

Independent Monitoring Report 14

Data Collection, Analysis & Management Compliance Assessments by Paragraph

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

Data Collection, Analysis & Management: ¶569

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

Compliance Progress		(Reporting Period: January 1, 2026, through June 30, 2026)
Preliminary:	In Compliance (FOURTH REPORTING PERIOD)	
Secondary:	In Compliance (ELEVENTH REPORTING PERIOD)	
Full:	Not In Compliance	

In the fourteenth reporting period, the City and the CPD maintained Secondary compliance with the requirements of ¶569 but did not achieve Full compliance.

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

The City and the CPD achieved Preliminary compliance with ¶569 in the fourth reporting period by providing several policies that demonstrated the data collection process required by this paragraph.¹ The City and the CPD achieved Secondary compliance in the eleventh reporting period by providing the IMT with a list of

¹ These policies include the following: (1) *Tactical Response Report (TRR)*, G03-02-02; (2) *Tactical Response Investigation Report (TRR-I)*, G03-02-08; (3) *Tactical Response Report Review (TRR-R)*, G03-02-08; (4) *Processing Persons Under Departmental Control*, G06-01 (including *Arrest Report and Field Arrest Procedures*, G06-01-01, and *Restraining Arrestees*, G03-02-02); (5) *Case Incident Report: Field Reporting Manual*, S04-13-06, D20-03, and G03-02-02; (6) *Investigatory Stop Report*, S04-13-09; (7) *Administrative Case Files*, G08-01; (8) *Body-Worn Camera*, S03-14; (9) *In-Car Camera*, S03-05; (10) *Third-Party Recordings*, G03-02-02; (11) *Witness Interviews*, G03-02-02; and (12) *Officer Interviews*, G03-02-02.

trainings, related to the data and records required by ¶¶568 and 569, evidencing that officers have received instruction in the range of data forms and documents that are required following a use-of-force event.

To maintain Secondary compliance in future reporting periods, the CPD must produce a list of trainings and associated attendance records on an ongoing basis that are relevant to each subsection of this paragraph. *See also* ¶¶290–91. The CPD did not produce these materials in the fourteenth reporting period.

To achieve Full compliance, the CPD must clearly demonstrate its processes to “collect, track, and maintain” the data required by subparagraphs a–f. In the twelfth reporting period, the CPD produced an Audit Report of Use of Force Data, which sought to address subparagraphs a–c. In the fourteenth reporting period, the CPD produced a *2025 Tactical Review and Evaluation Division (TRED) Midyear Report* and *2025 TRED Year-End Report*, but these materials alone do not provide sufficient evidence of collecting, tracking, and maintaining all the data required by each of the subparagraphs of this paragraph.

Paragraph 569 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: Preliminary	FIFTH REPORTING PERIOD JULY 1, 2021 – DECEMBER 31, 2021 COMPLIANCE PROGRESS: Preliminary	SIXTH REPORTING PERIOD JANUARY 1, 2022 – JUNE 30, 2022 COMPLIANCE PROGRESS: Preliminary
SEVENTH REPORTING PERIOD JULY 1, 2022 – DECEMBER 31, 2022 COMPLIANCE PROGRESS: Preliminary	EIGHTH REPORTING PERIOD JANUARY 1, 2023 – JUNE 30, 2023 COMPLIANCE PROGRESS: Preliminary	NINTH REPORTING PERIOD JULY 1, 2023 – DECEMBER 31, 2023 COMPLIANCE PROGRESS: Preliminary
TENTH REPORTING PERIOD JANUARY 1, 2024 – JUNE 30, 2024 COMPLIANCE PROGRESS: Preliminary	ELEVENTH REPORTING PERIOD JULY 1, 2024 – DECEMBER 31, 2024 COMPLIANCE PROGRESS: Secondary	TWELFTH REPORTING PERIOD JANUARY 1, 2025 – JUNE 30, 2025 COMPLIANCE PROGRESS: Secondary
THIRTEENTH REPORTING PERIOD JULY 1, 2025 – DECEMBER 31, 2025 COMPLIANCE PROGRESS: Secondary	FOURTEENTH REPORTING PERIOD JANUARY 1, 2026 – JUNE 30, 2026 COMPLIANCE PROGRESS: Secondary	

Data Collection, Analysis & Management: ¶575

575. CPD recently established a Force Review Unit (“FRU”) and tasked the FRU with certain responsibilities described in the preceding paragraph. CPD will ensure that the FRU or any other unit tasked with these responsibilities has sufficient resources to perform them. CPD will ensure that the FRU or any other unit tasked with these responsibilities is staffed with CPD members, whether sworn or civilian, with sufficient experience, rank, knowledge, and expertise to: effectively analyze and assess CPD’s use of force practices and related reporting and review procedures; conduct trend analysis based on use of force data; identify tactical, equipment, training, or policy concerns based on analysis of use of force incidents and data; and develop recommendations regarding modifications to tactics, equipment, training, or policy as necessary to address identified practices or trends relating to the use of force.

Compliance Progress	(Reporting Period: January 1, 2026, through June 30, 2026)
Preliminary:	In Compliance (NEW)
Secondary:	Under Assessment
Full:	Not In Compliance

In the fourteenth reporting period, the City and the CPD achieved Preliminary compliance with the requirements of ¶575 and are under assessment for Secondary compliance.

The City and the CPD achieved Preliminary and Secondary compliance with ¶575 in the fourth reporting period, but lost compliance in the sixth reporting period due to inadequate staffing and the large backlog of Incident Debriefing Reports (IDRs) to review. The CPD continues to maintain G03-02-08, *Department Review of Use of Force*² and Standard Operating Procedure 2020-002 to guide the operations of the Tactical Review and Evaluation Division (TRED, formerly known as the Force Review Unit).

The City and the CPD achieved Preliminary compliance this reporting period by continuing to maintain G03-02-08 and SOP 2020-002 and by demonstrating that the CPD has qualified personnel in TRED “with sufficient experience, rank, knowledge, and expertise” to meet the requirements of this paragraph. Additionally, TRED has taken steps to increase staffing and reduce its backlog of IDRs to review. At the end of the eleventh reporting period, TRED had 42 officers and 2 Tactical Review Specialists, while at the end of the fourteenth reporting period, TRED had 54 officers and 2 Tactical Review Specialists. On January 1, 2026, TRED implemented a backlog-reduction plan that reorganized staff into Area-based review groups and established a dedicated backlog team. TRED has demonstrated

² The latest version of G03-02-08, *Department Review of Use of Force* is dated June 28, 2023. Per ¶636, the CPD must conduct reviews of its policies every two years. The CPD’s ¶636 review of G03-02-08 is overdue but currently underway.

continued progress in reducing the backlog. This paragraph remains under assessment for Secondary compliance as we continue to await further demonstration of TRED’s progress in implementing its Area-based strategy.

The CPD continues to deliver its TRED On-Boarding Training to TRED members, which provides instruction related to the review, analysis, and assessment of use of force incidents. To achieve Secondary compliance, the CPD must continue to deliver this training to TRED members and must demonstrate ongoing development, evaluation, and as applicable, improvement and implementation of its training materials. The CPD must also continue to demonstrate qualified personnel with “sufficient experience, rank, knowledge, and expertise” to perform the responsibilities required by this paragraph, and must demonstrate adequate staffing of the CPD’s TRED to continue reducing TRED’s review backlog of cases.

Paragraph 575 requires the CPD to ensure that TRED has “sufficient resources” to perform the responsibilities required by this paragraph. The process of ensuring “sufficient resources to perform” the tasks TRED is required to perform is ongoing and necessary to perform the responsibilities required by this paragraph and to continue to reduce TRED’s current backlog of IDRs to review. While we appreciate the efforts the CPD has undertaken to relieve the backlog (*i.e.*, establishing a dedicated backlog team and pushing some reviews to district supervisors through their District Level Review Program), to achieve additional levels of compliance, the CPD must demonstrate sufficient staffing to continue to alleviate its backlog.

Paragraph 575 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: Secondary	FIFTH REPORTING PERIOD JULY 1, 2021 – DECEMBER 31, 2021 COMPLIANCE PROGRESS: Secondary	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	TWELFTH REPORTING PERIOD JANUARY 1, 2025 – JUNE 30, 2025 COMPLIANCE PROGRESS: None
THIRTEENTH REPORTING PERIOD JULY 1, 2025 – DECEMBER 31, 2025 COMPLIANCE PROGRESS: None	FOURTEENTH REPORTING PERIOD JANUARY 1, 2026 – JUNE 30, 2026 COMPLIANCE PROGRESS: Preliminary	