

**UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

STATE OF ILLINOIS,

Plaintiff,

v.

CITY OF CHICAGO,

Defendant.

Case No. 17-cv-6260

Judge Robert M. Dow Jr.

**THE CITY OF CHICAGO'S AMENDED
SECOND SEMIANNUAL STATUS REPORT**

Pursuant to Consent Decree Paragraph 680, the City of Chicago (“City”) submits this Amended Second Semi-Annual Status Report to update the Court on the City’s progress from September 1, 2019 through February 29, 2020 on implementing requirements of the Consent Decree entered in the above-captioned matter (Dkt. 107-1).

BACKGROUND AND OVERVIEW OF CITY’S PROGRESS IN IMR-2

The Consent Decree contains 799 paragraphs—more than 100 of which include specific deadlines for the City (mostly CPD) to complete in Year One. On May 30, 2019, IMT published its Monitoring Plan for Year One (Dkt. 743) (“Year-One Plan”). The Year-One Plan comprised two monitoring periods. “IMR-1” covered the first six-month period (March 1, 2019, through August 31, 2019). Largely tracking the early-deadline paragraphs in the Consent Decree, IMR-1 included 55 Consent Decree paragraphs for IMT compliance assessment. On September 3, 2019, the City submitted its first semiannual status report addressing Consent Decree implementation progress made during IMR-1 (Dkt. 771). On November 18, 2019, IMT submitted its Independent Monitoring Report 1 to the Court, which provided IMT’s assessments of the City’s progress on Consent Decree implementation during IMR-1 (Dkt. 798).

“IMR-2” covered the second six-month monitoring period (September 1, 2019, through February 29, 2020). Per the Year-One Plan, IMT’s Independent Monitoring Report 2 will assess the City’s Consent Decree implementation progress and compliance with 129 paragraphs, including the 55 paragraphs assessed in the first monitoring period. The City’s Second Semi-Annual Status Report therefore provides updates on progress the City made during IMR-2.

During IMR-2, the City made significant changes to numerous Chicago Police Department training, policies and procedures and has made progress on the requirements of the other City agencies set forth in the Consent Decree. Overall, the City made some progress on each of the 129 paragraphs. The City provides below a summary of progress made in each topic area of the Consent Decree.¹

**CITY’S PROGRESS ADDRESSING PRINCIPAL
CHALLENGES IDENTIFIED BY IMT**

Consent Decree Paragraph 661 requires IMT to provide in its semiannual reports a “summary of principal challenges or concerns related to the City’s achieving full and effective compliance.” Independent Monitoring Report 1 identified a series of “various hurdles to compliance for the City” and concluded that “many of these challenges are, to some degree, ongoing.” (Dkt. 798 at 30).

As addressed in the City’s first semiannual status report, the City seeks to accomplish sustainable reform. Thus, during IMR-2 the City focused much of its efforts on beginning to address the systemic barriers to compliance IMT identified by implementing the recommendations

¹ The City understands that IMT intends to provide an analysis and assessment for each paragraph in its upcoming report. This status report provides only a summary and highlights of the City’s progress and does not comprehensively address work done on each paragraph.

IMT provided for addressing these challenges. The City believes this work is the foundation for achieving and maintaining compliance with the Consent Decree requirements.

The City provides below a summary of work undertaken during IMR-2 to address the primary challenges IMT identified.

A. Increased Staffing and Resources for Consent Decree Implementation

IMT recommended that CPD address staffing and resource shortages in certain specified areas to “improve efficiency and [Consent Decree] compliance efforts.” CPD took several significant steps during IMR-2 to address this recommendation.

(1) Department Reorganization. CPD has engaged in significant hiring increases over the last several years. However, structural barriers contributed to inadequate staffing and resources in certain functions necessary for successful Consent Decree implementation, in part due to lack of internal coordination between bureaus.

On January 30, 2020, CPD announced a comprehensive departmental restructuring to maximize resources and provide the infrastructure to implement Consent Decree reform across the City. The restructure is aligned with the more modern organizational structures of other major U.S. police departments and recommendations of national policing experts.

The Department’s functions and responsibilities now fall under two new offices, the Office of Constitutional Policing and Reform Management and the Office of Operations.

- ***Office of Constitutional Policing and Reform Management:*** This office combines many of the vital functions for Consent Decree implementation— training, policy development, auditing, officer wellness, force review, and risk management— under one command. This structure will facilitate improved communication and coordination among these units.
- ***Office of Operations:*** The Office of Operations consolidates patrol and detective functions to allow for enhanced resource coordination accountable to one supervisory chain of command. Additionally, the reorganization will relocate intelligence and narcotics officers and detectives from centralized facilities into

districts. This reconfiguration will bring more resources directly to communities and under a single chain of command to facilitate better coordination. Focusing field-based resources, responsibility and authority under geographically defined districts helps CPD communicate and collaborate more effectively and directly with the neighborhoods it serves to prevent and solve crime.

(2) Additional Staffing for Consent Decree Functions. Consistent with the IMT's specific recommendations to increase staffing in five CPD units responsible for many Consent Decree requirements, during IMR-2 CPD increased staffing in the Research and Development Division (responsible for policy drafting) and expedited filling numerous vacancies in the Education and Training Division. In addition, CPD elevated the rank of the commanding officers for the Crisis Intervention Unit and Force Review Division and added significant additional personnel in each of these units.

(3) Staffing and Workforce Allocation. Per IMT's recommendation, CPD has engaged a university research partner to assist with developing comprehensive, a Department-wide staffing and allocation study.

B. Documents and Data Production

IMT also identified data and record production difficulties as primary challenges. The City agrees with IMT's assessment that addressing the data and document issues will require longer-term solutions that cannot be achieved in a single reporting period, and that adjustments will be necessary to meet the significant documentation requirements needed to achieve compliance with the Consent Decree. The City and CPD did make numerous preliminary adjustments during IMR-2 to begin addressing some of the issues identified:

(1) Data Auditing. IMT identified that CPD "does not have a regular system for auditing and validating its data systems or correcting and upgrading those systems based on regular audits." Under the reorganization, CPD has an internal Auditing Unit that reports to the Deputy Superintendent for the Office of Constitutional Policing and Reform Management. The Unit's

2020 Plan identifies audits addressing data collection and validation issues, including analyzing in-service training attendance records and data for accuracy and assessing the extent to which the number of foot pursuits are accurately reported. The Audit Plan outlines the work the unit is currently undertaking and identifies topics upon which it is likely to focus later in 2020. After the completion of the ongoing work identified, as noted in the Plan, the remainder of the year is expected to focus on Consent Decree requirements.

(2) Records Production. For the IMR-2 assessments, the City received approximately 250 document and data production requests from IMT and the Office of the Attorney General (“OAG”). Due to the volume of documentation required to demonstrate Consent Decree compliance, documentation production continues to be an ongoing challenge for CPD. During the second monitoring period, the City and CPD adopted processes to begin to streamline internal document review and production. The City and CPD have also made efforts to provide information to IMT and OAG on an ongoing basis throughout the monitoring period and have regularly scheduled telephone conferences to review information requested and/or expected to be provided.

(3) Data Systems. As IMT noted, CPD maintains and manages data in more than 100 different data systems and databases, making it difficult to easily collect, validate, and analyze data. Further, as discovered during IMR-2, fulfillment of numerous Consent Decree paragraphs requires cross-agency data collection and validation. CPD is currently in the process of seeking an expert vendor to conduct a comprehensive Information and Data Collection Assessment that will inform future adjustments CPD will need to undertake to address the data challenges.

C. Policy and Plan Review and Community Engagement

IMT identified numerous challenges related to the policy development process. First, as IMT noted, the Consent Decree outlines a detailed process for CPD’s policy creation and revision

process that provides IMT and OAG at least 30 days to review new and revised policies required by the Consent Decree. Over the last year, the policy review process has taken as long as six months for some policies due to back-and-forth discussion and sharing of drafts and written comments before the IMT and OAG approve a policy. The City agrees with IMT that this process is valuable and leads to the development of improved policies because the City can share ideas with and learn from the expertise of the IMT and OAG, particularly their policing experts who are well versed in national best practice. This process also allows the City, IMT, and OAG to problem solve where logistical or other hurdles arise. However, particularly given the volume of policy revisions required to satisfy the Consent Decree, this process results in delays to the implementation of the policies. Second, as IMT also noted, for many policies, opportunities for community input generally occurred late in the policy development process, during relatively brief public comment periods. Thus, without adjustments to this process, policies will not benefit from the required robust community input.

CPD has taken the following steps in IMR-2 to address these challenges:

(1) Collaborative Review with IMT and OAG. To address the recommendations related to IMT and OAG review of policies, CPD now as a matter of course provides IMT and OAG drafts for collaborative review to solicit IMT and OAG feedback throughout the policy development process. *See* Par. 627. The City, IMG, and OAG discuss these drafts during standing telephone conferences organized by topic. This process also allows the City to gain additional perspective and leverage the IMT's expertise, which was another improvement IMT recommended the City adopt from the first period.

(2) Review of COPA Policies. Based on conflicting interpretations of relevant language in the Consent Decree, the City and OAG disagreed on whether relevant City entities

other than the CPD were required to follow the same review process. With the assistance of the IMT and the Court, during the second monitoring period the parties collaborated to develop a process for review of Consent Decree policies and training for the Civilian Office of Police Accountability (“COPA”), which includes a number of requirements under the Consent Decree related to investigation of misconduct complaints.

(3) Community Engagement. A significant accomplishment this monitoring period was the progress toward implementing IMT’s recommendation that CPD create additional opportunities to solicit public input during policy development. In IMR-2, CPD proposed a community engagement plan to IMT and OAG for review based on this recommendation. IMT and OAG provided written and verbal feedback of five versions of the plan over the course of several months; CPD worked to incorporate suggestions and recommendations each time. CPD also solicited feedback from the Coalition of community groups that CPD now meets with regularly regarding Consent Decree implementation. As a result of this months-long collaboration, CPD developed a two-phase community engagement approach.

In February 2020, CPD kicked off its first phase of community engagement, hosting four “open space technology” meetings across the City. Open Space Technology is a conversation method which allows participants to self-organize around a set of group-defined ideas. A total of 14 policies were open for discussion at these meetings, and around 100 people attended each of the four meetings. CPD received feedback from surveys and engagement with the Coalition and other community groups (for instance, that fewer topics should be discussed at future meetings to provide the opportunity for more meaningful engagement), which will be incorporated into future meetings.

For the second phase, the City and CPD plan to host working groups, which will include community members and organizations with expertise and/or experience in the policy topics, as well as the relevant CPD subject-matter experts and stakeholders. The City and CPD have hosted one such working to develop revisions to CPD’s policy regarding interactions with transgender, intersex, and gender nonconforming individuals. The working group has provided the opportunity for CPD to work collaboratively with the group to receive community input, problem solve, and update policy language and procedure with appropriate and respectful language. As part of the engagement plan, CPD plans to establish a series of internal working groups so sworn members may fully participate in the process.

PROGRESS ON YEAR-ONE PLAN PARAGRAPHS

The Consent Decree is divided into 10 substantive sections: (1) community policing; (2) impartial policing; (3) crisis intervention; (4) use of force; (5) recruiting, hiring, and promotion; (6) training; (7) supervision; (8) officer wellness and support; (9) accountability and transparency; and (10) data collection, analysis, and management.² Below, the City provides a summary of progress in these areas during IMR-2.

I. COMMUNITY POLICING

The City and CPD continue to recognize that meaningful engagement with the communities it serves is a critical component to success in the reform effort. As the Consent Decree provides, strong community partnerships and positive interactions between law enforcement and members of the public are important tenets of effective policing.

² The Consent Decree includes one additional section addressing the Monitor’s role and procedures.

In addition to implementing the Year-One Plan requirements (explained in more detail below), CPD also completed during IMR-2 additional initiatives to improve community policing, including:

- CEMS Notification System. Based on feedback from community seeking better access to information about community policing activities, OCP instituted a new Community Engagement Management System, an automated tool that allows districts to electronically track community engagement opportunities and provide up-to-date information to the public.
- Community Conversations. As explained above, CPD conducted four public community conversations across the City on February 4, 5, 6, and 8, 2020 to solicit public input on 14 policy topics. In addition to hosting and organizing the meetings, OCP trained the table facilitators to host the dialogue tables at these meetings.

Below, the City provides additional summaries of CPD's notable community policing reform work during IMR-2 for paragraphs included in the IMT's Year-One Plan.

Community Policing Advisory Panel. In October 2016, the CPD Superintendent commissioned the Community Policing Advisory Panel ("CPAP") to develop recommendations to improve CPD's community engagement and collaboration efforts. CPAP published its proposed recommendations in October 2017, organized across seven pillars of community policing. As also noted in the Consent Decree, in 2017 the Superintendent accepted CPAP's recommendations. CPD began to implement a number of the recommendations, including creating the Office of Community Policing ("OCP"). Consent Decree Paragraph 13 requires CPD to develop a plan, including a timeline for completing implementation of CPAP's recommendations.

During IMR-2, CPD continued implementing the CPAP recommendations per the implementation plan through 15 identified projects. In response to one of recommendations in the CPAP report, for instance, OCP publishes quarterly reports that includes highlights of new developments; a snapshot of the Panel's recommendation projects and current status; and notable

upcoming events and resources for community engagement opportunities with CPD. These reports are publicly available on CPD's website.

District-Level Annual Strategic Plans. Prior to IMR-2, CPD developed a standardized framework to provide guidance to the districts in developing an annual *Community Policing Strategic Plan* specific to the needs of each specific district. Consistent with the requirements of Consent Decree Par. 15 and 45, the Strategic Plans address both crime reduction strategies policing strategies, and developing these strategies to align with the principles of community policing. Specifically, the annual plans provide a mechanism for districts to involve community members in collaborative problem-solving and strategy development. Each year the districts are responsible for: (1) incorporating community input - gathered at two separate community conversations - into a plan that is publicly posted, then (2) working to make progress against that plan, and (3) reporting on that progress through quarterly reports to CPD leadership and in beat meetings to the community.

To develop the 2020 annual plans, during IMR-2, CPD refined the framework to improve on the process used in the prior monitoring period based on input received from the IMT and community members. For example, CPD began to more consistently maintain documentation from the 44 community input meetings held, and OCP started to conduct surveys at the community conversations to solicit feedback from attendees. CPD also developed a Performance Management procedure that uses a data-driven approach to analyze community policing strategies on a monthly basis. *See* Consent Decree Par. 47.

School Resource Officer (“SRO”) Program. In IMR-1, CPD collaborated with Chicago Public Schools (“CPS”) to standardize and more clearly delineate the roles and responsibilities of officers who work in the public high schools where CPD officers are currently assigned. *See*

Consent Decree Paragraphs 39-44. In IMR-1, CPD created a policy that more clearly defines the role of SROs; negotiated a memorandum of understanding with CPS which, among other things, delineates the authority of SROs in CPS schools, sets out standardized criteria for selecting SROs, and specifies the manner in which CPD officers will engage with CPS students while on school grounds; and engaged a nationally recognized expert in school resource officers to provide a 40-hour specialized training course that all CPD SROs were required to take prior to the start of this school year.

In IMR-2, CPD made additional progress on implementing the SRO program, including:

- ***Selection criteria:*** CPD implemented the selection criteria to select officers in schools for the 2019-2020 school year.
- ***Ongoing communications with CPS.*** CPD and CPS established a working group to facilitate ongoing discussion regarding the implementation of the SRO program.
- ***Additional training.*** In addition to the 40-hour training provided prior to the start of the school year, in IMR-2 CPD and CPS provided SROs an additional eight-hour training covering topics including restorative justice practices, the CPS code of conduct, and proper protocols regarding detention of juveniles where detention is necessary.
- ***Improving the policy and training.*** The IMT has also provided feedback on the SRO policy and training, which CPD is currently working to incorporate into revised materials for the next school year. CPD also continued to solicit community input on the SRO program at the four open community conversations held in February.

II. IMPARTIAL POLICING

The Impartial Policing section of the Consent Decree focuses heavily on policy creation as the preliminary step to compliance. During IMR-1, CPD reviewed and, where necessary, revised numerous policies to implement these requirements. In IMR-2, CPD completed IMT and OAG review and comment, and a 15-day period of public comment, and thereafter made effective during IMR-2 the following policies related to impartial policing:

- G06-01-04, *Arrestee and In-Custody Communications* (see Consent Decree Par. 31, 34)
- G06-01, *Processing Persons Under Department Control* (see Consent Decree Par. 31, 34)
- S06-04, *Processing of Juveniles and Minors Under Department Control* (see Consent Decree Par. 32)
- G09-01-06, *Use of Social Media Outlets* (see Consent Decree Par. 57).

The above policies are available on CPD's public directives portal.

In IMR-2, CPD also drafted and revised numerous additional policies and has submitted them for review to IMT and OAG. As noted above, the Consent Decree provides IMT and OAG a minimum 30-day period to review and comment policies required by the Consent Decree, a process which thus far has taken two to six months to complete for each policy, depending on the policy's topic and complexity. Preliminary drafts of policies related to the following impartial policing paragraphs are currently in various stages of the IMT and OAG review and comment process and therefore will be finalized upon approval from IMT and OAG and solicitation and incorporation of community input:

- Interactions with transgender, intersex and gender non-conforming individuals (Consent Decree Par. 61);
- Prohibitions on sexual misconduct (Par. 63);
- Language access (Par. 64);
- Transporting juveniles (Par. 71); and
- Investigating and responding to hate crimes (Par. 76).

CPD also sought in IMR-2 to improve its efforts to engage the public and stakeholders in policy development, particularly policies related to impartial policing. This includes engaging individuals with lived experience and inviting advocate groups to participate in the input process.

As discussed above during IMR-2, CPD rolled out the first phase of its two-phase community engagement plan to solicit comments on CPD policies. Several of the policies in the Impartial Policing section were discussed at the February community conversations.

In IMR-2, the City convened a working group of individuals and advocates to collaborate on revisions to CPD's policy regarding interactions with transgender, intersex, and gender nonconforming (TIGN) individuals. As a result of the working group, CPD incorporated numerous recommendations received from the group into a revised draft policy that is now under IMT and OAG review. The City and CPD contemplate that as the second phase of the community engagement plan, similar working groups will be established to gather additional input on several Impartial Policing policies, including interactions with members of religious communities (Par. 60), and interactions with individuals with disabilities (Par. 68).

Disabilities Liaison. The Consent Decree requires that CPD designate an Americans with Disabilities Act ("ADA") liaison. *See* Par. 70. The ADA liaison is a new position that will coordinate CPD's efforts to comply with the ADA and will serve as a resource to assist CPD members in providing meaningful access to police services for individuals with disabilities. In IMR-2, CPD finalized the job specifications and interview questions with the assistance of an advocate group with expertise in disabilities rights and access. CPD posted the job position and publicized the opening to disability advocacy community groups. CPD has received approximately 170 applications and is reviewing them.

III. CRISIS INTERVENTION

CPD officers often respond to calls for service involving individuals who are experiencing a behavioral or mental health crisis. To better serve those individuals in crisis, the City and CPD

developed the Crisis Intervention Team (“CIT”) Program. *See* Consent Decree Par. 87-91. The City and CPD worked diligently in IMR-2 on improving its CIT programs and response.

City’s Crisis Intervention Response. The Consent Decree requires the City to streamline resources to improve the City’s response to persons in crisis. In IMR-2, the Mayor’s Office hosted a Crisis Intervention Advisory Committee (“CIAC”), the purpose of which is to facilitate collaboration between people with lived experience, City entities, care and social service providers, advocates, and other subject matter experts. The Advisory Committee met quarterly, with subcommittees meeting more frequently, and provided written recommendations for improving the City’s crisis intervention response, which it also presented to the Mayor. Per the Consent Decree and IMR-2 Plan, the City adopted and responded in writing to these recommendations and published a Crisis Intervention Plan. Over the course of several months, the committee also reviewed CPD and Office of Emergency Management and Communications (“OEMC”) policies and certain training related to crisis response and provided comments and suggestions for improvement, which both entities reviewed and incorporated. *See* Consent Decree Par. 122, 131, 137, 142.

Following the work of the CIAC, the City believed it was important that all aspects of mental health, beyond just crisis and law enforcement topics, become better aligned and connected under one umbrella committee. As a result, the City announced that in March 2020, it will launch the Chicago Council on Mental Health Equity (“CCMHE”), which will serve as the City’s main advisory committee on all mental and behavioral health topics. This CCMHE will include the entire CIAC and expand its responsibilities to now work on mental health challenges that do not exclusively involve crisis response, the justice system, or the use of first responders.

CIT Policies. In IMR-2, CPD conducted a comprehensive review and revision of its core crisis-intervention related policies, which incorporated the feedback received from the Crisis Intervention Advisory Committee. *See* Consent Decree Par. 137. IMT and OAG have also provided extensive comments on the draft policy revisions, which CPD is working to incorporate along with public input received during the February community conversations. OEMC also received input from the committee on three of its CIT-related policies and incorporated it into revised policies. *See* Par. 151.

CIT Training. In IMR-2, CPD worked with several community-based partners to develop a 16-hour CIT Refresher course for officers. The Crisis Intervention Advisory Committee also provided input on training content to include. *See* Consent Decree Par. 99. CPD received comments on the training curriculum from IMT and OAG and is working to incorporate them.

CIT Officer Implementation Plan. In IMR-2, CPD also completed a draft of its first CIT Officer Implementation Plan, which analyzes the number of certified CIT officers necessary to meet certain response ratio targets. *See* Par. 108. The draft plan is currently under IMT and OAG review.

IV. USE OF FORCE

CPD made considerable progress on a number of use-of-force related areas in IMR-2. Most notably, after several months of review and discussion, and several rounds of revision with IMT and OAG, in IMR-2 CPD published a revised set of a dozen use-of-force policies, as well as three revised forms, which incorporate the requirements of approximately 50 Consent Decree paragraphs (Par. 155-159; 161-166; 168; 173; 176-187; 197-235; 488-492; 568; 571; 574-575; 577-580), many of which are included in the Year-One Plan. These policies are available on CPD's public directives portal and are open for public comment.

Among numerous other changes, the revised policies:

- Redefine the levels of reportable force;
- Provide for numerous requirements for supervisors in responding to a use of force incident;
- Provide additional guidelines and restrictions on uses of certain weapons; and
- Establish a Force Review Board responsible for reviewing uses of deadly force and other specified uses of force.

CPD also collaborated closely with IMT and OAG during IMR-2 to revise the mandatory 2020 in-service use of force training. The training incorporates the new use of force revisions discussed above.

Tracking and Analyzing Foot Pursuits. In IMR-2, CPD continued to work with the IMT and OAG to refine its processes for tracking and analyzing foot pursuits, including foot pursuits associated with reportable use of force incidents. CPD's Force Review Division updated its Standard Operating Procedures to articulate specific protocols for reviewing foot pursuits associated with Use of Force and developed a 2019 year-end report that provides summary analyses of foot pursuit reviews and tactical, equipment, and training concerns identified during these reviews. *See* Par. 168-169.

After several rounds of review and comment by IMT and OAG, and review of input received from the Coalition, CPD also published a foot pursuits training bulletin that provides guidance to officers regarding engaging in foot pursuits, based on best practice in other jurisdictions. *See* Par. 170. Review of the training bulletin is mandatory for CPD members, and the concepts contained in the Bulletin have been incorporated in CPD's mandatory 2020 Use of Force Training.

Tracking and Analyzing Firearms Pointings. In IMR-2, CPD operationalized the Firearm Pointing Notification Policy and is currently training on it in the annual in-service Use of Force course. The Force Review Division continues to audit and review firearm pointing incidents and make recommendations on training, equipment, and tactics. CPD also continued communication around the new policy to members, including supervisors and roll call briefings.

V. RECRUITMENT, HIRING, AND PROMOTION

The Year-One Plan contained only two paragraphs related to recruitment, hiring, and promotion. During IMR-2, the City and CPD spent several months working with a human resources expert to prepare a job analysis of the Captain and Commander ranks. *See* Consent Decree Par. 263. In IMR-2, the knowledge, skills, and abilities were developed; the expert continues to work with the City to prepare the final job analysis.

During IMR-2, CPD also created a communications plan to increase transparency and awareness in the Department about the promotions process for the ranks of Captain and Commander. *See* Par. 264. The plan also includes provisions for communicating with officers, collective bargaining units, elected officials, and media. The plan is currently under review by the IMT and OAG.

VI. TRAINING

To be a successful law enforcement agency, CPD must offer high-quality training to its members. In IMR-2, CPD developed a comprehensive annual training plan to govern its training program for 2020. *See* Par. 272. CPD also made considerable progress on its training reforms in the following areas:

Training Oversight Committee. In IMR-2, CPD continued to host monthly Training Oversight Committee (“TOC”) meetings to provide guidance on and approve training materials.

To further operationalize the TOC, CPD revised its policy governing the committee. The policy revisions are currently under IMT and OAG review.

Field Training Program Review. The Consent Decree requires the establishment of an annual review by the TOC of the Field Training Officer program and consideration of best practices for the program. *See* Par. 316. Further, the Consent Decree requires the TOC to review referrals and recommendations of the Field Training Review and Evaluation Board. The 2019 review of the FTO program took place in December 2019, and the TOC made recommendations to the Superintendent.

In-Service Training. CPD continued to train officers throughout the remainder of 2019 toward the goal of having all officers complete 24 hours of in-service training. CPD's Audit Unit has worked with the IMT to develop a post-completion analysis to ensure training numbers are audited against paper-based sign-in sheets to validate attendance numbers. The 2020 Training Plan established 24 mandatory classroom-based in-service training hours, including use of force training, with eight elective hours. *See* Par. 320, 323.

Pre-Service Supervisor Field Training. CPD developed numerous policies and training materials to formalize its pre-service supervisor field training program, including lesson plans, observation guides, and training guides. These materials are currently under IMT and OAG review.

Training on the Consent Decree. CPD finalized and launched a mandatory eLearning module to educate members about the Consent Decree's goals, implementation process, and timelines. The training was reviewed and approved by IMT and OAG.

VII. SUPERVISION

CPD focused on supervision requirements in IMR-2, including the re-organization of its command structure to move toward geographically focused reporting and accountability. Much of the work in this section is focused on how staffing and allocation decision are made, as well as the unity of command/span of control launch. These are both fundamental changes for the way CPD staffs its operations and are critical foundational elements to achieve.

Unity of Command/Span of Control. The unity of command and span of control provisions of the Consent Decree require CPD to begin implementing a 10:1 officer-to-sergeant ratio in IMR-2. *See* Consent Decree Par. 360-368. CPD successfully launched this unity of command/span of control program during IMR-2 as a pilot program in the 6th District. CPD developed its staffing model and memorialized it in a Department Notice. The directive lays out the UOC/SOC program and schedule to be implemented in the 6th District.

Supervisory Responsibilities. During this period, CPD also reviewed and revised as appropriate its policies regarding supervisor responsibilities. *See* Par. 348. CPD continues to collaborate with the IMT and OAG on supervisory responsibilities.

VIII. OFFICER WELLNESS

CPD has extensive officer wellness programming available through its Employee Assistance Program (EAP), which includes efforts in existence, including a Peer Support Program, drug and alcohol counseling, support groups, and individual counseling available to officers and their families at no cost. CPD made progress on a number of initiatives related to officer wellness during this period, including completion of a needs assessment analyzing resources necessary to ensure adequacy of CPD's support services. *See* Par. 382-383. CPD is currently in the review

process with IMT and OAG on development of Officer Support Plan, which will provide a timeline for implementation of the needs identified through the assessment. *See* Par. 384.

FOID Card Eligibility Training. CPD developed and published during this period an e-Learning training addressing the effects of Firearm Owners Identification (“FOID”) card eligibility when a member seeks support services. *See* Par. 387. This training underwent extensive review from the IMT and OAG and reflects several rounds of review, comment, and revision.

Suicide Prevention Initiative. In March 2019, CPD established the Suicide Prevention working group, with the goal of reducing officer suicide through programming designed to address stressors. *See* Par. 388. The working group is overseen by the head of the Professional Counseling Division, who is a licensed health professional, along with the Deputy Superintendent for the Office of Constitutional Policing and Reform (formerly Chief of the Bureau of Organizational Development), who is a command staff member. The working group continued to meet and in IMR-2 developed a set of initiatives and projects to assess the current state of services and provide additional support:

- Surveyed exempt Command staff for response
- Surveyed all department members (EAP Survey)
- Feedback from in-service seminars
- Created Officer Wellness Self-Assessment Tool.

Chaplains Unit Standard Operating Procedure. The Police Chaplains Ministry provides services such as visits to ill and injured officers and family members, counseling and referrals, and other pastoral services. In IMR-2, CPD completed a standard operating procedure governing the Chaplains program. *See* Par. 406.

IX. ACCOUNTABILITY AND TRANSPARENCY

Chicago's police accountability structure is complex, and many of the items contained in the Consent Decree had short deadlines for items requiring coordination across multiple City entities. In light of the importance of accountability and transparency to the success of the overall reform effort, the City continues to work closely with the IMT to implement these requirements successfully and with cross-agency coordination, but continues to do so with the goal of sustained reform that achieves the goals of the Consent Decree long-term.

Intake Processes. At the recommendation of IMT, CPD's Bureau of Internal Affairs ("BIA") and the Civilian Office of Police Accountability ("COPA"), both of which are responsible by City ordinance for investigating allegations of police misconduct, developed in IMR-2 a working group to create consistent policies and procedures regarding the intake of complaints via phone, online, and in-person. *See* Par. 425. The goal of the working group is to ensure consistency and to reduce confusion regarding complaint investigations. The City agrees with IMT's recommendation that this work will help make Chicago's complex accountability structure more transparent and understandable to the public and CPD officers. IMT has committed to provide technical assistance to the City to help develop these procedures.

Policy and Training Development. Both BIA and COPA have numerous policy and training requirements in the Consent Decree, many of which have short deadlines. However, based on IMT's recommendation, both BIA and COPA determined that a comprehensive review and, as necessary, revision of their policies and trainings would be beneficial for the long-term success of reform in this critical area. Thus, in IMR-2, both BIA and COPA developed plans with IMT and OAG to conduct policy and training development that addresses each organization's Consent Decree requirements in a thoughtful and comprehensive manner. For instance, in IMR-2, BIA has

worked for several months to develop a standard operating procedure addressing the responsibilities of Accountability Sergeants. *See* Par. 493. After numerous rounds of review and comment by IMT and OAG, this SOP is in its final stages of development. COPA has revised drafts of numerous policies to address Consent Decree requirements and has collaborated with IMT and OAG to develop a review schedule to ensure timelier review of priority policies and training.

X. DATA COLLECTION, ANALYSIS, AND MANAGEMENT

As acknowledged in the Consent Decree, data is an important tool for CPD to evaluate its use of force practices and facilitate transparency and accountability regarding those practices. In IMR-2, CPD developed a Tableau dashboard, which provides a visual representation of monthly aggregated and incident level use of force data illustrated through graphs, charts and other visualizations of reportable use of force events. The published Use of Force Dashboard was released on CPD's public website on February 21, 2020. *See* Par. 581-582. The dashboard includes interactive maps that enable users to access use of force data by Community Area, Ward, District and Beat.

In IMR-2, CPD also revised and published the directive addressing the Consent Decree requirements for the Force Review Board ("FRB"), which is charged with conducting an executive-level review of the most serious use of force incidents for tactical training opportunities, potential policy revisions and other factors to improve CPD's response to similar incidents in the future. *See* Par. 577-580.

CONCLUSION

The City is working collaboratively with the IMT, OAG, and other stakeholders to implement the requirements of the Consent Decree. The City remains committed to achieving full compliance.

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Respectfully submitted,

THE CITY OF CHICAGO

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