



CITY OF CHICAGO
OFFICE OF INSPECTOR GENERAL

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Follow-up Evaluation of the Chicago Police Department's Post-Firearm Discharge Policy

December 3, 2024

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I | Introduction

The Public Safety section of the City of Chicago Office of Inspector General (OIG) has completed a follow-up to its October 2020 evaluation of the Chicago Police Department's (CPD or the Department) compliance with its policy regarding post-incident requirements for members who discharge their firearms, on- or off-duty.¹ Based on CPD's responses, OIG concludes that CPD has implemented corrective actions related to the evaluation's findings to varying degrees. Of five recommendations, the Department partially implemented two corrective actions, minimally implemented two, and did not implement one.

CPD requires its members who discharge their firearms to satisfy several steps before returning to regular field duties. They include completing a minimum of 30 days of administrative duty; participating in the Traumatic Incident Stress Management (TISM) program, which includes a trauma debriefing session with the Professional Counseling Division; attending the Critical Incident Overview (CIO) training; and completing any other training curriculum developed by the Training Division, including an individualized training curriculum (i.e., Individualized Critical Incident Overview (ICIO) training). As CPD reported to OIG, these requirements are designed to "minimize the chance that officers will suffer from the negative emotional and psychological reactions that can occur after a firearm discharge incident."

OIG's original inquiry found that CPD was not in full compliance with its post-firearm discharge policy and that its internal controls were inadequate, as indicated by the Department's insufficient policies and procedures and poor documentation of members' completion of return-to-duty requirements. This lack of compliance has led to members returning to regular duty without satisfying all the return-to-duty requirements, potentially putting themselves and others at risk. OIG also found that CPD's return-to-duty process was not structured to meet members' needs in an individualized or timely manner. This lack of individualized and timely training has led to inefficiencies, with many members remaining on administrative leave beyond the required 30 days.

Based on its original findings, OIG made five recommendations aimed at improving post-firearm discharge policies and procedures. First, OIG recommended that CPD develop and implement adequate internal controls to ensure members have completed all the necessary return-to-duty requirements before returning to field duty. Next, OIG recommended that CPD develop a software solution capable of providing relevant notifications and tracking all information necessary to verify completion of return-to-duty requirements. OIG also recommended that CPD review the purpose of the individualized training requirement in its directive, assess whether the ICIO training fulfills its purpose, and revise policies and procedures in accordance with its findings. Furthermore, OIG recommended that CPD track and document whether members have been involved in prior firearm discharge events to inform the TISM program and ensure members' unique trauma experiences are addressed. Finally, OIG recommended the Department examine why most members remain on

¹ This inquiry did not evaluate other processes that may take place after a member discharges their firearm, such as relief of police powers, the Civilian Office of Police Accountability's (COPA) release of video footage within 60 days of an incident, or misconduct investigations.

administrative duty past the 30-day requirement and identify measures to improve the timeliness of its processes.²

OIG has inquired about corrective actions taken by CPD in response to its recommendations. CPD reported that it had made progress on certain recommendations. Based on CPD's response, OIG concludes that the Department has implemented corrective actions at varying levels and did not implement one recommendation.

Specifically, CPD reported that the Office of the First Deputy Superintendent (OFDS) has implemented or updated its notification procedures to ensure that members involved in a firearm discharge incident complete all return-to-duty requirements.³ However, it has not yet finalized Standard Operating Procedures (SOPs) or built an application to track all return-to-duty requirements. CPD also reported that it has implemented an application to track TISM program completion but has not yet created mechanisms to track other return-to-duty requirements listed in the 30-day checklist, a form used by OFDS to document an involved member's satisfaction of return-to-duty requirements post firearm discharge, and the OFDS excel file, an internal Microsoft Excel spreadsheet that OFDS uses to track the duty status and release from administrative duty of involved members.⁴ In response to OIG's recommendation regarding the ICIO training, CPD stated that it has consulted with other jurisdictions and revised the ICIO training materials, adding a new course on tactical training. However, the Department has not yet implemented individualized trainings based on specific members' experiences. Moreover, CPD reported that while it can track previous firearm discharge incidents since the implementation of the TISM program, it does not use documentation from previous firearm discharge incidents to inform the TISM program and address the potentially unique trauma experiences of affected members. Finally, CPD reviewed reasons why most members remain on administrative duty for longer than 30 days, such as staffing and scheduling challenges, but failed to identify measures to improve the timeliness of its processes.

Although this follow-up inquiry does not contain recommendations, and therefore CPD was not required to respond, OIG provided the Department and the Office of Public Safety Administration (OPSA) with a draft of the report and invited both agencies to provide any further updates regarding corrective actions that may be underway. On November 7, 2024, OIG met with personnel from CPD and OPSA, who reported that they are in the process of setting up and implementing Benchmark, a software management system that streamlines police trainings and personnel management. CPD and OPSA stated that, among other things, this new system will track all post-firearm discharge procedures, replacing the current post-incident procedures. The agencies further reported that they are in the process of working with Benchmark and internal subject matter experts to customize modules for CPD's specific needs.

OIG urges CPD to fully implement all the recommended corrective actions. Below, OIG summarizes its findings and recommendations, as well as the Department's response to OIG's follow-up.

² City of Chicago Office of Inspector General, "OIG Evaluation of the Chicago Police Department's Post-Firearm Discharge Policy," October 27, 2020, <https://igchicago.org/wp-content/uploads/2023/08/OIG-Evaluation-of-the-Chicago-Police-Departments-Post-Firearm-Discharge-Policy.pdf>

³ At the time of CPD's response to OIG, Eric Carter was First Deputy Superintendent. As of October 2024, the position has remained unfilled since Carter retired in May 2023.

⁴ See Chicago Police Department, "Form 12.124: Administrative Duty Assignment For Firearm Discharge Incidents Check List," accessed February 26, 2024. <https://directives.chicagopolice.org/forms/CPD-12.124.pdf>.

II | Follow-Up Results

OIG has followed up on its evaluation of CPD's post-firearm discharge policy. OIG sought information from CPD on the status of the corrective actions to which it committed following OIG's recommendations.⁵ CPD responded by describing some of the corrective actions it has taken and provided supporting documentation. Below, we summarize OIG's five findings, the associated recommendations, and the current status of CPD's responsive corrective actions. This follow-up did not observe or test implementation of the new procedures. OIG therefore makes no determination as to their effectiveness, which would require a new evaluation with full testing.

A | Finding 1: CPD is not in full compliance with its return-to-duty requirements

OIG Recommendation 1 |

OIG recommended that CPD develop and implement internal controls to ensure that members who discharge their firearms satisfy all requirements before returning to field duty. Such internal controls should include procedures to:

- a) ensure that the OFDS is notified of all relevant firearm discharge incidents,
- b) verify that members required to complete 30 days of administrative duty have been assigned to administrative duty by their unit commanders within one day of a firearm discharge incident and for a minimum of 30 days,
- c) ensure that OFDS personnel or unit commanders do not return members to field duty until they have satisfied all post-firearm discharge requirements; these procedures should include supervisory oversight of the OFDS personnel responsible for ensuring satisfaction of the requirements,
- d) ensure that extensions of administrative duty beyond 30 days are approved by the First Deputy Superintendent, and
- e) ensure consistent and complete documentation of the satisfaction of administrative duty, the TISM program, and CIO and ICIO trainings.

State of Corrective Action 1 | Minimally Implemented

In its original response to OIG's recommendation, CPD agreed that the post-firearm discharge protocols should be standardized and stated it was deciding whether to do so via SOPs or an electronic database.

In response to OIG's follow-up inquiry, CPD reported that in order to ensure members involved in firearm discharge incidents do not return to duty prior to completing all requirements, the Department was continuing to work towards adopting improved SOPs that build internal controls and improve documentation. The Department noted that in order to finalize SOPs for tracking return-to-duty requirements, "an application needs to be built and placed into service."

⁵ City of Chicago Office of Inspector General, "Evaluation of the Chicago Police Department's Post-Firearm Discharge Policy," October 27, 2020, <https://igchicago.org/wp-content/uploads/2023/08/OIG-Evaluation-of-the-Chicago-Police-Departments-Post-Firearm-Discharge-Policy.pdf>.

CPD reported that, until an application to track all return-to-duty requirements is in place, OFDS is using certain notification procedures to ensure that members involved in a firearm discharge incident complete all return-to-duty requirements. Specifically, CPD reported that OFDS:

- monitors Crime Prevention and Information Center (CPIC) emails;⁶
- collects “Officer Involved Shooting (OIS) Notification forms;”
- verifies the identities of all members at the scene and the members who should be placed in the TISM program and 30-day administrative leave;
- notifies the Training Division and the involved member’s unit commanders;
- checks in with the Training Division when the member nears the end of their 30 days of administrative duty to ensure the member has completed all of the requirements;
- ensures the checklist is complete by having the First Deputy Superintendent sign off on the form; and
- notifies the member’s unit that the member can return to regular field duties.

Additionally, CPD reported that the Watch Operations Lieutenant in the District where the firearm discharge incident occurred is responsible for referring the involved member to the TISM program in its Citizen Law Enforcement Analysis and Reporting system (CLEAR). CPD also stated that the Professional Counseling Division is tasked with verifying the member has been referred to the TISM program in CLEAR and updating the program tracker in CLEAR once a member has completed the program.

As was previously the case, this process is documented in the OFDS Excel file. In OIG’s original project, CPD reported that OFDS “tracks the duty status and release from administrative duty using a Microsoft Excel spreadsheet.” CPD’s response to OIG’s follow-up inquiry shows that much of the process remains the same and does not address the issues raised in OIG’s finding. One notable change is that CPD now tracks referral to and completion of the TISM program in CLEAR. However, while CPD reports minor procedural changes to some processes, most processes follow the same procedures as when OIG originally studied them.

As the Department has made certain procedural changes to improve notification processes but has not yet adopted comprehensive SOPs or implemented other internal controls to ensure it is following its policy, OIG concludes that CPD has minimally implemented this recommendation.

OIG Recommendation 2 |

OIG recommended CPD develop a software solution capable of providing relevant notifications and tracking all information necessary to verify satisfaction of return-to-duty requirements, including but not limited to the information currently tracked in the 30-day checklist and the OFDS Excel File. CPD should provide guidance (e.g., procedures and training) to personnel from OFDS and other relevant units on how to use this software.

⁶ The Chicago Crime Prevention and Information Center (CPIC) is a “collaboration between federal, state, county and local law enforcement and public safety agencies to integrate criminal and terrorism threat intelligence and provide intake, analysis, and dissemination of that information.” Chicago Police Department, “Chicago Crime Prevention and Information Center (CPIC),” accessed February 11, 2024, <https://cpic.chicagopolice.org/>.

State of Corrective Action 2 | Partially Implemented

In its response to OIG’s recommendation, CPD agreed that a software solution should be sought, but noted that it must first examine the “significant limitations” of CPD’s software and storage capabilities to determine whether this would be possible. CPD also stated that OPSA, which was a new department at the time, would be responsible for the Department’s databases and electronic footprint. CPD pledged to work with OPSA “as it grows and absorbs the various CPD databases” to decide whether a software solution would be achievable.

In response to OIG’s follow-up inquiry, OPSA stated that it met with CPD and the agencies agreed to develop an application within CLEAR to automate the return-to-duty tracking and notification processes. OPSA reported that it planned to create the application in CLEAR. Once created, OPSA stated that it would begin testing the application with CPD members, including a review from OFDS.

In its response to OIG’s follow-up inquiry, CPD reported to OIG that in collaboration with OPSA, the Department conducted an evaluation of its electronic system and databases and that both agencies will “continue to explore options to create a software solution.” As described above, the Department reported some progress toward this goal. CPD now uses a TISM program tracking application within CLEAR to record attendance and referrals for the program. This change discontinued CPD’s “Form 07: Traumatic Incident Stress Management Program Notification.” CPD uses the TISM program application to track referrals and to document when involved members complete the program, making note of whether the program was successful or if the members need additional assistance.

As CPD has implemented an application to track TISM program completion but has not yet created mechanisms to track other return-to-duty requirements listed in the 30-day checklist and the OFDS Excel file, OIG finds that CPD has partially implemented this recommendation.

B | Finding 2: **CPD’s return-to-duty process is not structured to meet members’ needs in an individualized or timely manner**

OIG Recommendation 3 |

OIG recommended that CPD review the purpose of the individualized training requirement in “General Order G03-02-03: Firearm Discharge Incidents – Authorized Use and Post-Discharge Administrative Procedures” and evaluate whether its current ICIO training fulfills this purpose.⁷ If CPD determined that the purpose was to offer members training tailored to the details of their firearm discharge incidents, the Department should revise its policies and procedures to ensure that the Education and Training Division had the information and authority to do so. OIG further recommended that CPD should ensure that, in any effort to gather information about a specific firearm discharge incident to individually tailor training, it did not compromise any ongoing investigation of the shooting incident, and that it adhered to any relevant provisions of collective bargaining agreements. Finally, OIG encouraged CPD to consult with other jurisdictions that provide members with such individually tailored training.

⁷ Chicago Police Department, “General Order G03-02-03: Firearm Discharge Incidents – Authorized Use and Post-Discharge Administrative Procedures,” June 28, 2023, accessed February 21, 2024, <https://directives.chicagopolice.org/#directive/public/6755>.

State of Corrective Action 3 | Partially Implemented

In its response to OIG's original recommendation, CPD agreed that the ICIO training component of the current General Order had not been "used to its full potential." CPD stated it would request the Education and Training Division to evaluate its post-firearm discharge training to determine whether modifications were necessary.

In response to OIG's follow-up inquiry, CPD did not explicitly mention the ICIO training. Rather, the Department reported that the post-firearm discharge training is not currently tailored to each specific member or incident. CPD went on to state that the training is individualized in that members are able to "choose a portion of the training that they receive based upon their needs or interests." The Department also reported that the training is more tailored in certain circumstances, such as settlement of a lawsuit or supervisory referral. CPD stated that the Force Review Board has the authority to recommend that the Training and Support Group conduct additional individualized training that is "based upon a review of the officer's actions during the actual shooting incident."⁸

Additionally, CPD submitted revised versions of its ICIO trainings, covering such content as the tactical and legal aspects of firearm usage, the impact of trauma and loss, and practicing yoga and mindfulness. Since OIG's original report, CPD has designed a refresher course on tactical training. The lesson plans provide detailed guidance to instructors, clearly outlining course objectives, how participants will be evaluated and assessed, as well as procedures to mitigate safety risks.

CPD further reported that it does not collect specific information on firearm discharge incidents for post-discharge training to avoid compromising any ongoing investigation of the shooting incident and to ensure it abides by collective bargaining agreements.

Finally, the Department reported that it had consulted with the Las Vegas, Washington DC, Baltimore, Houston, Los Angeles, New York, and New Orleans police departments regarding individualized training programs.

As CPD has consulted with other jurisdictions and revised certain ICIO training materials but has not yet fully clarified the purpose of the ICIO training nor implemented trainings tailored to individual members, OIG finds that CPD has partially implemented this recommendation.

OIG Recommendation 4 |

OIG recommended that CPD track and document whether members have been involved in previous firearm discharge incidents to inform the TISM program and ensure that the potentially unique trauma experiences of such members are addressed.

State of Corrective Action 4 | Not Implemented

⁸ Per CPD policy, the Force Review Board is comprised of high-ranking Department officials and reviews, among other uses of force, firearm discharge incidents. Chicago Police Department, "General Order G03-02-08: Department Review of Use of Force," June 28, 2023, accessed February 21, 2024, <https://directives.chicagopolice.org/#directive/public/6577>. The Training and Support Group is responsible for all CPD training and contains several units, including the Professional Counseling Division and the Training Division. Chicago Police Department, "Organization for Command," May 11, 2023, accessed February 21, 2024, <https://home.chicagopolice.org/about/organization-for-command/>.

In its response to OIG's recommendation, CPD originally reported that it may consider documenting previous firearm discharge incidents as it explores the possibility of developing a database to electronically track post-firearm discharge requirements.

In response to OIG's follow-up inquiry, CPD reported that the Department did not agree to this recommendation but may consider it as the Department explores the option of developing a technological solution for tracking these incidents. CPD also stated that "all firearm discharge incidents and traumatic incidents that have occurred since implementation of the TISM program application in CLEAR can be tracked in the TISM CLEAR application." When asked to what extent CPD used documentation of previous firearm discharge incidents to inform the TISM program, CPD responded, "This is not expressly considered in TISM [p]rogram at this time but it may be part of the discussion officers have during the course of their experience under TISM [p]rogram." Accordingly, OIG finds that CPD has not implemented this recommendation.

OIG Recommendation 5 |

OIG recommended that CPD review why most members remain on administrative duty for longer than 30 days and for several days following the completion of return-to-duty requirements. OIG further recommended that CPD should identify measures to improve the timeliness of its processes, such as potentially increasing the frequency of the CIO and ICIO trainings to more than once per month.

State of Corrective Action 5 | Minimally Implemented

In its initial response to OIG's recommendation, CPD stated that it was committed to reviewing the entry of information documenting compliance with the post-firearm discharge requirements to assess if there are any barriers to releasing Department members from administrative duty in a timely manner.

In its follow-up responses, CPD stated, "Based on when a discharge incident occurs, given the current process, requirements, and general landscape of law enforcement, it is unlikely a member will be released on day thirty-one." The Department went on to identify some impediments to the completion of all return-to-duty requirements within 30 days, including staffing shortages and scheduling challenges. CPD also highlighted that members cannot participate in the CIO training while on medical leave, often delaying the process. Additionally, CPD recognized that offering the mandatory CIO training more frequently than once a month may shorten the time a referred member remains on administrative duty, but characterized this as impractical due to staffing shortages.

Furthermore, CPD noted that it has updated CLEAR to document referrals to the TISM program. The Department stated that this application is not likely "to reduce the amount of time a member is on administrative duty assignment," but noted it can provide additional transparency around the completion of post-firearm discharge requirements. As such, OIG finds that CPD has minimally implemented this recommendation.

III | Conclusion

In response to OIG's recommendations, CPD has implemented corrective actions to varying degrees. OFDS has implemented minimal notification changes to ensure that members involved in a firearm discharge incident complete all return-to-duty requirements, but has not yet finalized SOPs or implemented any other internal controls to ensure compliance with its post-firearm discharge policies. CPD has implemented an application to track TISM program completion but has not yet created mechanisms to track other return-to-duty requirements listed in the 30-day checklist and the OFDS excel file. CPD has revised the ICIO training materials and consulted with other jurisdictions regarding training but has not yet implemented trainings specifically tailored to individual members. CPD can document prior firearm discharge incidents in the TISM program application but does not use the documentation to inform the TISM program. Furthermore, CPD had reviewed why most members remain on administrative duty for longer than 30 days, including staffing shortages and members' injured on duty status, but failed to identify measures to improve the timeliness of its processes.

OIG recommends that CPD fully implement all recommendations to ensure that members are not returned to field duties before they are ready and able to fulfill their duties, and to avoid administrative delays. Ultimately, fully implementing corrective actions can help mitigate risks to CPD members and the public.

Appendix A | CPD and OPSA Response



Brandon Johnson
Mayor

Department of Police · City of Chicago
3510 S. Michigan Avenue · Chicago, Illinois 60653

Larry Snelling
Superintendent of Police

November 21, 2024

VIA ELECTRONIC MAIL

Ms. Tobar Richardson (TRichardson@igchicago.org)
Deputy Inspector General for Public Safety
City of Chicago Office of Inspector General
740 N. Sedgwick, Suite 200
Chicago, Illinois 60654

Re: Follow-up Evaluation of the Chicago Police Department's Post-Firearm Discharge Policy

Dear Public Safety Inspector General Richardson:

The Chicago Police Department ("CPD") and the Office of Public Safety Administration ("OPSA") appreciated the opportunity to discuss the Public Safety Inspector General's findings concerning the CPD's Post-Firearms Discharge Policy. As discussed, the OPSA has recently entered into an agreement with Benchmark Analytics to provide a more streamlined approach to tracking a CPD member's progress through the post-firearms process. As discussed, Benchmark Analytics will consolidate up to 44 personnel-related applications that already exist in the CLEAR system, which will allow a single application to provide a 360-degree view of officer performance. A PowerPoint presentation further describing Benchmark Analytics is attached.

As we also discussed, the CPD continues to work toward finalization of the standard operating procedures to be used for officers who enter the post-firearms discharge program.

Thank you for your review of this important program.

Sincerely,

A handwritten signature in blue ink, appearing to read "SS", positioned above the typed name of Scott Spears.

Scott Spears
General Counsel
Office of the Superintendent
Chicago Police Department

Benchmark Analytics for CPD

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Benchmark has:

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- Sole focus on elevating public safety through evidence-based insights

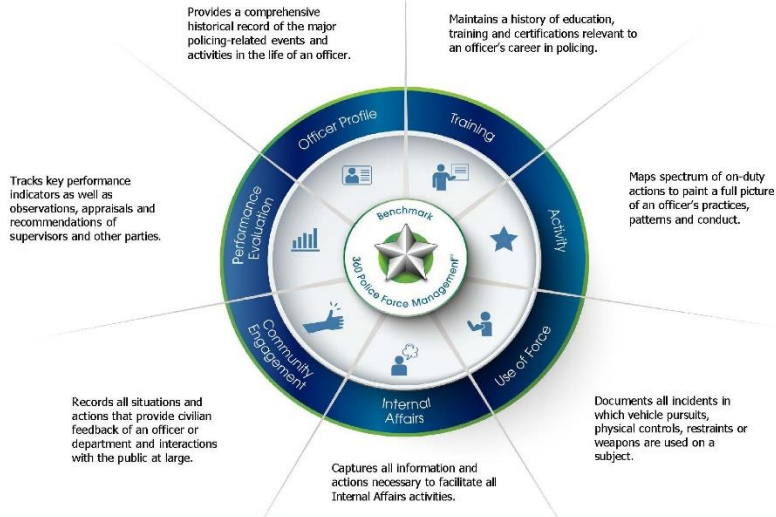


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Benchmark Management System



Benchmark Platform Review



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– Track intervention from A to Z

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Implementation Approaches		
Intervention Model	Evaluate Risk	Build Plan
Centralized	Department leaders	Department leaders
Centralized Review	Risk department	Supervisor
Decentralized	Supervisor	Supervisor
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Consent Decree Expertise

Consent Decree Status	Total	Benchmark Solution	%
Preliminary Compliance	287	142	49%
Secondary Compliance	75	17	23%
Full Compliance	24	3	13%
Not In Compliance	141	52	37%
Total	527	214	41%

EIS Consent Decree Status	Total	Benchmark Solution	%
Preliminary Compliance	20	20	100%

CPD Applications Replacement and Consolidation

Consolidation of up to 44 applications including but not limited to:

- Talent Management System (TMS), Auto-Spar, Column Case Management (CMS), Personnel Performance Suite (PPS), Acadis, Performance Evaluation System (PES), Learning Management System (LMS), and Performance Recognition System (PRS).

Green	Complete Benchmark Replacement	35 Applications Replaced
Blue	Potential Replacement, More Information Required	9 Potential Replacements
White	Integration Point, Not Personnel Records Management	82 Applications, Not Personnel Related



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