I. VISION STATEMENT

The Public Safety section of the Office of the Inspector General (OIG) will work toward transforming the critical relationship between the Chicago Police Department (CPD) and the communities it serves, by promoting constitutional, community-based policing and a transparent, accessible, and fair oversight and disciplinary system. An effective, transparent, and accountable police department and police oversight system is critical to all Chicagoans, including all members of CPD. The Deputy Inspector General for Public Safety (PSIG) is committed to bringing about strategic improvements to the operations of CPD, the Civilian Office of Police Accountability, and the Police Board. Based on robust community and agency engagement, as well as a focus on the appropriate use of data and technology, the Public Safety section will identify long-term, systemic reform opportunities, thereby improving the fairness and effectiveness with which public safety services are delivered and the safety of all of the City’s neighborhoods.

II. STRATEGIC PRIORITIES STATEMENT

OIG is an independent, nonpartisan oversight agency whose mission is to promote economy, efficiency, effectiveness, and integrity in the administration of programs and operation of City government.

The Public Safety section supports OIG’s mission by conducting independent, objective evaluations and reviews of CPD, the Civilian Office of Police Accountability (COPA), and the Police Board (PB). The section additionally conducts inspections of closed disciplinary investigations conducted by COPA and CPD’s Bureau of Internal Affairs.

The Public Safety section’s distinctive value within the City of Chicago’s public safety oversight system derives from its long-term, systemic perspective on necessary reforms, direct access to and utilization of City data systems, deep institutional knowledge of City operations, and position of independence from all other components of City government. In setting its priorities, the section will coordinate and confer with the Independent Monitoring Team charged with ensuring compliance with the Consent Decree entered in Illinois vs. Chicago.

Informed by coordination with stakeholders, an ongoing survey of CPD members and members of the public, and long-standing institutional knowledge of the core public safety challenges in Chicago, the Public Safety section adopts the following strategic priorities to guide its work:
1. Improving CPD’s operational competence to render it more effective in the performance of its critical public safety functions and more efficient in its administration.
   ○ The section’s areas of focus here may include: CPD’s management of data; management and production of records; clear transmission of and training on policies; timeliness and transparency in external communications; individual and unit-level performance evaluation; and other mission-critical operational tasks.

2. Ensuring transparency, diligence, fairness, consistency, and timeliness in the police discipline and accountability system for both the public and CPD members alike.
   ○ The section’s areas of focus here may include: use-of-force reporting; tracking complaint investigations and dispositions from initiation to resolution; enforcement of Rules 14, 21 and 22; COPA and Police Board policies and practices; the mediation process; and CPD’s handling of Equal Employment Opportunity complaints.

3. Ensuring that Chicagoans’ constitutional and civil rights are sufficiently and equitably protected in all aspects of public safety operations.
   ○ The section’s areas of focus here may include: disparities in use-of-force patterns and trends; execution of warrants; investigative stops and searches; immigration-related enforcement; civil asset forfeiture; arrests of CPS students; and response times on calls for service.

Public Safety section projects are chosen for their distinctive value-add within Chicago’s public safety oversight system and for their potential to drive lasting, systemic improvements in one or more of the strategic priority areas listed above.

III. 2020 POTENTIAL NEW PROJECTS

The following projects are under consideration for launch or publication in 2020. The potential projects are listed below in three categories corresponding to the strategic priorities listed above: (A) CPD operational competence; (B) discipline and accountability; and (C) constitutional policing. The list of projects below is intended to serve as a guiding document and is subject to change; it does not prohibit the Public Safety section from initiating other projects over the course of the year. Circumstances that arise during the year may prompt the Public Safety section to undertake new, higher priority projects, reduce the priority of a planned project or terminate a project if OIG determines that further work will not bring substantial benefit to the City. Some topics listed below may be deferred to following years.
A. CPD’S OPERATIONAL COMPETENCIES

1. EVALUATION OF CPD’S POLICY DEVELOPMENT & IMPLEMENTATION PROCESS

**Potential Objectives:**
- Do CPD’s Research and Development Division, Education and Training Division, Bureau of Patrol, Office of Reform Management, and Office of Strategy collaborate effectively to ensure policies are developed with the necessary input of all relevant stakeholders?
- Are changes in policy effectively communicated to all relevant parties within the Department?
- Does CPD ensure timely training when new policies become effective?

**Rationale:** Evaluating CPD processes for developing and implementing policy will potentially have a significant impact on the quality of CPD’s policies and its adherence to them. Moreover, the Consent Decree requires many new and amended policies. Evaluating CPD’s policy development and implementation processes can help ensure that policy changes related to the Consent Decree are effective and well implemented.

2. COMPSTAT EFFECTIVENESS

**Potential Objectives:**
- Is CPD’s CompStat operation an effective organizational and management accountability tool for district-level performance?
- Do CompStat performance reviews inform Districts-level changes?
- Do CPD’s performance metrics meet national best practice standards?

**Rationale:** CompStat represents one of the most direct means for command staff to shape district-level priorities and operations. It also serves as a mechanism for commanders and staff to identify operational inefficiencies and develop appropriate solutions. Ensuring that CompStat evaluates meaningful metrics and that district enforcement strategies are appropriately adjusted can improve neighborhood security and increase police legitimacy.
3. PROMOTION AND MERIT SELECTION PROCESSES

**Potential Objectives:**
- Were the qualities assessed by command staff when making merit-based promotion nominations consistent with national best practice research regarding performance prediction at each rank?
- Were command staff relying on all appropriate sources of information to assess candidate quality when making merit-based promotion nominations?
- Did the merit based promotional process increase diversity across Department ranks?
- How does the promotional test process and the merit promotional

**Rationale:** Improving the promotion and merit selection process has the potential to strengthen member trust in CPD administration and reform efforts, align member incentives with broad Departmental goals, and cultivate and deploy high potential talent more effectively. The U.S. Department of Justice investigation noted the “lack of transparency” surrounding the process of nominating and qualifying for merit promotions was one of the major complaints of CPD members. In response to the Public Safety section’s member survey, members selected “fairness in the promotion process” as the top management issue in need of improvement. Although the merit selection process is suspended, an evaluation of this process could increase transparency and inform future incarnations.

4. CPD’S RESPONSE TIMES TO 911 CALLS

**Potential Objectives:**
- What factors are associated with longer response times (e.g. demographic group, neighborhood, etc.)?
- What causes longer response times?
- Under what circumstances would a CPD member respond to a call outside of their district?

**Rationale:** A call for service is the most frequent type of citizen contact with the public safety system and often the first point of contact. Inequity and disparate impact here are foundational to inequity in provision of public safety overall. In the Public Safety survey, CPD and community members both identified “not enough police on the street” as a significant concern. CPD members cited it as the top challenge affecting their day-to-day performance. A review of district-level response times will contribute to CPD’s ability to ensure members are deployed and dispatched in an optimal manner.
B. DISCIPLINE AND ACCOUNTABILITY

1. USE OF FORCE EQUITY IMPACT

**Potential Objectives:**
- Are there disparities in use of force by CPD (both in application and intensity) based on the demographic of the CPD member or individual?

**Rationale:**
Inequitable use-of-force by CPD members is a major concern as demonstrated by ongoing media coverage and OIG’s Public Safety survey. This review will provide the public with the data analysis necessary to better understand any disparities which may exist.

2. DISCIPLINE PROCESS

This is an ongoing, multi-phase project.

**Potential Objectives:**
- What is the complaint disposition and disciplinary processes?
- What is the breakdown of complaints received and disposition by type?
- Are investigations completed in a timely fashion?
- What is the disparity between the recommended discipline and the actual discipline served?

**Rationale:**
A transparent and credible police disciplinary process is a fundamental component of building trust between police and the public. While aspects of this review are required by the Consent Decree, “accountability for misconduct” was also cited as the top priority of community respondents to the Public Safety survey.

3. FALSE REPORTS BY CPD MEMBERS

CPD’s Rules of Conduct prohibit “making a false report, written or oral” in Rule 14.

**Potential Objectives:**
- How often do COPA and BIA include Rule 14 violations in misconduct investigations?
- How do COPA and BIA discern when to apply, sustain, and exonerate Rule 14 violations?

**Rationale:**
Enforcement of Rule 14 can decrease abuse of power and create a more equitable consideration of testimony between CPD member and complainant in misconduct investigations. In the past, OIG has contributed to this area through its investigation of CPD’s handling of the aftermath of the Laquan McDonald shooting and through the development of an Anonymous Tip Line. OIG’s analysis of CPD’s enforcement of Rule 14, is also required by the Consent Decree.
4. INVESTIGATIONS OF CPD MEMBERS’ FAILURE TO REPORT MISCONDUCT

CPD’s Rules of Conduct require CPD members to report violations of Department policy and unlawful conduct in Rules 21 and 22.

**Potential Objectives:**
- How often do COPA and BIA include Rule 21 and 22 violations in misconduct investigations?
- How do COPA and BIA discern when to apply, sustain, and exonerate Rule 21 and 22 violations?
- Are CPD members aware of misconduct that they are not reporting?

**Rationale:** Enforcement of these rules have the potential to directly impact the so-called “Code of Silence.” In the past, OIG has contributed to this area through its investigation of CPD’s handling of the aftermath of the Laquan McDonald shooting and through the development of an Anonymous Tip Line. OIG’s analysis of CPD’s enforcement of Rules 21 and 22 are also required by Consent Decree.

5. COPA INVESTIGATIONS ADMINISTRATIVELY TERMINATED

**Potential Objectives:**
- How is COPA applying the “Administrative Termination” status, as distinguished from other dispositions?
- Is the use of “Administrative Termination” as a disposition status supported by COPA’s policies?
- Under what circumstances is COPA applying the “Administrative Termination” status?

**Rationale:** OIG’s review of closed investigations has resulted in the identification of a cohort of cases which COPA “administratively terminated.” This closing status is not defined in COPA’s internal policies and the practice has important implications for investigative quality and supervisory review. This review is also responsive to OIG’s obligations under Paragraph 558(d) of the Consent Decree.

6. POLICE BOARD HEARING PROCESS IMPROVEMENTS

**Potential Objectives:**
- Are Police Board hearings identified, selected, and conducted according to national best practices? Are the rules of evidence appropriate and consistently followed? Are there ways to make the process leading up to the hearing more efficient and timely, while still respecting the due process rights of CPD members?
- Do Police Board members have access to appropriate resources when making hearing determinations?
**Rationale:** As the adjudicatory body for the most serious police misconduct cases, it is important that both CPD members and members of the public understand what happens at a Police Board hearing and have confidence in the integrity of the process. The OIG ordinance requires regular evaluation of Police Board operations.

7. **Complaint-Involved Mediation Process**

**Potential Objectives:**
- Is the mediation process used appropriately?
- Are participants satisfied with process and outcomes?
- Is the process effective (e.g. in yielding changes to a CPD member’s behavior)?

**Rationale:** The Consent Decree directs COPA and BIA to develop a new mediation policy governing both agencies. The City will solicit public input on how mediation should be designed to effectively build trust and foster mutual respect between community members and police. The mediation process could be a way to handle certain complaints in a manner that is more satisfactory to both complainants and CPD members. OIG’s analysis of BIA and COPA’s mediation process is also required by the Consent Decree.

8. **Domestic Violence and Sexual Misconduct by CPD Members**

**Potential Objectives:**
- Does CPD take effective measures to prevent its members from engaging in domestic violence and sexual misconduct?
- Are allegations of domestic violence or sexual misconduct involving a CPD member reported and investigated appropriately?
- Is there a disparity in the outcomes of these investigations based on the demographic characteristics of the accused member or victim?

**Rationale:** Domestic violence and sexual misconduct perpetrated by members of a police department may leave victims particularly vulnerable. It is critical that allegations of domestic violence and sexual misconduct by CPD members are appropriately reported and investigated, and that perpetrators are appropriately disciplined in both criminal and administrative proceedings as appropriate. An evaluation of current policies and processes may lead to the identification of better means of detection and prevention, as well as improved service to victims.
C. CONSTITUTIONAL POLICING

1. “WRONG ADDRESS” SEARCH WARRANT EXECUTIONS

**Potential Objectives:**
- Why do “wrong address raids” happen?
- Does CPD effectively track “wrong address raids”?
- Has CPD implemented internal controls to prevent “wrong address raids”?

**Rationale:** OIG has committed to conducting this evaluation due to the potential for racial and economic disparities in impact, the gravity of the civil liberty concerns involved, and overwhelming community interest. Recent media reports indicate a potential lack of controls around CPD’s performance and supervision of warrant executions. Specifically, reports have highlighted multiple instances where CPD members have executed warrants at the wrong address, with significant impacts on innocent families and children.

2. COMPLIANCE WITH WELCOMING CITY ORDINANCE

**Potential Objectives:**
- Does CPD arrest or detain immigrants for ICE?
- Does CPD have internal controls to ensure compliance with the Welcoming City Ordinance?
- Are there disparities in treatment and consequences for undocumented immigrants versus documented immigrants and citizens arrested by CPD?

**Rationale:** Chicago’s Welcoming City Ordinance prohibits police from detaining or arresting an immigrant for ICE. Exceptions to this ordinance include undocumented individuals who are defendants in a criminal case with a felony charge pending, undocumented individuals with an outstanding criminal warrant, or undocumented individuals who are a gang member or have been convicted of a felony. Community members have voiced concern over how CPD interacts with federal immigration enforcement agencies and what information CPD shares with such agencies. This evaluation will assess CPD’s compliance with the Welcoming City Ordinance.

3. CIVIL ASSET FORFEITURE POLICY & PRACTICE

**Potential Objectives:**
- Is CPD’s Civil Asset Forfeiture Funds (CAFF) program consistent with relevant laws, CPD policy, and national best practices?
- Are the internal controls in place sufficient for effectively and fairly managing CAFF and to protect against “revenue driven policing”?
• Is there a disparate impact of the program on minority communities?

RATIONAL: Civil asset forfeiture is a legal tool that allows law enforcement officials to seize—and then keep or sell—any property that they allege has been involved in certain criminal activity. The owner of the property does not have to be accused of criminal conduct. This practice has implications for individual due process and property rights. Civil asset forfeiture also has the potential for disparate impact and dire consequences for people with lower incomes (i.e. the seizure of a vehicle used to travel to work). Also, CAFF do not appear to be a part of the official budget, raising concerns around oversight of how the funds are used.

4. CPS-RELATED ARRESTS

POTENTIAL OBJECTIVES:
• What percentage of juvenile arrests occur on school grounds?
• Are there disparities in charges for these arrests based on the demographic breakdown of the student?
• Does CPD follow national best practice for:
  o Arrest procedures for school related arrests?
  o Circumstances warranting an arrest on school grounds?

RATIONAL: School-based arrests put students in direct contact with the criminal justice system and can significantly impact a student’s future. OIG’s audit of CPD’s Juvenile Intervention and Support Center (JISC) has demonstrated that approximately 15-23% of juvenile arrests are for incidents that occurred at school. This review will reveal the number, types, and demographic distribution of school-based arrests and evaluate CPD policies and practices around such arrests.

5. YOUTH RESTRAINT AND DETAINMENT

POTENTIAL OBJECTIVES:
• Are CPD’s juvenile restraint and detention practices consistent with its own directives and policies?
• Are CPD’s juvenile restraint and detention policies and practices trauma informed and developmentally appropriate and consistent with best practices?
• Are there disparities in the use of restraint and detention with juveniles based on demographic?

RATIONAL: Being restrained and detained can be traumatizing for anyone but can have particularly negative consequences on the development of youth who come into contact with law enforcement. OIG’s recent Juvenile Intervention Support Center (JISC) audit revealed concern
over these practices and the media has recently uncovered instances in which youth are handcuffed at homes where search warrants are executed. OIG will review juvenile restraint and detention practices to ensure they are fair, equitable, consistent with department directives, and in the best service of the youth’s positive development and the public’s safety.

ADDITIONAL TOPICS UNDER CONSIDERATION:

1. Special Weapons and Tactics (SWAT) Staffing and Training
2. Training Development
3. Reckless Driving by CPD members
4. Complaints of Failure to Provide Service