January 7, 2020

VIA ELECTRONIC MAIL
Mr. Joseph M. Ferguson
Inspector General
City of Chicago Office of Inspector General
740 N. Sedgwick, Suite 200
Chicago, Illinois 60654
jferguson@igchicago.org

Re: *CPD's Response to OIG Advisory Concerning Predictive Risk Models*

Dear Inspector General Ferguson:

Please see below the Chicago Police Department's ("CPD") response to the City of Chicago Office of Inspector General's ("OIG") *Advisory Concerning Chicago Police Department's Predictive Risk Models.*

In order to continue to improve and refine its violence reduction strategies, the Chicago Police Department regularly participates in collaborative efforts with researchers and academic partners who are working towards innovation in crime and policing. CPD's participation in predictive risk modeling for gun violence, which became known as the Strategic Subject List ("SSL") and eventually the Crime Victimization Risk Model ("CVRM"), is an example of such collaboration. Predictive risk modeling for both community and individual crime patterns and victimization continues to be a top issue among academic and research institutions, and CPD will continue to stay informed on potential opportunities to enhance its crime prevention and response strategies to better inform its distribution and deployment of finite law enforcement resources. Following formal evaluation from its research partners and substantial internal review, at this time CPD has committed to completely decommission its SSL and CVRM programs and policies.

At its inception, CPD's predictive risk modeling pilot program began under a Department of Justice National Institute of Justice grant. CPD worked in collaboration with the Illinois Institute of Technology and RAND Corporation in order to meet the grant requirements and implement the program. Federal authority for the grant later shifted to the DOJ's Bureau of Justice Assistance, where CPD and its partners worked closely on development of a predictive risk model with BJA's law enforcement subject matter experts and researchers. CPD was fully aware that it was engaging in experimental research under these grant cycles, and that a formal project evaluation was necessary to determine whether the predictive risk tool was actually effective in predicting an individual's risk to be involved in gun violence as either a perpetrator or victim, and whether the information could be reliably used to reduce that risk.

Throughout this time, the risk model's accuracy and efficacy continued to be evaluated and revised. CPD adopted the SSL/CVRM score primarily as a factor for consideration as part of its focused deterrence efforts, where CPD leadership, outreach workers, and law enforcement partners engaged in "custom

notifications" and "call-ins" for individuals at high risk of gun violence victimization. Even as CPD worked with its research partners through six variations to refine the risk model's criteria, the RAND Corporation's evaluation determined that the SSL did not effectively predict an individual's propensity for gun violence criminality or victimization. In its most recent assessment, RAND determined that the CVRM risk modeling was not operationally effective to assist CPD's crime prevention strategies. What's more, as CPD and researchers continued to pare down the criteria used in the risk algorithm to improve results, the latest CVRM risk score was based primarily upon the individual's prior involvement in incidents of violence and gun-related offenses. Officers regularly analyze these factors every time they look at a person's prior police contacts and criminal history records. Following internal discussion on the actual utility of the algorithm in CPD's overall anti-violence strategy, the Department finally decided to discontinue use of the CVRM.

CPD has already initiated the process of identifying policies and directives in order to remove the SSL and CVRM from its documentation and protocols, and will provide appropriate notice to Department members as those orders are revised. A formal communication from the Superintendent to disband the CVRM was sent to CPD's bureau chiefs on 30 October 2019. CPD has also discontinued access to SSL and CVRM dashboards. Moving forward, SSL and CVRM risk scores have been removed from any previous reports or communications that included the scores. In order to comply with discovery laws and its current preservation order, CPD cannot alter, delete, or destroy historical criminal records or investigative materials that may contain SSL or CVRM scores.

Despite many lessons learned in the SSL and CVRM programs, CPD remains open to collaborative research to improve its practices, particularly where such collaboration can further the Department's primary objective – to protect Chicagoans from senseless shootings and homicides. If a validated predictive gun violence risk model is revisited in the future, CPD concurs with the OIG that the Department must execute the policy with a clear purpose on the risk model's utility and function for supervisors and officers working in the field. As such, CPD will continue to examine opportunities to improve public trust in its police officers by partnering with organizations that help prevent violent crime and guide high risk individuals to access needed services.

Thank you for your communication on this matter. Please reach out to the Office of Legal Affairs with any additional questions.

Sincerely,

Dana O'Malley
General Counsel
Office of the Superintendent
Chicago Police Department