



INDEPENDENT MONITORING REPORT 8

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

& Comprehensive Assessment, Part I

Report Date: November 1, 2023

Executive Summary

As the Independent Monitoring Team (IMT), we assess the City of Chicago’s (City’s) compliance with the requirements of the Consent Decree. Specifically, we assess how relevant City entities—including the Chicago Police Department (CPD); the Civilian Office of Police Accountability (COPA); the Chicago Police Board; the City Office of Inspector General, the Deputy Inspector General for Public Safety (Deputy PSIG); and the Office of Emergency Management and Communications (OEMC)—are complying with the Consent Decree.¹³

This is *Independent Monitoring Report 8 and Comprehensive Assessment, Part I*.¹⁴ As in previous monitoring reports, this is an update to the Court and the public on compliance efforts during the eighth reporting period: from January 1, 2023, through June 30, 2023.¹⁵ Among other things required by the Consent Decree, this report also includes the following:

- an updated compliance or status assessment from the previous reporting period;
- a compliance or status assessment for all monitorable paragraphs in the Consent Decree;
- a summary of the principal achievements and challenges facing the City’s compliance with the Consent Decree; and
- an updated projection of upcoming work for the City, the Office of the Illinois Attorney General (OAG), and the IMT. *See* ¶1661.¹⁶

¹³ As a party to the Consent Decree, the City is ultimately responsible for compliance. *See* ¶1720. Unless otherwise specified, our references to the City typically include its relevant entities. *See* ¶1736.

¹⁴ We provided a draft of this report to the City and the OAG on July 30, 2023, as required by ¶¶1661–65. Details about the required comprehensive assessment may be found in ¶¶1657–659.

¹⁵ The Consent Decree generally prevents the IMT from making any public statements or issuing findings regarding any non-public information or materials outside of these reports (*see* ¶1672). Because the Consent Decree will be in effect for a minimum of eight years, this is the eighth of at least 16 semiannual Independent Monitoring Reports. *See Stipulation Regarding Search Warrants, Consent Decree Timelines, and the Procedure for “Full and Effective Compliance,” Illinois v. Chicago*, Case No. 17-cv-6260 (March 25, 2022), https://cpdmonitoring-team.com/wp-content/uploads/2022/03/2022.03.25-Stipulation-Regarding-Search-Warrants-Consent-Decree-Timelin..._.pdf. Each year, we file a Monitoring Plan that sets out what we will assess during the year, and we file two semiannual Independent Monitoring Reports. The Independent Monitoring Plans and Reports are available on the IMT’s website. *See Reports and Resources*, <https://cpdmonitoringteam.com/reports-and-resources/>.

¹⁶ In November 2022, we filed the Monitoring Plan for Year Four, which outlined the projected monitoring efforts under the Consent Decree for Year Four (July 1, 2022, through June 30, 2023). The IMT’s Monitoring Plan for Year Four is available on the IMT’s website. *See Reports*, INDEPENDENT MONITORING TEAM (November 2, 2022), <https://cpdmonitoringteam.com/wp-content/uploads/2022/11/2022.11.02-Monitoring-Plan-for-Year-Four-filed.pdf>.

Per ¶661 of the Consent Decree, the IMT will continue to issue semiannual reports until the Consent Decree ends—which is after the City has reached full and effective compliance for each requirement for one to two years. See ¶¶693 and 714–15. With the agreement of the Parties, however, we will endeavor to streamline the reporting process in future reporting periods. Specifically, in accordance with ¶672, the IMT will seek to provide more information on our website to meet the requirements of ¶661 on a more regular basis and issue shorter, more manageable reports.

This report also includes Part I of our Comprehensive Assessment. Specifically, this report includes “whether and to what extent the City and CPD are in compliance with this Agreement,” including “areas of greatest progress and achievement, and the requirements that appear to have contributed to these achievements, as well as areas of greatest concern.” ¶¶657–58.

In the coming months, we will provide a separate report, *Comprehensive Assessment Part II*, which will include “whether the outcomes intended by [the Consent Decree] are being achieved[;] whether any modifications to [the Consent Decree] are necessary in light of changed circumstances or unanticipated impact (or lack of impact) of the requirements including strategies for accelerating full and effective compliance; as well as “strategies for accelerating full and effective compliance.”¹⁷

In the meantime, we note that the Consent Decree is a complex document that resulted from long and substantive negotiations between the City and the OAG. In this report, we have aimed to address the nuances of the agreement fairly and accurately.

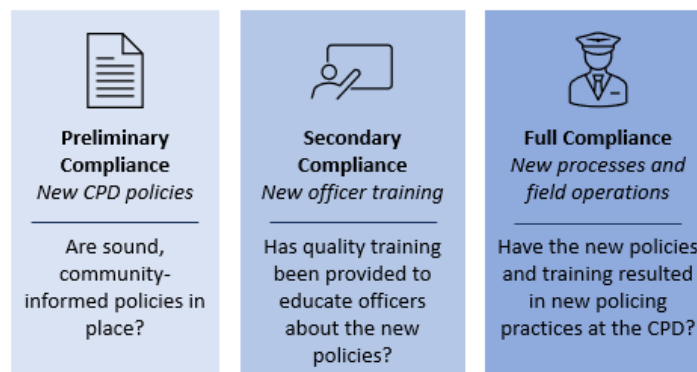
The monitoring process contains some tensions that we address in both our monitoring efforts and this report. For example, there has been—and likely will continue to be—a tension between the City’s need to make compliance efforts quickly and the need to ensure that its efforts are effective and sustainable. Because the Consent Decree prioritizes both goals, we do too. We recognize that if the City rushes to create a policy without, for example, the required community involvement, that may delay the date the City reaches compliance if the City must later re-engage the community, re-draft the policy, and potentially re-train personnel. We have attempted to address this tension in our analysis for each relevant paragraph in this report.

We know that many readers will be most interested in learning where the City, the CPD, and the other relevant entities have achieved compliance with the requirements of the Consent Decree. But in reviewing this report, it is important to keep

¹⁷ ¶696 notes that “OAG and the City may jointly agree to make changes, modifications, and amendments to this Agreement, which will be effective if approved by the Court.”

at least three things in mind regarding the scope and significance of our compliance assessments:

- ❖ First, this report represents a six-month assessment of the City’s compliance efforts from January 1, 2023, through June 30, 2023. It does not reflect all the efforts of the City, the CPD, or the other relevant City entities to date. While we report on the compliance efforts within defined reporting periods (*see ¶¶661*), we stress that work is ongoing by the City, its relevant entities, the OAG, the IMT, and Chicago’s communities. In many cases, relevant City entities have continued to develop policies and train personnel after June 30, 2023, and before the date we submit this report. In this report, we have not assessed efforts made after June 30, 2023. We will do so in the monitoring report for the ninth reporting period (July 1, 2023, through December 31, 2023).
- ❖ Second, we assess compliance at three levels: (1) Preliminary, (2) Secondary, and (3) Full. The Consent Decree requires the City and its entities to reach Full compliance and maintain that compliance for one to two years. *See ¶¶714–15*. These compliance levels allow us to share our assessments of the City’s progress throughout the duration of the Consent Decree. Typically, these levels correspond with whether the City or its relevant entities have (1) created a compliant policy, (2) adequately trained personnel on that policy, and (3) successfully implemented the reform in practice. There are, however, many paragraphs that do not include policy or training elements. In those circumstances, the three levels may follow a different trajectory, such as (1) whether the City or its relevant entities have established the framework and resources to achieve the reform, (2) whether the City or its relevant entities have effectively communicated the reform to relevant personnel, and (3) whether the City or its relevant entities have appropriately implemented the reform.



- ❖ Third, because of the nuances of each Consent Decree requirement and each level of compliance, the City and its relevant entities must—in a timely manner—provide the IMT with evidence, including access to personnel, records,

facilities, and data to establish that they have reached each level of compliance during the applicable reporting period.

Under the Consent Decree, the City, the CPD, or other relevant entities are not in compliance with any of the requirements of the Consent Decree until the IMT determines that the City provided sufficient proof that the City, the CPD, or other relevant entities are in compliance. *See* ¶1720. Even if the City has made significant efforts toward complying with a requirement—which in some cases it has—the City still has the additional burden of providing sufficient proof of its efforts with sufficient time for the IMT and the OAG to review the information.

To reflect the City’s and its relevant entities’ progress through the Consent Decree process, we have added four subcategories for each of the three levels of compliance (Preliminary, Secondary, or Full):

- **In Compliance.** Based on the evidence that the City has produced, the City has met a level of compliance with a requirement of the Consent Decree.
- **Under Assessment.** Based on the evidence that the City has produced per ¶1720, the IMT is still assessing whether the City has met a level of compliance with a requirement of the Consent Decree. This may occur, for example, when the City’s efforts are not completed within a reporting period.
- **Not in Compliance.** Based on the evidence that the City has produced, the City has not met a level of compliance with a requirement of the Consent Decree.
- **Not Yet Assessed.** The IMT has not yet assessed whether the City has met this level of compliance with a requirement of the Consent Decree. This may occur, for example, when the IMT is still assessing a lower level of compliance or the City has not yet met a lower level of compliance.

At the end of the eighth reporting period, the City and the CPD remain in Preliminary compliance with about 50% of monitorable paragraphs, in Secondary compliance with about 29%, and in Full compliance with about 6%. Overall, the City and the CPD have achieved some level of compliance with about 85% of monitorable paragraphs.

Accountability and Transparency: ¶532

532. Within 180 days of the Effective Date, the City will draft selection criteria for Police Board members with the objective of identifying individuals who possess sufficient experience, judgment, and impartiality to perform the duties of members of the Police Board. Selection criteria may include prior work in law or law enforcement, and service with Chicago-based community and non-profit organizations. The draft selection criteria will be published on the Police Board’s website for a period of 30 days for public review and comment. Following the 30-day public review and comment period, the City will provide the draft criteria to OAG for review and comment. The final selection criteria will be published and maintained on the Police Board’s website. The City will ensure that the selection criteria are the basis for future selection of Police Board members.

Compliance Progress

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

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

The City maintained Preliminary compliance with ¶532 but did not reach Secondary compliance.

To evaluate Preliminary compliance with ¶532, the IMT reviewed the City’s policies following the policy process described in the Consent Decree (¶¶626–41). To evaluate Secondary compliance, we reviewed various data sources and plans to determine whether the City developed a process for properly applying the selection criteria should a vacancy on the Police Board occur.

Progress before the Eighth Reporting Period

In the second reporting period, the City reached Preliminary compliance with its *Police Board Member Selection Criteria*. The City provided an initial draft and made subsequent revisions after receiving feedback from the IMT and the OAG. After revisions were made, we determined that the *Police Board Member Selection Criteria* allowed the City to move into Preliminary compliance. We did not receive additional evidence of compliance in the third or fourth reporting periods.

In the fifth reporting period, the City submitted the Mayor’s Office’s *Policy Governing Police Board Member Selection* (“Selection Process”) and supporting Police Board Candidate Screen Questions (“Screen Questions”). We provided feedback on these materials on December 29, 2021. We detailed our concern that the

Selection Process did not provide much guidance to “ensure that the selection criteria are the basis for future selection of Police Board members.” See ¶532. Because the Selection Process did not sufficiently ensure that “the selection criteria are the basis for future selection of Police Board members,” the City did not reach Secondary compliance with ¶532 in the fifth reporting period.

The City did not submit any materials related to ¶532 in the sixth or seventh reporting periods.

Progress in the Eighth Reporting Period

In the eighth reporting period, the City provided the IMT with a draft of the Community Commission for Public Safety and Accountability’s (CCPSA) *Police Board Member Selection Procedures*. These procedures detail a thorough, robust, and fair selection process for Police Board members in the event of a vacancy. The City also provided several supporting documents and questionnaires that the CCPSA will use during the selection process, including (1) *The Police Board Conflict of Interest Questionnaire*, (2) *The Police Board Application Eligibility Form*, (3) a screenshot of the website, (4) *Application Rounds 1 and 2 Questions*, (5) a *Candidate Questionnaire*, (6) a *Candidate Assessment Form Round 2*, and (7) proposed *Interview Questions*. In connection with the City’s efforts to achieved Secondary compliance, we suggest that the CCPSA finalize the procedures, including by dating the procedures and having at least one current member of the CCPSA Board sign the procedures, because the procedures and accompanying documents are likely to survive the current CCPSA Board. We also encourage the CCPSA and the City to ensure that the procedures are updated in the future according to the most current City policies and community expectations.

Further, we understand that there are currently vacancies on the Police Board. After finalizing the CCPSA’s procedures, the City may have an opportunity in future reporting periods to demonstrate Full compliance by selecting new Police Board members consistent with those procedures and providing documentation of that process.

With this, the City maintained Preliminary compliance with ¶532 but did not reach Secondary compliance. Moving forward, we will look for the City to finalize the CCPSA *Police Board Member Selection Procedures* to ensure that “the selection criteria are the basis for future selection of Police Board members” as required by ¶532.

Paragraph 532 Compliance Progress History

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

COMPLIANCE PROGRESS:
None

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

COMPLIANCE PROGRESS:
Preliminary

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

Accountability and Transparency: ¶533

533. *Within 180 days of the Effective Date, the Police Board will submit selection criteria for Police Board hearing officers to the Monitor and OAG for review and comment. The criteria will be drafted to help identify individuals who possess sufficient competence, impartiality, and legal expertise to serve as hearing officers. The selection criteria will be published on the Police Board’s website. The City and the Police Board will ensure that the selection criteria are the basis for future selection of Police Board hearing officers.*

Compliance Progress

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

Preliminary: *In Compliance* (SECOND REPORTING PERIOD)

Secondary: *In Compliance* (FOURTH REPORTING PERIOD)

Full: *In Compliance* (FOURTH REPORTING PERIOD)

Sustainment Period Ends *June 30, 2023*

The Police Board maintained Full compliance with ¶533 during the eighth reporting period.

To evaluate Preliminary compliance with ¶533 we reviewed Police Board’s relevant policies and documents following the process described in the Consent Decree (¶¶626–41). To evaluate Secondary compliance with ¶533, we considered whether the *Police Board Hearing Officer Selection Criteria*—which enabled the City and Police Board to reach Preliminary compliance with ¶533—had been sufficiently disseminated and explained to ensure that the Police Board Hearing Officer Selection Criteria would be appropriately followed. For Full compliance, we looked for evidence that the City and the Police Board follow the selection criteria set forth to assess Full compliance with ¶533.

Progress before the Eighth Reporting Period

In the second reporting period, the Police Board reached Preliminary compliance by submitting *Police Board Hearing Office Selection Criteria*. In the fourth reporting period, the Police Board reached Secondary and Full compliance by demonstrating that the *Police Board Hearing Officer Selection Criteria* had been disseminated and followed in the Police Board’s search for and hiring of a new Police Board Hearing Officer. Throughout the hiring process, the Police Board provided updates that demonstrated an awareness of the *Police Board Hearing Officer Selection Criteria* and a commitment to following that guidance. In the fifth reporting period, there were no Police Board Hearing Officer vacancies. We requested that, if a vacancy occurs in future reporting periods, the Police Board notify the IMT and provide the

same level of detail and transparency into its search and hiring process in order to maintain Full compliance.

In the sixth and seventh reporting periods, the Police Board submitted letters indicating that the Police Board continued to follow the process for Hearing Officer selection and reporting that the Police Board had no vacant hearing officer positions and did not conduct a hearing officer search during the sixth or seventh reporting periods.

Progress in the Eighth Reporting Period

This reporting period, the Police Board produced a memorandum dated June 7, 2023, that confirms that the Police Board did not have a Hearing Officer vacancy during the eighth reporting period. The Police Board therefore has not had the need to conduct a Hearing Officer search or engage in that hiring process during this monitoring period.

The Police Board maintained Full compliance with ¶533 during the eighth reporting period.

Paragraph 533 Compliance Progress History

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

Accountability and Transparency: ¶534

534. In any disciplinary action requiring the vote of the Police Board, the City will ensure: a. a hearing officer will preside over the disciplinary proceedings; and b. disciplinary hearings will be videotaped in their entirety.

Compliance Progress

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

Preliminary: *In Compliance* (FOURTH REPORTING PERIOD)

Secondary: *In Compliance* (FOURTH REPORTING PERIOD)

Full: *In Compliance* (FOURTH REPORTING PERIOD)

Sustainment Period Ends *June 30, 2023*

The City and the Police Board maintained Full compliance with ¶534 in the eighth reporting period.

To assess Preliminary compliance, we reviewed the City’s relevant policies and records following the process described in the Consent Decree (¶¶626–41), which outlines applicable consultation, resolution, workout, and public comment periods. To evaluate Secondary compliance, we reviewed, among other things, the City’s development, implementation, and evaluation of training. To assess Full compliance, the IMT determined whether the City and Police Board had sufficiently implemented their policies and training.

Progress before the Eighth Reporting Period

In the fourth reporting period, the Police Board reached Full compliance with ¶534 after providing several documents for review: (1) Section 2-8-030 of the Municipal Code of Chicago, which authorizes hearing officers to preside over Police Board disciplinary hearings and requires the hearing officers to conduct disciplinary hearings in accordance with the provisions of the Code and the Board’s Rules of Procedure; (2) the Police Board’s *Rules of Procedure*, which among other things, requires each disciplinary case to be assigned to a hearing officer and mandates that the hearing be video recorded in its entirety; and (3) links to video recorded disciplinary hearings for the three most recent cases decided by the Police Board.

These documents demonstrated that the Police Board not only has policies in place to instruct compliance with ¶534, but that the Police Board follows those policies and procedures, putting the mandates of ¶534 into action.

In the fifth reporting period, the Police board provided links to recorded hearings that occurred via Zoom. In the sixth and seventh reporting periods, the Police Board provided transcripts and videos of recorded hearings. These recordings confirmed that the Police Board continued to have a hearing officer presiding over disciplinary hearings and that the hearings were video recorded in their entirety.

Progress in the Eighth Reporting Period

This reporting period, the Police Board provided the IMT with a memorandum dated June 7, 2023, that included hyperlinks to cases in which the Police Board was involved. Police Board Hearing Officers presided over these cases, the hearings for which were videotaped in their entirety. The evidence provided in this memorandum address the requirements of ¶534, including ¶534(a) and (b).

The Police Board maintained Full compliance with ¶534 during the eighth reporting period.

Paragraph 534 Compliance Progress History

FIRST REPORTING PERIOD SEPTEMBER 1, 2019 – AUGUST 31, 2019 COMPLIANCE PROGRESS: Not Applicable	SECOND REPORTING PERIOD SEPTEMBER 1, 2019 – FEBRUARY 29, 2020 COMPLIANCE PROGRESS: Not Applicable	THIRD REPORTING PERIOD MARCH 1, 2020 – DECEMBER 31, 2020 COMPLIANCE PROGRESS: Not Applicable
FOURTH REPORTING PERIOD JANUARY 1, 2021 – JUNE 30, 2021 COMPLIANCE PROGRESS: Full	FIFTH REPORTING PERIOD JULY 1, 2021 – DECEMBER 31, 2021 COMPLIANCE PROGRESS: Full	SIXTH REPORTING PERIOD JANUARY 1, 2022 – JUNE 30, 2022 COMPLIANCE PROGRESS: Full
SEVENTH REPORTING PERIOD JULY 1, 2022 – DECEMBER 31, 2022 COMPLIANCE PROGRESS: Full	EIGHTH REPORTING PERIOD JANUARY 1, 2023 – JUNE 30, 2023 COMPLIANCE PROGRESS: Full	

Accountability and Transparency: ¶535

535. Prior to any vote by the Police Board following any disciplinary hearing, the City will ensure: a. all Police Board members are required to watch and certify that they have watched the videotape of the entire evidentiary hearing; b. all Police Board members are provided copies of the complete record, including demonstrative exhibits; c. hearing officers will prepare a written report that sets forth evidence presented at the hearing: (i) in support of the charges filed; (ii) in defense or mitigation; and (iii) in rebuttal, including evidence and aggravation, if any; the hearing officer's report will also include information relating to witness credibility; d. the Police Board may, at its discretion, ask a hearing officer to additionally prepare a written report and recommendation that sets forth findings of fact and conclusions of law, including any findings relating to witness credibility; e. the parties before the Police Board will have 14 days to review the hearing officer's report, and recommendation, and file any written objections; and f. all Police Board members will review de novo the hearing officer's report and any recommendation, and the parties' written objections to the same.

Compliance Progress

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

Preliminary: *In Compliance* (FOURTH REPORTING PERIOD)
Secondary: *In Compliance* (FOURTH REPORTING PERIOD)
Full: *In Compliance* (FOURTH REPORTING PERIOD)
Sustainment Period Ends *June 30, 2023*

The City and the Police Board maintained Full compliance with ¶535 in the eighth reporting period.

To assess Preliminary compliance with ¶535, we reviewed the City's relevant policies and records following the process described in the Consent Decree (¶¶626–41), which outlines applicable consultation, resolution, workout, and public comment periods. To evaluate Secondary compliance, we reviewed, among other things, the City's training development, implementation, and evaluation. To assess Full compliance, the IMT determined whether the City and Police Board had sufficiently implemented their policies and training.

Progress before the Eighth Reporting Period

The Police Board reached Full compliance with ¶535 in the fourth reporting period. In May 2021, the Police Board provided us with its *Rules of Procedure*. These rules addressed the requirements of ¶535's subsections (a) and (c)–(f). The Police

Board also provided a written transcript that included exhibits which demonstrated that Police Board members receive complete records for review before a Police Board vote, as required by subsection (b). These documents demonstrated that the Police Board not only had policies and procedures in place instructing compliance with ¶535’s requirements, but that the Police Board follows those policies and procedures. With this, the Police Board reached Full compliance.

In the fifth, sixth, and seventh reporting periods, the Police Board provided Police Board hearing transcripts and related case materials that demonstrated that Police Board members continued to comply with ¶535’s requirements. The Police Board’s actions included but were not limited to watching video recordings of evidentiary hearings, receiving and reviewing complete records from the hearings, and receiving and reviewing the hearing officers’ written reports—all prior to any Police Board vote. With this evidence, the Police Board maintained Full compliance with ¶535 in the fifth, sixth, and seventh reporting periods.

Progress in the Eighth Reporting Period

This reporting period, the Police Board provided the IMT with documentation showing that (1) the Police Board and its Hearing Officers continue to certify that they have watched video recordings of evidentiary hearings, (2) all copies of the complete record are provided to Police Board members, (3) Hearing Officers prepare a written report of evidence presented at hearings and may prepare supplemental reports, (4) parties are informed that they have 14 days to review the Hearing Officer’s report and object in writing, and (5) Police Board members may review the Hearing Officer’s report and any written objections. This evidence demonstrates continued compliance with ¶535.

The Police Board maintained Full compliance with ¶535 in the eighth reporting period.

Paragraph 534 Compliance Progress History

<p>FIRST REPORTING PERIOD SEPTEMBER 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: Full</p>	<p>FIFTH REPORTING PERIOD JULY 1, 2021 – DECEMBER 31, 2021 COMPLIANCE PROGRESS: Full</p>	<p>SIXTH REPORTING PERIOD JANUARY 1, 2022 – JUNE 30, 2022 COMPLIANCE PROGRESS: Full</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>	

Accountability and Transparency: ¶536

536. As part of the Police Board proceedings, the parties to the Police Board case (the Superintendent and the involved CPD member) will be given access to the CPD member’s complete disciplinary file and will have the opportunity to move for entry into the record of proceedings any relevant aspect of the CPD member’s disciplinary file, as permitted by law and any applicable collective bargaining agreements.

Compliance Progress

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

Preliminary: *In Compliance* (FOURTH REPORTING PERIOD)
Secondary: *In Compliance* (FOURTH REPORTING PERIOD)
Full: *In Compliance* (FOURTH REPORTING PERIOD)
Sustainment Period Ends *June 30, 2023*

The City and the Police Board maintained Full compliance with ¶536 in the eighth reporting period.

To assess Preliminary compliance, we reviewed the City’s relevant policies and records following the process described in the Consent Decree (¶¶626–41), which outlines applicable consultation, resolution, workout, and public comment periods. To evaluate Secondary compliance, we reviewed, among other things, the City’s training development, implementation, and evaluation. To assess Full compliance, the IMT determined whether the City and Police Board had sufficiently implemented their policies and training.

Progress before the Eighth Reporting Period

The Police Board reached Full compliance with ¶536 in the fourth reporting period. In May 2021, the Police Board provided us with its *Rules of Procedures*. The *Rules of Procedures* ensure that parties in a Police Board case are provided access to the CPD member’s disciplinary files and are able to move to enter relevant aspects of a CPD member’s disciplinary file into the proceeding records.

In the fifth, sixth, and seventh reporting periods, the Police Board provided materials from police disciplinary cases filed with the Board that showed that Police Board members, the Superintendent, and the involved CPD member were given access to the CPD member’s complete disciplinary file. This demonstrated that the Police Board continued to follow its procedures, acting in accordance with ¶536. With this evidence, the Police Board maintained Full compliance with ¶536 in the fifth, sixth, and seventh reporting periods.

Progress in the Eighth Reporting Period

In the eighth reporting period, the Police Board provided the IMT with documentation of three cases for which the complete disciplinary file was made available to the involved CPD member who was the subject of the administrative charges. With this evidence, the Police Board maintained Full compliance with ¶536.

The Police Board maintained Full compliance with ¶536 in the eighth reporting period.

Paragraph 536 Compliance Progress History

FIRST REPORTING PERIOD SEPTEMBER 1, 2019 – AUGUST 31, 2019 COMPLIANCE PROGRESS: Not Applicable	SECOND REPORTING PERIOD SEPTEMBER 1, 2019 – FEBRUARY 29, 2020 COMPLIANCE PROGRESS: Not Applicable	THIRD REPORTING PERIOD MARCH 1, 2020 – DECEMBER 31, 2020 COMPLIANCE PROGRESS: Not Applicable
FOURTH REPORTING PERIOD JANUARY 1, 2021 – JUNE 30, 2021 COMPLIANCE PROGRESS: Full	FIFTH REPORTING PERIOD JULY 1, 2021 – DECEMBER 31, 2021 COMPLIANCE PROGRESS: Full	SIXTH REPORTING PERIOD JANUARY 1, 2022 – JUNE 30, 2022 COMPLIANCE PROGRESS: Full
SEVENTH REPORTING PERIOD JULY 1, 2022 – DECEMBER 31, 2022 COMPLIANCE PROGRESS: Full	EIGHTH REPORTING PERIOD JANUARY 1, 2023 – JUNE 30, 2023 COMPLIANCE PROGRESS: Full	

Accountability and Transparency: ¶537

537. All regular meetings convened by the Police Board that are open to the public will be attended by the CPD Superintendent or his or her designee; the Chief Administrator of COPA or his or her designee; the Deputy PSIG or his or her designee; and the Chief of BIA or his or her designee.

Compliance Progress

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

Preliminary: *In Compliance* (FOURTH REPORTING PERIOD)
Secondary: *In Compliance* (FOURTH REPORTING PERIOD)
Full: *In Compliance* (FOURTH REPORTING PERIOD)
Sustainment Period Ends *June 30, 2023*

Through the efforts of the Police Board, the CPD Superintendent, the COPA Chief Administrator, the Deputy PSIG, and the BIA Chief, the City maintained Full compliance with ¶537 in the eighth reporting period.

To assess Preliminary compliance, we reviewed the City’s relevant policies and records to determine whether information is provided to all entities implicated by ¶537 so that they may attend Police Board public regular meetings. To evaluate Secondary compliance, we reviewed records to show that all entities had sufficient personnel and have allocated sufficient resources to allow compliance with ¶537’s mandate. To evaluate Full compliance, we reviewed data sources to show that all necessary entities attended Police Board meetings that are open to the public as required by ¶537.

Progress before the Eighth Reporting Period

The City reached Full compliance with ¶537 in the fourth reporting period. At that time, the IMT attended public Police Board meetings virtually. Each meeting was attended by the CPD Superintendent or designee, the COPA Chief Administrator or designee, the Deputy PSIG or designee, and the BIA Chief. In fact, in very few meetings were the respective heads not personally in attendance. Based on this, the City reached Full compliance.

In the fourth reporting period, we acknowledged the PSIG for its additional efforts ensuring compliance. The Office of Inspector General *Public Safety Section Policies Manual* includes a policy that ensures attendance of the PSIG at the Police Board meetings.

In the fifth reporting period, the Police Board submitted attendance records from its public meetings that demonstrated that the individuals (or their designees) required to attend these meetings under ¶537 attended all public meetings. With this, the City maintained Full compliance.

In the sixth and seventh reporting periods, the Police Board again submitted attendance records and meeting minutes from its public meetings that demonstrated that the individuals (or their designees) required to attend these meetings under ¶537 attended all public meetings. With this, the City maintained Full compliance with ¶537 in the sixth and seventh reporting periods.

Progress in the Eighth Reporting Period

In the eighth reporting period, the City provided a memorandum demonstrating, through Police Board meeting minutes (which include information about meeting attendees and relevant documents), that the required individuals or their designees regularly attended this reporting period’s Police Board meetings. With this, the City maintained Full compliance with ¶537.

The City maintained Full compliance with ¶537 in the eighth reporting period.

Paragraph 537 Compliance Progress History

FIRST REPORTING PERIOD SEPTEMBER 1, 2019 – AUGUST 31, 2019 COMPLIANCE PROGRESS: Not Applicable	SECOND REPORTING PERIOD SEPTEMBER 1, 2019 – FEBRUARY 29, 2020 COMPLIANCE PROGRESS: Not Applicable	THIRD REPORTING PERIOD MARCH 1, 2020 – DECEMBER 31, 2020 COMPLIANCE PROGRESS: Not Applicable
FOURTH REPORTING PERIOD JANUARY 1, 2021 – JUNE 30, 2021 COMPLIANCE PROGRESS: Full	FIFTH REPORTING PERIOD JULY 1, 2021 – DECEMBER 31, 2021 COMPLIANCE PROGRESS: Full	SIXTH REPORTING PERIOD JANUARY 1, 2022 – JUNE 30, 2022 COMPLIANCE PROGRESS: Full
SEVENTH REPORTING PERIOD JULY 1, 2022 – DECEMBER 31, 2022 COMPLIANCE PROGRESS: Full	EIGHTH REPORTING PERIOD JANUARY 1, 2023 – JUNE 30, 2023 COMPLIANCE PROGRESS: Full	

Accountability and Transparency: ¶538

538. *Within 90 days of the Effective Date, the City will create a policy for collecting, documenting, classifying, tracking, and responding to community input received during the Police Board’s regular community meetings. The policy will outline the methods for: (a) directing community input to the appropriate responding entity, agency, or office; and (b) documenting and making public, all responses to community input.*

Compliance Progress

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

Preliminary: *In Compliance (FIRST REPORTING PERIOD)*
Secondary: *In Compliance (FOURTH REPORTING PERIOD)*
Full: *In Compliance (FOURTH REPORTING PERIOD)*
Sustainment Period Ends *June 30, 2023*

The City and the Police Board maintained Full compliance with ¶538 in the eighth reporting period.

To assess Preliminary compliance, we reviewed the City’s relevant policies and records following the process described in the Consent Decree (¶¶626–41), which outlines applicable consultation, resolution, workout, and public comment periods. To evaluate Secondary compliance, we reviewed, among other things, the City’s training development, implementation, and evaluation. To assess Full compliance, the IMT determined whether the City and Police Board had sufficiently implemented their policies and training.

Progress before the Eighth Reporting Period

In previous reporting periods, we found the Police Board in Full compliance with ¶538. The Police Board’s adopted *Policy Regarding the Attendance of and Participation by the Public at Board Meetings* (Participation Policy) and *Response Policy*, which work together to create a framework that addresses the requirements of ¶538. The *Participation Policy* governs requirements for speakers who require some immediate action on the part of the CPD, COPA, or the Police Board, and the *Response Policy* directs the expectations of response from the CPD, COPA, or the Police Board. In addition to attending meetings where we saw the CPD, COPA, and Police Board representatives assume responsibility for concerns or issues raised, we also reviewed materials showing responses or actions resulting from these meetings (which is normally posted on the Police Board’s website in accordance with the Response Policy). With these efforts, the Police Board reached Full compliance.

The City maintained Full compliance with ¶538 in the fifth, sixth, and seventh reporting periods by providing a variety of materials, including but not limited to video and transcripts of Police Board meetings and community input reports. These reports tracked community input and responses from each agency. These records showed that complaints and issues raised during meetings are followed up on in accordance with ¶538 and the policies created by the Police Board related to ¶538’s requirements. Complaints and issues identified during each meeting are assigned to one of the four agencies for action and follow-up, and each issue is documented and made public on the Police Board website.

Progress in the Eighth Reporting Period

This reporting period, the City provided the IMT with the Police Board’s Community Input Policy and transcripts and videos of Police Board meetings. The City also provided the IMT with community input reports, which track community input and responses from each agency. During each Police Board meeting, the Police Board addresses the IMT’s observations regarding any complaints and issues from the community input reports. Those complaints and issues are identified during each Police Board meetings and then are assigned to one of the four agencies for action and follow-up. Each issue is documented and made public on the Police Board website.

With this, the City maintained Full compliance with ¶538 in the eighth reporting period.

Paragraph 538 Compliance Progress History

<p>FIRST REPORTING PERIOD SEPTEMBER 1, 2019 – AUGUST 31, 2019 COMPLIANCE PROGRESS: Preliminary</p>	<p>SECOND REPORTING PERIOD SEPTEMBER 1, 2019 – FEBRUARY 29, 2020 COMPLIANCE PROGRESS: Preliminary</p>	<p>THIRD REPORTING PERIOD MARCH 1, 2020 – DECEMBER 31, 2020 COMPLIANCE PROGRESS: Preliminary</p>
<p>FOURTH REPORTING PERIOD JANUARY 1, 2021 – JUNE 30, 2021 COMPLIANCE PROGRESS: Full</p>	<p>FIFTH REPORTING PERIOD JULY 1, 2021 – DECEMBER 31, 2021 COMPLIANCE PROGRESS: Full</p>	<p>SIXTH REPORTING PERIOD JANUARY 1, 2022 – JUNE 30, 2022 COMPLIANCE PROGRESS: Full</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>	

Accountability and Transparency: ¶539

539. The Police Board will make best efforts to streamline discovery efforts in all pending proceedings.

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

Preliminary: *In Compliance* (FOURTH REPORTING PERIOD)

Secondary: *In Compliance* (FOURTH REPORTING PERIOD)

Full: *In Compliance* (FOURTH REPORTING PERIOD)

Sustainment Period Ends *June 30, 2023*

The City and the Police Board maintained Full compliance with ¶539 in the eighth reporting period.

To assess Preliminary compliance, we reviewed the City’s relevant policies and records following the process described in the Consent Decree (¶¶626–41), which outlines applicable consultation, resolution, workout, and public comment periods. To evaluate Secondary compliance, we reviewed, among other things, the City’s training development, implementation, and evaluation. To assess Full compliance, the IMT determined whether the City and Police Board had sufficiently implemented their policies and training using “best efforts” as defined by ¶729.

Progress before the Eighth Reporting Period

In the fourth reporting period, the Police Board reached Full compliance by producing to the IMT the *Police Board Rules of Procedure*. Section II.A of the Police Board Rules of Procedures addresses ¶539 and includes additional information to further explain the process.

In the fifth reporting period, the Police Board maintained Full compliance by providing materials from three Police Board Hearings that demonstrated a streamlined discovery process. In addition, the Police Board provided a letter summarizing its efforts to streamline the discovery process. The letter indicated that the process had been changed to allow the Complaint Register file to be produced at the time of the initial status hearing or within a few days after. This had resulted in the accused officer’s attorney receiving discovery materials about 30 days sooner than they would have under the previous process. This change allowed the parties to prepare for and schedule the discipline hearing more quickly.

In the sixth reporting period, the Police Board maintained Full compliance by providing materials from two Police Board Hearings that demonstrated a streamlined discovery process. In addition, the Police Board provided a letter summarizing its efforts to streamline the discovery process, which reiterated its efforts taken during the fifth reporting period. In the seventh reporting period, the Police Board

provided documentation that continued to demonstrate a streamlined discovery process, and therefore, again maintained Full compliance with ¶539.

Progress in the Eighth Reporting Period

This reporting period, the Police Board provided documentation of three Police Board cases that evidences a streamlined discovery process in Police Board Cases.

With this, the Police Board maintained Full compliance with ¶539 in the eighth reporting period.

Paragraph 539 Compliance Progress History

FIRST REPORTING PERIOD SEPTEMBER 1, 2019 – AUGUST 31, 2019 COMPLIANCE PROGRESS: Not Applicable	SECOND REPORTING PERIOD SEPTEMBER 1, 2019 – FEBRUARY 29, 2020 COMPLIANCE PROGRESS: Not Applicable	THIRD REPORTING PERIOD MARCH 1, 2020 – DECEMBER 31, 2020 COMPLIANCE PROGRESS: Not Applicable
FOURTH REPORTING PERIOD JANUARY 1, 2021 – JUNE 30, 2021 COMPLIANCE PROGRESS: Full	FIFTH REPORTING PERIOD JULY 1, 2021 – DECEMBER 31, 2021 COMPLIANCE PROGRESS: Full	SIXTH REPORTING PERIOD JANUARY 1, 2022 – JUNE 30, 2022 COMPLIANCE PROGRESS: Full
SEVENTH REPORTING PERIOD JULY 1, 2022 – DECEMBER 31, 2022 COMPLIANCE PROGRESS: Full	EIGHTH REPORTING PERIOD JANUARY 1, 2023 – JUNE 30, 2023 COMPLIANCE PROGRESS: Full	

Accountability and Transparency: ¶1540

540. *Within 180 days of the Effective Date, Police Board members and hearing officers will receive initial and annual training that is adequate in quality, quantity, scope, and type and will cover, at minimum, the following topics: a. constitutional and other relevant law on police-community encounters, including law on the use of force and stops, searches, and arrests; b. police tactics; c. investigations of police conduct; d. impartial policing; e. policing individuals in crisis; f. CPD policies, procedures, and disciplinary rules; g. procedural justice; and h. community outreach.*

Compliance Progress

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

Recurring Schedule: Annually **Not Yet Applicable**

Preliminary: *In Compliance (FIFTH REPORTING PERIOD)*

Secondary: *Not in Compliance*

Full: *Not Yet Assessed*

The City and the Police Board maintained Preliminary compliance with ¶1540 in the eighth reporting period.

To evaluate Preliminary compliance with ¶1540, the IMT reviewed training materials to determine if trainings were developed to sufficiently address requirements listed in ¶1540. To evaluate Secondary compliance, we reviewed, among other things, the Police Board’s training development, implementation, and evaluation.

Progress before the Eighth Reporting Period

In previous reporting periods, the Police Board worked with a local law firm that agreed to provide training development to the Police Board at no cost. We commended the Police Board’s decision to seek outside assistance in developing appropriate training because the Police Board does not have staff to help develop and deliver training. The Police Board provided training regarding Police Boards in other major U.S. cities and the Consent Decree. We noted that neither of these trainings covered the requirements of ¶1540, but we recognized that these trainings were valuable.

At the end of the fourth reporting period, the Police Board produced a “training agenda” that detailed the training the Police Board hoped to accomplish. We reviewed the Police Board’s training agenda in the fifth reporting period. These proposed trainings outlined all substantive topics of training required by ¶1540. With this, the Police Board reached Preliminary compliance in the fifth reporting period.

During the fifth reporting period, Police Board members and hearing officers attended a one-hour block of training regarding responding to calls with a mental health component. This training was presented by NAMI Chicago and related to the requirements set out in ¶540(e). The Police Board also submitted training materials for its training *Policing First Amendment Activity*. We submitted a no-objection notice to this training.¹ The Police Board also provided other trainings beyond those required by ¶540.

We explained in the fifth reporting period that to reach Secondary compliance the Police Board would need to provide training materials and ultimately provide trainings that touched on all listed training topics for ¶540.

During the sixth reporting period, Police Board members and hearing officers attended the training *Policing First Amendment Activity*, which speaks to subsection ¶540(a)—though it does not completely satisfy ¶540(a). The IMT observed this training and found the training to be excellent in terms of its material, its instruction, and its presentation. The training was presented by attorneys from a local law firm, with each attorney providing instruction in specific areas of expertise and was both engaging and effective. The training concluded with a question-and-answer session, and the instructors were able to answer questions and provide additional context. With this, the City and the Police Board maintained Preliminary compliance with ¶540 in the sixth reporting period.

In the seventh reporting period, the City and the Police Board provided the Police Board’s *Fourth Amendment Training* for review, which was comprehensive, presented in a logical and clear manner, and incorporated scenarios designed to promote discussion and participant engagement. The training materials covered topics that address the requirements of ¶540(a) (“constitutional and other relevant law on police-community encounters, including law on the use of force and stops, searches, and arrests”), ¶540(b) (“police tactics”), ¶540(e) (“policing individuals in crisis”), and ¶540(f) (“CPD policies, procedures, and disciplinary rules”). The Police Board also provided documentation demonstrating that 100% of the current Police Board members and hearing officers attended the training in-person or as a virtual recording. We explained that, to reach Secondary compliance, the Police

¹ Under the Consent Decree policy review process, the City and the CPD consult with the IMT and the OAG to develop or revise policies in accordance with Consent Decree requirements. See ¶¶626–37. The City and the CPD provide the policy for review at least 30 days before the policy is scheduled to go into effect, and the IMT and the OAG have 30 days to comment on the policy. See ¶¶627–28. The City, the CPD, the IMT, and the OAG then work together to resolve comments. The IMT and the OAG will, separately and in writing, notify the City and the CPD that they no longer have any comments, which is referred to as a “no-objection notice.” Once the City and the CPD receive a no-objection notice from both the IMT and the OAG, the City and the CPD will begin the process of finalizing the policy. Typically, this includes the CPD posting the policy on its website for public comment for at least 15 days. The City and the CPD must then consider those comments and make additional changes, as appropriate. See ¶633.

Board would need to develop and provide training materials (and ultimately provide trainings) that also incorporate the topics in ¶¶540(c), (d), (g), and (h).

Progress in the Eighth Reporting Period

This reporting period, the Police Board provided slide decks for a Community Policing training that would be delivered by CPD personnel. The slide deck appears to be comprehensive, but the IMT was not provided with an accompanying lesson plan to understand the instruction that would accompany the slides. Further, it is not clear why a civilian member of the CPD would provide the training to the Police Board rather than a sworn CPD officer or commander. Finally, the Police Board did not indicate which portion(s) of ¶540 it believed the training would cover.

The Police Board also provided the IMT with a letter explaining that the Police Board and its hearing officers had not received any training during this reporting period, but that the Police Board intends to train its members and hearing officers on the previously mentioned Community Policing training during the next reporting period.

With this, the Police Board maintained Preliminary compliance. Moving forward, the IMT will look for the Police Board to provide training materials on the topics outlined in ¶540(c) (“investigations of police conduct”), ¶540(d) (“impartial policing”), ¶540(g) (“procedural justice”), and ¶540(h) (“community outreach”).

Paragraph 540 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: None	THIRD REPORTING PERIOD MARCH 1, 2020 – DECEMBER 31, 2020 COMPLIANCE PROGRESS: None
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: Preliminary	

Accountability and Transparency: ¶541

541. The trainings [referenced in ¶540] will be provided by sources both inside and outside of CPD, as needed, to provide high quality training on investigative techniques, and CPD policies, procedures, and disciplinary rules.

Compliance Progress

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

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

The City and Police Board maintained Preliminary compliance with ¶541 in the eighth reporting period.

To evaluate Preliminary compliance with ¶541, the IMT reviewed the Police Board’s policies following the policy process described in the Consent Decree (¶¶626–41). Paragraph 626, for example, requires policies to be “plainly written, logically organized, and use clearly defined terms.” To evaluate Secondary compliance, we reviewed, among other things, the City’s training development, implementation, and evaluation.

Progress before the Eighth Reporting Period

In previous reporting periods, the Police Board worked with a local law firm that agreed to provide training development to the Police Board at no cost. We commended the Police Board’s decision to seek outside assistance in developing appropriate training. The Police Board also provided training regarding Police Boards in other major U.S. cities and training regarding the Consent Decree. We noted that neither of these trainings covered the requirements of ¶540 and ¶541 but recognized that these trainings were valuable.

At the end of the fourth reporting period, the Police Board produced a training agenda that detailed the training the Police Board hoped to accomplish. In the fifth reporting period, the Police Board provided members and hearing officers a one-hour training regarding responding to calls with a mental health component. This training was presented by NAMI Chicago and addressed the requirements of ¶540(e). The Police Board also provided trainings beyond that required in ¶540 and ¶541, such as *Reflecting on the Holocaust: Defining Moments for Police*. Although this and other trainings are beyond those mentioned in ¶540 (and referenced in ¶541), the Police Board leadership believed that providing such blocks of instruction were essential for the work they perform and would provide greater meaning and context to the trainings required by ¶540 and ¶541. Additionally, the Police Board provided some trainings in accordance with its training agenda and

demonstrated its willingness and ability to seek out and engage appropriate individuals to provide its trainings. With this, the Police Board reached Preliminary compliance in the fifth reporting period.

During the sixth reporting period, Police Board members and hearing officers attended the training *Policing First Amendment Activity*. The IMT observed this training and found the training to be excellent in terms of its material, its instruction, and its presentation. The training was presented by attorneys from a local law firm, with each attorney providing instruction in specific areas of expertise and was both engaging and effective. The training concluded with a question-and-answer session, and the instructors were able to answer questions and provide additional context.

Although we noted that this training alone does not fulfill the requirements of ¶541, it further demonstrates the Police Board's commitment to methodically addressing the requirements of ¶540 while not burdening the Police Board and staff with a great number of training blocks. This high quality, meaningful training was developed and delivered at no cost to the City. With this, the City and Police Board maintained Preliminary compliance with ¶541 in the sixth reporting period.

In the seventh reporting period, the City and the Police Board provided the Police Board's *Fourth Amendment Training* for review, which was comprehensive, presented in a logical and clear manner, and incorporated scenarios designed to promote discussion and participant engagement. The Police Board indicated that attorneys who have specific knowledge of regarding Fourth Amendment procedures would deliver the training. The training materials addressed the requirements of ¶541. The Police Board also provided documentation demonstrating that 100% of the current Police Board members and hearing officers attended the training in-person or as a virtual recording. We noted that the partnership between the Police Board and attorneys from a local law firm demonstrated the City's ability to establish and foster relationships with organizations to provide trainings and share expertise, per ¶541's requirement that trainings "will be provided by sources both inside and outside of CPD, as needed, to provide high quality training on investigative techniques, and CPD policies, procedures and disciplinary rules."

Progress in the Eighth Reporting Period

This reporting period, the Police Board provided slide decks for a Community Policing training that would be delivered by CPD personnel. The slide deck appears to be comprehensive, but the IMT was not provided with an accompanying lesson plan to understand the instruction that would accompany the slides. Further, it is not clear why a civilian member of the CPD would provide the training to the Police Board rather than a sworn CPD officer or commander. Finally, ¶541 refers to ¶540, and the Police Board did not indicate which portion(s) of ¶540 it believed the Community Policing training would cover.

The Police Board also provided the IMT with a letter explaining that the Police Board and its hearing officers had not received any training during this reporting period, but that the Police Board intends to train its members and hearing officers on the previously mentioned Community Policing training during the next reporting period.

With this, the City and Police Board maintained Preliminary compliance with ¶541 in the eighth reporting period. Moving forward we will look for the Police Board to provide training materials relating to the topics set out in ¶541.

Paragraph 541 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: 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: Preliminary	

Accountability and Transparency: ¶542

542. Within 90 days of the Effective Date, the City will create a training policy for Police Board members and hearing officers.

Compliance Progress

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

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

The City maintained Preliminary compliance with ¶542 in the eighth reporting period.

To evaluate Preliminary compliance with ¶542, the IMT reviewed the Police Board’s policies following the policy process described in the Consent Decree (¶¶626–41), which details applicable consultation, resolution, workout, and public comment periods. To evaluate Secondary compliance, we reviewed, among other things, the City’s training development, implementation, and evaluation.

Progress before the Eighth Reporting Period

In previous reporting periods, the Police Board worked with a local law firm that agreed to provide training development to the Police Board at no cost. We commended the Police Board’s decision to seek outside assistance in developing appropriate training since the Police Board does not have staff to help develop and deliver training. The Police Board provided training regarding Police Boards in other major U.S. cities and the Consent Decree. At the end of the fourth reporting period, the Police Board produced a training agenda that detailed the training the Police Board hoped to accomplish.

During the fifth reporting period, we reviewed the training agenda the Police Board provided us at the end of the fourth reporting period. We provided feedback regarding the planned and contemplated training blocks. The Police Board provided an updated training agenda in December 2021. This updated draft captured the training blocks the Police Board provided during the fifth reporting period, such as the *Policing Individuals in Crisis*, presented by NAMI Chicago. It demonstrated the trainings the Police Board intended to provide next, *Consideration for Policing of First Amendment Activity*, and other trainings under the Police Board.

We noted in the fifth reporting period that the training blocks of instruction already provided to Police Board members and hearing officers demonstrated adherence to this training plan. With this detailed training agenda that the Police Board had adhered to, the Police Board reached Preliminary compliance in the fifth reporting period.

The Police Board did not provide additional materials related to ¶542 in the sixth reporting period but maintained Preliminary compliance by continuing to develop its training materials. We explained that, moving forward, we would look for the Police Board to continue to adhere to and update its training agenda. We also explained that, for Full compliance, the Police Board will need to provide evidence that it has created a system to ensure continued training will be provided in the years to come.

The Police Board did not provide additional materials related to ¶542 in the seventh reporting period but maintained Preliminary compliance by continuing to develop its training materials.

Progress in the Eighth Reporting Period

The Police Board provided the IMT with a letter explaining that the Police Board and its Hearing Officers had not received any training during this reporting period, but that the Police Board intends to train its members and hearing officers on Community Policing during the next reporting period. The Police Board maintained Preliminary compliance by continuing to develop its training materials.

With this, the City maintained Preliminary compliance with ¶542 in the eighth reporting period. Moving forward, we will look for the Police Board to continue to adhere to and update its training agenda. For Full compliance, the Police Board will need to provide evidence that it has created a system to ensure continued training will be provided in the years to come.

Paragraph 542 Compliance Progress History

<p>FIRST REPORTING PERIOD SEPTEMBER 1, 2019 – AUGUST 31, 2019 COMPLIANCE PROGRESS: None</p>	<p>SECOND REPORTING PERIOD SEPTEMBER 1, 2019 – FEBRUARY 29, 2020 COMPLIANCE PROGRESS: None</p>	<p>THIRD REPORTING PERIOD MARCH 1, 2020 – DECEMBER 31, 2020 COMPLIANCE PROGRESS: None</p>
<p>FOURTH REPORTING PERIOD JANUARY 1, 2021 – JUNE 30, 2021 COMPLIANCE PROGRESS: Under Assessment</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>	

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: January 1, 2023, through June 30, 2023)

Preliminary:	<i>In Compliance (SIXTH REPORTING PERIOD)</i>
Secondary:	<i>In Compliance (SIXTH REPORTING PERIOD)</i>
Full:	<i>In Compliance (SEVENTH REPORTING PERIOD)</i>
Sustainment Period Ends	<i>December 31, 2024</i>

The City maintained Full compliance with ¶543 in the eighth reporting period.

The fifth reporting period marked the first time the IMT assessed compliance with ¶543. During that reporting period, the Police Board raised that this paragraph could inadvertently be in tension with the municipal code. By the end of the fifth reporting period, the Parties remained in discussions regarding the objectives and intentions of ¶543. Therefore, compliance with ¶543 remained under assessment prior the seventh reporting period.

To evaluate Preliminary compliance in the sixth reporting period, the IMT considered whether the Police Board's proposed rule changes conflicted with the Consent Decree. To evaluate Secondary compliance, the IMT reviewed the Police Board's policies following the policy process described in the Consent Decree (¶¶626–41), which details applicable consultation, resolution, workout, and public comment periods. To evaluate Full compliance, the IMT considered whether the City and the Office of the Attorney General (OAG) reached an agreement that solidifies the requirements of this paragraph for the life of the Consent Decree.

Progress before the Eighth Reporting Period

During the sixth reporting period, the City and the CPD provided a draft *Policy on Adopting Chicago Police Department Rules and Regulations* for review with ¶543. The IMT submitted a no-objection notice on May 10, 2022.² On June 2, 2022, the

² Under the Consent Decree policy review process, the City and the CPD consult with the IMT and the OAG to develop or revise policies in accordance with Consent Decree requirements. See ¶¶626–37. The City and the CPD provide the policy for review at least 30 days before the policy is scheduled to go into effect, and the IMT and the OAG have 30 days to comment on the policy. See ¶¶627–28. The City, the CPD, the IMT, and the OAG then work together to resolve comments. The IMT and the OAG will, separately and in writing, notify the City and the CPD that they no longer have any comments, which is referred to as a “no-objection notice.” Once the City and the CPD receive a no-objection notice from both the IMT and the OAG, the City and the CPD will begin the process of finalizing the policy. Typically, this includes the CPD

City and Police Board provided a revised draft of the policy. We submitted a second no-objection notice on June 15, 2022, and noted that the policy addresses the Police Board’s authority regarding policy issuance and recommendations, which is relevant to the requirements of ¶543 by creating guidelines and processes for policy recommendations. Still, we recognized that while we appreciated the goals, format, and instruction of the *Policy on Adopting Chicago Police Department Rules and Regulations*, ¶543 is potentially in tension with the Police Board’s authority under the municipal code, which is the subject of the policy, and that the City of Chicago and Office of the Illinois Attorney General would continue to work through this issue. During subsequent discussions between the Parties, the City agreed to revise the *Policy on Adopting Chicago Police Department Rules and Regulations* to provide the OAG and the IMT an opportunity to review and approve proposed rule changes before implementation in order to ensure compliance with ¶543. With these efforts, the City achieved Preliminary and Secondary compliance with this paragraph.

We explained that, to achieve Full compliance, the IMT will look for the City and the OAG to reach an agreement that solidifies the requirements of this paragraph for the life of the Consent Decree. Because the Parties remained in discussions about what such an agreement might look like, Full compliance with ¶543 remained under assessment.

In the seventh reporting period, the City and the OAG reached an agreement solidifying the requirements of ¶543.³ With this, the City reached Full compliance with ¶543.

Progress in the Eighth Reporting Period

This reporting period, the Police Board provided the IMT with a letter stating that it had not taken any action regarding the adoption of new or revised CPD Rules and Regulations during the current monitoring period.

With this update, the Police Board maintained Full compliance with ¶543.

posting the policy on its website for public comment for at least 15 days. The City and the CPD must then consider those comments and make additional changes, as appropriate. See ¶633.

³ See *Stipulation Regarding the Review and Comment Process For the Chicago Police Board’s Adoption and Revision of Rules and Regulations for the Chicago Police Department, Illinois v. Chicago*, Case No. 1:17-cv-06260.

Accountability and Transparency: ¶555

555. On an annual basis, the Police Board will track and publish case-specific and aggregate data about Police Board decisions. Such publications will contain and include, at minimum, the following: a. the date on which the investigating agency (COPA, BIA, district, or OIG) received the complaint or notification for investigation; b. the date of the Police Board hearing over which the hearing officer presided; c. the disciplinary recommendations and/or decisions (where applicable) made by COPA, BIA, the Superintendent, and the Police Board; d. the average time between the filing of disciplinary charges with the Police Board and the first day of hearing; e. the average time between the filing of disciplinary charges with the Police Board and the Police Board’s decision; f. the average time between the date on which the investigating agency (COPA, BIA, district, or OIG) received the complaint for investigation and the Police Board’s decision; g. the date of the alleged misconduct; h. the average time between the date of the alleged misconduct giving rise to the complaint or notification and the Police Board’s decision; and i. whether any Police Board decision has been appealed to any state court and, if so, the court’s final judgment.

Compliance Progress

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

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

Preliminary: *In Compliance* (THIRD REPORTING PERIOD)

Secondary: *In Compliance* (FIFTH REPORTING PERIOD)

Full: *In Compliance* (FIFTH REPORTING PERIOD)

Sustainment Period Ends *December 31, 2023*

The City and Police Board maintained Full compliance with ¶555 in the eighth reporting period.

To evaluate Preliminary compliance with ¶555, the IMT reviewed the Police Board’s policies following the policy process described in the Consent Decree (¶¶626–41) and determined whether the Police Board tracked and annually published case-specific and aggregate data publications to meet the requirements of ¶555. To evaluate Secondary compliance, we considered whether the Police Board has allocated sufficient resources to develop and publish the case specific and aggregate data on an annual basis as required by ¶555. To evaluate Full compliance, we determined whether the Police Board’s annual publications sufficiently captured case specific and aggregate data about Police Board decisions.

Progress before the Eighth Reporting Period

In past reporting periods, we found the Police Board reached Preliminary compliance based on our review of information provided on the Police Board’s website and the Police Board’s Annual Reports for years 2017 through 2019, which is responsive to all subparagraphs of ¶555.

In the fifth reporting period, the Police Board continued to provide complete, up-to-date information in an excel spreadsheet housed on the Police Board website. The discipline spreadsheet indicates the number of cases filed with the Police Board in 2021. The excel sheet contains information responsive to all subparagraphs of ¶555. With this, the Police Board demonstrated that it is able to continuously provide, in a timely manner, the information contemplated by ¶555. This moved the Police Board into Full compliance in the fifth reporting period.

In the sixth reporting period, the Police Board maintained Full compliance and continued to provide complete, up-to-date information in an excel spreadsheet housed on the Police Board website. The discipline spreadsheet indicated the number of cases filed with the Police Board in 2022. The excel sheet contained information responsive to all subparagraphs of ¶555. Additionally, we noted that the Police Board’s website provides comprehensive information on the Police Discipline page, including Police Board decisions, reports, and data on Police Board cases; cases currently before the Police Board; and reviews of COPA and the CPD disagreements on discipline. In addition to this information, the Police Board submitted its *2021 Annual Report* in the sixth reporting period. The report reflected the information provided in the discipline spreadsheet and further provided comprehensive information regarding Police Board activities and disciplinary cases.

In the seventh reporting period, the Police Board maintained Full compliance and continued to provide complete, up-to-date information in an excel spreadsheet housed on the Police Board website. The discipline spreadsheet indicated the number of cases filed with the Police Board in the last six months of 2022. The excel sheet contained information responsive to all subparagraphs of ¶555. Additionally, we noted that the Police Board’s website provides comprehensive information on the Police Discipline page, including Police Board decisions, reports, and data on Police Board cases; cases currently before the Police Board; and reviews of COPA and the CPD disagreements on discipline.

Progress in the Eighth Reporting Period

This reporting period, the Police Board provided the IMT with documentation that they continue to provide complete and up-to-date information regarding Police Board discipline by publishing case-specific and aggregate data on the Police Board website. The discipline spreadsheet shows the disciplinary cases that were filed with the Police Board in the first six months of 2023; this spreadsheet includes

categories that cover each of the subparagraphs of ¶555. The Police Board website also includes information about Police Board decisions, reports and data regarding Police Board cases, cases currently before the Police Board, and reviews of COPA and CPD disagreements on discipline. We also reviewed the Police Board’s *2022 Annual Report*, which was published in March 2023. That *Report* reflects the information provided in the discipline spreadsheet and also contains comprehensive information regarding Police Board activities and disciplinary cases. With this, the Police Board maintained Full compliance with ¶555.

Moving forward, we will look for the Police Board to continue these efforts and provide information to the IMT to maintain compliance with ¶555.

Paragraph 555 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: Full	SIXTH REPORTING PERIOD JANUARY 1, 2022 – JUNE 30, 2022 COMPLIANCE PROGRESS: Full
SEVENTH REPORTING PERIOD JULY 1, 2022 – DECEMBER 31, 2022 COMPLIANCE PROGRESS: Full	EIGHTH REPORTING PERIOD JANUARY 1, 2023 – JUNE 30, 2023 COMPLIANCE PROGRESS: Full	

Accountability and Transparency: ¶565

565. At least quarterly, COPA, the Deputy PSIG, and the President of the Police Board, or his or her designee, will meet to confer and share information regarding trends and analyses of data relating to CPD. They will jointly or separately provide any resulting recommendations for changes in CPD policy or rules, in writing, to the Superintendent. Thereafter: a. the Superintendent will respond to any such recommendation within 60 days of receipt; b. the Superintendent's response will include a description of the actions that the Superintendent has taken or plans to take with respect to the issues raised in the recommendations; and c. all policy recommendations and responses to the same will be published on a City website.

Compliance Progress

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

Recurring Schedule: Quarterly **Met** **Missed**

Preliminary: *In Compliance* (FIRST REPORTING PERIOD)

Secondary: *In Compliance* (SECOND REPORTING PERIOD)

Full: *In Compliance* (FOURTH REPORTING PERIOD)

Sustainment Period Ends *June 30, 2023*

The City maintained Full compliance with ¶565 in the eighth reporting period and completed the two-year Sustainment Period for this paragraph.

To evaluate Preliminary compliance with ¶565, the IMT determined whether the relevant representatives are meeting quarterly. To evaluate Secondary compliance, we determined whether the relevant entities have allocated sufficient resources to ensure that the meetings contemplated by ¶565 continue on a quarterly basis. To evaluate Full compliance, we determined whether the meetings sufficiently include the requisite coordination and whether any recommendations result from the process.

Progress before the Eighth Reporting Period

The City and its entities achieved Full compliance with the requirements of ¶565 during the fourth reporting period. In the third and fourth reporting periods, the COPA Chief, the Deputy Inspector General for Public Safety, and the Police Board President and Vice President met to discuss trends and share information regarding data analysis related to the CPD. We were pleased to learn that these meetings have proven a meaningful opportunity to discuss such issues, as intended by ¶565.

In the fifth reporting period, the Police Board President provided the IMT with documentation regarding the Quarterly meetings held during the first three quarters of 2021. The meeting minutes indicated that the entities met regularly and had substantive discussions regarding each agency's work within and outside of the Consent Decree. We noted that, to date, no joint recommendations had been made to the CPD. This evidence demonstrated continued Full compliance with ¶565.

In the sixth reporting period, the Police Board President provided the IMT with documentation regarding the Quarterly meetings held during the fourth quarter of 2021. The Police Board provided minutes of the March 2022 meeting of the Police Board, COPA, and Deputy PSIG Quarterly meeting. Representatives from each were documented as attending the meeting, and relevant topics appear to have been discussed in a meaningful way. The minutes indicated that COPA, the Deputy PSIG and the Police Board continued meeting on a regular basis and had substantive discussions regarding each agency's work within and beyond the scope of the Consent Decree. At this point in the sixth reporting period, no joint recommendations had been made to the CPD Superintendent.

In the seventh reporting period, the Police Board President provided the IMT with documentation and minutes from the quarterly meetings held during 2022. The minutes, which are recorded and approved at the following meeting, indicate that COPA, the Deputy PSIG and the Police Board continued meeting on a regular basis and had substantive discussions regarding each agency's work within and beyond the scope of the Consent Decree. At this point in the seventh reporting period, no joint recommendations have been made to the CPD Superintendent. With this, the City maintained Full compliance with ¶565.

Progress in the Eighth Reporting Period

This reporting period, the Police Board provided the IMT with documentation from the Police Board President and minutes of the Police Board's quarterly meetings from December 6, 2022, to March 3, 2023. These meeting minutes show that COPA, the Deputy PSIG, the Police Board, and now the Community Commission for Public Safety and Accountability (CCPSA) executive continue to meet on a regular basis and have substantive discussions about their agencies' work, both within and beyond the scope of the Consent Decree. Meeting minutes are taken at each meeting and approved at the following meeting. The agencies have not yet made any joint recommendations to the CPD Superintendent.

The City maintained Full compliance with ¶565 in the eighth reporting period and completed the two-year Sustainment Period for this paragraph.

Paragraph 565 Compliance Progress History

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

COMPLIANCE PROGRESS:
Preliminary

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

COMPLIANCE PROGRESS:
Secondary

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

COMPLIANCE PROGRESS:
Secondary

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

COMPLIANCE PROGRESS:
Full

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

COMPLIANCE PROGRESS:
Full

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

COMPLIANCE PROGRESS:
Full

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

COMPLIANCE PROGRESS:
Full

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

COMPLIANCE PROGRESS:
Full