wellness resources. The IMT looks forward to the results of the WFA study as the vendor’s recommendations may prove to support and identify a sustainable process for a necessary and proper analysis for the PCD workloads.

To achieve Full compliance with ¶1391, the CPD must make changes to staffing levels consistent with the results of a compliant *Officer Wellness Support Plan*, which must in turn be based on a compliant needs assessment. The IMT anticipates that the CPD will complete its next needs assessment and *Officer Wellness Support Plan* in 2025.

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<sup>9</sup> A staffing study of wellness resources is required by both CPD Directive E06-01, *Professional Counseling Division*, and the Commission on Accreditation for Law Enforcement Agencies (CALEA) Standards 21.2.4, *Workload Assessments*.

## Paragraph 391 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:  
Preliminary

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

COMPLIANCE PROGRESS:  
Secondary

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:  
None

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

COMPLIANCE PROGRESS:  
None

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

COMPLIANCE PROGRESS:  
Secondary

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

COMPLIANCE PROGRESS:  
Secondary



## Officer Wellness and Support: ¶394

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

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### Compliance Progress

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

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

**Secondary:** *In Compliance* (TENTH REPORTING PERIOD)

**Full:** *Under Assessment* (NEW)

The City and the CPD are under assessment for Full compliance with ¶394 in the eleventh reporting period.

The City and the CPD achieved Preliminary compliance with ¶394 in the fourth reporting period by “addressing referral to third-party vendors in the *Officer Wellness Support Plan*, the *2021 Report to the Superintendent*, and [BOOD S.O.P. 19-01, *Chicago Police Department Chaplains Unit*].”<sup>10</sup> The City and the CPD achieved Secondary compliance with ¶394 in the tenth reporting period by submitting anonymized data reflecting referrals to external clinical service providers and by beginning to refine its methods for collecting this data.

In the eleventh reporting period, the City and the CPD produced the *PCD EAP Referrals Overview Month-to-Month Trend Analysis (Q2 April 2024 – June 2024)*, which includes anonymized data reflecting referrals to external clinical service providers. During monthly meetings, the CPD has provided additional, detailed data regarding additional referral numbers and the types of facilities to which members were referred, such as hospitals, rehabilitation facilities, and resident inpatient facilities. The IMT has requested this data in a formal production and has not yet received it. The IMT hopes to receive this data during the twelfth reporting period. Additionally, while the data produced includes referrals to external providers made by clinicians, it does not specify whether PCD drug and alcohol counselors also made referrals to external providers, as required by this paragraph.

To achieve Full compliance, the City and the CPD must produce quarterly reports showing anonymized data reflecting referrals to external clinical service providers. These reports must reflect all the detail available to the PCD while still respecting

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<sup>10</sup> *Independent Monitoring Report 8*, INDEPENDENT MONITORING TEAM (Nov. 1, 2023), Appendix 8 at 37, <https://cpdmonitoringteam.com/wp-content/uploads/2024/06/IMR8-Appendix-8-Officer-Wellness-and-Support-2023.11.01.pdf>.

member confidentiality. Furthermore, these reports must show data regarding referrals to external providers made by both clinicians and alcohol and drug counselors.<sup>11</sup>

### Paragraph 394 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: Not Applicable
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	ELEVENTH REPORTING PERIOD JULY 1, 2024 – DECEMBER 31, 2024 COMPLIANCE PROGRESS: Secondary	

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<sup>11</sup> If the alcohol and drug counselors make no referrals in each period, the report would show that they made no referrals.

## Officer Wellness and Support: ¶397

*397. CPD will continue to ensure that licensed mental health professionals employed by the Professional Counseling Division do not participate in fitness for duty evaluations, which will be conducted exclusively by third-party licensed mental health professionals.*

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### Compliance Progress

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

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

The City and the CPD maintained Preliminary and Secondary compliance and are under assessment for Full compliance with ¶397 in the eleventh reporting period.

The City and the CPD achieved Preliminary compliance with ¶397 in the fourth reporting period by submitting Directive E06-01, *Professional Counseling Division (PCD)*, which prohibits the PCD from participating in fitness for duty evaluations. It was unclear at that time, however, which entity made fitness for duty evaluations.

The City and the CPD achieved Secondary compliance with ¶397 in the ninth reporting period by arranging a meeting between the Office of Public Safety Administration (OPSA) to allow the IMT to confirm that the OPSA contracts with third-party mental health professionals who assess the member's fitness for duty and deliver their findings to the OPSA. The City and the CPD also produced a flow chart to the IMT showing the entities involved in making fitness for duty evaluations. This process complies with Directive E06-01, which requires that third-party mental health professionals, not the PCD, make fitness for duty evaluations.

The City and the CPD told the IMT that they would include the fitness for duty flow chart in an updated Directive E06-01, *Professional Counseling Division (PCD)*, or otherwise release the flow chart to CPD members to better inform CPD members that the PCD does not participate in fitness for duty evaluations.

The City and the CPD has not yet done so. To achieve Full compliance with ¶397, the City and the CPD must include the fitness-for-duty flow chart in a policy or the equivalent and memorialize the process in writing where all CPD members are able to access the policy. Furthermore, the City and the CPD must continue following the process laid out in ¶397, continue to ensure that the PCD does not participate in fitness for duty evaluations, and ensure that officers are aware of the process.

## Paragraph 397 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:  
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

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

COMPLIANCE PROGRESS:  
Secondary

## Officer Wellness and Support: ¶398

**398.** CPD currently employs five drug and alcohol counselors, all of whom are sworn CPD officers operating under the supervision of the Director of the Professional Counseling Division. These counselors provide free counseling for alcohol and substance abuse. CPD will continue to offer counseling services to CPD members for alcohol and substance abuse.

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### Compliance Progress

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

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

The City and the CPD achieved Secondary compliance with ¶398 during the eleventh reporting period.

The City and the CPD achieved Preliminary compliance with ¶398 during the fourth reporting period by submitting Directive E06-01, *Professional Counseling Division (PCD)*, the CPD’s *Officer Wellness Support Plan*, and the BOOD S.O.P. 19-01, *Chicago Police Department Chaplains Unit*. Specifically, E06-01 states that the Director of the PCD oversees the alcohol and drug counselors, as required by ¶398, and BOOD S.O.P. 19-01 requires that all drug and alcohol counselors be certified by the State of Illinois.

In the eleventh reporting period, the City and the CPD produced the *PCD EAP Accomplishments and Activities Month-to-Month Trend Analysis of EAP Services Usage (Q2 April 2024 – June 2024)* (“PCD/EAP Accomplishments”), which shows that the CPD continues to provide counseling services to CPD members for alcohol and substance use.

## Paragraph 398 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:  
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:  
Secondary

## Officer Wellness and Support: ¶400

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

### Compliance Progress

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

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

The City and the CPD have achieved Full compliance with ¶400 in the eleventh reporting period.

The City and the CPD achieved Preliminary compliance with ¶400 in the fourth reporting period by Directive E06-01, *Professional Counseling Division (PCD)*, which addresses the requirements of ¶400. And the City and the CPD achieved Secondary compliance with ¶400 in the tenth reporting period by requiring at the time of hire that drug and alcohol counselor must work toward obtaining certification after they are employed.

In the eleventh reporting period, the City and the CPD produced records showing that all drug and alcohol counselors have either obtained certification or are in the process of obtaining certification.

To maintain Full compliance with ¶400, the CPD must continue to produce the relevant records for the drug and alcohol counselors once per reporting period to ensure that the IMT remains apprised of any changes in the certification process.

### Paragraph 400 Compliance Progress History

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

## Officer Wellness and Support: ¶401

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

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### Compliance Progress

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

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

**Preliminary:** *In Compliance* (SECOND REPORTING PERIOD)

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

**Full:** *In Compliance* (NEW)

The City and the CPD achieved Full compliance with ¶401 in the eleventh reporting period.

The City and the CPD achieved Preliminary and Secondary compliance with ¶401 in the second and third reporting periods, respectively, by “increasing staffing of the Employee Assistance Program (EAP) with several substance use disorder treatment counselors and demonstrating the organization and supervision of the services, clinicians, and number of members utilizing the services.”<sup>12</sup>

In the tenth reporting period, the City and the CPD produced the *2023-2024 Annual Report to the Superintendent*. In the tenth monitoring report, the IMT wrote that “as written, the [2023-2024 Annual Report to the Superintendent] is unclear whether the PCD conducted the annual review of the anonymous support groups and programs for alcoholism, as required by ¶401.”<sup>13</sup>

In the eleventh reporting period, the City and the CPD clarified that the *2023-2024 Annual Report to the Superintendent* contained the Director of PCD’s annual review of anonymous support groups and programs for alcoholism and other addictions under ¶401. Therefore, the City and the CPD achieved Full compliance with ¶401.

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<sup>12</sup> *Independent Monitoring Report 8*, INDEPENDENT MONITORING TEAM (Nov. 1, 2023), Appendix 8 at 51, <https://cpdmonitoringteam.com/wp-content/uploads/2024/06/IMR8-Appendix-8-Officer-Wellness-and-Support-2023.11.01.pdf>.

<sup>13</sup> *Independent Monitoring Report 8*, INDEPENDENT MONITORING TEAM (Nov. 1, 2023), Appendix 8 at 13, <https://cpdmonitoringteam.com/wp-content/uploads/2024/06/IMR8-Appendix-8-Officer-Wellness-and-Support-2023.11.01.pdf>.



To maintain Full compliance with ¶401, the Director of PCD must continue to annually review the CPD’s anonymous support groups and programs for alcoholism and other addictions.

We recommend again that the PCD document such annual reviews separately from the annual report to the superintendent. Alternatively, if the PCD chooses to document its annual reviews in these reports, the PCD must clearly articulate its process of conducting annual reviews and the results of the annual reviews in the report.

### Paragraph 401 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: Preliminary	THIRD REPORTING PERIOD MARCH 1, 2020 – DECEMBER 31, 2020 COMPLIANCE PROGRESS: Secondary
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: 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	

## Officer Wellness and Support: ¶402

**402.** CPD will train all supervisors regarding recognizing signs and symptoms of alcoholism and substance abuse, how to recommend available support services to CPD members experiencing alcoholism and substance abuse issues, and their obligations under CPD policy to report members exhibiting signs of alcohol or drug impairment.

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### Compliance Progress

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

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

The City and the CPD achieved Secondary compliance with ¶402 in the eleventh reporting period.

The City and the CPD achieved Preliminary compliance with ¶402 in the fourth reporting period by finalizing Directive E06-01, *Professional Counseling Division (PCD)*, the CPD’s *Officer Wellness Support Plan*, and the BOOD S.O.P. 19-01, *Chicago Police Department Chaplains Unit*. These policies require that supervisors be trained on the signs and symptoms of alcohol use disorder, recommending support services, and reporting members exhibiting signs of impairment.

In the eleventh reporting period, the City and the CPD produced attendance records showing that over 95% of eligible supervisors (sworn and non-sworn) had attended the *2024 In-Service Supervisor Training*. This training included information on recognizing signs and symptoms of alcoholism and substance use, how to recommend available support services to CPD members experiencing alcoholism and substance use issues, and supervisors’ obligations under CPD policy to report members exhibiting signs of impairment. In the future, it may benefit sworn and civilian supervisors to be trained together, particularly as many civilian supervisors oversee sworn personnel and vice versa.

## Paragraph 402 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:  
Not Applicable

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:  
Secondary

## Officer Wellness and Support: ¶414

**414.** CPD will ensure that all CPD members are provided in-service training on stress management, alcohol and substance abuse, and officer wellness at least every three years. CPD will include training regarding stress management, alcohol and substance abuse, officer wellness, and support services in the recruit training program.

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### Compliance Progress

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

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

**Secondary:** *In Compliance* (NEW)

**Full:** *Not Yet Assessed*

The City and the CPD achieved Secondary compliance with ¶414 in the eleventh reporting period.

The City and the CPD achieved Preliminary compliance with ¶414 in the fourth reporting period by “(1) submitting curricula for the *Officer Wellness Training* and the *Employee Assistance Program (EAP) Pre-Service Promotional Training*; and (2) including verbiage in *Traumatic Incident Stress Management Program (TISMP)* Directive E06-01 that satisfies the requirements of ¶414. The CPD also submitted and revised *2021 In-Service Officer Wellness Training materials*, for which the IMT provided a no-objection notice.”<sup>14</sup>

In the eleventh reporting period, the City and the CPD submitted attendance records showing that over 95% of eligible members completed the *2024 Annual In-Service Supervisors Training*, the *Traumatic Incident Stress Management (TISMP) eLearning*, the *Law Enforcement Medical and Rescue Training/Officer Wellness and Resilience training (“LEMART Training”)*, the *2024 De-Escalation, Response to Resistance, and Use of Force, and Coordinated Multiple Arrests Training*, and the *CPD WELMART Training Enhancements*.

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<sup>14</sup> *Independent Monitoring Report 8*, INDEPENDENT MONITORING TEAM (Nov. 1, 2023), Appendix 8 at 78, <https://cpdmonitoringteam.com/wp-content/uploads/2024/06/IMR8-Appendix-8-Officer-Wellness-and-Support-2023.11.01.pdf>.

## Paragraph 414 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: 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: 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: Secondary	

## Officer Wellness and Support: ¶418

*418. In order to facilitate physical health and mental well-being, CPD will ensure its members have access to exercise equipment at CPD facilities in geographically dispersed areas throughout the City.*

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### Compliance Progress

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

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

**Secondary:** *In Compliance (NEW)*

**Full:** *Not Yet Assessed*

The City and the CPD achieved Secondary compliance with ¶418 in the eleventh reporting period.

The City and the CPD achieved Preliminary compliance with ¶418 in the third reporting period by producing “information which accounted for the exercise equipment possessed by the CPD, along with the location of that equipment.”<sup>15</sup>

In the ninth reporting period, the City and the CPD produced the *Audit Report from the Officer of Public Safety Administration for the Assets of the Chicago Police Department* (“2023 Equipment Audit”). The IMT noted that, “While the 2023 Equipment Audit includes an inventory list of equipment owned by the CPD, the inventory list does not show the condition of any equipment. Future equipment and technology audits should specify how the CPD is tracking the age and condition of its equipment and how the CPD is determining which items require repair or replacement.”

Additionally, in the ninth reporting period, the City and the CPD informed the IMT that they had identified fitness equipment that had either been removed and replaced and that they were working with the City of Chicago’s General Support for asset tagging.

In the tenth reporting period, the IMT observed equipment that had been tagged as inoperable and scheduled for removal. The IMT also spoke with several CPD members who were using equipment in the fitness rooms. These members reported that they enjoyed exercising at the CPD facility, that they saved money by doing so, and that they appreciated the health benefits that came from exercise.

In the eleventh reporting period, the CPD informed the IMT that the OPSA is working to address the IMT’s concerns and deliver the next fitness equipment audit in

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<sup>15</sup> *Independent Monitoring Report 8*, INDEPENDENT MONITORING TEAM (Nov. 1, 2023), Appendix 8 at 87, <https://cpdmonitoringteam.com/wp-content/uploads/2024/06/IMR8-Appendix-8-Officer-Wellness-and-Support-2023.11.01.pdf>.

the twelfth reporting period, allowing the City and the CPD to achieve Secondary compliance with ¶418.

The CPD has continued to have challenges regarding quiet rooms. While quiet rooms have become operational at various stations, members continue to experience barriers to their use, like locked doors and inconvenient or exposed locations. The IMT encourages the CPD to consider how those barriers might be lowered.

To achieve Full compliance, the City and the CPD must produce an equipment audit that specifies how the CPD is tracking the age and condition of its equipment and how the CPD is determining which items require repair or replacement.

### Paragraph 418 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: Secondary	