



CITY OF CHICAGO  
OFFICE OF INSPECTOR GENERAL

20  
23

# PUBLIC SAFETY 2023 OUTLOOK ON POLICE OVERSIGHT AND ACCOUNTABILITY

*DRAFT POSTED FOR PUBLIC COMMENT OCTOBER 18, 2022*

DEBORAH WITZBURG | INSPECTOR GENERAL FOR THE CITY OF CHICAGO  
TOBARA RICHARDSON | DEPUTY INSPECTOR GENERAL FOR PUBLIC SAFETY

# I | Vision

The Public Safety section of the Office of the Inspector General (OIG) works to improve the effectiveness, accountability, and transparency of the Chicago Police Department (CPD) and Chicago's police accountability agencies, and to transform the critical relationship between CPD and the communities it serves. The Public Safety section does this by conducting independent and objective evaluations, inspections, and reviews of the operations of CPD, the Civilian Office of Police Accountability (COPA), and the Police Board. These inquiries are designed to promote constitutional, community-based policing, as well as a transparent, accessible, and fair system for police accountability and discipline. Based on robust community and agency engagement, along with a focus on the appropriate use of data and technology, the Public Safety section identifies 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

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.

By ordinance, the Public Safety section's inquiries are focused on the policies, practices, programs, procedures, and training of CPD, COPA, and the Police Board, with respect to constitutional policing, discipline, use of force, and CPD's integrity, transparency, and relationship with City residents. Additionally, the Public Safety section is charged with studying police disciplinary investigations and hearings, including examining the fairness and consistency of discipline and whether individual misconduct investigations are complete, thorough, objective, and fair. MCC § 2-56-230.

Further, pursuant to the federal consent decree governing certain reforms of CPD and related public safety components as entered in *Illinois v. Chicago*, 17cv06260, (hereinafter the "consent decree"), the Public Safety section conducts "data-driven reviews and audits to measure the effectiveness of the City and CPD's accountability practices." These inquiries "measure whether members of the community can readily make a complaint alleging misconduct and whether such complaints are investigated and adjudicated consistently with CPD policy, this Agreement, and the law." Consent decree ¶ 558.

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.

Informed by specific obligations derived from its ordinance and the consent decree, coordination with stakeholders, input from CPD members and members of the public, and long-standing institutional knowledge of the core public safety challenges in Chicago, the Public Safety section has adopted the following strategic priorities to guide its work:

1. Improving CPD's administrative, managerial, and operational competencies to render it more effective in the performance of its critical public safety functions and more efficient in its administration.
2. Ensuring transparency, diligence, fairness, consistency, and timeliness in the police discipline and accountability system.
3. Ensuring that Chicagoans' constitutional and civil rights are sufficiently and equitably protected in all aspects of public safety operations.

The specific obligations imposed in paragraph 558 of the consent decree include that the Public Safety section analyze complaints against CPD members for timeliness, trends, and several other metrics; CPD's enforcement of its rules prohibiting false reports (Rule 14) and requiring that CPD members report misconduct by other members (Rules 21 and 22); the thoroughness of disciplinary investigations and justifications for terminating them; disciplinary grievance procedures and outcomes; and complainant-involved mediations in disciplinary investigations. With respect to those specific obligations:

- The Public Safety section publishes its analysis of complaints against CPD members in the form of OIG's dashboards and the Public Safety section's annual reports.
- Public Safety section projects on CPD's enforcement of Rules 14, 21, and 22, as well as complainant-involved mediations in disciplinary investigations are underway.
- The Public Safety section assesses the thoroughness of administrative disciplinary investigations in the course of its regular, ordinance-mandated review of individual closed investigations; summaries of these reviews are regularly published in OIG's quarterly reports and in the Public Safety section's annual report.
- An [analysis of consistency and fairness in CPD's disciplinary system](#) was published in 2022.

Public Safety section projects are chosen in consideration of their potential to add distinct value within Chicago's public safety oversight system and to drive lasting, systemic improvements. Pursuant to the consent decree, the Public Safety section coordinates and confers with the Independent Monitoring Team charged with ensuring compliance with the consent decree when setting the section's priorities and planning its inquiries. See ¶ 667.

In addition to those projects described above, recent and current areas of inquiry include:

- Collection and analysis of data relating to settlements and judgments against CPD and its members
- CPD's officer wellness programs
- Consecutive days worked by CPD members
- Demographic disparities in CPD's use of force
- Wrong address search warrant raids
- Demographic impacts of CPD's hiring processes
- CPD's policies and practices for Equal Employment Opportunity investigations
- Data collection and quality on 911 response times
- CPD's Gun Offender Registry
- CPD's Latent Print Unit
- CPD's Homicide Investigation Process
- CPD's Civil Rights Unit
- Beat integrity and district staffing
- Powers and duties of the Chicago Police Board
- Relief of a CPD member's police powers

OIG is also committed to its ongoing work of making City and CPD data publicly available, transparent, and useable through its [Information Portal](#) and accompanying analytical products.

## III | Potential Projects for 2023

The following projects are under consideration for 2023. They are listed below in categories corresponding to the Public Safety section's 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. The Public Safety section may initiate other projects over the course of the year and the section may not undertake each of the listed projects in 2023. Circumstances may arise during the year which prompt the 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 projects may not appear because they would center around topics which OIG has addressed through other oversight channels, or which have changed in nature or priority. Additionally, some topics listed below may be deferred to following years.

Potential projects are developed from a variety of sources, including input from community members, CPD members, and OIG staff. A draft of the project plan is posted for public comment and submitted to the court-appointed monitor for the consent decree, as required by paragraph 563 of the consent decree. A final plan, incorporating comments as appropriate, is then published on OIG's website.

### A | CPD's Operational Competence

#### 1. CompStat and Data-Driven Policing (*Appeared on 2022 Outlook*)

##### Background and Rationale

CPD's CompStat program involves regular meetings at which Department leadership review data related to the performance of specific units, operations, or issues. According to CPD policy, CompStat is "a performance management process that is used to reduce crime, enhance implementation of Department strategies, foster compliance with Department standards, and achieve other Department goals and objectives." The program "emphasizes thorough data analysis, information-sharing, and accountability as a means of improving effectiveness within and between the various units of the Department," and includes "the development and implementation of response plans to address identified crime trends and performance concerns." Given its stated purpose, CompStat presents a direct mechanism for command staff to use CPD-collected data to shape priorities and operations. In the midst of national conversation about the potential and risks of data-driven policing, there is high public value in increased transparency around CompStat and related ways in which CPD is using data to shape its practices.

##### Potential Objectives

- Does CPD's CompStat program comply with its policy?
- Does CPD's use of CompStat comport with successful uses of such programs in other major police departments across the country?
- To what extent does data analysis, as presented in CompStat, impact CPD's operations and performance goals?
- What kinds of data are presented in CompStat, and how is that data verified and its quality assured?



- Does CPD use other, related mechanisms to drive its policing practices with data it collects?

## 2. Annual Performance Evaluations for Police Officers (*Appeared on 2022 Outlook*)

### Background and Rationale

Performance evaluations are a key internal control that, if used appropriately, can identify and distinguish effective police officers as well as those officers who do not meet CPD's standards for conduct and performance. [An audit conducted by OIG's Audit and Program Review \(APR\) section](#) determined that while CPD has a performance evaluation system, it is inconsistently implemented and utilized. An effective performance evaluation process, applying appropriate metrics, would allow CPD to better manage its officers, develop the careers of its effective officers, make early identification of behavioral and wellness risks, and take necessary corrective steps for officers not meeting its standards. OIG's Investigations section has encountered several instances where personnel decisions were called into question in part because they lacked adequate and appropriate documentation; an effective performance evaluation system would help the Department provide a solid foundation for personnel decisions. This project will examine whether CPD's annual performance evaluations are, as a matter of design, good accountability tools for officers and, as a matter of operational reality, used as such.

### Potential Objectives

- Have all CPD members received annual performance evaluations?
- How does CPD determine which dimensions of member performance will be evaluated? How are criteria for success established, and who has input into that development?
- Are performance ratings applied consistently?
- Do CPD's policies and procedures for performance evaluations comport with best practices?
- Does CPD use the results of its performance evaluations to aid its efforts to identify members at high risk for behavioral and wellness risks?

## 3. CPD's Community Concerns Program and the City Service Request System (*Appeared on 2022 Outlook*)

### Background and Rationale

City leadership has articulated a "whole-of-government approach" as critical to its violence reduction strategy, to draw on non-police City resources to address public safety concerns such as abandoned vehicles and buildings, streetlight and pothole repair, and graffiti. Among the systems already in place by which this might be accomplished are CPD's Community Concerns program, an internet application through which members of the public can report non-emergency complaints that may be criminal in nature or lead to neighborhood disorder, and the City Service Request system, which is used by the City to communicate public safety issues raised by community members to various City departments. OIG has received, however, a significant volume of feedback from community members raising questions about the extent to which and how effectively the City and CPD are using these programs.

### Potential Objectives

- Are the City Service Request system and the Community Concerns webapp accessible and available to interested members of the public?
- How do processes for the City Service Request system and the Community Concerns webapp differ from each other?
- Does CPD sufficiently and adequately use these systems to mobilize City services?

#### 4. Operations of CPD's Education and Training Division (*Appeared on 2022 Outlook*)

##### Background and Rationale

This project aims to address three components of the operations of CPD's Education and Training Division (ETD): (1) ETD's instructors' qualifications and performance evaluations, (2) the process for creating and revising curricula and training material, and (3) tracking CPD members' training requirements. This proposal is not intended to evaluate the content of ETD's training, nor the effectiveness of the training CPD members receive; it is scoped to evaluate the systems and processes that inform the training provided by ETD and the mechanisms by which the instructors providing that training are selected, evaluated, and retained.

##### Potential Objectives

- What qualifications exist for ETD instructors? Do all of CPD's current ETD instructors meet these qualifications?
- What is the demographic profile of the ETD's faculty?
- How, when, and against what criteria are ETD instructors selected and evaluated? Are disciplinary histories considered when instructors are selected?
- What is the process by which ETD develops and revises training modules? Does CPD follow best practices?
- How does ETD track and report on which Department members have received specific trainings?

#### 5. "Scoop and Run" Transport of Victims of Traumatic Injuries (*Appeared on 2022 Outlook*)

##### Background and Rationale

"Scoop and run" refers to a practice by which police officers transport victims of traumatic injuries—such as gunshot victims—for emergency medical treatment in immediately available police vehicles, rather than waiting for ambulance service. Current CPD policies appear to permit this practice, but CPD provides little training and there is little evidence of the practice in regular use. OIG has received community feedback questioning why CPD does not use the practice more widely in an attempt to save lives, particularly of gunshot wound victims. This project will assess CPD's current policy, training, and practice around "scoop and run" against best practices and peer jurisdictions.

##### Potential Objectives

- How often do CPD members "scoop and run" victims of traumatic injuries? Under what circumstances are these "scoop and runs" performed, and what are the outcomes?
- Are there trends in "scoop and run" numbers based on geography or on the demographic characteristics of the injured person or involved CPD member?

- Does CPD offer policy guidance or training on the circumstances under which members should consider employing a “scoop and run” practice, and what factors they should use to determine appropriate circumstances? Do CPD’s policies and training comport with best practices and/or peer jurisdictions?
- Has CPD considered potential officer safety benefits from “scoop and run” practices, where such a practice might obviate the need for CPD members to wait at a potentially dangerous scene for emergency medical personnel?
- Has CPD adequately accounted for any liability risks involved in permitting “scoop and run”?

## 6. Workers’ Compensation for CPD Members (*Appeared on 2022 Outlook*)

### Background and Rationale

OIG and the Public Safety section have received several pieces of stakeholder feedback regarding CPD’s treatment and handling of workers’ compensation claims and the perceived lack of oversight and accountability regarding those claims. In particular, while much of the City’s workers’ compensation claims are administered by the Department of Finance (DOF), CPD handles its own workers’ compensation claims through its Medical Services Section. According to the feedback received by OIG, decisions on payment of CPD workers’ compensation claims are handled by a very small number of CPD officials and not subject to meaningful oversight, posing the risk that claims are improperly paid.

### Potential Objectives

- Does CPD meet best practices for evaluating workers’ compensation claims of recurrence of an injury?
- Does CPD meet best practices for referral of officers to an Independent Medical Examination physician?

## 7. City and CPD Relationship with Private Police Departments and Other Private Agencies (*Appeared on 2022 Outlook, Revised*)

### Background and Rationale

In addition to CPD, the Cook County Sheriff’s Police Department, and the Illinois State Police, a number of private police and security agencies operate in Chicago, many of which are affiliated with private universities or railroads, but have jurisdiction and patrol responsibilities well beyond the borders of the property owned by their parent organizations. Additionally, the Chicago Transit Authority (CTA) contracts with private security agencies to deploy private security guards on trains, buses, and at transit stations, and Chicago neighborhoods are hiring private security in the hopes of addressing rising crime. This project will evaluate the relationship between the City and CPD’s crime-prevention and policing strategies and these private entities, with a particular focus on oversight, transparency, and accountability of private police and security agencies. This project will build on the analysis of CPD’s coordination with other police agencies that OIG published in the context of its [report on the City’s response to the 2020 George Floyd protests and unrest in Chicago](#).

### Potential Objectives



- What level of authority and what jurisdiction do private police departments and private security agencies have within the City? To what extent are the operations of these police departments coordinated with CPD?
- What is the nature of oversight, if any, exercised by the City over private police departments and private security agencies which operate within the City?
- To what extent are the operations and practices of private police departments and security agencies publicly reported – including, but not limited to, arrests, uses of force, etc.?
- Does CPD have policies governing the investigation of misconduct involving both CPD officers and external actors?

## 8. Officer Retention

### Background and Rationale

Much of the recent discourse around CPD's current staffing shortages focuses on the hiring process and pipeline of recruiting and hiring new candidates. However, while CPD's struggle with sufficient hiring is a significant driver of the dwindling workforce, attrition plays a complementary role. Although some turnover is expected, particularly when a large number of the CPD workforce is nearing retirement age, CPD attrition increased in 2021, while hiring has not sped up. OIG previously conducted an [inquiry](#) into CPD's hiring process; this project will examine CPD's retention strategies and endeavor to understand why members leave the Department.

### Potential Objectives

- What is CPD's annual attrition rate and how has it changed over time?
- What are the characteristics (e.g., age, race/ethnicity, education level, work assignment) of members who have voluntarily resigned or retired in recent years and are there disparities in members who are leaving CPD?
- What efforts have CPD and the Office of Public Safety Administration (OPSA) undertaken to retain members and what, if any, has been their impact?
- Do CPD and OPSA's retention efforts align with best practices?

## 9. CPD's Use of Helicopters

### Background and Rationale

CPD currently has two helicopters which it shares with the Cook County Sheriff's Police Department. These helicopters were built in 1994 and 2006 and are used to help with vehicle pursuits, locating fleeing felons and missing persons, determining the size of large crowds, and specialized surveillance for events like SWAT incidents, narcotics enforcement operations, and hazardous material dumping. Recently, CPD officials have spoken out about the need for new helicopters to replace or add to the current fleet, and the Mayor's 2023 budget address included an announcement of \$100 million "for additional public safety investments," which would include the cost of new helicopters for the Department. Given this significant investment and CPD's statements regarding the effectiveness of helicopters as a law enforcement tool, this project will examine the policies and practices around CPD's use of helicopters.

### Potential Objectives

- What policies and processes exist to determine when and how helicopters are deployed, and is CPD in compliance with these policies?

- What data does CPD collect when helicopters are deployed and how does the Department use that data to inform future deployments?
- What internal controls does CPD use to ensure helicopters are used appropriately, safely, and equitably?
- For what types of law enforcement events does CPD engage a helicopter and what are the outcomes of those instances?
- How has CPD assessed the likely law enforcement benefit of additional investment in helicopters, as compared to other similarly sized investments in public safety infrastructure?

## 10. City of Chicago Protest Preparedness

### Background and Rationale

In summer 2020, the City of Chicago experienced large-scale protests and social unrest. OIG issued a [report](#) in February 2021 that identified critical operational failures in the City's and CPD's response, specifically identifying failures in mass arrest procedures, use of force reporting, and the implementation of accountability measures. OIG's report did not include recommendations related to those findings, but OIG did state a commitment to "monitor developments and assess whether there remain policy and operational issues that warrant future evaluative inquiry and reporting." This project will assess what measures CPD and the City have taken to improve preparedness for future large-scale protests and/or social unrest.

### Potential Objectives

- Has CPD upgraded its mass arrest materials inventory since 2020?
- Has CPD trained members on mass arrest procedures since 2020?
- Has CPD clarified, through memoranda of understanding, joint training, or any other means, coordinated response procedures with partner agencies including the Illinois Emergency Management Agency, Illinois State Police, Cook County Sheriff's Office, and private policing and security agencies?
- Has CPD trained or field-tested its policies on the use of force in protest and crowd control context since those policies were revised in 2020?
- Does CPD have up-to-date deployment contingency plans for policing large-scale protests?
- Does CPD's large-scale protest response policies include coordination with other law enforcement agencies?

## B | Discipline and Accountability

### 11. Response to Allegations of Gender-Based Violence by CPD Members (*Appeared on 2022 Outlook*)

#### Background and Rationale

Gender-based violence (GBV)—which the City of Chicago has defined as encompassing sexual assault, domestic violence, and human trafficking—perpetrated by CPD members may leave survivors or victims particularly vulnerable, as they may feel unable to rely upon the police for protection or assistance. Given recent high-profile settlements related to GBV by CPD members, and concerning statistics regarding GBV by police officers nationwide, the quality of the City's response to GBV by CPD members is of critical importance.

It is crucial that allegations of GBV by CPD members are appropriately reported and investigated, both administratively and criminally, which is a process often undertaken by COPA and CPD's Bureau of Internal Affairs (BIA) in tandem. This project builds on the Public Safety section's work in analyzing closed sexual misconduct complaints against CPD members under paragraph 444 of the consent decree by examining the number and outcomes of investigations of other forms of GBV committed by CPD members. It will also examine CPD's goals and policies as it relates to the prevention of GBV by CPD members.

#### Potential Objectives

- What measures does CPD take to prevent its members from engaging in GBV?
- What are the stated goals of COPA and CPD in tracking and acting on GBV-related complaints and how are these goals operationalized as policies? Are these goals and policies in line with best practices?
- What barriers exist to reporting GBV perpetrated by CPD members, and what do CPD, COPA, and BIA do to address these barriers?
- Are allegations of GBV 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?

## 12. Field Training Officers

#### Background and Rationale

After completing the CPD Academy, a Probationary Police Officer (PPO) is assigned to a Field Training Officer (FTO) to help the PPO apply the theoretical concepts they learn in the classroom to the practical realities of policing in the real world. FTOs are the cornerstone to ensuring CPD's ranks are filled with officers who are properly trained, fostering a culture of accountability and enhancing the effectiveness of the public safety system. In its inspections of individual closed BIA and COPA disciplinary investigations, the Public Safety section's Investigative Analysis Unit found numerous instances in which FTOs were alleged to have engaged in misconduct ranging from personnel violations to excessive force. It is unclear how disciplinary findings impact the selection of FTOs, or a member's status as an FTO. This project will review both the process used to select the most qualified candidates to be FTOs and the process by which members who did not meet certain standards are removed from the FTO position.

#### Potential Objectives

- How are FTO candidates selected and what is the demographic makeup of selected candidates?
- What measures are in place to monitor the effectiveness and accountability of FTOs and their assigned PPOs?
- How and under what circumstances are FTOs removed from their positions? What role do allegations of misconduct have on an FTO's employment status?

## 13. COPA's Role in Police Misconduct Settlements

#### Background and Rationale

Pursuant to its enabling ordinance, MCC § 2-78-120, COPA has the authority to "appear before the Committee on Finance at public hearings at which proposed settlements of lawsuits and controverted claims against the Police Department or its members are submitted for approval, and,

subject to any applicable legal constraints regarding confidentiality, reply to questions related to Office or Independent Police Review Authority investigations involving Police Department members who are named parties to said lawsuits or controverted claims.” [OIG recently found](#) that, between 2017 and 2020, the City paid out \$250 million in settlements and judgments related to CPD and its members. Further, due to shortcomings in the collection of litigation data, the City is hindered in its ability to, among other things, analyze trends, inform early intervention systems, and improve disciplinary investigations. COPA is uniquely positioned to ensure disciplinary investigations related to the underlying misconduct are completed and to provide information to alderpersons who approve settlements to help better inform those decisions.

#### Potential Objectives

- Is COPA fulfilling its duties under MCC § 2-78-120(w) to attend Committee on Finance hearings regarding proposed settlements for lawsuits involving police misconduct?
- Is COPA providing information to members of the Committee on Finance to aid in their decisions to approve proposed settlements, specifically with respect to the question of whether allegations of misconduct underlying settlements have been investigated for disciplinary purposes?

## 14. COPA’s Organizational Structure and Allocation of Resources

#### Background and Rationale

In the City of Chicago’s multi-layered and complex police oversight landscape, COPA’s primary responsibility is to conduct investigations into misconduct allegations against CPD members. As COPA celebrates its five-year anniversary in 2022, it maintains a backlog of investigations that have yet to be closed: as of October 2022, several hundred cases initiated in 2018 or earlier are still in a pending status with COPA. This project will assess COPA’s organizational structure and allocation of resources to determine whether it is able to fulfill its core obligations as an agency which investigates the most serious instances of police misconduct.

#### Potential Objectives

- What is the extent of COPA’s investigative backlog?
- What is COPA’s current organizational structure and what proportion of COPA’s staff is dedicated to conducting investigations?
- What resources does COPA dedicate to the challenge of concluding IPRA legacy cases?
- How do COPA’s non-investigative units support its core organizational mission?

## 15. Police Board’s Role in Adjudicating Discipline

#### Background and Rationale

Police Board members do not preside over the Police Board hearings against a CPD member. Instead, a Hearing Officer assigned by the Police Board is tasked with overseeing the hearing. At the Police Board hearing, the accused officer will typically have legal representation. The Superintendent, who is pursuing the disciplinary action against the officer, will be represented by an attorney from the Department of Law. The Hearing Officer rules on objections, receives evidence, and takes other actions to manage the hearing. After the hearing, the Police Board members receive a written report from the Hearing Officer as well as a transcript and video recording of the hearing. After reviewing the transcript and other material, the Police Board members then

determine whether the accused member is guilty of the allegations filed. If the Police Board finds a CPD member guilty of a charge raised, then it will determine a penalty.

In 2020, the Police Board provided data to City Council regarding the amount of time it took for cases to be decided. In 2019, on average, it took over 16 months from the date the Superintendent filed charges with the Police Board until the Police Board issued its decision. In 2020, that figure was over 10 months. Those figures do not include the length of time for the entire process to be resolved, but only reflect the amount of time in which the Police Board oversaw the case. 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.

#### Potential Objectives

- Are Police Board hearings conducted according to best practices for the adjudication of disciplinary disputes?
- What is the impact of hiring additional hearing officers on the CPD disciplinary system?
- How do the Police Board's Rules of Procedure compare to the operations of a Police Board hearing?

## C | Constitutional Policing

### 16. CPD Tactical Review and Evaluation Division (TRED)

#### Background and Rationale

The Tactical Review and Evaluation Division (TRED, formerly known as the Force Review Unit and Force Review Division) reviews reportable use of force incidents involving CPD members. TRED is responsible for both determining whether an individual use of force was justifiable or indicative of potential misconduct, as well as identifying patterns and trends observed during the review of use of force incidents generally. If TRED identifies a use of force incident that is an "obvious policy violation," it should ensure an investigation into potential misconduct is initiated. However, in its 2021 yearly report, TRED stated it referred three incidents to COPA out of the 2,363 reviews it conducted. Moreover, if TRED identifies concerning patterns or trends, it should recommend changes to existing policies, procedures, and training to address those issues it identifies. This project will evaluate the effectiveness of TRED, both as it relates to individual incidents and the holistic review of uses of force Department-wide.

#### Potential Objectives

- How does TRED compare to similar force review divisions in peer jurisdictions?
- How does TRED determine whether an individual use of force constitutes an "obvious policy violation?" How does this determination align with CPD members' duty to report misconduct under CPD Rules 21 and 22?
- Does TRED, in fact, recommend changes to CPD's policies, procedures, and training based on patterns and trends observed in the review of use of force incidents? How do CPD's data collection practices impact TRED's ability to make these recommendations?

### 17. Compliance with Chicago's Welcoming City Ordinance (*Appeared on 2022 Outlook*)



Background and Rationale

Chicago's Welcoming City Ordinance (WCO) generally prohibits police from participating in civil immigration enforcement, including at the request of the several federal agencies charged with enforcement of immigration laws. WCO also obligates CPD to produce a quarterly report on its WCO compliance and provide that report to OIG, which publishes it. Despite recent changes to the WCO to make it more restrictive, community organizations continue to voice concerns over how CPD interacts with federal immigration authorities and what information CPD shares with such agencies. This project will examine whether CPD's policies align with the WCO and whether, in practice, CPD avoids participation or cooperation in civil immigration enforcement.

Potential Objectives

- Does CPD adhere, in practice, to the WCO or is there evidence that CPD continues to cooperate and participate in civil immigration enforcement?
- Do CPD's policies align with the WCO?
- What structures does CPD have in place to ensure compliance with the WCO?
- What, if any, contact, information sharing, etc. is permissible between CPD and federal immigration authorities and how often does that occur?
- Do CPD's quarterly reports accurately and completely report the information required by WCO?

## 18. Inventory, Use, and Impact of Military-Grade Equipment (*Appeared on 2022 Outlook*)

Background and Rationale

Since the 2014 events in Ferguson, Missouri, there has been an increased public interest and concern about the use of military-grade equipment by local law enforcement agencies. Research suggests that the use of such equipment has little effect on officer safety or crime rates but has negative impacts on perceptions of the police by both communities and potential police recruits. Additionally, there is evidence that militarized police units are more often deployed in predominantly Black communities. This project will consider CPD's policies on and use of military-grade equipment and whether CPD has taken steps to mitigate the potentially harmful effects of that use.

Potential Objectives

- What is the full inventory and source of each piece of military-grade equipment owned or used by CPD?
- Is CPD in compliance with program requirements mandated by the sources of its military-grade equipment?
- What policies and training requirements does CPD have in place to ensure proper use of its military-grade equipment?
- How frequently, and for what purposes, has CPD used its military-grade equipment?
- How does CPD assess the effectiveness of its military-grade equipment? How does CPD justify the need for more equipment?
- Has CPD evaluated the use of military-grade equipment on Chicago's communities and its police-community relationships?

## 19. Arrest Diversion (*Appeared on 2022 Outlook*)

Background and Rationale

CPD is regularly the point of entry or re-entry for an individual into the criminal justice system. CPD members are likely, however, to encounter circumstances which present a need or opportunity for diversion from the criminal justice system and connection to appropriate social services. This project is not an evaluation of CPD's current alternate response/arrest diversion programs (e.g., the Narcotics Arrest Diversion, the Crisis Assistance Response and Engagement program, Restorative Justice Community Court), but rather focuses on CPD's response to myriad incidents of individuals in need, the content and adequacy of the Department's guidelines and training for responding members, the consistency of the guidelines across units, the ultimate outcome of the police interaction (arrest or diversion from arrest), and any trends measurable in those outcomes.

#### Potential Objectives

- What are CPD's policies and procedures for arrest diversion, and are these standardized across units and districts?
- How often do 911 calls result in an arrest, arrest diversion, or neither when the event type implicates the need for social services? Are certain types of calls more/less likely to result in arrest or diversion to services?
- Are there trends in arrest or diversion rates based on geography or on the demographic characteristics of the subject or involved CPD member?

## 20. CPD's Language Access Policy Compliance (*Appeared on 2022 Outlook*)

#### Background and Rationale

Under CPD's Language Access Policy, the Department is required to provide interpretation services free of charge to all persons to whom they are providing police services. CPD is also in the process of developing a new Language Access Policy, as required by the consent decree. This project will examine the extent to which CPD is complying with its existing policy. This is an issue which has been raised to the Public Safety section in the course of its community engagement efforts, where community members have reported poor quality police service due to language barriers.

#### Potential Objectives

- Is CPD operating in compliance with its Language Access Policy? Are the resources needed to comply with the Language Access Policy distributed in a manner which accounts for those areas or populations with the greatest need?
- How many CPD members have responsibility for implementation of the Language Access Policy? How are they selected, trained, and evaluated?
- What is the view of community stakeholders of CPD's accessibility to non-English speakers?

## 21. Asset Forfeiture

#### Background and Rationale

There are two types of judicial forfeiture proceedings: criminal and civil. With criminal forfeiture, the government takes property only after its owner is found guilty of a crime. With civil forfeiture, it takes "guilty property" (property involved in a crime) without any need to convict, or even charge, the owner criminally. Civil forfeiture actions have proliferated in recent years, in part because they can be an effective crime-fighting tool, and in part because federal and state governments have a lucrative stake in forfeited property. This project will seek to evaluate how assets are managed after

forfeiture. The project would build, in part, on a 2021 U.S. Department of Justice Office of Inspector General [audit](#) of CPD's participation in a federal asset forfeiture program which found CPD's controls to be lacking.

#### Potential Objectives

- How does the City operationally oversee and manage assets once they are forfeited?
- Does the City's administration of its asset forfeiture operations meet all legal obligations? Does the City have adequate internal controls over the administration of its asset forfeiture operations?
- How does the City use the funds it received from state and federal asset forfeiture programs?
- How do the City's asset forfeiture operations impact residents? Is there a disparate impact between the communities affected by the seizure of assets and the communities where those assets are subsequently invested?

## 22. License Plate Readers

#### Background and Rationale

Automated License Plate Readers (ALPRs) can be permanently fixed cameras, portable cameras, or vehicle-mounted devices that capture license plate images. In Chicago, ALPRs scan 200 million license plates each year and flag officers when they get a "hit" on a plate. This ALPR alert is generated when a passing plate matches to a preloaded "Hot List" of license plate numbers of interest. Despite these cameras being touted as a public safety solution, use of this technology is not without potential risks; as OIG has [previously demonstrated](#), when people of color are pulled over, they are disproportionately subjected to force by officers. Further, because the "hit" is tied to license plate information rather than specific drivers, individuals who are not connected to any crime have the potential to be subjected to a traffic stop and people from low-income households who share vehicles may be disparately impacted.

#### Potential Objectives

- How does CPD use ALPRs in its investigations?
- Do CPD responses to ALPR alerts lead to investigatory stops that provide investigative value?
- Do CPD policies regarding ALPRs meet best practices regarding permissible use and data retention?
- Has CPD assessed whether and to what extent ALPRs increase police and civilian interactions, and whether any such increase is beneficial?
- Does CPD follow its own policies to ensure ALPRs are only used for legitimate law enforcement purposes, only designated members have access, and any misconduct is investigated?
- Are certain communities subject to disproportionate risks as a result of the use of ALPRs?



The City of Chicago Office of Inspector General is an independent, nonpartisan oversight agency whose mission is to promote economy, efficiency, effectiveness, and integrity in the administration of programs and operations of city government.

OIG's authority to produce reports of its findings and recommendations is established in the City of Chicago Municipal Code §§ 2-56-030(d), -035(c), -110, -230, and -240. For further information about this report, please contact the City of Chicago Office of Inspector General, 740 N. Sedgwick Ave., Suite 200, Chicago, IL 60654, or visit our website at [igchicago.org](http://igchicago.org).

Suggest Ways to Improve City Government:

[igchicago.org/contact-us/help-improve-city-government](http://igchicago.org/contact-us/help-improve-city-government)

Report Fraud, Waste, and Abuse in City Programs:

Call OIG's complaint hotline at (866) 448-4754 / TTY: (773) 478-2066

[igchicago.org/contact-us/report-fraud-waste-abuse/](http://igchicago.org/contact-us/report-fraud-waste-abuse/)

Cover image courtesy of the Department of Assets, Information and Services.  
Alternate formats available upon request

