

# *Independent Monitoring Report 11*

## Accountability and Transparency

### Compliance Assessments by Paragraph

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

## Accountability and Transparency: ¶424

**424.** *When members of the public submit complaints to the City (“complainants”), those complaints must be courteously received, properly classified, and efficiently investigated. Throughout a non-criminal investigation of the actions of a member (an “administrative investigation”), complainants should be able to track the status of their complaints and receive current, accurate information.*

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<b>Compliance Progress</b>	(Reporting Period: July 1, 2024, through December 31, 2024)
<b>Preliminary:</b>	<i>In Compliance</i> (FIFTH REPORTING PERIOD)
CPD	<i>In Compliance</i> (FIFTH REPORTING PERIOD)
COPA	<i>In Compliance</i> (FIFTH REPORTING PERIOD)
<b>Secondary:</b>	<i>In Compliance</i> (NINTH REPORTING PERIOD)
CPD	<i>In Compliance</i> (NINTH REPORTING PERIOD)
COPA	<i>In Compliance</i> (FIFTH REPORTING PERIOD)
<b>Full:</b>	<i>In Compliance</i> (NEW)
CPD	<i>In Compliance</i> (NEW)
COPA	<i>In Compliance</i> (NINTH REPORTING PERIOD)

In the eleventh reporting period, the City and the CPD achieved Full compliance and COPA maintained Full compliance with ¶424.

This reporting period, COPA provided documentation that maintained Full compliance with ¶424.

To maintain Secondary compliance, the CPD provided a draft of its *BIA Onboard Training: Initiation and Sworn Affidavits* for review, and the IMT provided a no objection notice. Additionally, the CPD provided documentation that at least 95% of CPD members completed the *BIA Accountability Supplemental eLearning*, which addressed the requirements of this paragraph.

To assess Full compliance, the IMT reviewed screenshots and direct links from the CPD to web pages to file a complaint and an anonymous complaint, the COPA case portal, the Chicago Data Portal, and an individual log submission. The IMT looks forward to the CPD continuing to demonstrate that complaints are courteously received, properly classified, and efficiently investigated, and that community members are able to track the status of investigations into their complaint.

For both the CPD and COPA, we expect to receive evidence of continued compliance each reporting period to maintain Full compliance.

## Paragraph 424 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: Not Applicable	FIFTH REPORTING PERIOD JULY 1, 2021 – DECEMBER 31, 2021 COMPLIANCE PROGRESS: Preliminary	SIXTH REPORTING PERIOD JANUARY 1, 2022 – JUNE 30, 2022 COMPLIANCE PROGRESS: Preliminary
SEVENTH REPORTING PERIOD JULY 1, 2022 – DECEMBER 31, 2022 COMPLIANCE PROGRESS: Preliminary	EIGHTH REPORTING PERIOD JANUARY 1, 2023 – JUNE 30, 2023 COMPLIANCE PROGRESS: Preliminary	NINTH REPORTING PERIOD JULY 1, 2023 – DECEMBER 31, 2023 COMPLIANCE PROGRESS: 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	

## Accountability and Transparency: ¶¶425–26

**425.** *The City, CPD, and COPA will ensure individuals are allowed to submit complaints in multiple ways, including: in person to COPA or at a CPD district station, by telephone, online, anonymously, and through third party representatives. To ensure broad and easy access to its complaint system, within 90 days of the Effective Date: a. the City, CPD, and COPA will make the process for filing a complaint widely available to the public, including in-person, by telephone, and online; b. the City, CPD, and COPA will make the process for filing a complaint available electronically; c. the City, CPD, and COPA will make information on filing a complaint and accompanying instructions accessible to people who speak languages other than English and will provide telephonic language interpretation services consistent with the City's and CPD's existing limited English proficiency policies and this Agreement; d. the City, CPD, and COPA will ensure individuals may submit allegations of misconduct, regardless of whether the individual is a member or perceived member of an identifiable group, based upon, but not limited to: race, ethnicity, color, national origin, ancestry, religion, disability status, gender, gender identity, sexual orientation, marital status, parental status, military discharge status, financial status, or lawful source of income; e. the City, CPD, and COPA will continue to ensure that members of the public may make complaints via telephone using free 24-hour services, including by calling 311 and being given the option to leave a voicemail for COPA or speak to a CPD supervisor, and will clearly display this information on their respective websites and other appropriate City and CPD printed materials; f. the City, CPD, and COPA will ensure that instructions for submitting complaints are available via telephone, on-line, and in-person; and g. the City and CPD will ensure that complaint filing information is prominently displayed on CPD website's homepage, including by linking to COPA's online complaint form.*

**426.** *As part of the COPA's system for processing non-confidential complaints and administrative notifications (the "intake process"), each complaint and administrative notification will be assigned a unique tracking number. This unique tracking number will be linked with all phases of the investigation and disciplinary process, through the final disposition.*

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

	¶425	¶426
<b>Preliminary:</b>	<i>In Compliance</i> (FIFTH REPORTING PERIOD)	<i>In Compliance</i> (FIFTH REPORTING PERIOD)
CPD	<i>In Compliance</i> (FIFTH REPORTING PERIOD)	<i>In Compliance</i> (FIFTH REPORTING PERIOD)
COPA	<i>In Compliance</i> (FOURTH REPORTING PERIOD)	<i>In Compliance</i> (FOURTH REPORTING PERIOD)
<b>Secondary:</b>	<i>In Compliance</i> (NINTH REPORTING PERIOD)	<i>In Compliance</i> (EIGHTH REPORTING PERIOD)
CPD	<i>In Compliance</i> (NINTH REPORTING PERIOD)	<i>In Compliance</i> (EIGHTH REPORTING PERIOD)
COPA	<i>In Compliance</i> (FIFTH REPORTING PERIOD)	<i>In Compliance</i> (FIFTH REPORTING PERIOD)
<b>Full:</b>	<i>In Compliance</i> (NEW)	<i>In Compliance</i> (NEW)
CPD	<i>In Compliance</i> (NEW)	<i>In Compliance</i> (NEW)
COPA	<i>In Compliance</i> (NINTH REPORTING PERIOD)	<i>In Compliance</i> (NINTH REPORTING PERIOD)

In the eleventh reporting period, the City and the CPD achieved Full compliance with ¶¶425–26, and COPA maintained Full compliance.

This reporting period, COPA provided documentation that maintained Full compliance with ¶¶425–26.

To maintain Secondary compliance, the CPD provided a draft of its *BIA Onboard Training: Initiation and Sworn Affidavits* for review, and the IMT provided a no objection notice. Additionally, the CPD provided documentation that at least 95% of CPD members completed *BIA Accountability Supplemental eLearning*, which addressed the requirements of ¶¶425–26.

To assess Full compliance, the IMT reviewed screenshots and direct links from the CPD to web pages to file a complaint and an anonymous complaint, the COPA case portal, the Chicago Data Portal, and an individual log submission. The IMT looks forward to the CPD continuing to demonstrate that complaints are courteously received, properly classified, and efficiently investigated, and that community members are able to track the status of investigations into their complaint.

For both the CPD and COPA, we expect to receive evidence of continued compliance in each reporting period to maintain Full compliance.

## Paragraph 425 Compliance Progress History

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

## Paragraph 426 Compliance Progress History

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

## Accountability and Transparency: ¶429

**429.** *The City will continue to ensure that a website is made available to CPD members to anonymously report officer misconduct (“anonymous reporting website”) and will internally disseminate information regarding the anonymous reporting website to all CPD members. Reports made on the anonymous reporting website will not relieve CPD members of their duties under CPD Rules of Conduct 21 and 22.*

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### Compliance Progress

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

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

The City and the CPD achieved Full compliance with ¶429 in the eleventh reporting period.

To maintain Secondary compliance, the CPD provided a draft of its *BIA Onboard Training: Initiation and Sworn Affidavits* for review, and the IMT provided a no objection notice. Additionally, the CPD provided documentation that at least 95% of CPD members completed the *BIA Accountability Supplemental eLearning*, which addressed the requirements of this paragraph.

To assess Full compliance, the IMT reviewed screenshots and direct links from the CPD to web pages to file a complaint and an anonymous complaint, the COPA case portal, the Chicago Data Portal, and an individual log submission. The IMT looks forward to the CPD continuing to demonstrate that complaints are courteously received, properly classified, and efficiently investigated, and that community members are able to track the status of investigations into their complaint.

We expect to receive evidence of continued compliance in each reporting period to maintain Full compliance.

## Paragraph 429 Compliance Progress History

FIRST REPORTING PERIOD MARCH 1, 2019 – AUGUST 31, 2019 COMPLIANCE PROGRESS: Status Update	SECOND REPORTING PERIOD SEPTEMBER 1, 2019 – FEBRUARY 29, 2020 COMPLIANCE PROGRESS: Status Update	THIRD REPORTING PERIOD MARCH 1, 2020 – DECEMBER 31, 2020 COMPLIANCE PROGRESS: Status Update
FOURTH REPORTING PERIOD JANUARY 1, 2021 – JUNE 30, 2021 COMPLIANCE PROGRESS: Under Assessment	FIFTH REPORTING PERIOD JULY 1, 2021 – DECEMBER 31, 2021 COMPLIANCE PROGRESS: Preliminary	SIXTH REPORTING PERIOD JANUARY 1, 2022 – JUNE 30, 2022 COMPLIANCE PROGRESS: Preliminary
SEVENTH REPORTING PERIOD JULY 1, 2022 – DECEMBER 31, 2022 COMPLIANCE PROGRESS: Preliminary	EIGHTH REPORTING PERIOD JANUARY 1, 2023 – JUNE 30, 2023 COMPLIANCE PROGRESS: Secondary	NINTH REPORTING PERIOD JULY 1, 2023 – DECEMBER 31, 2023 COMPLIANCE PROGRESS: Secondary
TENTH REPORTING PERIOD JANUARY 1, 2024 – JUNE 30, 2024 COMPLIANCE PROGRESS: Secondary	ELEVENTH REPORTING PERIOD JULY 1, 2024 – DECEMBER 31, 2024 COMPLIANCE PROGRESS: Full	

## Accountability and Transparency: ¶436

**436.** *Within 90 days of the Effective Date, CPD will ensure that there are adequate policies and practices in place to encourage and protect CPD members who report potential misconduct by other CPD members. Such policies will provide, at a minimum: a. that CPD members promptly report any misconduct of which they are aware to a supervisor; b. that the supervisor document such alleged misconduct and promptly report it to COPA; and c. that all forms of retaliation, interference, intimidation, and coercion against a CPD member who reports misconduct or cooperates with an investigation of misconduct, are strictly prohibited.*

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### Compliance Progress

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

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

The City and the CPD achieved Full compliance with ¶436 in the eleventh reporting period.

To maintain Secondary compliance, the CPD provided a draft of its *BIA Onboard Training: Initiation and Sworn Affidavits* for review, and the IMT provided a no objection notice. Additionally, the CPD provided documentation that at least 95% of CPD members completed the *BIA Accountability Supplemental eLearning*, which addressed the requirements of this paragraph.

To assess Full compliance, the IMT reviewed the CPD’s documentation of data in its case management system (CMS) database for the years 2023 and 2024 using category codes and/or key words associated with conduct prohibited by this paragraph (*i.e.*, discrimination, retaliation, interference, intimidation, coercion, and adverse action) as well as any identified log number investigations and their investigation statuses (*i.e.*, closed without a finding of a policy violation or ongoing). The data demonstrated that the CPD has adequate policies and practices in place to encourage and protect CPD members to report potential misconduct by other CPD members by prohibiting all forms of retaliation, intimidation, coercion, and adverse action.

We expect to receive evidence of continued compliance in each reporting period to maintain Full compliance.

## Paragraph 436 Compliance Progress History

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

## Accountability and Transparency: ¶437

*437. CPD will expressly prohibit all forms of retaliation, intimidation, coercion, or adverse action against any person who reports misconduct or cooperates with an administrative investigation.*

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### Compliance Progress

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

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

The City and the CPD achieved Full compliance with ¶437 in the eleventh reporting period.

To maintain Secondary compliance, the CPD provided drafts of its *BIA Onboard Training: Initiation and Sworn Affidavits* and its *BIA Onboard Training: Introduction to BIA and the Case Management System* for review, and the IMT provided no objection notices. Additionally, the CPD provided documentation that at least 95% of CPD members completed the *BIA Accountability Supplemental eLearning*, which addressed the requirements of this paragraph.

To assess Full compliance, the IMT reviewed the CPD’s documentation of data in its case management system (CMS) database for the years 2023 and 2024 using category codes and/or key words associated with conduct prohibited by this paragraph (*i.e.*, discrimination, retaliation, interference, intimidation, coercion, and adverse action) as well as any identified log number investigations and their investigation statuses (*i.e.*, closed without a finding of a policy violation or ongoing). The data demonstrated that the CPD has adequate policies and practices in place to encourage and protect CPD members to report potential misconduct by other CPD members by prohibiting all forms of retaliation, intimidation, coercion, and adverse action.

We expect to receive evidence of continued compliance in each reporting period to maintain Full compliance.

## Paragraph 437 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: 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	

## Accountability and Transparency: ¶438

**438.** OAG acknowledges that the City, CPD, and COPA are working to create an electronic Case Management System (“CMS”). The City, CPD, and COPA will ensure that the CMS maintains accurate data regarding the number, classification, and status of all administrative investigations, from the intake process through the final disciplinary decision, if any, and through any grievance process, arbitration, Police Board proceeding, or appeal relating to the final disciplinary decision (the “final disposition”). CMS will be maintained by appropriate personnel from the City, CPD, and COPA. The CMS will be fully operational by June 30, 2020.

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<b>Compliance Progress</b>	(Reporting Period: July 1, 2024, through December 31, 2024)
<b>Preliminary:</b>	<i>In Compliance</i> (SEVENTH REPORTING PERIOD)
CPD	<i>In Compliance</i> (SEVENTH REPORTING PERIOD)
COPA	<i>In Compliance</i> (FOURTH REPORTING PERIOD)
<b>Secondary:</b>	<i>In Compliance</i> (NINTH REPORTING PERIOD)
CPD	<i>In Compliance</i> (NINTH REPORTING PERIOD)
COPA	<i>In Compliance</i> (SEVENTH REPORTING PERIOD)
<b>Full:</b>	<i>In Compliance</i> (NEW)
CPD	<i>In Compliance</i> (NEW)
COPA	<i>In Compliance</i> (NINTH REPORTING PERIOD)

In the eleventh reporting period, the City and the CPD achieved Full compliance with ¶438, and COPA maintained Full compliance.

This reporting period, COPA provided documentation that maintained Full compliance with ¶438.

To maintain Secondary compliance, the CPD provided a draft of its *BIA Onboard Training: Introduction to BIA and the Case Management System* for review, and the IMT provided a no objection notice.

To assess Full compliance, the IMT reviewed screenshots and direct links from the CPD to web pages to file a complaint and an anonymous complaint, the COPA case portal, the Chicago Data Portal, and an individual log submission. The IMT looks forward to the CPD continuing to demonstrate that complaints are courteously received, properly classified, and efficiently investigated, and that community members are able to track the status of investigations into their complaint.

For both COPA and the CPD, we expect to receive evidence of continued compliance in each reporting period to maintain Full compliance.

## Paragraph 438 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: Under Assessment
FOURTH REPORTING PERIOD JANUARY 1, 2021 – JUNE 30, 2021 COMPLIANCE PROGRESS: None	FIFTH REPORTING PERIOD JULY 1, 2021 – DECEMBER 31, 2021 COMPLIANCE PROGRESS: None	SIXTH REPORTING PERIOD JANUARY 1, 2022 – JUNE 30, 2022 COMPLIANCE PROGRESS: None
SEVENTH REPORTING PERIOD JULY 1, 2022 – DECEMBER 31, 2022 COMPLIANCE PROGRESS: Preliminary	EIGHTH REPORTING PERIOD JANUARY 1, 2023 – JUNE 30, 2023 COMPLIANCE PROGRESS: Preliminary	NINTH REPORTING PERIOD JULY 1, 2023 – DECEMBER 31, 2023 COMPLIANCE PROGRESS: Secondary
TENTH REPORTING PERIOD JANUARY 1, 2024 – JUNE 30, 2024 COMPLIANCE PROGRESS: Secondary	ELEVENTH REPORTING PERIOD JULY 1, 2024 – DECEMBER 31, 2024 COMPLIANCE PROGRESS: Full	

## Accountability and Transparency: ¶439

*439. The City and CPD will ensure that complainants and their representatives are able to track non-confidential unique tracking numbers from the intake process through final disposition via telephone and in person. By June 30, 2020, the City will also ensure complainants and their representatives are able to track the status of non-confidential unique tracking numbers from the intake process through final disposition online.*

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<b>Compliance Progress</b>	(Reporting Period: July 1, 2024, through December 31, 2024)
<b>Preliminary:</b>	<i>In Compliance (FIFTH REPORTING PERIOD)</i>
CPD	<i>In Compliance (FIFTH REPORTING PERIOD)</i>
COPA	<i>In Compliance (FOURTH REPORTING PERIOD)</i>
<b>Secondary:</b>	<i>In Compliance (NEW)</i>
CPD	<i>In Compliance (NEW)</i>
COPA	<i>In Compliance (FIFTH REPORTING PERIOD)</i>
<b>Full:</b>	<i>In Compliance (NEW)</i>
CPD	<i>In Compliance (NEW)</i>
COPA	<i>In Compliance (NINTH REPORTING PERIOD)</i>

In the eleventh reporting period, the City and the CPD achieved Secondary and Full compliance with ¶439, and COPA maintained Full compliance.

This reporting period, COPA provided documentation that maintained Full compliance with ¶439.

To achieve Secondary compliance, the CPD provided documentation that at least 95% of CPD members completed the *BIA Accountability Supplemental eLearning*, which addressed the requirements of this paragraph.

To assess Full compliance, the IMT reviewed screenshots and direct links from the CPD to web pages to file a complaint and an anonymous complaint, the COPA case portal, the Chicago Data Portal, and an individual log submission. The IMT looks forward to the CPD continuing to demonstrate that complaints are courteously received, properly classified, and efficiently investigated, and that community members are able to track the status of investigations into their complaint.

For both COPA and the CPD, we expect to receive evidence of continued compliance in each reporting period to maintain Full compliance.

## Paragraph 439 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: None
FOURTH REPORTING PERIOD JANUARY 1, 2021 – JUNE 30, 2021 COMPLIANCE PROGRESS: None	FIFTH REPORTING PERIOD JULY 1, 2021 – DECEMBER 31, 2021 COMPLIANCE PROGRESS: Preliminary	SIXTH REPORTING PERIOD JANUARY 1, 2022 – JUNE 30, 2022 COMPLIANCE PROGRESS: Preliminary
SEVENTH REPORTING PERIOD JULY 1, 2022 – DECEMBER 31, 2022 COMPLIANCE PROGRESS: Preliminary	EIGHTH REPORTING PERIOD JANUARY 1, 2023 – JUNE 30, 2023 COMPLIANCE PROGRESS: Preliminary	NINTH REPORTING PERIOD JULY 1, 2023 – DECEMBER 31, 2023 COMPLIANCE PROGRESS: Preliminary
TENTH REPORTING PERIOD JANUARY 1, 2024 – JUNE 30, 2024 COMPLIANCE PROGRESS: Preliminary	ELEVENTH REPORTING PERIOD JULY 1, 2024 – DECEMBER 31, 2024 COMPLIANCE PROGRESS: Full	



City entities must reach levels of compliance to bring the City, as a whole, into compliance, the City has not yet reached Full compliance.

This reporting period, COPA provided documentation that maintained Full compliance with ¶444.

To assess Secondary compliance, the IMT reviewed documentation that at least 95% of CPD members completed the *BIA Accountability Supplemental eLearning*, which addressed the requirements of this paragraph. Additionally, the CPD provided a draft of its *Prohibitions of Sexual Misconduct eLearning* for review, and the IMT provided comments to the CPD. The eLearning remained under development at the end of the reporting period.

Moving forward, for the CPD, we will look for evidence that the CPD is acting in accordance with ¶444 and working to meet their reporting requirement to the Deputy PSIG. For COPA, we will look for continued evidence that its employees are acting in accordance with ¶444, as well as working to meet their reporting requirement to the Deputy PSIG.

### Paragraph 444 Compliance Progress History

FIRST REPORTING PERIOD MARCH 1, 2019 – AUGUST 31, 2019 COMPLIANCE PROGRESS: Status Update	SECOND REPORTING PERIOD SEPTEMBER 1, 2019 – FEBRUARY 29, 2020 COMPLIANCE PROGRESS: Status Update	THIRD REPORTING PERIOD MARCH 1, 2020 – DECEMBER 31, 2020 COMPLIANCE PROGRESS: 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: 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	

## Accountability and Transparency: ¶1448

*448. If COPA, BIA, or the district does not arrive at the investigative findings and recommendations within 180 days, COPA, BIA or an Accountability Sergeant will, thereafter, periodically, but not less than once every 60 days, attempt contact with the complainant or his or her representative to provide status updates until the investigative findings and recommendations are issued. Such contacts will be documented in the administrative investigative file. By 2020, this requirement will be satisfied by providing complainants and their representatives the ability to track the status of non-confidential unique tracking numbers from the intake process through final disposition online.*

Compliance Progress		(Reporting Period: July 1, 2024, through December 31, 2024)
<b>Preliminary:</b>		<i>In Compliance (FIFTH REPORTING PERIOD)</i>
	CPD	<i>In Compliance (FIFTH REPORTING PERIOD)</i>
	COPA	<i>In Compliance (FOURTH REPORTING PERIOD)</i>
<b>Secondary:</b>		<i>In Compliance (NEW)</i>
	CPD	<i>In Compliance (NEW)</i>
	COPA	<i>In Compliance (SEVENTH REPORTING PERIOD)</i>
<b>Full:</b>		<i>Not in Compliance</i>
	CPD	<i>Not Yet Assessed</i>
	COPA	<i>In Compliance (NINTH REPORTING PERIOD)</i>

In the eleventh reporting period, the City and the CPD achieved Secondary compliance with ¶1448 while COPA maintained Full compliance. Because all relevant City entities must reach levels of compliance to bring the City, as a whole, into compliance, the City has not yet reached Full compliance.

This reporting period, COPA provided documentation that maintained Full compliance with ¶1448.

To assess Secondary compliance, the IMT reviewed documentation that at least 95% of CPD members completed the *BIA Accountability Supplemental eLearning*, which addressed the requirements of this paragraph. The CPD also provided documentation that at least 95% of BIA members and Accountability Sergeants completed the 2024 BIA in-service training. The in-service training included instruction on the *Investigation Assignment and Timelines* module, which addressed the requirements of this paragraph. Additionally, the CPD provided a draft of its *BIA Onboard Training: Introduction to BIA and the Case Management System* for review, and the IMT provided a no objection notice.

Moving forward, we will look for documentation that the CPD is acting in accordance with ¶1448's mandates. The IMT and the CPD are having discussions on what documentation is needed for Full compliance. For COPA, we expect to receive evidence of continued compliance in each reporting period to maintain Full compliance.

## Paragraph 448 Compliance Progress History

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

## Accountability and Transparency: ¶451

*451. A CPD member who reviews audio or video evidence for purposes of completing an incident report will document in writing that he or she reviewed the evidence in each relevant incident report.*

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### Compliance Progress

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

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

In the eleventh reporting period, the City and the CPD made efforts toward but did not achieve any level of compliance with ¶451.

This reporting period, the CPD provided a draft of its G04-01, *Preliminary Investigations*, for review. However, the City, the CPD, and the OAG continue to have conversations on whether the latest draft complies with the Court’s order regarding “public safety briefings.” While G04-01 must ultimately comply with the Court’s order, the IMT provided a no objection notice. However, to reach Preliminary compliance, the CPD must also receive a no objection notice from the OAG.

In addition, the CPD provided documentation that at least 95% of CPD members completed the *BIA Accountability Supplemental eLearning*, which addressed the requirements of this paragraph. However, the CPD cannot achieve Secondary compliance without first achieving Preliminary compliance.

Moving forward, we will look for the City and the CPD to reach a resolution with the OAG and then to finalize G04-01.

## Paragraph 451 Compliance Progress History

FIRST REPORTING PERIOD MARCH 1, 2019 – AUGUST 31, 2019 COMPLIANCE PROGRESS: Status Update	SECOND REPORTING PERIOD SEPTEMBER 1, 2019 – FEBRUARY 29, 2020 COMPLIANCE PROGRESS: Status Update	THIRD REPORTING PERIOD MARCH 1, 2020 – DECEMBER 31, 2020 COMPLIANCE PROGRESS: 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	

## Accountability and Transparency: ¶453

**453.** *If a criminal investigation of a CPD member’s conduct has commenced, COPA, BIA, or the Accountability Sergeant will continue the administrative investigation, absent specific circumstances that would jeopardize the criminal investigation. In such circumstances, the determination to postpone the administrative investigation, along with the rationale for doing so, will be documented by COPA, BIA or the district in writing.*

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### Compliance Progress

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

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

In the eleventh reporting period, the City and the CPD achieved Secondary compliance with ¶453 while COPA maintained Full compliance. Because all relevant City entities must reach levels of compliance to bring the City, as a whole, into compliance, the City has not yet reached Full compliance.

This reporting period, COPA provided documentation that maintained Full compliance with ¶543.

To assess Secondary compliance, the IMT reviewed documentation that at least 95% of CPD members completed the *BIA Accountability Supplemental eLearning*, which addressed the requirements of this paragraph. The CPD also provided documentation that at least 95% of BIA members and Accountability Sergeants completed the 2024 BIA in-service training. The in-service training included instruction on the *Collection of Evidence and Interviews with Non-Department Members* module, which addressed the requirements of this paragraph.

Moving forward, we will look for documentation demonstrating that the CPD is acting in accordance with ¶453’s mandates. The IMT and the CPD are having discussions on what documentation is needed for Full compliance. For COPA, we expected to receive evidence of continued compliance in each reporting period to maintain Full compliance.

## Paragraph 453 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: Status Update	THIRD REPORTING PERIOD MARCH 1, 2020 – DECEMBER 31, 2020 COMPLIANCE PROGRESS: Status Update
FOURTH REPORTING PERIOD JANUARY 1, 2021 – JUNE 30, 2021 COMPLIANCE PROGRESS: None	FIFTH REPORTING PERIOD JULY 1, 2021 – DECEMBER 31, 2021 COMPLIANCE PROGRESS: None	SIXTH REPORTING PERIOD JANUARY 1, 2022 – JUNE 30, 2022 COMPLIANCE PROGRESS: None
SEVENTH REPORTING PERIOD JULY 1, 2022 – DECEMBER 31, 2022 COMPLIANCE PROGRESS: Preliminary	EIGHTH REPORTING PERIOD JANUARY 1, 2023 – JUNE 30, 2023 COMPLIANCE PROGRESS: Preliminary	NINTH REPORTING PERIOD JULY 1, 2023 – DECEMBER 31, 2023 COMPLIANCE PROGRESS: Preliminary
TENTH REPORTING PERIOD JANUARY 1, 2024 – JUNE 30, 2024 COMPLIANCE PROGRESS: Preliminary	ELEVENTH REPORTING PERIOD JULY 1, 2024 – DECEMBER 31, 2024 COMPLIANCE PROGRESS: Secondary	

## Accountability and Transparency: ¶1454

454. COPA, BIA, and the districts will conduct objective, comprehensive, and timely investigations of complaints.

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### Compliance Progress

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

<b>Preliminary:</b>	<i>In Compliance</i> (FIFTH REPORTING PERIOD)
CPD	<i>In Compliance</i> (FIFTH REPORTING PERIOD)
COPA	<i>In Compliance</i> (FOURTH REPORTING PERIOD)
<b>Secondary:</b>	<i>In Compliance</i> (NEW)
CPD	<i>In Compliance</i> (NEW)
COPA	<i>In Compliance</i> (FIFTH REPORTING PERIOD)
<b>Full:</b>	<i>Not in Compliance</i>
CPD	<i>Not Yet Assessed</i>
COPA	<i>In Compliance</i> (NINTH REPORTING PERIOD)

In the eleventh reporting period, the City and the CPD achieved Secondary compliance with ¶1454 while COPA maintained Full compliance. Because all relevant City entities must reach levels of compliance to bring the City, as a whole, into compliance, the City has not yet reached Full compliance.

This reporting period, COPA provided documentation that maintained Full compliance with ¶1454.

To assess Secondary compliance, the IMT reviewed documentation that at least 95% of BIA members and Accountability Sergeants completed the 2024 BIA in-service training. The in-service training included instruction on the *Investigation Assignment and Timelines* module, which addressed the requirements of this paragraph.

Moving forward, we will look for documentation demonstrating that the CPD is acting in accordance with ¶1454's mandates. The IMT and the CPD are having discussions on what documentation is needed for Full compliance. For COPA, we expect to receive evidence of continued compliance in each reporting period to maintain Full compliance.

## Paragraph 454 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: None	FIFTH REPORTING PERIOD JULY 1, 2021 – DECEMBER 31, 2021 COMPLIANCE PROGRESS: Preliminary	SIXTH REPORTING PERIOD JANUARY 1, 2022 – JUNE 30, 2022 COMPLIANCE PROGRESS: Preliminary
SEVENTH REPORTING PERIOD JULY 1, 2022 – DECEMBER 31, 2022 COMPLIANCE PROGRESS: Preliminary	EIGHTH REPORTING PERIOD JANUARY 1, 2023 – JUNE 30, 2023 COMPLIANCE PROGRESS: Preliminary	NINTH REPORTING PERIOD JULY 1, 2023 – DECEMBER 31, 2023 COMPLIANCE PROGRESS: Preliminary
TENTH REPORTING PERIOD JANUARY 1, 2024 – JUNE 30, 2024 COMPLIANCE PROGRESS: Preliminary	ELEVENTH REPORTING PERIOD JULY 1, 2024 – DECEMBER 31, 2024 COMPLIANCE PROGRESS: Secondary	

## Accountability and Transparency: ¶455

455. All investigative findings will be based on the appropriate standard of proof. This standard will be clearly delineated in COPA and BIA policies, training, and procedures.

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### Compliance Progress

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

<b>Preliminary:</b>	<i>In Compliance</i> (FIFTH REPORTING PERIOD)
CPD	<i>In Compliance</i> (FIFTH REPORTING PERIOD)
COPA	<i>In Compliance</i> (FOURTH REPORTING PERIOD)
<b>Secondary:</b>	<i>In Compliance</i> (NEW)
CPD	<i>In Compliance</i> (NEW)
COPA	<i>In Compliance</i> (SEVENTH REPORTING PERIOD)
<b>Full:</b>	<i>Not in Compliance</i>
CPD	<i>Not Yet Assessed</i>
COPA	<i>In Compliance</i> (NINTH REPORTING PERIOD)

In the eleventh reporting period, the City and the CPD achieved Secondary compliance while COPA maintained Full compliance with ¶455. Because all relevant City entities must reach levels of compliance to bring the City, as a whole, into compliance, the City has not yet reached Full compliance.

To assess Secondary compliance, the IMT reviewed documentation that at least 95% of CPD members completed the *BIA Accountability Supplemental eLearning*, which addressed the requirements of this paragraph. The CPD also provided documentation that at least 95% of BIA members and Accountability Sergeants completed the 2024 BIA in-service training. The in-service training included instruction on Module 3, *Credibility, Standards of Proof, and Disciplinary Decision Making*, which addressed the requirements of this paragraph.

Additionally, the CPD provided a draft of its *BIA Onboard Training: Credibility, Standards of Proof, and Disciplinary Decision Making* for review, and the IMT provided a no objection notice.

Moving forward, we will look for documentation demonstrating that the CPD is acting in accordance with ¶455's mandates. The IMT and the CPD are having discussions on what documentation is needed for Full compliance. For COPA, we expect to receive evidence of continued compliance in each reporting period to maintain Full compliance.

## Paragraph 455 Compliance Progress History

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

## Accountability and Transparency: ¶456

*456. The City will ensure that the disciplinary histories of current and former CPD members are reviewed prior to employment with COPA, or assignment within BIA or as an Accountability Sergeant.*

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### Compliance Progress

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

<b>Preliminary:</b>	<i>In Compliance</i> (FIFTH REPORTING PERIOD)
CPD	<i>In Compliance</i> (FIFTH REPORTING PERIOD)
COPA	<i>In Compliance</i> (FIFTH REPORTING PERIOD)
<b>Secondary:</b>	<i>In Compliance</i> (NEW)
CPD	<i>In Compliance</i> (NEW)
COPA	<i>In Compliance</i> (EIGHTH REPORTING PERIOD)
<b>Full:</b>	<i>Not in Compliance</i>
CPD	<i>Not in Compliance</i>
COPA	<i>In Compliance</i> (NINTH REPORTING PERIOD)

In the eleventh reporting period, the City and the CPD achieved Secondary compliance while COPA maintained Full compliance with ¶456. Because all relevant City entities must achieve levels of compliance to bring the City, as a whole, into compliance, the City has not yet achieved Full compliance.

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

To assess Secondary compliance, the IMT reviewed documentation that at least 95% of CPD members completed the *BIA Accountability Supplemental eLearning*, which addressed the requirements of this paragraph. Additionally, the CPD provided documentation of selection/vetting materials, which requires the CPD to evaluate, among other things, the disciplinary histories of CPD members before assignment within BIA or as an Accountability Sergeant, as required by this paragraph.

With respect to Full compliance, the CPD provided a follow-up to the 2022 BIA Investigator and Accountability Sergeant Eligibility Audit for review. However, to achieve Full compliance, the CPD must produce the underlying data relevant to this paragraph.<sup>2</sup>

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<sup>2</sup> The 2024 BIA Quarter 2 Report was also produced for Full compliance review with ¶¶456, 462, 476, and 526–27, and the 2024 BIA Quarter 3 Report was also produced for Full compliance review with ¶¶431, 433, 443, 456, 462, 476–77, and 526–27. However, the reports alone are insufficient for Full compliance with those paragraphs. To achieve Full compliance with those paragraphs, the CPD must produce the underlying data relevant to those paragraphs rather than a summary of that data. The reports include all necessary aggregate data regarding investigations conducted by BIA and Accountability Sergeants, as required by ¶¶550–51.

Moving forward, we will look for documentation that the CPD is acting in accordance with ¶456’s mandates. For COPA, we expect to receive evidence of continued compliance in each reporting period to maintain Full compliance.

### Paragraph 456 Compliance Progress History

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

## Accountability and Transparency: ¶460

**460.** Preliminary investigations will take all reasonable steps to discover any and all objective verifiable evidence relevant to the complaint or administrative notification through the identification, retention, review, and analysis of all available evidence, including, but not limited to: all time-sensitive evidence, audio and video evidence, physical evidence, arrest reports, photographic evidence, GPS records, computer data, and witness interviews. All reasonable steps will be taken to preserve relevant evidence identified during the preliminary investigation.

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<b>Compliance Progress</b>	(Reporting Period: July 1, 2024, through December 31, 2024)
<b>Preliminary:</b>	<i>In Compliance</i> (SEVENTH REPORTING PERIOD)
CPD	<i>In Compliance</i> (SEVENTH REPORTING PERIOD)
COPA	<i>In Compliance</i> (FOURTH REPORTING PERIOD)
<b>Secondary:</b>	<i>In Compliance</i> (NEW)
CPD	<i>In Compliance</i> (NEW)
COPA	<i>In Compliance</i> (SEVENTH REPORTING PERIOD)
<b>Full:</b>	<i>Not in Compliance</i>
CPD	<i>Not Yet Assessed</i>
COPA	<i>In Compliance</i> (NINTH REPORTING PERIOD)

In the eleventh reporting period, the City and the CPD achieved Secondary compliance with ¶460 while COPA maintained Full compliance. Because all relevant City entities must reach levels of compliance to bring the City, as a whole, into compliance, the City has not yet reached Full compliance.

This reporting period, COPA provided documentation that maintained compliance with ¶460.

To maintain Preliminary compliance, the CPD provided its revised S08-01-04, *Initial Investigatory Responsibilities in Log Number Investigations*, for review and the IMT provided a no objection notice.

To assess Secondary compliance, the IMT reviewed documentation that at least 95% of CPD members completed the *BIA Accountability Supplemental eLearning*, which addressed the requirements of this paragraph. The CPD also provided documentation that at least 95% of BIA members and Accountability Sergeants completed the 2024 BIA in-service training. The in-service training included instruction on the *Investigation Assignment and Timelines* module, which addressed the requirements of this paragraph.

Moving forward, we will look for documentation that the CPD is acting in accordance with ¶460's mandates. The IMT and the CPD are having discussions on what

documentation is needed for Full compliance. For COPA, we expect to receive evidence of continued compliance in each reporting period to maintain Full compliance.

### Paragraph 460 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: Status Update	THIRD REPORTING PERIOD MARCH 1, 2020 – DECEMBER 31, 2020 COMPLIANCE PROGRESS: Status Update
FOURTH REPORTING PERIOD JANUARY 1, 2021 – JUNE 30, 2021 COMPLIANCE PROGRESS: None	FIFTH REPORTING PERIOD JULY 1, 2021 – DECEMBER 31, 2021 COMPLIANCE PROGRESS: None	SIXTH REPORTING PERIOD JANUARY 1, 2022 – JUNE 30, 2022 COMPLIANCE PROGRESS: None
SEVENTH REPORTING PERIOD JULY 1, 2022 – DECEMBER 31, 2022 COMPLIANCE PROGRESS: Preliminary	EIGHTH REPORTING PERIOD JANUARY 1, 2023 – JUNE 30, 2023 COMPLIANCE PROGRESS: Preliminary	NINTH REPORTING PERIOD JULY 1, 2023 – DECEMBER 31, 2023 COMPLIANCE PROGRESS: Preliminary
TENTH REPORTING PERIOD JANUARY 1, 2024 – JUNE 30, 2024 COMPLIANCE PROGRESS: Preliminary	ELEVENTH REPORTING PERIOD JULY 1, 2024 – DECEMBER 31, 2024 COMPLIANCE PROGRESS: Secondary	

## Accountability and Transparency: ¶464

**464.** *In the course of conducting thorough and complete misconduct investigations, COPA, BIA, and the districts will: a. take all reasonable steps to promptly identify, collect, and consider all relevant circumstantial, direct, and physical evidence, including officer-recorded audio or video taken with body-worn cameras or other recording devices; b. take all reasonable steps to locate and interview all witnesses as soon as feasible, including non-CPD member witnesses, and attempt to interview any complainant or witness in-person at a time and place that is convenient and accessible for the complainant or witness, when feasible; c. determine whether there are any other open administrative investigations involving the same involved member, and monitor or combine the investigation(s), as appropriate; d. audio record non-CPD member interviews subject to the interviewee’s consent, or promptly prepare summaries of interviews when the interview is not recorded; e. take all reasonable steps to identify the involved and witness CPD member(s) if the complainant was unable do so; f. determine if there may have been additional misconduct beyond that initially alleged. COPA, BIA, or the district will take all reasonable steps to ensure that such identified misconduct is fully and fairly documented, classified, and investigated; g. as applicable, consider a CPD member’s behavior based on the available training records and disciplinary history, including complaints in which allegations were not sustained, as permitted by law and any applicable collective bargaining agreement; and h. identify and take into account known relevant evidence gathered in parallel criminal investigation or criminal or civil litigation, if available.*

Compliance Progress		(Reporting Period: July 1, 2024, through December 31, 2024)
<b>Preliminary:</b>		<i>In Compliance</i> (SEVENTH REPORTING PERIOD)
	CPD	<i>In Compliance</i> (SEVENTH REPORTING PERIOD)
	COPA	<i>In Compliance</i> (FIFTH REPORTING PERIOD)
<b>Secondary:</b>		<i>In Compliance</i> (NEW)
	CPD	<i>In Compliance</i> (NEW)
	COPA	<i>In Compliance</i> (SEVENTH REPORTING PERIOD)
<b>Full:</b>		<i>Not in Compliance</i>
	CPD	<i>Not Yet Assessed</i>
	COPA	<i>In Compliance</i> (NINTH REPORTING PERIOD)

In the eleventh reporting period, the City and the CPD achieved Secondary compliance with ¶464 while COPA maintained Full compliance. Because all relevant City entities must reach levels of compliance to bring the City, as a whole, into compliance, the City has not yet reached Full compliance.

This reporting period, COPA provided documentation that maintained Full compliance with ¶464.

To maintain Preliminary compliance, the CPD provided its revised S08-01-04, *Initial Investigatory Responsibilities in Log Number Investigations*, for review and the IMT provided a no objection notice.

To assess Secondary compliance, the IMT reviewed documentation that at least 95% of BIA members and Accountability Sergeants completed the 2024 BIA in-service training. The in-service training included instruction on Module 8, *Audio Recording Interview Guidelines*, the *Collection of Evidence and Interviews with Non-Department Members* module and the *Investigation Assignment and Timelines* module, which addressed the requirements of this paragraph.

Moving forward, we will look for documentation that the CPD is acting in accordance with ¶464’s mandates. The IMT and the CPD are having discussions on what documentation is needed for Full compliance. For COPA, we expect to receive evidence of continued compliance in each reporting period to maintain Full compliance.

### Paragraph 464 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: Status Update	THIRD REPORTING PERIOD MARCH 1, 2020 – DECEMBER 31, 2020 COMPLIANCE PROGRESS: None
FOURTH REPORTING PERIOD JANUARY 1, 2021 – JUNE 30, 2021 COMPLIANCE PROGRESS: None	FIFTH REPORTING PERIOD JULY 1, 2021 – DECEMBER 31, 2021 COMPLIANCE PROGRESS: None	SIXTH REPORTING PERIOD JANUARY 1, 2022 – JUNE 30, 2022 COMPLIANCE PROGRESS: None
SEVENTH REPORTING PERIOD JULY 1, 2022 – DECEMBER 31, 2022 COMPLIANCE PROGRESS: Preliminary	EIGHTH REPORTING PERIOD JANUARY 1, 2023 – JUNE 30, 2023 COMPLIANCE PROGRESS: Preliminary	NINTH REPORTING PERIOD JULY 1, 2023 – DECEMBER 31, 2023 COMPLIANCE PROGRESS: Preliminary
TENTH REPORTING PERIOD JANUARY 1, 2024 – JUNE 30, 2024 COMPLIANCE PROGRESS: Preliminary	ELEVENTH REPORTING PERIOD JULY 1, 2024 – DECEMBER 31, 2024 COMPLIANCE PROGRESS: Secondary	

## Accountability and Transparency: ¶1465

**465.** *When conducting an administrative interview of any CPD member, COPA, BIA, and the districts will: a. ask the identity of other persons with whom he or she has communicated regarding the incident in question, and the date, time, place, and content of such communication, subject to any evidentiary privilege recognized under Illinois or federal law; b. ask whether he or she has reviewed any audio or video footage of the incident in question, and, if so, the date, time, and place the video or audio was reviewed; c. ask whether he or she is aware of any media or social media coverage of the incident in question, and, if so, the content and source of such known media coverage; d. note on the record of the interview anytime the CPD member seeks or obtains information from his or her legal or union representative, as well as the length of any “off the record” discussion between the CPD member and his or her legal or union representative and ensure that the CPD member’s counsel or representative does nothing to disrupt or interfere with the interview; e. document, and make part of the investigative file, all requests made on behalf of a CPD member to reschedule an interview; and f. audio record all CPD member in-person interviews.*

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

<b>Preliminary:</b>		<i>In Compliance (SEVENTH REPORTING PERIOD)</i>
	CPD	<i>In Compliance (SEVENTH REPORTING PERIOD)</i>
	COPA	<i>In Compliance (FIFTH REPORTING PERIOD)</i>
<b>Secondary:</b>		<i>In Compliance (NEW)</i>
	CPD	<i>In Compliance (NEW)</i>
	COPA	<i>In Compliance (SEVENTH REPORTING PERIOD)</i>
<b>Full:</b>		<i>Not in Compliance</i>
	CPD	<i>Not Yet Assessed</i>
	COPA	<i>In Compliance (TENTH REPORTING PERIOD)</i>

In the eleventh reporting period, the City and the CPD achieved Secondary compliance with ¶1465 while COPA maintained Full compliance. Because all relevant City entities must achieve levels of compliance to bring the City, as a whole, into compliance, the City has not yet achieved Full compliance.

This reporting period, COPA provided documentation that maintained Full compliance with ¶1465.

To assess Secondary compliance, the IMT reviewed documentation that at least 95% of BIA members and Accountability Sergeants completed the 2024 BIA in-service training. The in-service training included instruction on Module 8, *Audio Recording Interview Guidelines* and Module 9, *Interviewing Department Members*, which addressed the requirements of this paragraph.

Moving forward, we will look for documentation that the CPD is acting in accordance with ¶1465’s mandates. The IMT and the CPD are having discussions on what

documentation is needed for Full compliance. For COPA, we expect to receive evidence of continued compliance in each reporting period to maintain Full compliance.

### Paragraph 465 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: Status Update	THIRD REPORTING PERIOD MARCH 1, 2020 – DECEMBER 31, 2020 COMPLIANCE PROGRESS: None
FOURTH REPORTING PERIOD JANUARY 1, 2021 – JUNE 30, 2021 COMPLIANCE PROGRESS: None	FIFTH REPORTING PERIOD JULY 1, 2021 – DECEMBER 31, 2021 COMPLIANCE PROGRESS: None	SIXTH REPORTING PERIOD JANUARY 1, 2022 – JUNE 30, 2022 COMPLIANCE PROGRESS: None
SEVENTH REPORTING PERIOD JULY 1, 2022 – DECEMBER 31, 2022 COMPLIANCE PROGRESS: Preliminary	EIGHTH REPORTING PERIOD JANUARY 1, 2023 – JUNE 30, 2023 COMPLIANCE PROGRESS: Preliminary	NINTH REPORTING PERIOD JULY 1, 2023 – DECEMBER 31, 2023 COMPLIANCE PROGRESS: Preliminary
TENTH REPORTING PERIOD JANUARY 1, 2024 – JUNE 30, 2024 COMPLIANCE PROGRESS: Preliminary	ELEVENTH REPORTING PERIOD JULY 1, 2024 – DECEMBER 31, 2024 COMPLIANCE PROGRESS: Secondary	

## Accountability and Transparency: ¶466

**466.** *When assessing credibility, COPA, BIA, and the districts will: a. make credibility determinations of statements made by complainants, involved CPD members, and witnesses based on independent, unbiased, and credible evidence, taking into account any known record or final determination of deception or untruthfulness in legal proceedings, administrative investigations, or other investigations; and b. critically evaluate all statements, like any other evidence, giving no automatic preference to, or discounting, any statement solely due to its source, including statements made by CPD members.*

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

<b>Preliminary:</b>		<i>In Compliance (SEVENTH REPORTING PERIOD)</i>
	CPD	<i>In Compliance (SEVENTH REPORTING PERIOD)</i>
	COPA	<i>In Compliance (FOURTH REPORTING PERIOD)</i>
<b>Secondary:</b>		<i>In Compliance (NEW)</i>
	CPD	<i>In Compliance (NEW)</i>
	COPA	<i>In Compliance (FIFTH REPORTING PERIOD)</i>
<b>Full:</b>		<i>Not in Compliance</i>
	CPD	<i>Not Yet Assessed</i>
	COPA	<i>In Compliance (SIXTH REPORTING PERIOD)</i>

In the eleventh reporting period, the City and the CPD achieved Secondary compliance with ¶466 while COPA maintained Full compliance. Because all relevant City entities must reach levels of compliance to bring the City, as a whole, into compliance, the City has not yet reached Full compliance.

This reporting period, COPA provided documentation that maintained Full compliance with ¶466.

To assess Secondary compliance, the IMT reviewed documentation that at least 95% of BIA members and Accountability Sergeants completed the 2024 BIA in-service training. The in-service training included instruction on Module 3, *Credibility, Standards of Proof, and Disciplinary Decision Making*, which addressed the requirements of this paragraph. Additionally, the CPD provided a draft of its *BIA Onboard Training: Credibility, Standards of Proof, and Disciplinary Decision Making*, for review and the IMT provided a no objection notice.

Moving forward, we will look for documentation that the CPD is acting in accordance with ¶466’s mandates. The IMT and the CPD are having discussions on what documentation is needed for Full compliance. For COPA, we expect to receive documentation of efforts towards maintaining Full compliance every reporting period.

## Paragraph 466 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: Status Update	THIRD REPORTING PERIOD MARCH 1, 2020 – DECEMBER 31, 2020 COMPLIANCE PROGRESS: None
FOURTH REPORTING PERIOD JANUARY 1, 2021 – JUNE 30, 2021 COMPLIANCE PROGRESS: None	FIFTH REPORTING PERIOD JULY 1, 2021 – DECEMBER 31, 2021 COMPLIANCE PROGRESS: None	SIXTH REPORTING PERIOD JANUARY 1, 2022 – JUNE 30, 2022 COMPLIANCE PROGRESS: None
SEVENTH REPORTING PERIOD JULY 1, 2022 – DECEMBER 31, 2022 COMPLIANCE PROGRESS: Preliminary	EIGHTH REPORTING PERIOD JANUARY 1, 2023 – JUNE 30, 2023 COMPLIANCE PROGRESS: Preliminary	NINTH REPORTING PERIOD JULY 1, 2023 – DECEMBER 31, 2023 COMPLIANCE PROGRESS: Preliminary
TENTH REPORTING PERIOD JANUARY 1, 2024 – JUNE 30, 2024 COMPLIANCE PROGRESS: Preliminary	ELEVENTH REPORTING PERIOD JULY 1, 2024 – DECEMBER 31, 2024 COMPLIANCE PROGRESS: Secondary	

## Accountability and Transparency: ¶467

**467.** For each allegation associated with a misconduct investigation, COPA, BIA, or the districts will explicitly identify and recommend one of the following findings: a. “Sustained,” where it is determined the allegation is supported by a preponderance of the evidence; b. “Not Sustained,” where it is determined there is insufficient evidence to prove the allegations by a preponderance of the evidence; c. “Unfounded,” where it is determined, by clear and convincing evidence, that an allegation is false or not factual; or d. “Exonerated,” where it is determined, by clear and convincing evidence, that the conduct described in the allegation occurred but is lawful and proper.

Compliance Progress		(Reporting Period: July 1, 2024, through December 31, 2024)
<b>Preliminary:</b>		<i>In Compliance</i> (FIFTH REPORTING PERIOD)
	CPD	<i>In Compliance</i> (FIFTH REPORTING PERIOD)
	COPA	<i>In Compliance</i> (FOURTH REPORTING PERIOD)
<b>Secondary:</b>		<i>In Compliance</i> (NEW)
	CPD	<i>In Compliance</i> (NEW)
	COPA	<i>In Compliance</i> (SEVENTH REPORTING PERIOD)
<b>Full:</b>		<i>Not in Compliance</i>
	CPD	<i>Not Yet Assessed</i>
	COPA	<i>In Compliance</i> (NINTH REPORTING PERIOD)

In the eleventh reporting period, the City and the CPD achieved Secondary compliance while COPA maintained Full compliance with ¶467. Because all relevant City entities must reach levels of compliance to bring the City, as a whole, into compliance, the City has not yet reached Full compliance.

This reporting period, COPA provided documentation that maintained Full compliance with ¶467.

To assess Secondary compliance, the IMT reviewed documentation that at least 95% of CPD members completed the *BIA Accountability Supplemental eLearning*, which addressed the requirements of this paragraph. The CPD also provided documentation that at least 95% of BIA members and Accountability Sergeants completed the 2024 BIA in-service training. The in-service training included instruction on Module 3, *Credibility, Standards of Proof, and Disciplinary Decision Making*, which addressed the requirements of this paragraph.

Additionally, the CPD provided a draft of its *BIA Onboard Training: Credibility, Standards of Proof, and Disciplinary Decision Making*, for review and the IMT provided a no objection notice.

Moving forward, we will look for documentation that the CPD is acting in accordance with ¶467’s mandates. The IMT and the CPD are having discussions on what

documentation is needed for Full compliance. For COPA, we expect to receive evidence of continued compliance in each reporting period to maintain Full compliance.

### Paragraph 467 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: Status Update	THIRD REPORTING PERIOD MARCH 1, 2020 – DECEMBER 31, 2020 COMPLIANCE PROGRESS: None
FOURTH REPORTING PERIOD JANUARY 1, 2021 – JUNE 30, 2021 COMPLIANCE PROGRESS: None	FIFTH REPORTING PERIOD JULY 1, 2021 – DECEMBER 31, 2021 COMPLIANCE PROGRESS: Preliminary	SIXTH REPORTING PERIOD JANUARY 1, 2022 – JUNE 30, 2022 COMPLIANCE PROGRESS: Preliminary
SEVENTH REPORTING PERIOD JULY 1, 2022 – DECEMBER 31, 2022 COMPLIANCE PROGRESS: Preliminary	EIGHTH REPORTING PERIOD JANUARY 1, 2023 – JUNE 30, 2023 COMPLIANCE PROGRESS: Preliminary	NINTH REPORTING PERIOD JULY 1, 2023 – DECEMBER 31, 2023 COMPLIANCE PROGRESS: Preliminary
TENTH REPORTING PERIOD JANUARY 1, 2024 – JUNE 30, 2024 COMPLIANCE PROGRESS: Preliminary	ELEVENTH REPORTING PERIOD JULY 1, 2024 – DECEMBER 31, 2024 COMPLIANCE PROGRESS: Secondary	

## Accountability and Transparency: ¶468

**468.** COPA, BIA, and the districts will ensure that investigators do not: a. ask leading questions that suggest legal justifications for the CPD member’s conduct during interviews of witnesses, complainants, or the involved CPD member; b. make statements that could discourage a CPD member or non-CPD member witness from providing a full account of the specific allegations; c. close an administrative investigation solely because of findings in a related criminal proceedings; d. consider findings in a related criminal investigation to solely determine whether a CPD member engaged in misconduct; e. disregard a witness’s statement solely because the witness has some connection to either the complainant or the CPD member or because the witness or complainant has a criminal history; or f. close an investigation solely because the complainant seeks to withdraw the complaint or is unavailable, unwilling, or unable to cooperate with an administrative investigation. If the complainant is unable or unwilling to provide information beyond the initial complaint, the administrative investigation will continue based on the available evidence in accordance with this Agreement, applicable law, and any applicable collective bargaining agreements.

Compliance Progress		(Reporting Period: July 1, 2024, through December 31, 2024)
<b>Preliminary:</b>		<i>In Compliance</i> (SEVENTH REPORTING PERIOD)
	CPD	<i>In Compliance</i> (SEVENTH REPORTING PERIOD)
	COPA	<i>In Compliance</i> (FIFTH REPORTING PERIOD)
<b>Secondary:</b>		<i>In Compliance</i> (NEW)
	CPD	<i>In Compliance</i> (NEW)
	COPA	<i>In Compliance</i> (SEVENTH REPORTING PERIOD)
<b>Full:</b>		<i>Not in Compliance</i>
	CPD	<i>Not Yet Assessed</i>
	COPA	<i>In Compliance</i> (NINTH REPORTING PERIOD)

In the eleventh reporting period, the City and the CPD achieved Secondary compliance with ¶468 while COPA maintained Full compliance. Because all relevant City entities must reach levels of compliance to bring the City, as a whole, into compliance, the City has not yet reached Full compliance.

This reporting period, COPA provided documentation that maintained Full compliance with ¶468.

To assess Secondary compliance, the IMT reviewed documentation that at least 95% of BIA members and Accountability Sergeants completed the 2024 BIA in-service training. The in-service training included instruction on Module 8, *Audio Recording Interview Guidelines*, and the *Collection of Evidence and Interviews with Non-Department Members*; and *Investigation Assignment and Timelines* module, which addressed the requirements of this paragraph.

Moving forward, we will look for documentation that the CPD is acting in accordance with ¶468’s mandates. The IMT and the CPD are having discussions on what documentation is needed for Full compliance. For COPA, we expect to receive evidence of continued compliance in each reporting period to maintain Full compliance.

### Paragraph 468 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: Status Update	THIRD REPORTING PERIOD MARCH 1, 2020 – DECEMBER 31, 2020 COMPLIANCE PROGRESS: None
FOURTH REPORTING PERIOD JANUARY 1, 2021 – JUNE 30, 2021 COMPLIANCE PROGRESS: None	FIFTH REPORTING PERIOD JULY 1, 2021 – DECEMBER 31, 2021 COMPLIANCE PROGRESS: None	SIXTH REPORTING PERIOD JANUARY 1, 2022 – JUNE 30, 2022 COMPLIANCE PROGRESS: None
SEVENTH REPORTING PERIOD JULY 1, 2022 – DECEMBER 31, 2022 COMPLIANCE PROGRESS: Preliminary	EIGHTH REPORTING PERIOD JANUARY 1, 2023 – JUNE 30, 2023 COMPLIANCE PROGRESS: Preliminary	NINTH REPORTING PERIOD JULY 1, 2023 – DECEMBER 31, 2023 COMPLIANCE PROGRESS: Preliminary
TENTH REPORTING PERIOD JANUARY 1, 2024 – JUNE 30, 2024 COMPLIANCE PROGRESS: Preliminary	ELEVENTH REPORTING PERIOD JULY 1, 2024 – DECEMBER 31, 2024 COMPLIANCE PROGRESS: Secondary	

## Accountability and Transparency: ¶470

*470. The City will ensure that COPA arrives at the investigative findings and recommendations within 180 days of the initiation of the investigation. Any request for an extension of time must be approved in writing by the Chief Administrator of COPA, or his or her designee, who must provide a short explanation of the reason(s) for granting or denying the extension.*

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### Compliance Progress

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

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

In the eleventh reporting period, the City and COPA achieved Full compliance with ¶470.

To assess Full compliance, the IMT reviewed COPA’s documentation of their 180-day letters ensuring that COPA arrives at the investigative findings and recommendations within 180 days of the initiation of the investigation. The documentation included detailed extensions of time that are approved in writing by the Chief Administrator of COPA, or his or her designee, with a short explanation for the reason of granting or denying the request. COPA also provided data showing the number and percentage of cases for which COPA arrived at investigative findings and recommendations within 180 days of the initiation of the investigation, and the number and percentage of cases for which COPA missed the 180-day timeline.

Additionally, COPA provided its training evaluation records for its *Disciplinary and Remedial Recommendations Training*.

Moving forward, we expect to receive evidence of continued compliance in each reporting period to maintain Full compliance.

## Paragraph 470 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:  
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

## Accountability and Transparency: ¶471

**471.** *The City and CPD will ensure that BIA arrives at the investigative findings and recommendations within 180 days of the initiation of the investigation. Any request for an extension of time must be approved in writing by the Chief of BIA or his or her designee.*

### 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

The City and the CPD achieved Secondary compliance with ¶471 in the eleventh reporting period.

To assess Secondary compliance, the IMT reviewed documentation that at least 95% of CPD members completed the *BIA Accountability Supplemental eLearning*, which addressed the requirements of this paragraph. The CPD also provided documentation that at least 95% of BIA members and Accountability Sergeants completed the 2024 BIA in-service training. The in-service training included instruction on the *Investigation Assignment and Timelines* module, which addressed the requirements of this paragraph. Additionally, the CPD provided a draft of its *BIA Onboard Training: Introduction to BIA and the Case Management System* for review, and the IMT provided a no objection notice.

Moving forward, we will look for documentation that the CPD is acting in accordance with ¶471’s mandates. The IMT and the CPD are having discussions on what documentation is needed for Full compliance.

### Paragraph 471 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: None</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: Preliminary</p>	<p>ELEVENTH REPORTING PERIOD JULY 1, 2024 – DECEMBER 31, 2024</p> <p>COMPLIANCE PROGRESS: Secondary</p>	

## Accountability and Transparency: ¶475

475. The City and CPD will undertake best efforts to ensure that the identities of complainants are not revealed to the involved CPD member prior to the CPD member's interrogation.

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

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

In the eleventh reporting period, the City and the CPD achieved Secondary compliance with ¶475 while COPA maintained Full compliance. Because all relevant City entities must reach levels of compliance to bring the City, as a whole, into compliance, the City has not yet reached Full compliance.

This reporting period, COPA provided documentation that maintained Full compliance with ¶475.

To assess Secondary compliance, the IMT reviewed documentation that at least 95% of CPD members completed the *BIA Accountability Supplemental eLearning*, which addressed the requirements of this paragraph. The CPD also provided documentation that at least 95% of BIA members and Accountability Sergeants completed the 2024 BIA in-service training. The in-service training included instruction on Module 9, *Interviewing Department Members*, which addressed the requirements of this paragraph.

Moving forward, we will look for documentation that the CPD is acting in accordance with ¶475's mandates. The IMT and the CPD are having discussions on what documentation is needed for Full compliance. For COPA, we expect to receive evidence of continued compliance in each reporting period to maintain Full compliance.

## Paragraph 475 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:  
Status Update

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

COMPLIANCE PROGRESS:  
None

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

COMPLIANCE PROGRESS:  
None

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

COMPLIANCE PROGRESS:  
Preliminary

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

COMPLIANCE PROGRESS:  
Preliminary

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

COMPLIANCE PROGRESS:  
Preliminary

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

COMPLIANCE PROGRESS:  
Preliminary

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

COMPLIANCE PROGRESS:  
Preliminary

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

COMPLIANCE PROGRESS:  
Preliminary

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

COMPLIANCE PROGRESS:  
Secondary

## Accountability and Transparency: ¶479

*479. Within 120 days of the Effective Date, CPD and COPA will each adopt or review and, to the extent necessary, revise its policy establishing investigative timelines, benchmarks, and goals by which the progress of investigations will be measured.*

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

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

In the eleventh reporting period, the City and the CPD achieved Secondary compliance with ¶479 while COPA achieved Full compliance with ¶479. Because all relevant City entities must achieve levels of compliance to bring the City, as a whole, into compliance, the City has not yet achieved Full compliance.

To assess Secondary compliance, the IMT reviewed documentation that at least 95% of BIA members and Accountability Sergeants completed the 2024 BIA in-service training. The in-service training included instruction on the *Investigation Assignment and Timelines* module, which addressed the requirements of this paragraph. Additionally, the CPD provided a draft of its *BIA Onboard Training: Introduction to BIA and the Case Management System* for review and the IMT provided a no objection notice.

To assess COPA’s Full compliance, the IMT reviewed COPA’s documentation of their 180-day letters ensuring that COPA arrives at the investigative findings and recommendations within 180 days of the initiation of the investigation, which addresses the requirements of this paragraph. Additionally, COPA provided its training evaluation records for its *Investigative File Maintenance Training*.

Moving forward, for the CPD, we will look for documentation that the CPD is acting in accordance with ¶479’s mandates. The IMT and the CPD are having discussions on what documentation is needed for Full compliance. For COPA, we expect to receive evidence of continued compliance in each reporting period to maintain Full compliance.

## Paragraph 479 Compliance Progress History

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

## Accountability and Transparency: ¶480

**480.** Within 120 days of the Effective Date, the City, CPD, and COPA will each develop a policy establishing procedures for COPA, BIA, and Accountability Sergeant’s review and consideration of evidence from civil and criminal litigation.

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

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

In the eleventh reporting period, the City and the CPD achieved Secondary compliance while COPA maintained Full compliance with ¶480. Because all relevant City entities must achieve levels of compliance to bring the City, as a whole, into compliance, the City has not yet achieved Full compliance.

This reporting period, COPA provided documentation that maintained Full compliance with ¶480.

To assess Secondary compliance, the IMT reviewed the CPD’s documentation that at least 95% of BIA members and Accountability Sergeants completed the 2024 BIA in-service training. The in-service training included instruction on the *Collection of Evidence and Interviews with Non-Department Members* module, which addressed the requirements of this paragraph.

Moving forward, we will look for documentation demonstrating that the CPD is acting in accordance with ¶480’s mandates. The IMT and the CPD are having discussions on what documentation is needed for Full compliance. For COPA, we expect to receive evidence of continued compliance in each reporting period to maintain Full compliance.

## Paragraph 480 Compliance Progress History

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

## Accountability and Transparency: ¶483

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

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### 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*

The City and the CPD achieved Secondary compliance with ¶483 in the eleventh reporting period

To maintain Preliminary compliance, the CPD provided its revised S08-01-08, *Post-Investigation Log Number Procedures*, for review and the IMT provided a no objection notice.

To assess Secondary compliance, the IMT reviewed documentation that at least 95% of CPD members completed the *BIA Accountability Supplemental eLearning*, which addressed the requirements of this paragraph.

In addition, the CPD provided its *BIA Satisfaction Survey Status Report* for review, which appropriately addresses the requirements of this paragraph. The report includes examples of key survey data and the CPD’s response. The satisfaction survey can be accessed via a link on the CPD’s website<sup>3</sup> and via a link in Final Summary Reports distributed to complainants and members. The IMT encourages the CPD to continue to seek ways to improve the community participation and response to the surveys in order to assess the depth of the public support for the CPD’s accountability and transparency initiatives.

Moving forward, we will look for documentation that the CPD is acting in accordance with ¶483’s mandates. The IMT and the CPD are having discussions on what documentation is needed for Full compliance.

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<sup>3</sup> The Chicago Police Department, “Accountability Dashboard,” <https://www.chicagopolice.org/statistics-data/data-dashboards/accountability-dashboard/>.

## Paragraph 483 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: Not Applicable	FIFTH REPORTING PERIOD JULY 1, 2021 – DECEMBER 31, 2021 COMPLIANCE PROGRESS: Preliminary	SIXTH REPORTING PERIOD JANUARY 1, 2022 – JUNE 30, 2022 COMPLIANCE PROGRESS: Preliminary
SEVENTH REPORTING PERIOD JULY 1, 2022 – DECEMBER 31, 2022 COMPLIANCE PROGRESS: Preliminary	EIGHTH REPORTING PERIOD JANUARY 1, 2023 – JUNE 30, 2023 COMPLIANCE PROGRESS: Preliminary	NINTH REPORTING PERIOD JULY 1, 2023 – DECEMBER 31, 2023 COMPLIANCE PROGRESS: Preliminary
TENTH REPORTING PERIOD JANUARY 1, 2024 – JUNE 30, 2024 COMPLIANCE PROGRESS: Preliminary	ELEVENTH REPORTING PERIOD JULY 1, 2024 – DECEMBER 31, 2024 COMPLIANCE PROGRESS: Secondary	

## Accountability and Transparency: ¶484

**484.** *If at any time during the intake or investigation of a complaint, COPA, BIA, or Accountability Sergeants find evidence indicating criminal conduct by any CPD member, the Chief Administrator of COPA or Chief of BIA will refer the investigation to the appropriate prosecuting agency.*

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### Compliance Progress

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

<b>Preliminary:</b>	<i>In Compliance</i> (SEVENTH REPORTING PERIOD)
CPD	<i>In Compliance</i> (SEVENTH REPORTING PERIOD)
COPA	<i>In Compliance</i> (FOURTH REPORTING PERIOD)
<b>Secondary:</b>	<i>In Compliance</i> (NEW)
CPD	<i>In Compliance</i> (NEW)
COPA	<i>In Compliance</i> (NINTH REPORTING PERIOD)
<b>Full:</b>	<i>Not in Compliance</i>
CPD	<i>Not in Compliance</i>
COPA	<i>In Compliance</i> (NINTH REPORTING PERIOD)

In the eleventh reporting period, the City and the CPD achieved Secondary compliance with ¶484 while COPA maintained Full compliance. Because all relevant City entities must reach levels of compliance to bring the City, as a whole, into compliance, the City has not yet reached Full compliance with ¶484.

This reporting period, COPA provided documentation that maintained Full compliance with ¶484.

To assess Secondary compliance, the IMT reviewed documentation that at least 95% of CPD members completed the *BIA Accountability Supplemental eLearning*, which addressed the requirements of this paragraph. The CPD also provided documentation that at least 95% of BIA members and Accountability Sergeants completed the 2024 BIA in-service training. The in-service training included instruction on the *Collection of Evidence and Interviews with Non-Department Members* module, which addressed the requirements of this paragraph.

Moving forward, we will look for documentation that the CPD is acting in accordance with ¶484's mandates. The IMT and the CPD are having discussions on what documentation is needed for Full compliance. For COPA, we expect to receive evidence of continued compliance in each reporting period to maintain Full compliance.

## Paragraph 484 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: Status Update	THIRD REPORTING PERIOD MARCH 1, 2020 – DECEMBER 31, 2020 COMPLIANCE PROGRESS: None
FOURTH REPORTING PERIOD JANUARY 1, 2021 – JUNE 30, 2021 COMPLIANCE PROGRESS: None	FIFTH REPORTING PERIOD JULY 1, 2021 – DECEMBER 31, 2021 COMPLIANCE PROGRESS: None	SIXTH REPORTING PERIOD JANUARY 1, 2022 – JUNE 30, 2022 COMPLIANCE PROGRESS: None
SEVENTH REPORTING PERIOD JULY 1, 2022 – DECEMBER 31, 2022 COMPLIANCE PROGRESS: Preliminary	EIGHTH REPORTING PERIOD JANUARY 1, 2023 – JUNE 30, 2023 COMPLIANCE PROGRESS: Preliminary	NINTH REPORTING PERIOD JULY 1, 2023 – DECEMBER 31, 2023 COMPLIANCE PROGRESS: Preliminary
TENTH REPORTING PERIOD JANUARY 1, 2024 – JUNE 30, 2024 COMPLIANCE PROGRESS: Preliminary	ELEVENTH REPORTING PERIOD JULY 1, 2024 – DECEMBER 31, 2024 COMPLIANCE PROGRESS: Secondary	

## Accountability and Transparency: ¶1486

**486.** *The City, CPD, and COPA will ensure that CPD and COPA maintain thorough and complete administrative investigative files. Such administrative investigative files will include: a. documentation of all evidence that was gathered, including names, phone numbers, and addresses of witnesses to the alleged misconduct. In situations in which there are no known witnesses, the file will specifically state this fact. In situations in which witnesses were present but circumstances prevented the investigator from collecting information from those witnesses, the investigative file will state the reasons why. The investigative file also will include all available identifying information for anyone who refuses to provide a statement; b. documentation of each interview conducted and the recording of those interviews, if available; c. the names of all CPD members who have been identified as witnesses to the alleged misconduct; d. COPA's, BIA's, or the district's narrative description and evaluation of the alleged misconduct, based on its review of the evidence gathered, including a determination of whether the CPD member's actions appear to be within CPD policy, procedure, regulations, orders, or other standards of conduct required of CPD members; e. in cases where material inconsistencies exist between complainant, CPD member, and witness statements, explicit identification of the inconsistencies, including a description of the evidence reviewed and written credibility findings; f. if a CPD member deployed a weapon, documentation of whether the CPD member's certification and training for the weapon were current; g. all CPD member original statements, as well as any amendments or clarifications to the original statement, and any subsequent statements; and h. an explicit identification of each allegation and the recommended finding for each allegation of misconduct in an investigation.*

Compliance Progress		(Reporting Period: July 1, 2024, through December 31, 2024)
<b>Preliminary:</b>		<i>In Compliance (SEVENTH REPORTING PERIOD)</i>
	CPD	<i>In Compliance (SEVENTH REPORTING PERIOD)</i>
	COPA	<i>In Compliance (SIXTH REPORTING PERIOD)</i>
<b>Secondary:</b>		<i>In Compliance (NEW)</i>
	CPD	<i>In Compliance (NEW)</i>
	COPA	<i>In Compliance (NINTH REPORTING PERIOD)</i>
<b>Full:</b>		<i>Not in Compliance</i>
	CPD	<i>Not in Compliance</i>
	COPA	<i>Under Assessment (TENTH REPORTING PERIOD)</i>

In the eleventh reporting period, the City and the CPD achieved Secondary compliance with ¶1486 while COPA remained under assessment for Full compliance. Because all relevant City entities must achieve levels of compliance to bring the City, as a whole, into compliance, the City has not yet achieved Full compliance.

To assess Secondary compliance, the IMT reviewed documentation that at least 95% of BIA members and Accountability Sergeants completed the 2024 BIA in-service training. The in-service training included instruction on Module 3, *Credibility*,

*Standards of Proof, and Disciplinary Decision Making*, and the *Collection of Evidence and Interviews with Non-Department Members* module, which addressed the requirements of this paragraph. Additionally, the CPD provided drafts of its *BIA Onboard Training: Credibility, Standards of Proof, and Disciplinary Decision Making* and its *BIA Onboard Training: Introduction to BIA and the Case Management System* for review. The IMT provided no objection notices for each of these productions.

To assess Full compliance for the CPD, the IMT reviewed the CPD's follow-up to the 2022 Audit of BIA Investigative Files for review. However, the IMT will conduct a more in-depth review of completed investigations to assess whether investigation files are thorough and complete.

To assess Full compliance for COPA, the IMT reviewed COPA's documentation of its administrative investigative files. The documentation included Final Summary Reports (FSRs), Case Management System (CMS) screenshots, Log Number attachment reports, and CMS notes. While this documentation partially addresses ¶486 for Full compliance, the IMT will conduct a more in-depth review of completed investigations to assess whether investigation files are thorough and complete.

Additionally, COPA provided its training evaluation records for its *Investigative File Maintenance Training*.

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

## Paragraph 486 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:  
Status Update

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

COMPLIANCE PROGRESS:  
Status Update

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

COMPLIANCE PROGRESS:  
None

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

COMPLIANCE PROGRESS:  
None

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

COMPLIANCE PROGRESS:  
None

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

COMPLIANCE PROGRESS:  
Preliminary

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

COMPLIANCE PROGRESS:  
Preliminary

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

COMPLIANCE PROGRESS:  
Preliminary

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

COMPLIANCE PROGRESS:  
Preliminary

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

COMPLIANCE PROGRESS:  
Secondary

## Accountability and Transparency: ¶487

*487. Investigators will consider all original statements, and any subsequent statements, including amended or modified statements, for purposes of determining whether a CPD member willfully made a false statement about a fact material to the incident under investigation.*

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### Compliance Progress

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

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

In the eleventh reporting period, the City and the CPD achieved Secondary compliance with ¶487 while COPA maintained Full compliance. Because all relevant City entities must reach levels of compliance to bring the City, as a whole, into compliance, the City has not yet reached Full compliance.

This reporting period, COPA provided documentation that maintained Full compliance with ¶487.

To assess Secondary compliance, the IMT reviewed documentation that at least 95% of BIA members and Accountability Sergeants completed the 2024 BIA in-service training. The in-service training included instruction on Module 3, *Credibility, Standards of Proof, and Disciplinary Decision Making*, which addressed the requirements of this paragraph.

Moving forward, we will look for documentation demonstrating that the CPD is acting in accordance with ¶487's mandates. The IMT and the CPD are having discussions on what documentation is needed for Full compliance. For COPA, we expect to receive evidence of continued compliance in each reporting period to maintain Full compliance.

## Paragraph 487 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: Status Update	THIRD REPORTING PERIOD MARCH 1, 2020 – DECEMBER 31, 2020 COMPLIANCE PROGRESS: None
FOURTH REPORTING PERIOD JANUARY 1, 2021 – JUNE 30, 2021 COMPLIANCE PROGRESS: None	FIFTH REPORTING PERIOD JULY 1, 2021 – DECEMBER 31, 2021 COMPLIANCE PROGRESS: None	SIXTH REPORTING PERIOD JANUARY 1, 2022 – JUNE 30, 2022 COMPLIANCE PROGRESS: None
SEVENTH REPORTING PERIOD JULY 1, 2022 – DECEMBER 31, 2022 COMPLIANCE PROGRESS: Preliminary	EIGHTH REPORTING PERIOD JANUARY 1, 2023 – JUNE 30, 2023 COMPLIANCE PROGRESS: Preliminary	NINTH REPORTING PERIOD JULY 1, 2023 – DECEMBER 31, 2023 COMPLIANCE PROGRESS: Preliminary
TENTH REPORTING PERIOD JANUARY 1, 2024 – JUNE 30, 2024 COMPLIANCE PROGRESS: Preliminary	ELEVENTH REPORTING PERIOD JULY 1, 2024 – DECEMBER 31, 2024 COMPLIANCE PROGRESS: Secondary	

## Accountability and Transparency: ¶497

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

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### Compliance Progress

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

<b>Preliminary:</b>	<i>In Compliance</i> (FIFTH REPORTING PERIOD)
CPD	<i>In Compliance</i> (FIFTH REPORTING PERIOD)
COPA	<i>In Compliance</i> (FIFTH REPORTING PERIOD)
<b>Secondary:</b>	<i>In Compliance</i> (NEW)
CPD	<i>In Compliance</i> (NEW)
COPA	<i>In Compliance</i> (SEVENTH REPORTING PERIOD)
<b>Full:</b>	<i>Not in Compliance</i>
CPD	<i>Not Yet Assessed</i>
COPA	<i>In Compliance</i> (TENTH REPORTING PERIOD)

In the eleventh reporting period, the City and the CPD achieved Secondary compliance with ¶497 while COPA maintained Full compliance. Because all relevant City entities must achieve levels of compliance to bring the City, as a whole, into compliance, the City has not yet achieved Full compliance.

This reporting period, COPA provided documentation that maintained Full compliance with ¶497.

To assess Secondary compliance, the IMT reviewed documentation that at least 95% of CPD members completed the *BIA Accountability Supplemental eLearning*, which addressed the requirements of this paragraph.

Moving forward, we will look for documentation demonstrating that the CPD is acting in accordance with ¶497's mandates. The IMT and the CPD are having discussions on what documentation is needed for Full compliance. For COPA, we expect to receive evidence of continued compliance in each reporting period to maintain Full compliance.

## Paragraph 497 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: Status Update	THIRD REPORTING PERIOD MARCH 1, 2020 – DECEMBER 31, 2020 COMPLIANCE PROGRESS: None
FOURTH REPORTING PERIOD JANUARY 1, 2021 – JUNE 30, 2021 COMPLIANCE PROGRESS: None	FIFTH REPORTING PERIOD JULY 1, 2021 – DECEMBER 31, 2021 COMPLIANCE PROGRESS: Preliminary	SIXTH REPORTING PERIOD JANUARY 1, 2022 – JUNE 30, 2022 COMPLIANCE PROGRESS: Preliminary
SEVENTH REPORTING PERIOD JULY 1, 2022 – DECEMBER 31, 2022 COMPLIANCE PROGRESS: Preliminary	EIGHTH REPORTING PERIOD JANUARY 1, 2023 – JUNE 30, 2023 COMPLIANCE PROGRESS: Preliminary	NINTH REPORTING PERIOD JULY 1, 2023 – DECEMBER 31, 2023 COMPLIANCE PROGRESS: Preliminary
TENTH REPORTING PERIOD JANUARY 1, 2024 – JUNE 30, 2024 COMPLIANCE PROGRESS: Preliminary	ELEVENTH REPORTING PERIOD JULY 1, 2024 – DECEMBER 31, 2024 COMPLIANCE PROGRESS: Secondary	

## Accountability and Transparency: ¶499

**499.** When COPA, BIA, or the investigating district has arrived at the investigative findings and recommendations, it will promptly finalize a summary report (“Administrative Summary Report”). The Administrative Summary Report will include: a. a description of the CPD members and individuals involved in the alleged misconduct; b. the date, time, and location of the alleged misconduct; c. a description of the allegations and applicable policies; d. a narrative summary of the alleged misconduct; e. a narrative summary of the investigation; and f. the investigating body’s findings and conclusions for each allegation of misconduct, including any discipline recommended.

Compliance Progress		(Reporting Period: July 1, 2024, through December 31, 2024)
<b>Preliminary:</b>		<i>In Compliance</i> (FIFTH REPORTING PERIOD)
	CPD	<i>In Compliance</i> (FIFTH REPORTING PERIOD)
	COPA	<i>In Compliance</i> (FOURTH REPORTING PERIOD)
<b>Secondary:</b>		<i>In Compliance</i> (NEW)
	CPD	<i>In Compliance</i> (NEW)
	COPA	<i>In Compliance</i> (SEVENTH REPORTING PERIOD)
<b>Full:</b>		<i>Not in Compliance</i>
	CPD	<i>Not Yet Assessed</i>
	COPA	<i>In Compliance</i> (NINTH REPORTING PERIOD)

In the eleventh reporting period, the City and the CPD achieved Secondary compliance with ¶499 while COPA maintained Full compliance. Because all relevant City entities must achieve levels of compliance to bring the City, as a whole, into compliance, the City has not yet achieved Full compliance.

This reporting period, COPA provided documentation that maintained Full compliance with ¶499.

To assess Secondary compliance, the IMT reviewed documentation that at least 95% of CPD members completed the *BIA Accountability Supplemental eLearning*, which addressed the requirements of this paragraph. The CPD also provided documentation that at least 95% of BIA members and Accountability Sergeants completed the 2024 BIA in-service training. The in-service training included instruction on Module 10, *Mistakes and Updates*, which addressed the requirements of this paragraph.

Moving forward, we will look for documentation demonstrating that the CPD is acting in accordance with ¶499’s mandates. The IMT and the CPD are having discussions on what documentation is needed for Full compliance. For COPA, we expect to receive evidence of continued compliance in each reporting period to maintain Full compliance.

## Paragraph 499 Compliance Progress History

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

COMPLIANCE PROGRESS:  
None

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

COMPLIANCE PROGRESS:  
Status Update

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

COMPLIANCE PROGRESS:  
Status Update

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

COMPLIANCE PROGRESS:  
None

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

COMPLIANCE PROGRESS:  
Preliminary

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

COMPLIANCE PROGRESS:  
Preliminary

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

COMPLIANCE PROGRESS:  
Preliminary

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

COMPLIANCE PROGRESS:  
Preliminary

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

COMPLIANCE PROGRESS:  
Preliminary

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

COMPLIANCE PROGRESS:  
Preliminary

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

COMPLIANCE PROGRESS:  
Secondary

## Accountability and Transparency: ¶1503

**503.** When an allegation of misconduct contains multiple separate potential policy violations, all applicable violations will be identified and investigated. Exoneration for the most serious allegations of misconduct will not preclude the recommendation of discipline, training, or other corrective measures for less serious misconduct stemming from the same set of allegations.

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### Compliance Progress

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

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

In the eleventh reporting period, the City and the CPD achieved Secondary compliance with ¶1503 while COPA maintained Full compliance. Because all relevant City entities must achieve levels of compliance to bring the City, as a whole, into compliance, the City has not yet achieved Full compliance.

This reporting period, COPA provided documentation that maintained Full compliance with ¶1503.

To assess Secondary compliance, the IMT reviewed documentation that at least 95% of CPD members completed the *BIA Accountability Supplemental eLearning*, which addressed the requirements of this paragraph. The CPD also provided documentation that at least 95% of BIA members and Accountability Sergeants completed the 2024 BIA in-service training. The in-service training included instruction on Module 3, *Credibility, Standards of Proof, and Disciplinary Decision Making*, and Module 10, *Mistakes and Updates*, which addressed the requirements of this paragraph.

Additionally, the CPD provided a draft of its *BIA Onboard Training: Credibility, Standards of Proof, and Disciplinary Decision Making*, for review and the IMT provided a no objection notice.

Moving forward, we will look for documentation demonstrating that the CPD is acting in accordance with ¶1503's mandates. The IMT and the CPD are having discussions on what documentation is needed for Full compliance. For COPA, we expect to receive evidence of continued compliance in each reporting period to maintain Full compliance.

## Paragraph 503 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: Not Applicable	FIFTH REPORTING PERIOD JULY 1, 2021 – DECEMBER 31, 2021 COMPLIANCE PROGRESS: None	SIXTH REPORTING PERIOD JANUARY 1, 2022 – JUNE 30, 2022 COMPLIANCE PROGRESS: None
SEVENTH REPORTING PERIOD JULY 1, 2022 – DECEMBER 31, 2022 COMPLIANCE PROGRESS: Preliminary	EIGHTH REPORTING PERIOD JANUARY 1, 2023 – JUNE 30, 2023 COMPLIANCE PROGRESS: Preliminary	NINTH REPORTING PERIOD JULY 1, 2023 – DECEMBER 31, 2023 COMPLIANCE PROGRESS: Preliminary
TENTH REPORTING PERIOD JANUARY 1, 2024 – JUNE 30, 2024 COMPLIANCE PROGRESS: Preliminary	ELEVENTH REPORTING PERIOD JULY 1, 2024 – DECEMBER 31, 2024 COMPLIANCE PROGRESS: Secondary	

## Accountability and Transparency: ¶1504

*504. As soon as feasible, but by no later than January 2020, upon arriving at the final disciplinary decision, CPD and COPA will ensure that the Administrative Summary Report is provided to the involved CPD member and the Department. CPD will ensure that the Administrative Summary Report is provided to the involved CPD member’s District or Unit Commander and immediate supervisor.*

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<b>Compliance Progress</b>	(Reporting Period: July 1, 2024, through December 31, 2024)
<b>Preliminary:</b>	<i>In Compliance (FIFTH REPORTING PERIOD)</i>
<b>CPD</b>	<i>In Compliance (FIFTH REPORTING PERIOD)</i>
<b>COPA</b>	<i>In Compliance (FOURTH REPORTING PERIOD)</i>
<b>Secondary:</b>	<i>In Compliance (NEW)</i>
<b>CPD</b>	<i>In Compliance (NEW)</i>
<b>COPA</b>	<i>In Compliance (NEW)</i>
<b>Full:</b>	<i>Not in Compliance</i>
<b>CPD</b>	<i>Not Yet Assessed</i>
<b>COPA</b>	<i>Not in Compliance</i>

The City, the CPD, and COPA achieved Secondary compliance with ¶1504 in the eleventh reporting period.

To assess Secondary compliance for the CPD, the IMT reviewed documentation that at least 95% of BIA members and Accountability Sergeants completed the 2024 BIA in-service training. The in-service training included instruction on the *Investigation Assignment and Timelines* module, which addressed the requirements of this paragraph. Additionally, the CPD provided a draft of its *BIA Onboard Training: Introduction to BIA and the Case Management System* for review and the IMT provided a no objection notice.

To assess Secondary compliance for COPA, the IMT reviewed COPA’s revised *Publishing and Distribution of Final Summary Reports* guidance, which establishes that COPA will provide Final Summary Reports to both the CPD and the involved CPD member no later than 60 days of the Final Disciplinary Decision.

To assess Full compliance, the IMT reviewed COPA’s Final Summary Reports and transmissions of the Final Summary Reports to the involved CPD member. COPA produced five examples of Final Summary Reports that were transmitted to support compliance with this paragraph. Moving forward, the IMT looks forward to discussions with COPA to develop a production plan to demonstrate that the Final Summary Reports are timely sent to the involved CPD member and sent to the CPD, as required by this paragraph.

Moving forward, we will look for documentation that the CPD and COPA are acting in accordance with ¶504’s mandates. The IMT and the CPD are having discussions on what documentation is needed to demonstrate for Full compliance.

### Paragraph 504 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: 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	

## Accountability and Transparency: ¶513

*513. COPA will ensure that the recommended level of discipline for findings is consistently applied in a fair, thorough, and timely fashion, based on the nature of the misconduct. COPA and CPD will also ensure that mitigating and aggravating factors are identified, consistently applied, and documented.*

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

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

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

This reporting period, the CPD provided documentation that maintained Secondary compliance with ¶513.

To assess Full compliance, the IMT reviewed a memorandum and supporting documentation regarding a review COPA conducted of its *Disciplinary and Remedial Recommendation Policy* over a period of approximately a month and a half and involving five to ten cases.<sup>4</sup> However, the documentation provided does not appropriately address the requirements of this paragraph. The IMT recommends that COPA continue dialogue with the CPD with regard to policies and practices developed in response to ¶¶513–14.

Additionally, COPA provided its training evaluation records for its *Disciplinary and Remedial Recommendations Training*.

Moving forward, we will look for documentation that the CPD and COPA are acting in accordance with ¶513’s mandates. This will require collaboration between the CPD and COPA to address the requirements of ¶¶513–14.

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<sup>4</sup> COPA also provided this information for Full compliance review with ¶514. However, the documentation provided does not appropriately address the requirements of ¶514. The CPD and COPA must collaborate to address the requirements of ¶¶513–14.

## Paragraph 513 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:  
None

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

COMPLIANCE PROGRESS:  
None

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

COMPLIANCE PROGRESS:  
None

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

COMPLIANCE PROGRESS:  
Preliminary

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

COMPLIANCE PROGRESS:  
Preliminary

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

COMPLIANCE PROGRESS:  
Secondary

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

COMPLIANCE PROGRESS:  
Secondary

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

COMPLIANCE PROGRESS:  
Secondary

## Accountability and Transparency: ¶516

*516. Each sustained finding contained within a CPD member’s disciplinary history will be considered for the purposes of recommending discipline for a subsequent sustained finding for a period of up to five years after the date of the incident or the date on which the violation is discovered, whichever is later.*

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

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

In the eleventh reporting period, the City and the CPD achieved Secondary compliance with ¶516 while COPA maintained Full compliance. Because all relevant City entities must achieve levels of compliance to bring the City, as a whole, into compliance, the City has not yet achieved Full compliance.

This reporting period, COPA provided documentation that maintained Full compliance with ¶516.

To assess Secondary compliance, the IMT reviewed documentation that at least 95% of BIA members and Accountability Sergeants completed the 2024 BIA in-service training. The in-service training included instruction on Module 3, *Credibility, Standards of Proof, and Disciplinary Decision Making*, which addressed the requirements of this paragraph. Additionally, the CPD provided a draft of its *BIA Onboard Training: Credibility, Standards of Proof, and Disciplinary Decision Making*, for review and the IMT provided a no objection notice.

Moving forward, we will look for documentation demonstrating that the CPD is acting in accordance with ¶516’s mandates. The IMT and the CPD are having discussions on what documentation is needed for Full compliance. For COPA, we expect to receive evidence of continued compliance in each reporting period to maintain Full compliance.

## Paragraph 516 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:  
Status Update

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

COMPLIANCE PROGRESS:  
Status Update

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

COMPLIANCE PROGRESS:  
None

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

COMPLIANCE PROGRESS:  
Preliminary

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

COMPLIANCE PROGRESS:  
None

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

COMPLIANCE PROGRESS:  
Preliminary

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

COMPLIANCE PROGRESS:  
Preliminary

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

COMPLIANCE PROGRESS:  
Preliminary

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

COMPLIANCE PROGRESS:  
Preliminary

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

COMPLIANCE PROGRESS:  
Secondary

## Accountability and Transparency: ¶517

517. The City, CPD, and COPA will ensure that findings of “Sustained – Violation Noted, No Disciplinary Action”: a. may not be used in any investigation in which the conduct resulted in injury to any person; and b. will only be used for investigations that warrant a sustained finding, but were a result of unintentional violations of policy or law.

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Compliance Progress		(Reporting Period: July 1, 2024, through December 31, 2024)
<b>Preliminary:</b>		<i>In Compliance</i> (SEVENTH REPORTING PERIOD)
	CPD	<i>In Compliance</i> (SEVENTH REPORTING PERIOD)
	COPA	<i>In Compliance</i> (FOURTH REPORTING PERIOD)
<b>Secondary:</b>		<i>In Compliance</i> (NEW)
	CPD	<i>In Compliance</i> (NEW)
	COPA	<i>In Compliance</i> (SEVENTH REPORTING PERIOD)
<b>Full:</b>		<i>Not in Compliance</i>
	CPD	<i>Not Yet Assessed</i>
	COPA	<i>In Compliance</i> (NINTH REPORTING PERIOD)

In the eleventh reporting period, the City and the CPD achieved Secondary compliance with ¶517 while COPA maintained Full compliance. Because all relevant City entities must achieve levels of compliance to bring the City, as a whole, into compliance, the City has not yet achieved Full compliance.

This reporting period, COPA provided documentation that maintained Full compliance with ¶517.

To assess Secondary compliance, the IMT reviewed documentation that at least 95% of CPD members completed the *BIA Accountability Supplemental eLearning*, which addressed the requirements of this paragraph. The CPD also provided documentation that at least 95% of BIA members and Accountability Sergeants completed the 2024 BIA in-service training. The in-service training included instruction on Module 3, *Credibility, Standards of Proof, and Disciplinary Decision Making*, which addressed the requirements of this paragraph. Additionally, the CPD provided a draft of its *BIA Onboard Training: Credibility, Standards of Proof, and Disciplinary Decision Making*, for review and the IMT provided a no objection notice.

Moving forward, we will look for documentation demonstrating that the CPD is acting in accordance with ¶517's mandates. The IMT and the CPD are having discussions on what documentation is needed for Full compliance. For COPA, we expect to receive evidence of continued compliance in each reporting period to maintain Full compliance.

## Paragraph 517 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: None	FIFTH REPORTING PERIOD JULY 1, 2021 – DECEMBER 31, 2021 COMPLIANCE PROGRESS: None	SIXTH REPORTING PERIOD JANUARY 1, 2022 – JUNE 30, 2022 COMPLIANCE PROGRESS: None
SEVENTH REPORTING PERIOD JULY 1, 2022 – DECEMBER 31, 2022 COMPLIANCE PROGRESS: Preliminary	EIGHTH REPORTING PERIOD JANUARY 1, 2023 – JUNE 30, 2023 COMPLIANCE PROGRESS: Preliminary	NINTH REPORTING PERIOD JULY 1, 2023 – DECEMBER 31, 2023 COMPLIANCE PROGRESS: Preliminary
TENTH REPORTING PERIOD JANUARY 1, 2024 – JUNE 30, 2024 COMPLIANCE PROGRESS: Preliminary	ELEVENTH REPORTING PERIOD JULY 1, 2024 – DECEMBER 31, 2024 COMPLIANCE PROGRESS: Secondary	

## Accountability and Transparency: ¶518

*518. CPD will provide the required notice regarding disciplinary matters to the Illinois Law Enforcement Training and Standards Board, including when an officer resigns while a misconduct investigation or disciplinary charges are pending.*

### 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*

The City and the CPD achieved Secondary compliance with ¶518 in the eleventh reporting period.

To assess Secondary compliance, the IMT reviewed documentation that at least 95% of CPD members completed the *BIA Accountability Supplemental eLearning*, which addressed the requirements of this paragraph.

Moving forward, we will look for documentation demonstrating that the CPD is acting in accordance with ¶518’s mandates. The IMT and the CPD are having discussions on what documentation is needed for Full compliance.

### Paragraph 518 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: None</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: Preliminary</p>	<p>ELEVENTH REPORTING PERIOD JULY 1, 2024 – DECEMBER 31, 2024</p> <p>COMPLIANCE PROGRESS: Secondary</p>	

## Accountability and Transparency: ¶519

*519. The failure to complete an administrative investigation within the timeframes set forth in this Agreement will not invalidate, impair, or otherwise negatively impact CPD’s ability to issue discipline for sustained findings.*

### Compliance Progress

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

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

The City and the CPD achieved Secondary compliance with ¶519 in the eleventh reporting period.

To assess Secondary compliance, the IMT reviewed documentation that at least 95% of CPD members completed the *BIA Accountability Supplemental eLearning*, which addressed the requirements of this paragraph.

Moving forward, we will look for documentation demonstrating that the CPD is acting in accordance with ¶519’s mandates. The IMT and the CPD are having discussions on what documentation is needed for Full compliance.

### Paragraph 519 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: None</p>	<p>FIFTH REPORTING PERIOD JULY 1, 2021 – DECEMBER 31, 2021</p> <p>COMPLIANCE PROGRESS: None</p>	<p>SIXTH REPORTING PERIOD JANUARY 1, 2022 – JUNE 30, 2022</p> <p>COMPLIANCE PROGRESS: None</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: Preliminary</p>	<p>ELEVENTH REPORTING PERIOD JULY 1, 2024 – DECEMBER 31, 2024</p> <p>COMPLIANCE PROGRESS: Secondary</p>	

## Accountability and Transparency: ¶521

521. The City, CPD, and COPA will continue to build on these critical efforts by ensuring that BIA, COPA, the Police Board, and the Deputy PSIG have sufficient funding and an adequate number of qualified staff to fulfill their respective missions as required by law, each entity's policies, and this Agreement.

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### Compliance Progress

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

<b>Preliminary:</b>	<i>In Compliance (NEW)</i>
CITY	<i>In Compliance (NEW)</i>
CPD	<i>In Compliance (NEW)</i>
COPA	<i>In Compliance (SEVENTH REPORTING PERIOD)</i>
<b>Secondary:</b>	<i>Not in Compliance</i>
CITY	<i>Not Yet Assessed</i>
CPD	<i>Not Yet Assessed</i>
COPA	<i>In Compliance (NINTH REPORTING PERIOD)</i>
<b>Full:</b>	<i>Not in Compliance</i>
CITY	<i>Not Yet Assessed</i>
CPD	<i>Not Yet Assessed</i>
COPA	<i>In Compliance (TENTH REPORTING PERIOD)</i>

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

This reporting period, COPA provided documentation that maintained Full compliance with ¶521.

To assess Preliminary compliance, the IMT reviewed the Workforce Allocation Vendor Plan that the City and the CPD produced for review, which addresses the requirements of this paragraph. Additionally, the CPD provided its 2025 Staffing and Equipment Needs Assessment and Implementation Plan for review, which addresses ¶521's requirements.<sup>5</sup>

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<sup>5</sup> As written, similar to other plans the IMT has reviewed, the 2025 Staffing and Equipment Needs Assessment and Implementation Plan suggests that Accountability Sergeants are not expected to be full-time investigators and that "[s]taffing for accountability sergeants can be fluid" due to factors such as "temporary staffing shortages that require sergeants to perform multiple functions." The IMT continues to be concerned with this language because ¶494(b) describes Accountability Sergeants' "primary responsibility" as "receiving, processing, and investigating complaints against CPD members." See ¶494(b) (emphasis added). The IMT does not believe it is realistic to expect that this role can be adequately performed on a part-time basis, and the IMT again recommends that the CPD consider Accountability Sergeants for other assignments only when their caseload of assigned investigations is current.

Moving forward, we will look for the City and the CPD to implement its Workforce Allocation Vendor Plan. For COPA, we expect to receive evidence of continued compliance in each reporting period to maintain Full compliance.

### Paragraph 521 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: Not Applicable	FIFTH REPORTING PERIOD JULY 1, 2021 – DECEMBER 31, 2021 COMPLIANCE PROGRESS: Not Applicable	SIXTH REPORTING PERIOD JANUARY 1, 2022 – JUNE 30, 2022 COMPLIANCE PROGRESS: None
SEVENTH REPORTING PERIOD JULY 1, 2022 – DECEMBER 31, 2022 COMPLIANCE PROGRESS: None	EIGHTH REPORTING PERIOD JANUARY 1, 2023 – JUNE 30, 2023 COMPLIANCE PROGRESS: None	NINTH REPORTING PERIOD JULY 1, 2023 – DECEMBER 31, 2023 COMPLIANCE PROGRESS: None
TENTH REPORTING PERIOD JANUARY 1, 2024 – JUNE 30, 2024 COMPLIANCE PROGRESS: None	ELEVENTH REPORTING PERIOD JULY 1, 2024 – DECEMBER 31, 2024 COMPLIANCE PROGRESS: Preliminary	

## Accountability and Transparency: ¶1523

*523. On an annual basis, COPA, the Deputy PSIG, and BIA will review and revise, if needed, each entity’s respective staffing and equipment-needs plans.*

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

**Recurring Schedule:** Annually  **Not Yet Applicable**

<b>Preliminary:</b>		<i>In Compliance (FIFTH REPORTING PERIOD)</i>
	CPD	<i>In Compliance (FIFTH REPORTING PERIOD)</i>
	COPA	<i>In Compliance (THIRD REPORTING PERIOD)</i>
	Deputy PSIG	<i>In Compliance (THIRD REPORTING PERIOD)</i>
<b>Secondary:</b>		<i>In Compliance (NEW)</i>
	CPD	<i>In Compliance (NEW)</i>
	COPA	<i>In Compliance (FIFTH REPORTING PERIOD)</i>
	Deputy PSIG	<i>In Compliance (THIRD REPORTING PERIOD)</i>
<b>Full:</b>		<i>Not in Compliance</i>
	CPD	<i>Not Yet Assessed</i>
	COPA	<i>In Compliance (FIFTH REPORTING PERIOD)</i>
	Deputy PSIG <sup>6</sup>	<i>In Compliance (FOURTH REPORTING PERIOD)</i>

In the eleventh reporting period, the City and the CPD achieved Secondary compliance with ¶1523, and COPA maintained Full compliance. Because all relevant City entities must achieve levels of compliance to bring the City, as a whole, into compliance, the City has not yet achieved Full compliance.

This reporting period, COPA provided documentation that maintained Full compliance with ¶1523.

To assess Secondary compliance, the IMT reviewed the CPD’s BIA 2025 Staffing and Equipment Needs Assessment and Implementation Plan, which addresses the requirements of this paragraph.<sup>7</sup>

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<sup>6</sup> The Deputy PSIG achieved Full compliance with all requirements pertaining to its office in the fourth reporting period and maintained that Full compliance during subsequent reporting periods. In the eighth reporting period, the Deputy PSIG successfully completed its two-year sustainment period, marking two years that it had maintained Full compliance with all requirements pertaining to its office. Therefore, in the ninth reporting period, the Parties moved to release the OIG and the Deputy PSIG from its Consent Decree requirements, which was granted by the Court.

<sup>7</sup> The 2025 Staffing and Equipment Needs Assessment and Implementation Plan was also produced for Secondary compliance review with ¶1522. However, the plan alone is insufficient for Secondary compliance because BIA has been unable to implement key aspects of the plan with respect to hiring civilian investigators.

Moving forward, we will look for the CPD to implement its BIA 2025 Staffing and Equipment Needs Assessment and Implementation Plan, and we will determine whether the CPD has developed processes to assess staffing and equipment needs, update staffing and equipment needs plans on an annual basis, and annually communicate those needs plans. For COPA, we expect to receive evidence of continued compliance in each reporting period to maintain Full compliance.

### Paragraph 523 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: None
FOURTH REPORTING PERIOD JANUARY 1, 2021 – JUNE 30, 2021 COMPLIANCE PROGRESS: None	FIFTH REPORTING PERIOD JULY 1, 2021 – DECEMBER 31, 2021 COMPLIANCE PROGRESS: Preliminary	SIXTH REPORTING PERIOD JANUARY 1, 2022 – JUNE 30, 2022 COMPLIANCE PROGRESS: Preliminary
SEVENTH REPORTING PERIOD JULY 1, 2022 – DECEMBER 31, 2022 COMPLIANCE PROGRESS: Preliminary	EIGHTH REPORTING PERIOD JANUARY 1, 2023 – JUNE 30, 2023 COMPLIANCE PROGRESS: Preliminary	NINTH REPORTING PERIOD JULY 1, 2023 – DECEMBER 31, 2023 COMPLIANCE PROGRESS: Preliminary
TENTH REPORTING PERIOD JANUARY 1, 2024 – JUNE 30, 2024 COMPLIANCE PROGRESS: Preliminary	ELEVENTH REPORTING PERIOD JULY 1, 2024 – DECEMBER 31, 2024 COMPLIANCE PROGRESS: Secondary	

## Accountability and Transparency: ¶524

*524. BIA’s staffing and equipment-needs plans will include the investigation staffing and equipment needs of the districts.*

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

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

The City and the CPD achieved Secondary compliance with ¶524 in the eleventh reporting period.

To assess Secondary compliance, the IMT reviewed the CPD’s BIA 2025 Staffing and Equipment Needs Assessment and Implementation Plan, which addresses the requirements of this paragraph.<sup>8</sup>

Moving forward, we will look for the CPD to implement its BIA 2025 Staffing and Equipment Needs Assessment and Implementation Plan.

### Paragraph 524 Compliance Progress History

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

<sup>8</sup> The 2025 Staffing and Equipment Needs Assessment and Implementation Plan was also produced for Secondary compliance review with ¶1522. However, the plan alone is insufficient for Secondary compliance because BIA has been unable to implement key aspects of the plan with respect to hiring civilian investigators.

## Accountability and Transparency: ¶527

*527. Within 180 days of the Effective Date, COPA and BIA will begin providing all investigation staff members with at least eight hours of annual, comprehensive, in-service training.*

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

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

In the eleventh reporting period, the City and the CPD achieved Secondary compliance with ¶527 while COPA maintained Full compliance. Because all relevant City entities must achieve levels of compliance to bring the City, as a whole, into compliance, the City has not yet achieved Full compliance.

This reporting period, COPA provided documentation that maintained Full compliance with ¶527.

To assess Secondary compliance, the IMT reviewed documentation that at least 95% of BIA members and Accountability Sergeants completed the 2024 BIA in-service training. The in-service training included eight hours of instruction, as required by this paragraph, and included instruction on Module 3, *Credibility, Standards of Proof, and Disciplinary Decision Making*; Module 8, *Audio Recording Interview Guidelines*; Module 9, *Interviewing Department Members*; Module 10, *Mistakes and Updates*; *Collection of Evidence and Interviews with Non-Department Members*; and *Investigation Assignment and Timelines*.

Moving forward, we will look for documentation demonstrating that the CPD is acting in accordance with ¶527’s mandates.<sup>9</sup> The IMT and the CPD are having dis-

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<sup>9</sup> The 2024 BIA Quarter 2 Report was also produced for Full compliance review with ¶¶456, 462, 476, and 526–27, and the 2024 BIA Quarter 3 Report was also produced for Full compliance review with ¶¶431, 433, 443, 456, 462, 476–77, and 526–27. However, the reports alone are insufficient for Full compliance with those paragraphs. To achieve Full compliance with those paragraphs, the CPD must produce the underlying data relevant to those paragraphs rather than a summary of that data. The reports include all necessary aggregate data regarding investigations conducted by BIA and Accountability Sergeants, as required by ¶¶550–51.

cussions on what documentation is needed for Full compliance. For COPA, we expect to receive evidence of continued compliance in each reporting period to maintain Full compliance.

### Paragraph 527 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: 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	

## Accountability and Transparency: ¶528

**528.** *The initial and annual in-service training for COPA and BIA investigators will include instruction in: a. how to properly handle complaint intake, and the consequences for failing to take complaints; b. best practices in procedural justice, including techniques for communicating with complainants and members of the public; c. the collection of objective verifiable evidence; d. the process for seeking an override affidavit in the absence of a signed complainant affidavit; e. for COPA investigators, techniques for conducting impartial investigations of domestic violence and sexual misconduct; f. for BIA investigators, techniques for conducting impartial investigations of sexual misconduct; g. investigative skills, including proper interrogation and interview techniques, gathering and objectively analyzing evidence, and data and case management; h. the challenges of law enforcement administrative investigations, including identifying alleged misconduct that is not clearly stated in the complaint or that becomes apparent during the investigation; i. properly weighing the credibility of witnesses against CPD members; j. using objective evidence to identify and resolve inconsistent statements; k. implicit bias; l. the proper application of the relevant standards of proof; m. relevant COPA and CPD rules, policies, and protocols including the requirements of this Agreement; n. relevant state and federal law; o. relevant CPD Rules of Conduct, including Rules 14, 21, and 22; p. the CMS; q. the applicable collective bargaining agreements; and r. how to access and use the PRS or information available on the PRS.*

Compliance Progress		(Reporting Period: July 1, 2024, through December 31, 2024)
<b>Preliminary:</b>		<i>In Compliance</i> (TENTH REPORTING PERIOD)
	CPD	<i>In Compliance</i> (TENTH REPORTING PERIOD)
	COPA	<i>In Compliance</i> (SECOND REPORTING PERIOD)
<b>Secondary:</b>		<i>In Compliance</i> (NEW)
	CPD	<i>In Compliance</i> (NEW)
	COPA	<i>In Compliance</i> (NINTH REPORTING PERIOD)
<b>Full:</b>		<i>Not in Compliance</i>
	CPD	<i>Not Yet Assessed</i>
	COPA	<i>In Compliance</i> (TENTH REPORTING PERIOD)

In the eleventh reporting period, the City and the CPD achieved Secondary compliance with ¶528 while COPA maintained Full compliance. Because all relevant City entities must achieve levels of compliance to bring the City, as a whole, into compliance, the City has not yet achieved Full compliance.

This reporting period, COPA provided documentation that maintained Full compliance with ¶528.

To maintain Preliminary compliance, the CPD provided various drafts of its *BIA Onboard Training* modules for review, to which the IMT provided no objection notices, including:

- *BIA Onboard Training: Consent Decree and Law Review*
- *BIA Onboard Training: Procedural Justice, Implicit Bias, and Conflicts of Interest*
- *BIA Onboard Training: Initiation and Sworn Affidavits*
- *BIA Onboard Training: Rules and Regulations*
- *BIA Onboard Training: Introduction to BIA and the Complaint Management System (CMS)*
- *BIA Onboard Training: Sexual Misconduct Intake and TIRSA Review*
- *BIA Onboard Training: Credibility, Standards of Proof, and Disciplinary Decision Making*

To assess Secondary compliance, the IMT reviewed documentation that at least 95% of BIA members and Accountability Sergeants completed the 2024 BIA in-service training. The in-service training included instruction on Module 3, *Credibility, Standards of Proof, and Disciplinary Decision Making*; Module 8, *Audio Recording Interview Guidelines*; Module 9, *Interviewing Department Members*; Module 10, *Mistakes and Updates; Collection of Evidence and Interviews with Non-Department Members*; and *Investigation Assignment and Timelines*. With the completion of the 2024 BIA in-service training, the CPD has now trained on each relevant subparagraph of ¶528.

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

¶528 Topic	Relevant CPD Training(s)	Relevant COPA Training(s)
a. how to properly handle complaint intake, and the consequences for failing to take complaints	<p>Module 2, <i>Complaint Initiation and Affidavit Overrides</i> (delivered in IMR9)</p> <p><i>BIA Onboard Training: Initiation and Sworn Affidavits</i> (yet to be delivered)</p>	<p><i>COPA Intake Unit: Overview of Policies and Procedures</i> (delivered in IMR5)</p>
b. best practices in procedural justice, including techniques for communicating with complainants and members of the public	<p>Module 4, <i>Sexual Misconduct Initiation</i> (delivered in IMR9)</p> <p>Module 7, <i>Procedural Justice, Implicit Bias, and Conflicts of Interest</i> (delivered in IMR9)</p> <p><i>Collection of Evidence and Interviews with Non-Department Members</i> (delivered in IMR11)</p> <p><i>BIA Onboard Training: Procedural Justice, Implicit Bias,</i></p>	<p><i>COPA Intake Unit: Overview of Policies and Procedures</i> (delivered in IMR5)</p> <p><i>Procedural Justice Training</i> (delivered in IMR4)</p>

	<i>and Conflicts of Interest</i> (yet to be delivered)	
<b>c.</b> the collection of objective verifiable evidence	<i>Collection of Evidence and Interviews with Non-Department Members</i> (delivered in IMR11)	<i>Fact Gathering-Evidence Collection Training</i> (delivered in IMR7)
<b>d.</b> the process for seeking an override affidavit in the absence of a signed complainant affidavit	Module 2, <i>Complaint Initiation and Affidavit Overrides</i> (delivered in IMR9)  <i>BIA Onboard Training: Initiation and Sworn Affidavits</i> (yet to be delivered)	<i>Complaint Register Training</i> (delivered in IMR8)
<b>e.</b> for COPA investigators, techniques for conducting impartial investigations of domestic violence and sexual misconduct	Not Applicable	<i>Forensic Experiential Trauma Interviews (FETI) Training</i> (delivered in IMR6)  <i>Sexual Misconduct and Domestic Violence Training</i> (delivered in IMR 9)
<b>f.</b> for BIA investigators, techniques for conducting impartial investigations of sexual misconduct	Module 4, <i>Sexual Misconduct Initiation</i> (delivered in IMR9)  <i>BIA Onboard Training: Sexual Misconduct Intake and TIRSA Review</i> (yet to be delivered)	Not Applicable
<b>g.</b> investigative skills, including proper interrogation and interview techniques, gathering, and objectively analyzing evidence, and data and case management	Module 9, <i>Interviewing Department Members</i> (delivered in IMR11)	<i>COPA Intake Unit: Overview of Policies and Procedures</i> (delivered in IMR5)  <i>COPA Officer Interviews Training</i> (delivered in IMR7)  <i>Fact Gathering-Evidence Collection Training</i> (delivered in IMR7)
<b>h.</b> the challenges of law enforcement administrative investigations, including identifying alleged misconduct that is not clearly stated in the complaint or that becomes apparent during the investigation	Module 10, <i>Mistakes and Updates</i> (delivered in IMR11)	<i>Fact Gathering-Evidence Collection Training</i> (delivered in IMR7)

<p><b>i.</b> properly weighing the credibility of witnesses against CPD members</p>	<p>Module 3, <i>Credibility, Standards of Proof, and Disciplinary Decision Making</i> (delivered in IMR11)</p> <p><i>BIA Onboard Training: Credibility, Standards of Proof, and Disciplinary Decision Making</i> (yet to be delivered)</p>	<p><i>Fact Gathering-Evidence Collection Training</i> (delivered in IMR7)</p> <p><i>Witness Reliability Training</i> (delivered in IMR4)</p>
<p><b>j.</b> using objective evidence to identify and resolve inconsistent statements</p>	<p>Module 3, <i>Credibility, Standards of Proof, and Disciplinary Decision Making</i> (delivered in IMR11)</p> <p><i>BIA Onboard Training: Credibility, Standards of Proof, and Disciplinary Decision Making</i> (yet to be delivered)</p>	<p><i>COPA Officer Interviews Training</i> (delivered in IMR7)</p> <p><i>Fact Gathering-Evidence Collection Training</i> (delivered in IMR7)</p> <p><i>CPD Rules and Directives</i> (delivered in IMR4)</p>
<p><b>k.</b> implicit bias</p>	<p>Module 3, <i>Credibility, Standards of Proof, and Disciplinary Decision Making</i> (delivered in IMR11)</p> <p>Module 7, <i>Procedural Justice, Implicit Bias, and Conflicts of Interest</i> (delivered in IMR9)</p> <p><i>BIA Onboard Training: Procedural Justice, Implicit Bias, and Conflicts of Interest</i> (yet to be delivered)</p> <p><i>BIA Onboard Training: Credibility, Standards of Proof, and Disciplinary Decision Making</i> (yet to be delivered)</p>	<p><i>Implicit Bias Training</i> (delivered in IMR4)</p>
<p><b>l.</b> the proper application of the relevant standards of proof</p>	<p>Module 3, <i>Credibility, Standards of Proof, and Disciplinary Decision Making</i> (delivered in IMR11)</p> <p><i>BIA Onboard Training: Credibility, Standards of Proof, and Disciplinary Decision Making</i> (yet to be delivered)</p>	<p><i>Final Summary Reports Training</i> (delivered in IMR7)</p>
<p><b>m.</b> relevant COPA and CPD rules, policies, and protocols</p>	<p>Module 7, <i>Procedural Justice, Implicit Bias, and Conflicts of Interest</i> (delivered in IMR9)</p>	<p><i>Consent Decree Overview</i> (delivered in IMR3)</p>

<p>including the requirements of this Agreement</p>	<p>Module 10, <i>Mistakes and Updates</i> (delivered in IMR11)</p> <p><i>Investigation Assignment and Timelines</i> (delivered in IMR11)</p> <p><i>BIA Onboard Training: Rules and Regulations</i> (yet to be delivered)</p> <p><i>BIA Onboard Training: Initiation and Sworn Affidavits</i> (yet to be delivered)</p> <p><i>BIA Onboard Training: Procedural Justice, Implicit Bias, and Conflicts of Interest</i> (yet to be delivered)</p> <p><i>BIA Onboard Training: Consent Decree and Law Review</i> (yet to be delivered)</p> <p><i>BIA Onboard Training: Credibility, Standards of Proof, and Disciplinary Decision Making</i> (yet to be delivered)</p> <p><i>BIA Onboard Training: Sexual Misconduct Intake and TIRSA Review</i> (yet to be delivered)</p> <p><i>BIA Onboard Training: Introduction to BIA and the Complaint Management System (CMS)</i> (yet to be delivered)</p>	<p><i>CPD Rules and Directives</i> (delivered in IMR4)</p>
<p><b>n.</b> relevant state and federal law</p>	<p>Module 4, <i>Sexual Misconduct Initiation</i> (delivered in IMR9)</p> <p>Module 5, <i>Consent Decree and Law Review</i> (delivered in IMR9)</p> <p>Module 10, <i>Mistakes and Updates</i> (delivered in IMR11)</p> <p><i>BIA Onboard Training: Consent Decree and Law Review</i> (yet to be delivered)</p>	<p><i>Fourth Amendment Training</i> (delivered in IMR9)</p> <p><i>Compelled Statements Training</i> (delivered in IMR9)</p>

<p><b>o.</b> relevant CPD Rules of Conduct, including Rules 14, 21, and 22</p>	<p>Module 2, <i>Complaint Initiation and Affidavit Overrides</i> (delivered in IMR9)</p> <p>Module 3, <i>Credibility, Standards of Proof, and Disciplinary Decision Making</i> (delivered in IMR11)</p> <p><i>BIA Onboard Training: Rules and Regulations</i> (yet to be delivered)</p> <p><i>BIA Onboard Training: Initiation and Sworn Affidavits</i> (yet to be delivered)</p> <p><i>BIA Onboard Training: Credibility, Standards of Proof, and Disciplinary Decision Making</i> (yet to be delivered)</p>	<p><i>CPD Rules and Directives</i> (delivered in IMR4)</p>
<p><b>p.</b> the CMS</p>	<p>Module 1, <i>Complaint Management System and Complete Investigatory Files</i> (delivered in IMR9)</p> <p><i>BIA Onboard Training: Introduction to BIA and the Complaint Management System (CMS)</i> (yet to be delivered)</p>	<p><i>Case Management System: Overview of Policy and Procedures</i> (delivered in IMR6)</p>
<p><b>q.</b> the applicable collective bargaining agreements</p>	<p>Module 8, <i>Audio Recording Interview Guidelines</i> (delivered in IMR11)</p>	<p><i>Collective Bargaining Agreement Training</i> (delivered in IMR3)</p>
<p><b>r.</b> how to access and use the PRS or information available on the PRS</p>	<p>Module 6, <i>SharePoint, SPARS &amp; Performance Recognition System</i> (delivered in IMR9)</p>	<p>Not Applicable</p>

Moving forward, for the CPD, we will look for additional onboard training modules and documentation demonstrating that the CPD has implemented ¶1528’s mandates. For COPA, we will look for documentation maintaining that COPA and its employees continue to implement ¶1528’s mandates.

## Paragraph 528 Compliance Progress History

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

COMPLIANCE PROGRESS:  
None

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

COMPLIANCE PROGRESS:  
None

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

COMPLIANCE PROGRESS:  
None

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

COMPLIANCE PROGRESS:  
None

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

COMPLIANCE PROGRESS:  
None

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

COMPLIANCE PROGRESS:  
None

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

COMPLIANCE PROGRESS:  
None

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

COMPLIANCE PROGRESS:  
None

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

COMPLIANCE PROGRESS:  
None

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

COMPLIANCE PROGRESS:  
Preliminary

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

COMPLIANCE PROGRESS:  
Secondary

## Accountability and Transparency: ¶1529

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

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### Compliance Progress

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

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

The City and the CPD achieved Preliminary compliance with ¶1529 in the eleventh reporting period.

To assess Preliminary compliance, the IMT reviewed G08-01, *Complaint and Disciplinary System*, which addresses the requirements of this paragraph.

With respect to Secondary compliance, the CPD produced attendance records reflecting that more than 95% of all CPD members had taken and passed the *CPD Consent Decree eLearning*. However, the eLearning curriculum was never submitted for review under ¶1529. The CPD must submit the eLearning for review under ¶1529 so the IMT can assess whether it meets the requirements of this paragraph.

We look forward to reviewing the *Consent Decree eLearning* in the next reporting period.

## Paragraph 529 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: Preliminary	

## Accountability and Transparency: ¶1530

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

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

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

In the eleventh reporting period, the City and the CPD achieved Secondary compliance with ¶1530 while COPA remained under assessment for Full compliance. Because all relevant City entities must achieve levels of compliance to bring the City, as a whole, into compliance, the City has not yet achieved Full compliance.

To assess Secondary compliance, the IMT reviewed the CPD's *BIA 2025 In-Service Training Plan* and the *BIA 2025 Onboard Training Plan*, which address the requirements of this paragraph. Following review, the IMT provided a no objection notice to the training plans.

To assess Full compliance, the IMT reviewed COPA's *2025-2026 In-Service Training Plan*, which appropriately addresses the requirements of this paragraph. The IMT provided a no objection notice in response to this production. The plan explains COPA's Faculty Frameworks Series, which is designed to develop and maintain quality presentation and delivery skills for instructors that should improve future instruction. COPA has also instituted electronic course evaluations and identified how it will ensure course participants are reminded to submit evaluations upon completion of each course.

Moving forward, to achieve Full compliance, the CPD and COPA need to implement their training plans and provide attendance records and evaluations to the IMT (see ¶1287).

## Paragraph 530 Compliance Progress History

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

## Accountability and Transparency: ¶543

*543. With regard to the promulgation or adoption of CPD rules and regulations, the Police Board’s authority will be limited to issuing policy recommendations in the manner set forth in this Agreement.*

### Compliance Progress

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

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

The City and the Police Board maintained Full compliance with ¶543 during the eleventh reporting period.

During the seventh reporting period, the City and the Office of the Attorney General reached an agreement that solidified the requirements of ¶543, which was approved by the Court on February 16, 2023. With this, the City reached Full compliance with ¶543.

This reporting period, the IMT reviewed a letter from the Police Board stating that it had not taken any action regarding the adoption of new or revised CPD Rules and Regulations during the eleventh reporting period. Therefore, the City and the Police Board maintained Full compliance.

### Paragraph 543 Compliance Progress History

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

## Accountability and Transparency: ¶1550

**550.** *By April 2020, CPD and COPA will electronically publish quarterly and annual reports that will include, at a minimum, the following: a. aggregate data on the classification of allegations, self-reported complainant demographic information, and complaints received from anonymous or third party complainants; b. aggregate data on complaints received from the public, specified by district or unit of assignment and subcategorized by classification of allegations; c. aggregate data on the processing of investigations, including: i. The average time from the receipt of the complaint by COPA, BIA, or the district to the next or initial contact with the complainant or his or her representative; ii. the average time from the investigative findings and recommendations to the final disciplinary decision; iii. the average time from the investigative findings and recommendations to a final disposition; and iv. the number of investigations closed based on the absence of a complainant affidavit, including the number of attempts (if any) to obtain an override affidavit in the absence of a signed complainant affidavit; d. aggregate data on the outcomes of administrative investigations, including the number of sustained, not sustained, exonerated, and unfounded allegations; the number of sustained allegations resulting in a non-disciplinary outcome; and the number resulting in disciplinary charges; e. aggregate data on discipline, including the number of investigations resulting in written reprimand, suspension, demotion, and termination; f. aggregate data on grievance proceedings arising from misconduct investigations, including: the number of cases grieved; the number of cases that proceeded before the Police Board; the number of cases that proceeded to arbitration; and the number of cases that were settled prior to a full evidentiary hearing, whether before the Police Board or in arbitration; g. aggregate data on outcomes of misconduct investigations by classification of allegations, broken down by self-reported race, gender, and age of the complainant and the CPD member; h. aggregate data on (i) the number of CPD members who have been the subject of more than two completed misconduct investigations in the previous 12 months, and (ii) the number of CPD members who have had more than one sustained allegation of misconduct in the previous 12 months, including the number of sustained allegations; i. aggregate data on CPD members who have been the subject, in the previous 12 months, of more than two complaints in the following classifications of allegations, regardless of the outcome of those complaint investigations: i. allegations of discriminatory policing based on an individual's membership or perceived membership in an identifiable group, based upon, but not limited to: race, physical or mental disability, gender identity, sexual orientation, religion, and age; ii. allegations of excessive force; and iii. allegations of unlawful stops, searches and arrests; j. the disposition of misdemeanor criminal prosecutions of current CPD members.*

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## Compliance Progress

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

<b>Preliminary:</b>	<i>In Compliance</i> (FIFTH REPORTING PERIOD)
CPD	<i>In Compliance</i> (FOURTH REPORTING PERIOD)
COPA	<i>In Compliance</i> (FIFTH REPORTING PERIOD)
<b>Secondary:</b>	<i>In Compliance</i> (FIFTH REPORTING PERIOD)
CPD	<i>In Compliance</i> (FIFTH REPORTING PERIOD)
COPA	<i>In Compliance</i> (FIFTH REPORTING PERIOD)
<b>Full:</b>	<i>In Compliance</i> (SEVENTH REPORTING PERIOD)
CPD	<i>In Compliance</i> (SEVENTH REPORTING PERIOD)
COPA	<i>In Compliance</i> (SIXTH REPORTING PERIOD)

The City, the CPD, and COPA maintained Full compliance with ¶550 during the eleventh reporting period.

To assess Full compliance for the CPD, the IMT reviewed the CPD’s *2024 BIA Quarter 2 Report* and the *2024 BIA Quarter 3 Report*, which include all necessary aggregate data regarding investigations conducted by BIA and Accountability Sergeants, as required by ¶¶550–51.<sup>10</sup>

To assess Full compliance for COPA, the IMT reviewed COPA’s *2024 Second Quarter Report* and the *2024 Third Quarter Report*, which include all necessary aggregate data required by ¶550.

Therefore, the City, the CPD, and COPA maintained Full compliance with ¶550.

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<sup>10</sup> The *2024 BIA Quarter 2 Report* was also produced for Full compliance review with ¶¶456, 462, 476, and 526–27, and the *2024 BIA Quarter 3 Report* was also produced for Full compliance review with ¶¶431, 433, 443, 456, 462, 476–77, and 526–27. However, the reports alone are insufficient for Full compliance with those paragraphs. To achieve Full compliance with those paragraphs, the CPD must produce the underlying data relevant to those paragraphs rather than a summary of that data.

## Paragraph 550 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: None
FOURTH REPORTING PERIOD JANUARY 1, 2021 – JUNE 30, 2021 COMPLIANCE PROGRESS: None	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: Full	EIGHTH REPORTING PERIOD JANUARY 1, 2023 – JUNE 30, 2023 COMPLIANCE PROGRESS: Full	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	

## Accountability and Transparency: ¶553

**553.** Beginning in 2020, CPD will audit, on at least an annual basis, the investigation and disciplinary process involving complaints investigated by BIA and the districts to ensure that the investigations are conducted in accordance with BIA policies and this Agreement. The audits will include completed investigations and the recommendations of discipline. CPD will make public any of the audit findings, ensuring that any personally identifiable information is redacted.

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### Compliance Progress

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

<b>Recurring Schedule:</b>	Annually	<input checked="" type="checkbox"/> <b>Not Yet Applicable</b>
<b>Preliminary:</b>	<i>In Compliance (NEW)</i>	
<b>Secondary:</b>	<i>In Compliance (NEW)</i>	
<b>Full:</b>	<i>Not Yet Assessed</i>	

The City and the CPD achieved Preliminary and Secondary compliance with ¶553 in the eleventh reporting period.

To assess Preliminary and Secondary compliance, the IMT previously reviewed the CPD’s G08-01, *Complaint and Disciplinary System*, which was implemented on December 29, 2023. G08-01 addresses the requirements of ¶553. However, as noted in prior reports, because ¶553 requires that the CPD conduct an annual audit, G08-01 alone is not sufficient for Preliminary compliance.

In addition to G08-01, the IMT also reviewed CPD’s *Audit of 2023 Investigation Timeframe Requirements* during the eleventh reporting period. The audit sufficiently addresses the requirements of this paragraph and is publicly available as required by this paragraph.<sup>11</sup>

Moving forward, we will determine whether the CPD continues to conduct audits on an annual basis, whether the audits are sufficient, and whether the audits are published in a timely manner.

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<sup>11</sup> See *Audit of 2023 Investigation Timeframe Requirements*, [https://www.chicagopolice.org/wp-content/uploads/24-007-BIATimeframes\\_FINAL\\_Report\\_18Dec2024.pdf](https://www.chicagopolice.org/wp-content/uploads/24-007-BIATimeframes_FINAL_Report_18Dec2024.pdf).

## Paragraph 553 Compliance Progress History

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

## Accountability and Transparency: ¶1564

**564.** *The Deputy PSIG will exercise his or her discretionary and oversight responsibilities without interference from any person, group, or organization, including CPD, COPA, the Police Board, and City officials. Any person that knowingly interferes with the Deputy PSIG’s performance of his or her duties will be subject to the penalties set forth in Municipal Code of Chicago Sections 2-56-140, 145, 270.*

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

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

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

This reporting period, COPA provided documentation that maintained Full compliance with ¶1564.

To assess Secondary compliance, the IMT reviewed documentation that at least 95% of CPD members completed the *BIA Accountability Supplemental eLearning*, which addressed the requirements of this paragraph.

To assess Secondary compliance for the Police Board, the IMT reviewed documentation that the Police Board implemented *Policy Regarding Deputy Public Safety Inspector General Review and Audits*. The Police Board also provided its responses to PSIG requests.

Additionally, as in past reporting periods, the Deputy PSIG provided a memorandum this reporting period stating that “PSIG is unaware of any interference from any person, group, organization—including CPD, COPA, the Police Board, and City officials—that has impaired or affected its ability to conduct its discretionary and oversight responsibilities.”

Moving forward, we will also determine whether the CPD and the Police Board have systems in place to detect and report any interference and implement appropriate penalties. For COPA, we expect to receive evidence of continued compliance in each reporting period to maintain Full compliance.

### Paragraph 564 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: Not Applicable	FIFTH REPORTING PERIOD JULY 1, 2021 – DECEMBER 31, 2021 COMPLIANCE PROGRESS: Not Applicable	SIXTH REPORTING PERIOD JANUARY 1, 2022 – JUNE 30, 2022 COMPLIANCE PROGRESS: None
SEVENTH REPORTING PERIOD JULY 1, 2022 – DECEMBER 31, 2022 COMPLIANCE PROGRESS: None	EIGHTH REPORTING PERIOD JANUARY 1, 2023 – JUNE 30, 2023 COMPLIANCE PROGRESS: None	NINTH REPORTING PERIOD JULY 1, 2023 – DECEMBER 31, 2023 COMPLIANCE PROGRESS: None
TENTH REPORTING PERIOD JANUARY 1, 2024 – JUNE 30, 2024 COMPLIANCE PROGRESS: Preliminary	ELEVENTH REPORTING PERIOD JULY 1, 2024 – DECEMBER 31, 2024 COMPLIANCE PROGRESS: Secondary	