



CITY OF CHICAGO
OFFICE OF INSPECTOR GENERAL

Public Safety 2024 Outlook on Police Oversight and Accountability

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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.

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, 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.

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

- CPD's Gun Offender Registry
- CPD's Latent Print Unit
- CPD's Homicide Investigation Process
- CPD's Civil Rights Unit
- Patrol staffing
- Powers and duties of the Chicago Police Board
- Relief of a CPD member's police powers
- Intimate Partner Violence by CPD members
- CPD Mass Protest Preparedness
- CPD Officer Retention
- Scoop and Run Procedures

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 2024

The following projects are under consideration for 2024. 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 2024. 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. 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 | CPD's Operational Competence

1. CPD Missing Person Investigations

Background and Rationale

CPD's Missing Persons Section (MPS) is housed within the Youth Investigations Division of the Bureau of Detectives. MPS is responsible for the reporting and investigation of missing and found persons. The project will provide a descriptive product about missing person investigations and assess CPD's current policies and procedures guiding their reporting, investigation, and resolution of missing person cases.

Potential Objectives

- What is MPS's clearance rate for missing person investigations and how long do investigations take?
- Are CPD's missing person investigation processes equitable?
- How do CPD's missing person investigation processes compare with comparable law enforcement agencies?
- Do CPD's missing person investigation processes align with best practices?

2. Detention Aides

Background and Rationale

Detention Aides are responsible for the custody, care, and processing of prisoners in the central detention and district lockups of CPD. CPD has 25 district stations, each with a lock-up and Detention Aides, as well as a lock-up at Central Detention. Amongst other qualifications, Detention Aides with CPD are required to follow the CPD directives and Rules and Regulations, possess knowledge of law enforcement procedures, possess the physical ability to maintain control of detainees, but do not carry a firearm. This project will examine the role of Detention Aides, including hiring processes and training with respect to use of force and de-escalation techniques used on arrestees.

Potential Objectives

- What are the qualifications of, and training given to, CPD Detention Aides?
- What restraining techniques or devices do Detention Aides use for de-escalation and controlling detainees?
- What employee resources are available to CPD Detention Aides?
- What additional guidelines do Detention Aides follow that are not included in the CPD directives?

3. Sworn CPD Members in Administrative Assignments

Background and Rationale

The Chicago Police Department is comprised of both sworn law enforcement members and civilian (or non-sworn) members. Sworn members' job responsibilities are directly related to their police powers, such as to make arrests and carry a firearm. However, sworn members may be assigned to administrative positions with duties not requiring police powers for a variety of reasons, including medical restrictions or loss of police powers while awaiting a misconduct investigation. Given the concern about Department staffing levels, this inquiry will examine whether CPD's use of sworn members in administrative roles is necessary and efficient.

Potential Objectives

- What criteria does CPD utilize to determine sworn versus civilian job classifications?
- To what extent can roles occupied by sworn CPD members be filled by civilian members?
- Is there a financial impact resulting from sworn CPD members serving in administrative assignments?
- Do CPD's sworn and civilian positions align with industry best practices and considerations?

4. Radio Assignments Pending (RAPs)

Background and Rationale

When individuals call 911 for police response in Chicago, the Office of Emergency Management and Communications (OEMC) dispatchers are responsible for assigning available CPD units to the event. Based on the priority of the event, OEMC dispatchers are given a set amount of time to assign calls to responding CPD units. If no CPD vehicles in a District are available and the allotted time to dispatch an event has passed, the event becomes a Radio Assignment Pending, or RAP. The dispatcher must follow procedures to alert their supervisor and the CPD field supervisor, and make radio announcements to locate potentially available units. This project will examine contributing factors for RAPs, including OEMC emergency dispatch processes and the availability of CPD resources.

Potential Objectives

- How often is OEMC unable to dispatch 911 calls for police service in Chicago due to a lack of available units?
- To what extent do OEMC dispatch protocols and the staffing levels of OEMC and CPD contribute to the occurrence of RAPs?
- Does OEMC have sufficient controls to ensure it adheres to its dispatch timeliness standards and RAP protocols?

5. Medical Services Section

Background and Rationale

The Medical Services Section (MSS) is an integral part of the Chicago Police Department that not only assists Department members who need medical care for work-related injuries, but also ensures those members receive care in a timely manner in order to recover and safely return to work. Interviews conducted by OIG with individuals working in MSS and the Department of Finance (DOF) suggest that current policies and practices inhibit the timeliness of medical care, and in certain instances, the quality of care received by CPD members injured on duty (IOD). This project would evaluate the efficiency of the processes and policies of the Medical Services Section and related agencies in reviewing and processing CPD members' claims for medical care as a result of work-related injuries.

Potential Objectives

- What policies and processes are in place within MSS and DOF to ensure efficiency and timeliness in processing CPD members' IOD claims? Do these policies and processes align with best practices?
- What controls do CPD/MSS have to ensure that the list of medical specialists provided to injured members seeking services is up-to-date and accurate?
- How often are members awarded additional paid leave as a result of procedural inefficiencies by MSS, DOF, or another agency?

6. CPD's Leave of Absence Policy

Background and Rationale

As CPD continues to answer questions related to staffing shortages and resource allocation, the Department should examine a small percentage, but significant portion of its staff: the sworn members on a leave of absence. In 2022, The Daily Line reported that CPD had 364 sworn members out on leaves of absence. CPD's policy grants members up to a one-year leave with the ability to apply for a leave extension. If a member fails to return to work or apply for an extension after their leave expires, the member is considered to have "voluntarily resigned" from CPD. OIG has found that CPD and the City have not consistently updated employment records to correctly reflect which members are on leave and which members have "voluntarily resigned." This has led to investing resources by continuing disciplinary investigations of individuals no longer employed by CPD. Those members may also engage in misconduct and put the City at risk. Additionally, CPD's active employee count may be inflated due to inconsistently tracking members on leaves of absence. This project would examine CPD and the City's management of members' leaves of absence to account for all active employees and all available position vacancies.

Potential Objectives

- How many CPD members are on a leave of absence? How many of those members "on leave" are no longer considered active employees?
- How does CPD record and track members on a leave of absence?
- Are there trends in members on a leave of absence based on demographic characteristics, type of leave, or disciplinary history?
- What policies or intergovernmental agreements govern the leave of absence responsibilities between CPD, OPSA, and DHR?

- How are separations handled by CPD, OPSA, and DHR for CPD members who fail to return to work upon the expiration of their leave?

7. CPD Weapons Qualification

Background and Rationale

Sworn CPD members must “qualify annually with all prescribed, alternate prescribed, or auxiliary firearms, and short-barreled revolvers prior to carrying the firearm on or off duty.” The weapons qualification consists of a certified firearms instructor observing the member’s handling of the firearm and the functionality of the weapon. To qualify, the member participates in a timed course of fire from various distances and positions. The member must receive a minimum score of 70 percent to qualify to use the prescribed weapon. Members are allowed two attempts to qualify. If a member fails to qualify on their second attempt, the member must attend an “intensified training session.”

Each CPD member is required to ensure that their unit of assignment schedules them to attend one of the prescribed weapon qualification program periods. If a member does not appear on the scheduling matrices provided by the Education and Training Division, the member should schedule an appointment. Additionally, commanding members must ensure that all sworn members assigned or detailed to their commands are scheduled in accordance with the scheduling matrices provided by the Education and Training Division. The directive indicates that a member’s failure to comply with the program requirements could result in discipline.

Potential Objectives

- Are all CPD members appropriately qualified on their weapons?
- What quality assurance measures are in place to ensure that members are qualifying their weapons on time?
- Are there obstacles and impediments that are out of CPD members’ control that prevent them from qualifying their weapons on time?
- How does CPD ensure that members who fail to qualify on their second attempt participate in required intensified training sessions?

8. Annual Performance Evaluations for Police Officers (*Appeared on 2023 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. 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?

9. CPD's Community Concerns Program and the City Service Request System *(Appeared on 2023 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?

10. Operations of CPD's Education and Training Division *(Appeared on 2023 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 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?

11. City and CPD Relationship with Private Police Departments and Other Private Agencies (*Appeared on 2023 Outlook*)

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 that 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?

B | Discipline and Accountability

12. Separation Charges Against CPD Members

Background and Rationale

All CPD members are required to comply with Department Rules and Regulations, directives, and orders, and failure to comply "will be considered just cause for disciplinary action." If a member is alleged to have committed misconduct, an investigation may commence followed by a multi-phase process to determine appropriate outcome and discipline. In the most severe cases of sustained misconduct where the penalty is separation, the Superintendent will file separation charges against the accused member with the Police Board and the member will be stripped of their police powers. The Police Board will then decide whether the member is guilty of one or more of the charges filed and, if proven guilty, determine the member's final discipline outcome. This project would examine

whether CPD is filing separation charges against CPD members with the Police Board in a consistent and timely manner.

Potential Objectives

- How does CPD file separation charges against a member with the Police Board? Are there any policies or intergovernmental agreements that govern the process?
- What factors may impact CPD's process of filing separation charges against a CPD member?
- How long are accused members waiting for CPD to file separation charges with the Police Board?
- How long are accused members relieved of their police powers while waiting for separation charges to be decided by the Police Board?

13. Field Training Officers (*Appeared on 2023 Outlook*)

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?

14. COPA's Role in Police Misconduct Settlements (*Appeared on 2023 Outlook*)

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 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?

15. COPA's Organizational Structure and Allocation of Resources *(Appeared on 2023 Outlook)*

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 celebrated its five-year anniversary in 2022, it maintained a backlog of investigations. In 2023, COPA began its Timeliness Initiative where it reviewed cases that were 18 months or older to reduce its backlog of cases and redirect resources to focus on recent investigations and more complex investigations. The several hundred cases identified by COPA for its Timeliness Initiative were closed short of a finding. 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 that 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?

16. Police Board's Role in Adjudicating Discipline *(Appeared on 2023 Outlook)*

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 member will typically have legal representation. The Superintendent, who is pursuing the disciplinary action against the member, 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 CPD 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 its 2022 annual report, the Police Board reported that it took, on average, over 14 months from the date the Superintendent filed charges with the Police Board until the Police Board issued its decision. This does not include the length of time for the entire process to be resolved, but only reflects 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 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

17. Facial Recognition Technology

Background and Rationale

CPD has one public-facing directive regarding the use of facial recognition technology (FRT), issued in 2013. The policy restricts the use of such technology to the Bureau of Detectives, Bureau of Organized Crime (now the Bureau of Counter-terrorism), and the Crime Prevention Information Center (CPIC) for "investigative purposes," but does not specify the software the Department uses, the database against which photos are compared, or any other specific criteria or terms of use for such technology. The potential for misuse of facial recognition technology could pose a risk to Chicagoans' constitutional and civil rights. Police use of emerging technologies such as facial recognition technology is still relatively new, and little is known about the effectiveness, impacts, and risks of its use in law enforcement. This project will examine whether CPD has developed and adheres to policies governing its use of facial recognition technology, and has sufficient internal controls to limit facial recognition technology access to trained personnel within designated units. Additionally, the project will seek to determine to what extent CPD monitors and limits its members use of facial recognition technology, from documenting reasons for access to recording investigative outcomes of its use.

Potential Objectives

- Is CPD's use of facial recognition technology consistent with Department policies, training, and protocols?
- Does CPD have controls in place to ensure that use of facial recognition technology is restricted to necessary members?
- Does CPD monitor the use of facial recognition technology by its members?
- Does CPD track investigative outcomes of facial recognition technology use?

18. CPD's Use of Drones

Background and Rationale

In June 2023, Governor J.B. Pritzker signed the Drones as First Responders Act, which allows law enforcement agencies across the state to utilize drones at special events and parades. The Act specifically prohibits the use of facial recognition technology when deploying drones during these events and allotted additional money in the Illinois state budget for local police departments to expand their use of drones. This project would focus on and review the policies, practices, and procedures for CPD's use of drones with respect to constitutional policing in relation to City residents.

Potential Objectives

- For what types of events does CPD use drones and what are the outcomes of those instances?
- How many drones are currently in CPD's possession? What policies and processes exist to determine when and how aerial technology is used, and is CPD in compliance with these policies?
- What programs, policies, and practices does CPD have for the use of drones?
- What are the costs and benefits of utilizing drones for law enforcement practices?
- What data does CPD collect on its use of drones?
- What internal controls does CPD use to ensure drones are used appropriately, safely, and equitably?
- What parameters does CPD have in place to address the privacy concerns of citizens over CPD's use of drones?

19. CPD Tactical Review and Evaluation Division (TRED) (*Appeared on 2023 Outlook*)

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 2022 yearly report, TRED stated it did not refer any incidents to COPA out of the 2,575 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?

20. Compliance with Chicago's Welcoming City Ordinance (*Appeared on 2023 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?

21. Inventory, Use, and Impact of Military-Grade Equipment (*Appeared on 2023 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?

22. Arrest Diversion (Appeared on 2023 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 that 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?

23. CPD's Language Access Policy Compliance (Appeared on 2023 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 that 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 that 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?

24. Asset Forfeiture (Appeared on 2023 Outlook)

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 receives 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?



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 St., Suite 200, Chicago, IL 60654, or visit our website at igchicago.org.

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